



LUDLOW EXCHANGE, LLC.
New York, NY

September 25, 2026	LUDLOW EXCHANGE, LLC DESIGNATED CONTRACT MARKET CONFIDENTIAL
FOIA Confidential Treatment Request Pursuant to 17 C.F.R. §§ 40.8 and 145.9	

FOIA CONFIDENTIAL TREATMENT REQUEST

Pursuant to 17 C.F.R. §§ 40.8 and 145.9

September 25, 2026

Via Portal Submission

Assistant Secretary of the Commission
for FOI, Privacy and Sunshine Acts Compliance
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
FOIAsubmissions@cftc.gov

Re: FOIA Confidential Treatment Request

Dear Sir or Madam:

Ludlow Exchange, LLC (“Submitter”) hereby respectfully requests that the Commodity Futures Trading Commission (the “CFTC”) accord confidential treatment under 17 C.F.R. §§ 40.8 and 145.9 to the confidential transmission today with this letter that are marked confidential, and all information derived therefrom (collectively, the “Confidential Information”). Pursuant to Commission Regulation 145.9(d)(4), please consider that this cover sheet has been clearly marked “FOIA Confidential Treatment Requested” and is securely attached to the group of records submitted for which confidential treatment is requested.

This request for confidential treatment is made pursuant to 17 C.F.R. §145.9(d)(1) because Submitter believes that the Confidential Information is covered by one or more exemptions in the Freedom of Information Act (the “FOIA”) (5 U.S.C. §552(b)) and is therefore exempt from the CFTC’s public disclosure requirements pursuant to 17 C.F.R. §145.5. In particular, 5 U.S.C. §552(b)(4) and 17 C.F.R. §145.9(d)(1)(ii) exempts disclosure that would reveal the Submitter’s trade secrets or confidential commercial or financial information. Submitter believes that the Confidential Information contains confidential commercial and financial information that should be protected from public disclosure pursuant to this exemption. In particular, the nature of how Submitter intends to grow its business and conduct its product selection and listing is highly confidential, and was developed at immense expense, and disclosure would materially harm Submitter by giving Submitter’s competitors Submitter’s confidential information. Additionally, disclosure would materially harm Submitter’s existing business relationships. Further, this information was submitted voluntarily. Confidential treatment is requested for a period of five years.

If the Commission or its staff transmits any of the Confidential Submission to another federal agency, Submitter requests that you forward a copy of this letter to any such agency with the Submission and further requests that you advise any such agency that Submitter has requested that



LUDLOW EXCHANGE, LLC.

New York, NY

this material be accorded confidential treatment.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever that are made by, or at the request of, any employee of the Commission (or any other federal agency) and which (1) incorporate, include or relate to any aspect of the Confidential Submission; or (2) refer to any conference, meeting, or telephone conversation between Submitter, its current or former employees, representatives, agents, auditors or counsel on the one hand and employees of the Commission (or any other government agency) on the other, relating to the Confidential Submission.

This request is not to be construed as a waiver of any other protection from disclosure or confidential treatment accorded by law, and Submitter will rely on and invoke any such confidentiality protection. Submitter requests that the CFTC advise the undersigned, pursuant to 17 C.F.R. §145.9(e)(1), in advance of any disclosure of the Confidential Information pursuant to the FOIA, so that this request for confidential treatment may be substantiated.

If you should have any questions or comments or require further information, please do not hesitate to contact the undersigned.

Sincerely,

Alex Wolf
Chief Legal Officer
Ludlow Exchange, LLC