

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 an event contract series 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 - MLB First 5 Innings Combined Run Total (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. 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 does not waive its notification rights under Section 8(f) of the CEA.

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](mailto:andrew.beatty@gemini.com)