

TRADITION SEF, LLC

January 10, 2025

VIA E-MAIL (FOIAsubmissions@cftc.gov)

Assistant Secretary of the Commission for FOIA,
Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

RE: Tradition SEF, LLC – FOIA Confidential Treatment Request

Dear Sir or Madam:

By CFTC Portal submission on January 10, 2025 (confirmation number 2501-1018-0639-43), Tradition SEF, LLC (the “Submitter”) provided the information attached as Exhibit A (the “Confidential Information”) and attached hereto to the Commodity Futures Trading Commission (the “Commission”) and staff of the Division of Market Oversight in connection with a Swap Execution Facility (“SEF”) notification made pursuant to Commission Rule 37.1306.

Pursuant to Commission Rules 40.8 and 145.9(d), the Submitter requests confidential treatment of the Confidential Information consisting of Exhibit A to this submission on the grounds that disclosure of the Confidential Information would reveal confidential commercial and financial information of the Submitter and would be considered commercially material information to competitors of the Submitter.

Submitter’s notice that is reflected on Exhibit A contains information that is proprietary to the Submitter and forms an integral part of the competitive nature of the marketplace and is subject to an ongoing internal review. Hence pending completion of its review and for the Submitter to continue to operate its business without undue inquiry, distraction or interruption, it is imperative that such information be treated as confidential. Accordingly, the Submitter requests confidential treatment of Exhibit A in its entirety.

Pursuant to Commission Rule 145.9(d)(5), the Submitter requests that confidential treatment of the Confidential Information be maintained until further notice from the Submitter. The Submitter requests that the Commission notify it immediately after receiving any request under the Freedom of Information Act (“FOIA”) or any other court order, subpoena or summons for the Confidential Information. The Submitter specifically notes that it does not waive, in any manner, its rights under Section 8(f) of the Commodity Exchange Act to receive a copy of any subpoena or summons for the Confidential Information prior to the Commission’s disclosure of such information pursuant to such subpoena or summons. Finally, the Submitter requests that the Commission notify it in the event that the Commission intends to disclose the Confidential Information to Congress or any federal or state governmental agency or department.

Should you require additional information related to this request, please contact the undersigned at (212) 377-2337 or bennett.kirschner@tradition.com.

Assistant Secretary of the Commission for FOIA,
Privacy and Sunshine Acts Compliance
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Sincerely,

/s/ Bennett Kirschner
General Counsel and Secretary

Att.
Exhibit A

EXHIBIT A
Confidential Information

- “Spread-over Treasuries Liquidity Incentive Program Description - Participant Notice 25-02”.