Polymarket US

QCX LLC d/b/a Polymarket US

VIA CFTC PORTAL

September 18, 2026

Assistant Secretary of the Commission for FOIA Matter
Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, D.C. 20581
FOIAsubmissions@cftc.gov

Re: FOIA Confidential Treatment Request

Dear Assistant Secretary:

Pursuant to CFTC Regulation 40.6(a), QCX LLC ("Polymarket US" or "Exchange") has on this date submitted a self-certification of the Deposit Incentive Program ("Program" or "Submission"). The Exchange respectfully requests that the Commission accord confidential treatment to the confidential transmittal provided to the Commission today, segregated from the Submission as Appendix B and marked confidential, and to all information contained therein (the "Confidential Information"). The Confidential Information is proprietary to the Exchange and contains highly sensitive and confidential commercial and financial information exempt from disclosure pursuant to Section 8 of the Commodity Exchange Act, Commission Regulations, and paragraph b(4) of the Freedom of Information Act, as explained below.

In accordance with CFTC Regulations 40.8, 145.5, and 145.9, the Exchange requests confidential treatment of the Confidential Information, on the grounds that disclosure of such information would reveal trade secrets and confidential commercial and financial information of the Exchange. Confidential treatment additionally is requested on the grounds that Appendix B is exempt from disclosure under paragraph (b)(4) of the Freedom of Information Act ("Exemption 4") and CFTC Regulations 145.5(d) and 145.9(d)(1)(ii) because it contains confidential commercial and financial information that would grant competitors a material unfair competitive advantage and/or compromise the competitive advantages possessed by the Exchange.

The information set forth in Appendix B was voluntarily provided to the Commission and is not of a type customarily made to the public by the Exchange. In particular, the Confidential Information in Appendix B contains valuable commercial information with respect to, among other information, the specific match percentages, qualifying thresholds, and incentive amounts that the Exchange found necessary to increase market participation, account activation and reactivation, repeat engagement, and liquidity. This information took significant time and expense to develop, and constitutes an essential part of the Exchange's strategy for its event contract markets. Disclosure of the terms of the Program would cause significant competitive harm to the Exchange.

Accordingly, we ask that you take appropriate steps to keep the Confidential Information confidential and that you restrict the redistribution of the Confidential Information. Pursuant to CFTC Regulation 145.9(d)(5), the Exchange hereby requests that the Confidential Information be afforded confidential treatment in perpetuity. The Exchange requests that the Commission notify the undersigned immediately after receiving any Freedom of Information Act request, or any court order, subpoena, or summons seeking to access the Confidential Information in whole or in part. The Exchange further requests notification (through the undersigned) in the event the Commission intends to disclose the Confidential Information in whole or part. The Exchange does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons with respect to the Confidential Information in whole or in part. Should you have any questions or need additional information, please contact me at megan.mcgrath@qcex.com.

Sincerely,

/s/ Megan McGrath
Chief Compliance Officer
Polymarket US
Email: megan.mcgrath@qcex.com