



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 21st Street, NW
Washington, D.C. 20581
Via email: FOIAsubmissions@cftc.gov

September 23, 2016

Re: **FOIA Confidential Treatment Request**

Ladies and Gentlemen:

ICAP SEF (US) LLC (**Applicant**) has requested that the Commodity Futures Trading Commission (**Commission**) amend its application for registration as a swap execution facility subsequent to being issued its Order of Registration by submitting a Form SEF (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 black ink, appearing to read 'Gregory Compa', written in a cursive style.

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**

Name of Confidential Information	Identifying Number and Code
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	ICAP SEF Exhibit N-21
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 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
Exhibit V-5	ICAP SEF Exhibit V-5
Exhibit V-6	ICAP SEF Exhibit V-6
Exhibit V-7	ICAP SEF Exhibit V-7
Exhibit V-8	ICAP SEF Exhibit V-8
Exhibit V-9	ICAP SEF Exhibit V-9
Exhibit V-10	ICAP SEF Exhibit V-10
Exhibit V-11	ICAP SEF Exhibit V-11
Exhibit V-12	ICAP SEF Exhibit V-12
Exhibit V-13	ICAP SEF Exhibit V-13
Exhibit V-14	ICAP SEF Exhibit V-14
Exhibit V-15	ICAP SEF Exhibit V-15
Exhibit V-16	ICAP SEF Exhibit V-16
Exhibit V-17	ICAP SEF Exhibit V-17
Exhibit V-18	ICAP SEF Exhibit V-18
Exhibit V-19	ICAP SEF Exhibit V-19
Exhibit V-20	ICAP SEF Exhibit V-20
Exhibit V-21	ICAP SEF Exhibit V-21
Exhibit V-22	ICAP SEF Exhibit V-22
Exhibit V-23	ICAP SEF Exhibit V-23
Exhibit V-24	ICAP SEF Exhibit V-24
Exhibit V-25	ICAP SEF Exhibit V-25
Exhibit V-26	ICAP SEF Exhibit V-26
Exhibit V-27	ICAP SEF Exhibit V-27
Exhibit V-28	ICAP SEF Exhibit V-28
Exhibit V-29	ICAP SEF Exhibit V-29
Exhibit V-30	ICAP SEF Exhibit V-30

Exhibit V-31	ICAP SEF Exhibit V-31
Exhibit V-32	ICAP SEF Exhibit V-32
Exhibit V-33	ICAP SEF Exhibit V-33
Exhibit V-34	ICAP SEF Exhibit V-34
Exhibit V-35	ICAP SEF Exhibit V-35
Exhibit V-36	ICAP SEF Exhibit V-36
Exhibit V-37	ICAP SEF Exhibit V-37
Exhibit V-38	ICAP SEF Exhibit V-38
Exhibit V-39	ICAP SEF Exhibit V-39
Exhibit V-40	ICAP SEF Exhibit V-40
Exhibit V-41	ICAP SEF Exhibit V-41
Exhibit V-42	ICAP SEF Exhibit V-42
Exhibit V-43	ICAP SEF Exhibit V-43
Exhibit V-44	ICAP SEF Exhibit V-44
Exhibit V-45	ICAP SEF Exhibit V-45
Exhibit V-46	ICAP SEF Exhibit V-46
Exhibit V-47	ICAP SEF Exhibit V-47
Exhibit V-48	ICAP SEF Exhibit V-48
Exhibit V-49	ICAP SEF Exhibit V-49
Exhibit V-50	ICAP SEF Exhibit V-50
Exhibit V-51	ICAP SEF Exhibit V-51
Exhibit V-52	ICAP SEF Exhibit V-52
Exhibit V-53	ICAP SEF Exhibit V-53
Exhibit V-54	ICAP SEF Exhibit V-54
Exhibit V-55	ICAP SEF Exhibit V-55
Exhibit V-56	ICAP SEF Exhibit V-56
Exhibit V-57	ICAP SEF Exhibit V-57
Exhibit V-58	ICAP SEF Exhibit V-58
Exhibit V-59	ICAP SEF Exhibit V-59
Exhibit V-60	ICAP SEF Exhibit V-60
Exhibit V-61	ICAP SEF Exhibit V-61
Exhibit V-62	ICAP SEF Exhibit V-62
Exhibit V-63	ICAP SEF Exhibit V-63
Exhibit V-64	ICAP SEF Exhibit V-64
Exhibit V-65	ICAP SEF Exhibit V-65
Exhibit V-66	ICAP SEF Exhibit V-66
Exhibit V-67	ICAP SEF Exhibit V-67
Exhibit V-68	ICAP SEF Exhibit V-68
Exhibit V-69	ICAP SEF Exhibit V-69
Exhibit V-70	ICAP SEF Exhibit V-70
Exhibit V-71	ICAP SEF Exhibit V-71
Exhibit V-72	ICAP SEF Exhibit V-72
Exhibit V-73	ICAP SEF Exhibit V-73
Exhibit V-74	ICAP SEF Exhibit V-74

Exhibit V-75	ICAP SEF Exhibit V-75
Exhibit V-76	ICAP SEF Exhibit V-76
Exhibit V-77	ICAP SEF Exhibit V-77
Exhibit V-78	ICAP SEF Exhibit V-78
Exhibit V-79	ICAP SEF Exhibit V-79
Exhibit V-80	ICAP SEF Exhibit V-80
Exhibit V-81	ICAP SEF Exhibit V-81