

Gemini Titan, LLC
600 Third Avenue
2nd Floor
New York, New York 10016

September 14, 2026

VIA ELECTRONIC SUBMISSION

Assistant Secretary of the Commission for FOIA Matters
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
FOIAsubmissions@cftc.gov

Re: FOIA Confidential Treatment Request: Petition Pursuant to Regulation 145.9(d)

To Whom It May Concern,

On this date, Gemini Titan, LLC (the “Exchange”), submitted via the CFTC Portal a product self-certification submission (the “Submission”) under 17 C.F.R. § 40.2(d).

By this petition, the Exchange requests confidential treatment of the following materials contained in the Submission. Each page of the following materials (the “Confidential Materials”) is marked with the statement “Confidential Treatment Requested by Gemini Titan, LLC,” pursuant to Section 145.9(d) of the Commission’s regulations, as follows:

Gemini 40.2(d) Attachment B - WNBA WinLose (Class)

Pursuant to Section 8(a) of the CEA and 145.9(d) of the Commission’s regulations, the Exchange requests confidential treatment of the Confidential Materials under the Freedom of Information Act on the grounds that disclosure of such materials would reveal trade secrets and/or confidential commercial information of the Exchange. The Confidential Materials are proprietary to the Exchange and contain highly sensitive and confidential business information. In addition to violating the Exchange’s proprietary rights, the disclosure of Confidential Materials would grant competitors an unfair competitive advantage and/or compromise the competitive advantages possessed by the Exchange. Accordingly, we ask that you take appropriate steps to keep the Confidential Materials confidential and that you restrict the redistribution of the Confidential Materials.

Pursuant to 145.9(d)(5) of the Commission’s regulations, the Exchange hereby requests that the Confidential Materials be afforded confidential treatment in perpetuity.

The Exchange requests that the Commission notify the undersigned immediately after receiving any Freedom of Information Act request, any court order, subpoena, or summons seeking to access the Confidential Materials in whole or in part. The Exchange further requests notification (through the undersigned) in the event the Commission intends to disclose the Confidential Materials in whole or in 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 materials in whole or in part.

Please contact me using the information below if you have any questions regarding this request for confidential treatment.

Sincerely,

Andrew R. Beatty
Chief Legal Officer
Gemini Titan, LLC
andrew.beatty@gemini.com