



**FOIA CONFIDENTIAL TREATMENT REQUESTED**

October 25, 2019

(Submitted electronically via the CFTC Portal)

Assistant Secretary of the Commission  
FOIA, Privacy and Sunshine Acts Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre, 8<sup>th</sup> Floor  
1155 21st Street, N.W.  
Washington, DC 2058

**Re: FOIA Confidential Treatment Request - Risk Management Framework Amendments**

Dear FOIA Compliance Staff:

In conjunction with the self-certification submitted today via the CFTC Portal by ICE Clear U.S., Inc. ("ICUS"), pursuant to Section 5c(c)(1) of the Commodity Exchange Act ("CEA") and Commission Regulation 40.6(a), ICUS respectfully requests Confidential Treatment for all information attached to the submission until further notice.

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Under the Freedom of Information Act ("FOIA"), 5 USC Section 552, Section 809(g) of the Dodd-Frank Wall Street Reform and Consumer Protection Act and pursuant to Commission Regulation 145.9(d)(5) and any other applicable regulations under or implementing FOIA, ICUS hereby respectfully requests that confidential treatment be maintained for the document which bear Bates number ICUS 10.25.19 (1) - 000001 to ICUS 10.25.19 (1) - 000002 and ICUS 10.25.19 (2) - 000001 until further notice. ICUS also requests that the Commission notify the undersigned immediately after receiving any FOIA request for such documents or any other court order, subpoena or summons for the same. Finally, ICUS requests that it be notified in the event the Commission intends to disclose such documents to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA or other applicable law. ICUS does not waive its notification rights under Section 8(f) of the CEA or other applicable law with respect to any subpoena or summons for such document(s).

The basis for the request is that disclosure of these document(s) would reveal confidential commercial and financial information of ICUS, the disclosure of which could have a material adverse effect on, and cause injury to, the operations and competitive position of ICUS. This request is not to be construed as a waiver of any other protection from disclosure or confidential treatment accorded by law, and ICUS will rely on and invoke any such confidentiality protection.

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If you should have any questions or require further information, please contact me at (212) 748-3964 or [eamonn.hahessy@theice.com](mailto:eamonn.hahessy@theice.com).

Sincerely,

Eamonn Hahessy  
General Counsel and Chief Compliance Officer  
ICE Clear U.S., Inc.