

September 3, 2026

Via CFTC Portal Submissions

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 - Certification Pursuant to CFTC Regulation 40.2(a): “Will the Cincinnati Bengals be the First Team to Score in the Tampa Bay Buccaneers at Cincinnati Bengals event on September 13th, 2026?” Event Contract

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act (the “Act” or “CEA”) and Commission Regulation 40.2(a), ProphetX LLC (“ProphetX” or the “Exchange”), a designated contract market (“DCM”), hereby notifies the Commission that it intends to list “Will the Cincinnati Bengals be the First Team to Score in the Tampa Bay Buccaneers at Cincinnati Bengals event on September 13th, 2026” Event Contract. The Contract will be listed no earlier than one business day following the Commission’s receipt of this submission, and no later than December 31, 2026.

Pursuant to Commission Regulation 40.2, ProphetX certifies that the Contracts comply with the Act and the Commission’s regulations thereunder and that this submission, excluding portions subject to confidential treatment, has been concurrently posted on the Exchange’s website.

Consistent with CFTC Staff Letter No. 26-08 (March 12, 2026) and CFTC Staff Letter No. 26-22 (July 24, 2026), the Exchange submits this Contract as a single, specific event contract identifying one named team, one named scoring-sequence outcome, one named game, and one identified settlement source, rather than as a Broad Template Certification. The Exchange intends to rely on this certification as the referenced contract for a subsequent event contract series certification to be filed pursuant to 17 C.F.R. § 40.2(d), covering other teams and NFL games that share an identical settlement source and methodology with this Contract. Confidential Appendices C and D to this submission analyze the Settlement Reference Sources and the settlement determination as such, and will be relied on and incorporated by reference in that series certification rather than resubmitted.

This submission includes the following:

- A concise explanation and analysis of the Contracts;
- The Exchange’s certification of compliance with the Act and Commission regulations;
- Appendix A – Contract Terms and Conditions;
- Appendix B – Trading Prohibitions; and

- Confidential Appendices C and D, submitted under FOIA confidential treatment pursuant to 17 C.F.R. § 145.9, containing the Core Principle compliance analysis and the full Appendix C to Part 38 demonstration.

Pursuant to Commission Regulation 40.2, ProphetX certifies that the Contracts comply with the Act and the Commission's regulations thereunder and that this submission, excluding portions subject to confidential treatment, has been concurrently posted on the Exchange's website.

/s/ Gabe Wong
Gabe Wong
Chief Regulatory Officer
ProphetX LLC

Concise Description of the Contracts and Analysis of Compliance with the Commodity Exchange Act, Core Principles, and Commission Regulations

I. Introduction

The Contract is a binary event contract relating to whether the Cincinnati Bengals are the first team to score in the Tampa Bay Buccaneers at Cincinnati Bengals NFL game scheduled for September 13, 2026 (the “Event”). The Contract does not permit any additional parameters, iterations, or permutations. The Exchange intends to separately submit a certification pursuant to 17 C.F.R. § 40.2(d) that references this Contract as the basis for an event contract series covering other teams and NFL games that share an identical settlement source and methodology with this Contract.

This Contract settles in cash with a notional value of \$1.00. A Contract resolves “Yes” if: the Cincinnati Bengals are recorded by the Settlement Reference Source as the team credited with the first scoring play in the Event. The full contract terms and conditions are set out in Appendix A.

Pursuant to Section 5c(c)(1) of the Act and Commission Regulation 40.2(a), ProphetX certifies that the listing of the Contracts complies with the Act and the Commission’s regulations thereunder. A Core Principle compliance analysis is included in Confidential Appendix C. A demonstration of compliance with Appendix C to Part 38 of the Commission’s regulations, including the occurrence integrity assessment, settlement methodology verification, conclusion statement, and supporting documentation, is included in Confidential Appendix D.

II. General Contract Terms

This Contract has a \$1.00 notional value and a \$0.01 minimum price fluctuation. Contracts may only be listed at prices between \$0.01 and \$0.99. The payout structure is binary: the “Yes” side of an in-the-money Contract receives \$1.00 at settlement; the “No” side receives nothing. All Contracts are fully collateralized: no Market Participant may hold a position that creates an exposure in excess of funds on deposit in its Exchange account, consistent with Rules 5.1(b), 5.1(f), and 7.3 of the Rulebook. Trading is available outside of announced maintenance windows. Fees are assessed in accordance with Rule 3.6 of the Rulebook.

Settlement is determined from the official scoring summary, gamebook, or comparable official publication for the referenced Event as published by the Settlement Reference Source. Markets are settled after the close of trading once the first-scoring outcome is available, with “Yes” position holders and “No” position holders paid in accordance with the applicable Payout Criterion.

¹ The Contract has not been endorsed by the National Football League, its member clubs, the Cincinnati Bengals, or the Tampa Bay Buccaneers. The use of the names “National Football League,” “Cincinnati Bengals,” and “Tampa Bay Buccaneers” is solely for the purpose of identifying the underlying Event.

