CFTC SUBMISSION COVER SHEET

Organization: ProphetX LLC

Filing as a: ☒ DCM ☐ SEF ☐ DCO ☐ SDR

Date: August 18, 2026

Filing Description:

Self-Certification of an amendment to Schedule A (Program Terms) to the ProphetX Market Maker Agreement under the ProphetX Market Maker Program, implemented under existing Chapter 8 (Market Makers) of the ProphetX Rulebook.

FILING TYPE

Organization Rules and Rule Amendments

☒ Certification — § 40.6(a)

☐ Request for Approval — § 40.5(a)

☐ Notification — § 40.6(d)

☐ Advance Notice of SIDCO Rule Change — § 40.10(a)

☐ SIDCO Emergency Rule Change — § 40.10(h)

Rule Numbers: Existing Chapter 8, Rules 8.1, 8.2, 8.3, and 8.4 (Market Makers) (enabling authority; no Rulebook text amended by this filing).

New Product or Product Amendment

☐ Certification — § 40.2(a)

☐ Request for Approval — § 40.3(a)

☐ Novel Derivative Product Notification — § 40.12(a)

☐ Swap Class Certification — § 40.2(d)

Product / Official Product Name: Not applicable (rule filing).

August 18, 2026

SUBMITTED VIA CFTC PORTAL

Secretary of the Commission
Office of the Secretariat
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: ProphetX LLC – Self-Certification of Amendment to Schedule A (Program Terms) to the ProphetX Market Maker Agreement (ProphetX Market Maker Program, Implemented Under Existing Chapter 8 of the ProphetX Rulebook)

Dear Sir or Madam,

ProphetX LLC ("ProphetX," the "Exchange," or "ProphetX DCM") hereby notifies the Commodity Futures Trading Commission (the "Commission" or "CFTC") that, pursuant to Section 5c(c) of the Commodity Exchange Act (the "Act" or "CEA") and CFTC Regulation 40.6(a), and in accordance with ProphetX Rules 2.2 and 3.6, it is amending Schedule A (Program Terms) to the ProphetX Market Maker Agreement (the "Schedule A Amendment") under the ProphetX Market Maker Program (the "Program"), which the Exchange certified to the Commission on July 13, 2026. The Schedule A Amendment will become effective on or after September 1, 2026, which is no earlier than ten (10) business days following the date of this submission.

The Program continues to be offered under existing Chapter 8 (Market Makers) of the ProphetX Rulebook, which is already in effect. This filing does not amend any Rulebook text. Chapter 8, Rules 8.1 through 8.4, and the conforming Chapter 1 definition of "Market Maker," each certified on July 13, 2026, are unchanged by this filing, as is every other provision of the Rulebook. No other provision of the Market Maker Agreement, and no other element of the Program, is amended; the Schedule A Amendment is limited to Schedule A. Section 8 of the Market Maker Agreement (Amendments to Program Terms) authorizes the Exchange to amend Schedule A in accordance with the Rulebook and Applicable Law, subject to any required filing with the Commission under Rule 3.6 and CFTC Regulation 40.6.

Schedule A sets forth the Program Terms — the leagues and categories a Market Maker may elect, and the size, maximum spread, and availability service levels applicable to each market group and time window — that a Market Maker must satisfy to earn Program incentives. The Schedule A Amendment makes the following changes:

(a) Adds two leagues or categories — WNBA and Motorsports (comprising the NASCAR Cup Series, the NASCAR Xfinity Series, the NASCAR Craftsman Truck Series, and Formula 1) — to the Section A.0 election grid, together with corresponding central limit order book ("CLOB") Program Terms tables in Section A.1;

(b) Adds WNBA markets to the Section A.2 Futures Program Terms, under both Core Futures and Other / Award Futures, and expands the existing NFL, MLB, NBA, and Soccer futures listings to include additional award and other futures markets;

(c) Adds player-prop coverage minimums — the minimum number of players and strikes a Market Maker must quote — for NFL, MLB, NBA, WNBA, NHL, College Basketball, College Football, Combat Sports, Tennis, and Soccer, and adds field-size coverage minimums for Golf;

