



July 31, 2013

**FOIA CONFIDENTIAL TREATMENT REQUEST
Pursuant to 17 C.F.R. §§ 37.3(b)(2), 145.5, 145.9**

VIA E-MAIL AND FEDERAL EXPRESS

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: Petition Pursuant to Regulation 145.9(d)

To Whom It May Concern:

On this date, INFX SEF, Inc. ("INFX SEF") has submitted to Ms. Nancy Markowitz of the Division of Market Oversight of the Commodity Futures Trading Commission (the "Commission") the materials described in Schedule I hereto (the "Confidential Submission") in connection with an application for INFX SEF to be registered as a swap execution facility pursuant to Section 5h of the Commodity Exchange Act, and Part 37 of the Commission's regulations (the "Application").

Pursuant to Commission Regulations 37.3(b)(2), 145.5 and 145.9, we hereby request confidential treatment of the Confidential Submission. Confidential treatment is requested on the grounds that disclosure of such materials would reveal trade secrets and/or confidential commercial or financial information of INFX SEF. In addition to violating INFX SEF's proprietary rights, the disclosure of the Confidential Submission would grant competitors an unfair competitive advantage and/or compromise the competitive advantages possessed by INFX SEF.

In accordance with Commission Regulation 145.9(d)(5), INFX SEF hereby requests that the Confidential Submission be afforded confidential treatment in perpetuity.

INFX SEF requests that the Commission notify the undersigned immediately after receiving any Freedom of Information Act ("FOIA") request, any court order, subpoena, or summons seeking to access the Confidential Submission in whole or in part. INFX SEF further requests notification (through the undersigned) in the event that the Commission intends to disclose the Confidential Submission in whole or in part to Congress or to any other governmental agency. If the Commission transmits any portion of the Confidential Submission to Congress or such other governmental agency, we request that you forward a copy of this letter with the Confidential Submission and further request that you advise Congress or such other governmental agency that INFX SEF has requested that this material be accorded confidential treatment.



The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writing of any sort whatsoever that are made by, or at the request of, any employee of the Commission (or any other governmental 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 INFX SEF, its current or former employees, representatives, agents, auditors or counsel on the one hand and employees of the Commission (or any other governmental agency) on the other, relating to the Confidential Submission.

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

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,

A handwritten signature in blue ink that reads "Stephanie Feldt".

Stephanie Feldt
Chief Compliance Officer

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