



ICAP SEF (US) LLC  
Harborside Financial Center  
1100 Plaza 5  
Jersey City, NJ 07311

Assistant Secretary of the Commission for  
FOI, Privacy and Sunshine Acts  
Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, D.C. 20581  
[Via email: FOIAsubmissions@cftc.gov](mailto:FOIAsubmissions@cftc.gov)

August 11, 2016

Re: **FOIA Confidential Treatment Request**

Ladies and Gentlemen:

ICAP SEF (US) LLC (**Applicant**) has requested that the Commodity Futures Trading Commission (**Commission**) amend to its Order of Registration as a swap execution facility by submitting a Form SEF amending its application for registration (collectively with each exhibit thereto, the **SEF Application**) pursuant to Commission Regulation 37.3(b)(3).

The Applicant hereby requests that the limited sections of the SEF Application detailed in Appendix A hereto (**Confidential Information**) be treated as confidential in order to prevent disclosure of Applicant's trade secrets and confidential commercial and financial information upon a request under the Freedom of Information Act (**FOIA**). We request the Confidential Information be provided confidential treatment for an indefinite period.

Please promptly inform the following of any request for the Confidential Information or its contents made pursuant to FOIA or the Commission's rules so that we may substantiate the foregoing request for confidential treatment in accordance with Section 145.9 of the Commission's Regulations: Attention: General Counsel, ICAP SEF (US) LLC, Harborside Financial Center, 1100 Plaza 5, Jersey City, NJ 07311.

Pursuant to Part 145.9(d)(4) of the Commission's regulations, we have marked each page of the Confidential Information with the words "Confidential Treatment Requested by ICAP SEF (US) LLC" and have identified each portion of the Confidential Information with an identifying number and code.

Please contact the undersigned at 212-341-9193 with any questions regarding this matter.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gregory Compa".

Gregory Compa, Chief Compliance Officer  
**ICAP SEF (US) LLC**  
Harborside Financial Center  
1100 Plaza 5  
Jersey City, NJ 07311

Cc by email: Division of Market Oversight, Commodity Futures Trading Commission  
([dmosubmissions@cftc.gov](mailto:dmosubmissions@cftc.gov))

**Appendix A  
Confidential Information**

<b>Name of Confidential Information</b>	<b>Identifying Number and Code</b>
Exhibit A	ICAP SEF Exhibit A
Exhibit B-2	ICAP SEF Exhibit B-2
Exhibit D	ICAP SEF Exhibit D
Exhibit D-1	ICAP SEF Exhibit D-1
Exhibit D-3	ICAP SEF Exhibit D-3
Exhibit D-4	ICAP SEF Exhibit D-4
Exhibit E	ICAP SEF Exhibit E
Exhibit F	ICAP SEF Exhibit F
Exhibit H	ICAP SEF Exhibit H
Exhibit I	ICAP SEF Exhibit I
Exhibit K	ICAP SEF Exhibit K
Exhibit N	ICAP SEF Exhibit N
Exhibit N-1(A)	ICAP SEF Exhibit N-1(A)
Exhibit N-1(B)	ICAP SEF Exhibit N-1(B)
Exhibit N-2	ICAP SEF Exhibit N-2
Exhibit N-3	ICAP SEF Exhibit N-3
Exhibit N-4	ICAP SEF Exhibit N-4
Exhibit N-5	ICAP SEF Exhibit N-5
Exhibit N-6(A)	ICAP SEF Exhibit N-6(A)
Exhibit N-6(B)	ICAP SEF Exhibit N-6(B)
Exhibit N-7	ICAP SEF Exhibit N-7
Exhibit N-8	ICAP SEF Exhibit N-8
Exhibit N-9	ICAP SEF Exhibit N-9
Exhibit N-10	ICAP SEF Exhibit N-10
Exhibit N-11	ICAP SEF Exhibit N-11
Exhibit N-12	ICAP SEF Exhibit N-12
Exhibit N-13	ICAP SEF Exhibit N-13
Exhibit N-14	ICAP SEF Exhibit N-14
Exhibit N-15	ICAP SEF Exhibit N-15
Exhibit N-16	ICAP SEF Exhibit N-16
Exhibit N-17	ICAP SEF Exhibit N-17
Exhibit N-18(A)	ICAP SEF Exhibit N-18(A)
Exhibit N-18(B)	ICAP SEF Exhibit N-18(B)
Exhibit N-19	ICAP SEF Exhibit N-19
Exhibit N-20	ICAP SEF Exhibit N-20
Exhibit N-21(A)	ICAP SEF Exhibit N-21(A)
Exhibit N-21(B)	ICAP SEF Exhibit N-21(B)
Exhibit N-22	ICAP SEF Exhibit N-22
Exhibit N-23	ICAP SEF Exhibit N-23

Exhibit N-24	ICAP SEF Exhibit N-24
Exhibit N-25	ICAP SEF Exhibit N-25
Exhibit N-26	ICAP SEF Exhibit N-26
Exhibit N-27	ICAP SEF Exhibit N-27
Exhibit M – Ch. 9	ICAP SEF Exhibit M – Ch. 9
Exhibit O	ICAP SEF Exhibit O
Exhibit Q	ICAP SEF Exhibit Q
Exhibit S	ICAP SEF Exhibit S
Exhibit S-1A	ICAP SEF Exhibit S-1A
Exhibit S-1B	ICAP SEF Exhibit S-1B
Exhibit S-1C	ICAP SEF Exhibit S-1C
Exhibit S-2	ICAP SEF Exhibit S-2
Exhibit S-3	ICAP SEF Exhibit S-3
Exhibit S-4	ICAP SEF Exhibit S-4
Exhibit S-5	ICAP SEF Exhibit S-5
Exhibit V	ICAP SEF Exhibit V
Exhibit V-1	ICAP SEF Exhibit V-1
Exhibit V-2	ICAP SEF Exhibit V-2
Exhibit V-3	ICAP SEF Exhibit V-3
Exhibit V-4	ICAP SEF Exhibit V-4
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Exhibit V-6	ICAP SEF Exhibit V-6
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