



November 4, 2019

(Submitted via the CFTC Portal)

Assistant Secretary of the Commission  
FOIA, Privacy and Sunshine Act Compliance  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, D.C. 20851

RE: Freedom of Information Act ("FOIA") Confidential Treatment Request

Dear Assistant Secretary:

Pursuant to Commodity Futures Trading Commission ("CFTC" or "Commission") Regulation 145.9, the Minneapolis Grain Exchange, Inc. ("MGEX") hereby requests that the Commission afford confidential treatment under FOIA for Exhibit A, which is being submitted in connection with MGEX's Rule Certification pursuant to CFTC Regulation 40.6(a) regarding amendments to MGEX's Risk Management Manual. Please note that MGEX is requesting confidentiality for documents that may or may not be identified by watermark.

MGEX specifically requests confidential treatment of Exhibit A pursuant to Commission Regulations 145.9 and 145.5. Under Commission Regulation 145.9, a submitter making this request "shall specify the grounds on which confidential treatment is being requested." Confidential treatment is being sought on the basis that Exhibit A contains confidential commercial or financial information under Commission Regulation 145.9(d)(1)(ii). In addition, MGEX represents that the Confidential Submission is a nonpublic record pursuant to Commission Regulation 145.5.

In accordance with Commission Regulation 145.9(d)(5), MGEX asks the Commission to afford confidential treatment to Exhibit A in perpetuity. We also request that the Commission notify MGEX immediately after receiving any FOIA request for such documents or any other court order, subpoena, or summons for the same. Finally, we request that the Commission notify MGEX if it intends to disclose such documents to any governmental agency or unit pursuant to Section 8 of the Commodity Exchange Act. MGEX does not waive its notification rights under Section 8(f) of the Commodity Exchange Act with respect to any subpoena or summons for such documents.

If there are any questions regarding this submission, please contact me at (612) 321-7144 or [mleisen@mgex.com](mailto:mleisen@mgex.com).

Sincerely,

A handwritten signature in black ink that reads "Matthew Leisen". The signature is written in a cursive style with a prominent, sweeping initial "M" and a long, horizontal flourish at the end.

Matthew D. Leisen  
Associate Counsel, MGEX Clearing

Exhibit A