



August 29, 2024

Submitted via CFTC Portal

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

Re: FOIA Confidential Treatment Request – SpectrAxe Credit Program

Dear Assistant Secretary,

SpectrAxe LLC (SpectrAxe) hereby requests that the U.S. Commodity Futures Trading Commission (Commission) accord confidential treatment under the Freedom of Information Act (FOIA) to the attached Reverse Give Up Credit Program (Credit Program), which was submitted to the Commission on this date pursuant to Commission Regulation 37.1501(e)(2). This request pertains to all materials set forth in the Credit Program. SpectrAxe requests that confidential treatment be afforded as long as the Commission retains the Credit Program. In accordance with the Commission's FOIA regulations, the Credit Program bears the designation "CONFIDENTIAL TREATMENT REQUESTED BY SPECTRAXE LLC PURSUANT TO 17 CFR PART 145."

This request for confidential treatment under the FOIA is made pursuant to Commission Regulation 145.9(d), as the Credit Program contains information that would reveal the trade secrets or confidential commercial or financial information of SpectrAxe and/or its affiliates. As requested by Commission Regulation 145.9(d), SpectrAxe has submitted, together with this request, a written justification in support of the confidentiality of the Credit Program.

This request shall not be construed as a waiver of any protection from disclosure or confidential treatment under Commission Regulations or any other protection from disclosure or confidential treatment accorded by law, and SpectrAxe will rely on and invoke any such confidentiality protection with respect to the Credit Program. SpectrAxe requests that the Commission advise the undersigned, its representative, in advance of any disclosure of the Credit Program pursuant to the FOIA so that this request for confidential treatment may be further substantiated. SpectrAxe further requests that if any of the confidential information in the Credit Program is to be disclosed to Congress or any other federal or state governmental agency or department, a request for confidential treatment be made by the Commission on SpectrAxe's behalf, or that SpectrAxe be permitted to make such a request directly.

If you have any questions, please do not hesitate to contact the undersigned at +1-929-581-0340 or mlee@spectraxe.com.

Respectfully,

A handwritten signature in black ink, appearing to read "mlee", with a horizontal line extending to the right.

Michael Lee
Chief Compliance Officer, Chief Regulatory Officer
SpectrAxe, LLC