(d) Adds scope and tiering provisions that specify which leagues, tours, promotions, or series an election covers, and the corresponding adjustments to size, maximum spread, and availability, for College Basketball, College Football, Combat Sports, Tennis, Golf, and Motorsports;

(e) Makes two service-level corrections: the in-game requirement for the Combat Sports Player Props market group is changed from “N/A” to a size of $500, a maximum spread of 5%, and 70% availability, and the “(Dead Heat)” qualifier is removed from the description of the Golf Finishing Positions market group; and

(f) Makes conforming and typographical corrections, including removal of the statement that the values in Section A.1 were illustrative placeholders subject to final calibration, correction of “met two-sided” to “net two-sided” in the description of the required Size value, and removal of a redundant note describing the labelling of the final time-window column in the Golf table.

The Schedule A Amendment does not alter the structure or economics of the Program’s incentives. The Program incentive remains a flat rebate of one hundred percent (100%) of the platform fee remaining after the standard volume rebate, paid on any market that satisfies its applicable size, spread, and availability requirements, with no size tiers and no change to any rebate rate. Participation in the Program remains voluntary and open to any Market Participant designated as a Market Maker under Chapter 8 on the same objective terms, and the Program continues to apply uniformly to all participating Market Makers.

ProphetX has reviewed the designated contract market Core Principles set forth in Section 5(d) of the Act and Part 38 of the Commission’s regulations and has concluded that the Schedule A Amendment is not inconsistent with the Act or the CFTC’s regulations thereunder. ProphetX has identified the following Core Principles as most directly relevant: Core Principle 2 (Compliance with Rules); Core Principle 3 (Contracts Not Readily Susceptible to Manipulation); Core Principle 4 (Prevention of Market Disruption); Core Principle 7 (Availability of General Information); Core Principle 9 (Execution of Transactions); Core Principle 12 (Protection of Markets and Market Participants); Core Principle 18 (Recordkeeping); Core Principle 19 (Antitrust Considerations); and Core Principle 21 (Financial Resources). A Core Principle compliance analysis is set forth in Appendix C.

The Program, as amended by the Schedule A Amendment, continues to be governed by and administered in accordance with the Exchange Rulebook and the Market Maker Agreement. Existing Chapter 8 sets forth the eligibility, designation, benefits, and obligations applicable to Market Makers, and provides that Market Makers remain subject to all market surveillance, trade practice monitoring, and compliance requirements applicable to other Market Participants. ProphetX Rule 3.6(f) authorizes the Exchange to establish incentive programs to encourage market participation and trading, and Rules 3.6(b) and 3.6(d) require that fees and fee structures be applied in a fair, transparent, and non-discriminatory manner; the Schedule A Amendment is consistent with these authorities. The Program is administered on impartial, transparent, and objective criteria applied in a non-discriminatory manner, with equal opportunity and uniform application of incentives for all Market Makers meeting the applicable service levels; the Exchange does not offer hidden, one-off, or preferential arrangements, undisclosed perks, retention bonuses, non-cash prizes, or sweepstakes-, chance-, or game-based rewards, and does not provide selectively available trading advantages such as faster market data or enhanced API access. The Program's qualification criteria continue to reward bona fide two-sided liquidity provision and do not incentivize wash trading, spoofing, layering, or other manipulative or disruptive conduct, all of which remain prohibited under Rule 4.12. The Schedule A Amendment does not alter the Exchange's anonymous central-limit-order-book execution under Rule 4.3 or its request-for-quote system under Rule 4.4, does not impair the Exchange's trade practice and market surveillance program, and does not render any Exchange contract readily susceptible to manipulation. The Program remains anticipated to be economically sustainable and is not expected to adversely affect ProphetX's satisfaction of its financial resources requirements.

ProphetX certifies that the Schedule A Amendment complies with the requirements of the Act and the rules and regulations promulgated thereunder. No substantive opposing views with respect to the Schedule A Amendment were expressed to ProphetX by its governing board or committee members, members of the Exchange, or market participants. ProphetX further certifies that, concurrent with this submission, ProphetX posted on its website a notice of pending certification with the Commission and a copy of this submission, which may be accessed at: https://www.prophetx.co/lobby/t-c/filings. ProphetX will provide to Commission staff, upon request, any additional information, data, or documentation that may assist the Commission in its review of this submission.

