



December 19, 2024

VIA ELECTRONIC 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, NW
Washington, DC 20581

RE: FOIA Confidential Treatment Request – Petition for Confidential Treatment of North American Derivatives Exchange, Inc d/b/a Crypto.com Derivatives North America Product Self-Certification Filings Submitted to the Commission pursuant to Commission Regulation §40.2(a)

Dear Assistant Secretary:

I write to inform you that on December 19, 2024, North American Derivatives Exchange Inc. d/b/a crypto.com | Derivatives North America (“Nadex”) submitted to the Commission via the CFTC Portal, Product Self-Certification Filings pursuant to Commission Regulation §40.2(a). Certain information contained in these filings is proprietary to Nadex. As such, we request confidential treatment of all submitted documents and information marked as requesting confidential treatment. This request includes the submissions of ten (10) Product filings. The list of Product Filings included in this request are listed below:

1. Certification of Commercial Economic Event Contract (Top Album) - Submission Pursuant to Commission Regulation 40.2(a)
2. Certification of Commercial Economic Event Contract (Grammys) - Submission Pursuant to Commission Regulation 40.2(a)
3. Certification of Commercial Economic Event Contract (Oscars) - Submission Pursuant to Commission Regulation 40.2(a)
4. Certification of Commercial Economic Event Contract (Financial Times Person of the Year) - Submission Pursuant to Commission Regulation 40.2(a)
5. Certification of Commercial Economic Event Contract (Title Event) - Submission Pursuant to Commission Regulation 40.2(a)
6. Certification of Commercial Economic Event Contract (Fed Funds Rate Cut) - Submission Pursuant to Commission Regulation 40.2(a)
7. Certification of Commercial Economic Event Contract (Time Person of the Year) - Submission Pursuant to Commission Regulation 40.2(a)



8. Certification of Commercial Economic Event Contract (H5N1 Count) - Submission Pursuant to Commission Regulation §40.2(a)
9. Certification of Commercial Economic Event Contract (Hometown Celebration) - Submission Pursuant to Commission Regulation 40.2(a)
10. Certification of Commercial Economic Event Contract (Fed Funds Rate Hike) - Submission Pursuant to Commission Regulation 40.2(a)

Pursuant to Section 8 and 8(a) of the Commodity Exchange Act, as amended, (“CEA”) and Commission Regulation §145.9, Nadex requests confidential treatment of the submission and this cover letter (together, the “Materials”) on the grounds that disclosure of such Materials would reveal trade secrets, financial information, or confidential commercial information of Nadex. Furthermore, we request confidentiality for every document included in the Materials. To ensure confidentiality, all pages have been labeled as confidential. In addition, we respectfully request that we be notified if the Commission, for any reason, considers disclosing the Materials, in any form, to a third party, and be given the opportunity to object.

Pursuant to Commission Regulation §145.9(d)(5), we request that the confidential treatment of the Materials be permanent.

The submitter of the information is North American Derivatives Exchange, Inc., d/b/a Crypto.com Derivatives North America. The submitter’s corporate address is 200 W. Jackson Blvd., Suite 1400, Chicago, IL, 60606. The submitter’s telephone is (312) 884-0161. Please send any communications regarding this matter to my attention.

Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (312) 884-0161 or by email at kevin.dan@nadex.com.

Sincerely,

/s/

Kevin Dan
Chief Compliance Officer and Chief Regulatory Officer
The North American Derivatives Exchange, Inc. d/b/a Crypto.com | Derivatives North America