APPENDIX A – CONTRACT TERMS AND CONDITIONS**1. “Will the Cincinnati Bengals be the First Team to Score in the Tampa Bay Buccaneers at Cincinnati Bengals event on September 13th, 2026?”**

Official Name	“Will the Cincinnati Bengals be the First Team to Score in the Tampa Bay Buccaneers at Cincinnati Bengals event on September 13th, 2026?”
Underlying	The Underlying for the Contract is whether the Cincinnati Bengals are the first team to score in the Tampa Bay Buccaneers at Cincinnati Bengals National Football League (“NFL”) game scheduled for September 13, 2026 (the “Event”).
Settlement Reference Source	The Settlement Reference Source consists of authoritative, publicly available sources that publish official NFL game results and scoring information. The primary source for the applicable Event is the National Football League (“NFL”) through NFL.com and the official NFL Game Center or gamebook for the Event. Secondary sources include ESPN (espn.com). The fallback source is The Associated Press (apnews.com). If the primary source has not published an official result within a reasonable time following the official determination of the referenced outcome, the Exchange may consult one or more secondary or fallback sources. If no Settlement Reference Source has published an official result and a settlement disruption exists, the Exchange may exercise its authority under Exchange Rule 5.2. All Settlement Reference Sources are publicly available, widely disseminated, and independent of the Exchange and its Market Participants. The Exchange may update the designated Settlement Reference Sources by posting notice on its website or trading platform. Any instructions regarding access to a Settlement Reference Source are non-binding and provided solely for convenience.
Settlement Criteria	Resolves to “Yes” if the Settlement Reference Source reports that the applicable payout criteria set forth has been satisfied and no applicable contingency has been triggered according to the Settlement Criteria listed below: The Cincinnati Bengals are reported by the Settlement Reference Source as the team credited with the first scoring play in the Event. For purposes of this Contract, the first team to score is the team awarded the earliest points in the official scoring summary for the

	Event, including any scoring play credited under NFL rules in regulation or overtime. If the Tampa Bay Buccaneers are credited with the first scoring play, or if the Event concludes with no scoring by either team, the Contract resolves “No.” If no team scores the contract resolves “No” If the Event is postponed, suspended, rescheduled, abandoned, or canceled, the Expiration Date and Time will be adjusted or the Contract will be settled or voided in accordance with Exchange Rules 2.8 and 5.2, provided that the Contract may be settled if the first team to score has been unequivocally determined by the Settlement Reference Source before the relevant contingency.
Minimum Tick	\$0.01 per Contract.
Notional Value	\$1.00 per Contract.
Settlement Value	\$1.00 per in-the-money Contract.
Position Accountability Level	25,000 Contracts per Market Participant per strike.
Last Trading Date/Time	Trading closes upon the occurrence of the first scoring play in the Tampa Bay Buccaneers at Cincinnati Bengals game scheduled for September 13, 2026, as reflected in the live scoring published by the primary Settlement Reference Source, or, if no team scores, when the Event is officially concluded and that result is reflected by the Settlement Reference Source. No new position may be opened after this time.
Expiration Date and Time	The date and time at which the first team to score in the Event becomes determinable based on information published by the Settlement Reference Source. If no team scores in the Event, the Expiration Date and Time is the date and time at which that no-score result becomes determinable based on the Settlement Reference Source. If the Event is postponed, suspended, or rescheduled, the Expiration Date and Time will be adjusted accordingly.

Settlement Date

No later than one business day following the Expiration Date, unless the Market Outcome is under review pursuant to applicable Exchange Rules.

APPENDIX B – TRADING PROHIBITIONS

In addition to the general prohibition on trading while in possession of material non-public information set forth in Exchange Rule 4.12, the following persons are prohibited from trading “Will the Cincinnati Bengals be the First Team to Score in the Tampa Bay Buccaneers at Cincinnati Bengals event on September 13th, 2026?”:

- Current players, coaches, coordinators, trainers, medical staff, game-day personnel, and other sideline or on-field personnel of the Cincinnati Bengals or the Tampa Bay Buccaneers;
- Current employees, officers, directors, contractors, game officials, replay officials, official scorers, data personnel, and agents of the NFL, any NFL member club, or any other governing body or affiliated organization with authority over the Event;
- Any person with authority over, or material financial or governance interest in, either participating team, the Event, or the official scoring data used to determine the Contract outcome;
- Any person in possession of material non-public information relating to the Event or its first scoring sequence, including information regarding lineup decisions, player availability, injuries or health status, planned play-calling, kicking decisions, weather-related operational decisions, officiating or replay determinations, scoring corrections, or other non-public competitive or scoring matters, until such information has been publicly disseminated; and
- Immediate family members and household members of any person described above, including spouses, domestic partners, parents, children, and siblings.

The Exchange may impose additional trading restrictions or prohibitions where necessary to protect market integrity and deter the misuse of material non-public information.