



September 17, 2026

VIA ELECTRONIC MAIL: FOIAsubmissions@cftc.gov

Assistant Secretary of the Commission for FOI,
Privacy, and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

RE: FOIA Confidential Treatment Request - Petition for Confidential Treatment of Rothera Exchange and Clearing LLC Product Self-Certification Filing Submitted to the Commission pursuant to Commission Regulation §40.2(a)

Dear Assistant Secretary,

I write to inform you that on September 17, 2026, Rothera Exchange and Clearing LLC ("Rothera") submitted to the Commission via the CFTC Portal, a Product Self-Certification Filing pursuant to Commission Regulation §40.2(a). Certain information contained in this filing is proprietary to Rothera. As such, we request confidential treatment of this submitted document and information marked as requesting confidential treatment. The Product Filing included in this request is listed below:

- "Will the U.S. Team win the 2026 Presidents Cup?" Event Contract
- "Will the U.S. Team score more points than the International Team on September 24, 2026 at the 2026 Presidents Cup?" Event Contract
- "Will the Duke Blue Devils advance to the 2027 NCAA Tournament?" Event Contract
- "Will the Duke Blue Devils win the 2027 NCAA Tournament Championship?" Event Contract

Pursuant to Section 8 and 8(a) of the Commodity Exchange Act, as amended, ("CEA") and Commission Regulation §145.9, Rothera requests confidential treatment of the submission and this cover letter (together, the "Materials") on the grounds that disclosure of such Materials would reveal trade secrets, financial information, or confidential commercial information of Rothera. Furthermore, we request confidentiality for every document included in the Materials. To ensure confidentiality, all pages have been labeled as confidential. In addition, we respectfully request that we be notified if the Commission, for

CONFIDENTIAL TREATMENT REQUESTED BY ROTHERA PURSUANT TO 17 CFR 145



any reason, considers disclosing the Materials, in any form, to a third party, and be given the opportunity to object.

Pursuant to Commission Regulation §145.9(d)(5), we request that the confidential treatment of the Materials be permanent.

The submitter of the information is Rothera Exchange and Clearing LLC. The submitter's corporate address is 222 S. Riverside Plaza, Suite 1500, Chicago, IL 60606. The submitter's telephone is (773) 703-6335. Please send any communication regarding this matter to my attention.

Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (773) 703-6335 or by email at kevin@rothera.io.

Sincerely,

/s/

Kevin J. Dan
Chief Compliance Officer
Chief Regulatory Officer