

July 31, 2013

## VIA ELECTRONIC SUBMISSION AND FEDERAL EXPRESS

Office of the Secretary Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, NW Washington, DC 20581

Re: Request for Temporary Registration as a Swap Execution Facility

To Whom it May Concern:

Pursuant to Section 5h of the Commodity Exchange Act and Part 37 of the regulations of the Commodity Futures Trading Commission ("CFTC"), INFX SEF, Inc. ("INFX SEF") hereby submits this Swap Execution Facility Application. INFX SEF respectfully requests that the CFTC grant INFX SEF's application for temporary registration pursuant to CFTC regulation § 37.3(c). INFX SEF requests from the CFTC a unique, extensible, alphanumeric code for the purpose of identifying the SEF pursuant to Part 45 of the CFTC's regulations.

INFX SEF has submitted to the Assistant Secretary of the Commission for Freedom of Information a request for confidential treatment of the documents listed on Schedule I hereto. INFX SEF requests confidential treatment for these materials pursuant to CFTC regulation § 145.9(d)(1)(ii) because disclosure of such materials would reveal trade secrets and/or confidential commercial or financial information of INFX SEF. We request this confidential treatment for an indefinite period.

Pursuant to CFTC regulation § 37.3(c)(1)(ii), INFX SEF hereby notifies the CFTC that its parent company, Integral Development Corp., is currently operating as an Exempt Board of Trade pursuant to a notification sent to the Office of the Secretary of the CFTC on June 21, 2012.

Please contact Stephanie Feldt or Peter Y. Malyshev using the information below if you have any questions regarding this application.

Stephanie Feldt 3400 Hillview Avenue Building 4 Palo Alto, CA 94304 Phone: (650) 424-4529



Peter Y. Malyshev Latham & Watkins LLP 555 11th Street, NW Washington, DC 20004 Phone: (202) 637-1087

Sincerely,

Stephanie Feldt

Chief Compliance Officer

Stephani Feldt

cc: Nancy Markowitz, Deputy Director, Division of Market Oversight, Exchange and Data Repository Branch

(Commodity Futures Trading Commission)

Peter Y. Malyshev Jonathan T. Ammons (Latham & Watkins LLP)



## **SCHEDULE I Confidential Submission**

Each of the following exhibits to Form SEF is subject to a request for confidential treatment pursuant to § 145.9 of the Commission's regulations:

Exhibit A	List of owners and control persons
Exhibit B-2	Director compensation
Exhibit D-2	List of affiliates and general nature of the affiliation
Exhibit E	Professional employees and qualifications
Exhibit F	Staffing requirements and name and qualifications of key staff persons
Exhibit H	Material pending legal proceedings
Exhibit I	General financial exhibits
Exhibit J	Financial information of affiliates
Exhibit K	Fee schedule
Exhibit M-2	User Guide
Exhibit N	Third party agreements
Exhibit O	Compliance manual and certain other policies
Exhibit P	Investigations and enforcement procedures
Exhibit Q	Trading system description
Exhibit R	List of rules prohibiting trade practice violations
Exhibit S	Description of how trade data will be maintained
Exhibit T	List of clearing organizations
Exhibit V	Technology Questionnaire