Please note that Schedule A (Program Terms), in both the clean form set forth in Appendix A and the marked form set forth in Appendix B, and the Core Principle Compliance Analysis set forth in Appendix C, constitute confidential commercial information and are submitted under a request for confidential treatment pursuant to the procedures provided in CFTC Regulation 40.8 and CFTC Regulation 145.9, as set forth in the accompanying request for confidential treatment. The Market Maker Agreement itself remains publicly available in the form previously filed, except that the confidential commercial information contained in Schedule A remains subject to the request for confidential treatment. Consistent with CFTC Regulation 40.6(a)(2), the confidential information has been redacted from the version of this submission posted on the Exchange's website, and ProphetX will republish such information consistent with any determination made pursuant to CFTC Regulation 40.8(c)(4).

If you have any questions or comments or require further information, please do not hesitate to contact me.

Sincerely,

/s/ Gabe Wong
Gabe Wong
Chief Regulatory Officer
ProphetX LLC
gabe.wong@prophetexchange.com

Enclosures:

Appendix A – Schedule A to the ProphetX Market Maker Agreement (Clean) (Confidential)

Appendix B – Schedule A to the ProphetX Market Maker Agreement (Redlined) (Confidential)

Appendix C – Core Principle Compliance Analysis (Confidential)

FOIA Request for Confidential Treatment

VIA CFTC PORTAL SUBMISSION

Assistant Secretary of the Commission for FOIA
Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581
FOIAsubmissions@cftc.gov

Re: FOIA Confidential Treatment Request — ProphetX LLC Self-Certification of Amendment to Schedule A (Program Terms) to the ProphetX Market Maker Agreement Under the ProphetX Market Maker Program (§ 40.6(a))

Dear Sir or Madam,

We write to inform you that ProphetX LLC ("Exchange," "ProphetX," or "we") submitted on August 18, 2026 to the Commodity Futures Trading Commission ("CFTC") the materials described in the Appendix to this letter (the "Confidential Submission"), as part of a self-certification of an amendment to Schedule A (Program Terms) to the ProphetX Market Maker Agreement, filed under Section 5c(c)(1) of the Commodity Exchange Act (the "Act") and CFTC Regulation 40.6(a), via the CFTC Portal to the Secretary of the Commission and the Division of Market Oversight. The Confidential Submission consists of Confidential Appendix A (Schedule A to the ProphetX Market Maker Agreement, clean), Confidential Appendix B (Schedule A to the ProphetX Market Maker Agreement, marked to show changes), and Confidential Appendix C (Core Principle Compliance Analysis), each of which is clearly marked and segregated from the public portions of the submission.

Because the self-certification is filed under Part 40 of the CFTC's regulations, confidential treatment is governed by 17 C.F.R. § 40.8, which incorporates the standards of 17 C.F.R. § 145.9 and provides that a detailed written justification accompany this request. Pursuant to CFTC Regulation 145.9, 17 C.F.R. § 145.9, we hereby request that the CFTC afford confidential treatment to the Confidential Submission and any copies thereof, and any other materials and correspondence related to the self-certification that is not required by law to be made public. Furthermore, we request confidential treatment of any memoranda, notes, transcripts or other writings of any sort that are made by, or at the request of, any employee of the CFTC (or of any government employee, agent, or agency) and that: (1) incorporate or relate to any aspect of the Confidential Submission; or (2) refer to any conference, meeting, or telephone conversation between the Exchange, its current or former employees, representatives, agents, auditors, or counsel on the one hand and employees of the CFTC (or of any other government agency) on the other hand, relating to the Confidential Submission ("Derivative Materials").

We request confidential treatment on the grounds that, pursuant to 17 C.F.R. § 145.9(d)(1)(ii), the Confidential Submission and any Derivative Materials contain and constitute the Exchange's "trade secrets or confidential commercial or financial information" and other competitively sensitive information. Disclosure of the Confidential Submission or any Derivative Materials would place the Exchange at a competitive disadvantage with competitors who do not publicly reveal such information. Therefore, the Confidential Submission and any Derivative Materials are subject to, at a minimum, the exemption from mandatory disclosure under Exemption Number 4 of the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA").

The Confidential Submission is competitively sensitive in several respects. Schedule A (Program Terms), submitted in clean form as Confidential Appendix A and in marked form as Confidential Appendix B, sets forth, in granular detail, the proprietary economic and operational terms of the Exchange's market-maker program — including the per-market required quote sizes, maximum bid/offer spreads, and availability (uptime) thresholds; the specific leagues, categories, market groups, and phases eligible for coverage; the player-prop and field-size coverage minimums and the scope and tiering provisions applicable to each league or category; and the fee-rebate economics and qualification mechanics that determine the incentives paid to market makers. Confidential Appendix B additionally reveals, through the marked changes, the direction and sequencing of the Exchange's expansion of the program into additional leagues and categories and its calibration of existing service levels. Confidential Appendix C (Core Principle Compliance Analysis) describes the proprietary design and operation of the market-maker program together with the Exchange's related regulatory and risk-management approach and the commercial rationale for the amendment. Public disclosure of these materials would reveal the Exchange's liquidity-incentive economics and market-making terms to competing venues and to prospective and current market makers, would enable competitors to replicate the Exchange's program design and to anticipate its liquidity and product roadmap, and could allow market participants to reverse-engineer or arbitrage the program's qualification thresholds — thereby placing the Exchange, a privately held company, at a competitive disadvantage with competitors who do not publicly reveal such information. The public portions of the self-certification — the cover letter and the concise explanation of the amendment — contain the information necessary for the public to understand the amendment and are being posted concurrently on the Exchange's website. The ProphetX Rulebook, including Chapter 8 (Market Makers), and the ProphetX Market Maker Agreement (other than Schedule A) remain publicly available in the forms previously filed and are not amended by this submission. The Confidential Submission, by contrast, is not directed to the trading public and is reasonably segregable from the public portions.

If any person (including any government employee who is not an employee of the CFTC) requests an opportunity to inspect or copy any of the Confidential Submission (or any Derivative Materials) or the CFTC receives any FOIA request or any other court order, subpoena or summons for the Confidential Submission (or any Derivative Materials), we request that we be immediately notified of any such request, be promptly furnished with all written materials pertaining to such request, and be given a reasonable opportunity to respond, as provided by 17 C.F.R. § 145.9(e).

If the CFTC or its Staff tentatively concludes that the Confidential Submission, or any specific materials therein, or any Derivative Materials are not exempt from disclosure pursuant to FOIA or applicable CFTC regulations, we request, pursuant to 17 C.F.R. § 145.9(f), an opportunity to be heard on these claims of exemption and that we be given at least ten business days' notice prior to any intended release so that we may pursue any available remedies under 17 C.F.R. § 145.9(g), including the appeal and stay procedures provided therein, if deemed appropriate. Pursuant to 17 C.F.R. § 145.9(d)(2), a copy of this letter is being provided to the relevant members of Staff at the CFTC who received the Confidential Submission. Additionally, we request that a copy of this letter accompany the Confidential Submission and related materials at all times.

In accordance with 17 C.F.R. § 145.9(d)(5), we request that the Confidential Submission and any Derivative Materials be afforded confidential treatment in perpetuity. Thank you for your anticipated cooperation. If you have any questions or require further information, please contact the undersigned at the address and email below.

Sincerely,

/s/ Gabe Wong

Gabe Wong
Chief Regulatory Officer, ProphetX LLC
4 World Trade Center, 150 Greenwich Street, 29th Floor
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APPENDIX

Confidential Treatment — ProphetX Market Maker Program Schedule A Amendment Self-Certification

ProphetX requests confidential treatment of the following materials submitted with the one Regulation 40.6(a) self-certification described in the above letter, including but not limited to:

1. **ProphetX Market Maker Program — Schedule A Amendment Self-Certification**
   - Confidential Appendix A — Schedule A to the ProphetX Market Maker Agreement (Clean).
   - Confidential Appendix B — Schedule A to the ProphetX Market Maker Agreement (Redlined).
   - Confidential Appendix C — Core Principle Compliance Analysis.
   - Any Derivative Materials and other materials and correspondence related to the foregoing, as described in the above letter.