June 12, 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 – New Market Participant Bonus

Dear Sir or Madam,

ProphetX LLC ("ProphetX" or the "Exchange") hereby certifies that, pursuant to ProphetX Rule 3.6(f), Section 5c(c) of the Commodity Exchange Act ("CEA"), and Commodity Futures Trading Commission ("CFTC") Regulation 40.6(a), it is implementing the New Market Participant Bonus (the "Program") as set forth in Appendix A. The Program will become effective on June 29, 2026, which is no earlier than ten (10) business days following the date of this certification.

The Program is intended to broaden participation in the contracts offered by the Exchange and to deepen the liquidity available in each of its markets. Under the Program, an eligible new Market Participant, as defined in Appendix A, who completes an initial trade of at least $10.00 during the required period, and who satisfies the remaining eligibility requirements, will receive a one-time credit of $20.00 to the Market Participant's Exchange account, subject to the terms set forth in Appendix A. ProphetX anticipates that the Program will increase the number of participants transacting in its markets, which will result in increased liquidity and will benefit all participants through tighter bid/ask spreads and greater size available at each price level.

Appendix A contains the Program's terms.

Compliance with Core Principles

ProphetX has concluded that the Program is not inconsistent with the CEA and the CFTC's regulations thereunder. The following core principles most directly pertain to the Program: 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; and Core Principle 21 – Financial Resources.

ProphetX Rule 3.6(f) authorizes the Exchange to establish incentive programs to encourage market participation and trading, and the Program is consistent with that authority. The Program does not affect the Exchange's ability to perform its trade practice and market surveillance obligations under the CEA and does not render the Exchange's contracts readily susceptible to manipulation.

ProphetX Rule 4.12 (Prohibited Transactions and Activities), within Chapter 4 (Access and Trading), includes prohibitions against fraudulent, non-competitive, unfair, or abusive practices, all of which apply to trading under the Program, and ProphetX will continue to monitor for manipulative trading, market abuse, and other trading violations, including by participants in the Program. Additionally, the Exchange's systems will track Program participants' eligibility to ensure proper distribution of the incentive. The terms of the Program will be posted on the Exchange's website and publicly available. The Program does not affect the Exchange's execution of transactions.

The eligibility criteria for the Program are set forth in Appendix A, are non-discriminatory, and are designed to encourage wide participation in the Program. The increased participation and liquidity encouraged by the Program will enhance the competitiveness and efficiency of the market. The Program is anticipated to be economically sustainable and is not expected to adversely affect ProphetX's satisfaction of its financial resources requirements.

Notification of this filing has been posted to ProphetX's website. The terms of the Program are set forth in Appendix A and will be publicly available on the Exchange's website prior to implementation. ProphetX will keep records of participation in the Program. ProphetX has not received any substantive opposing views with respect to the Program from any prospective Market Participant or other interested party.

ProphetX accordingly certifies that the Program complies with the requirements of the CEA and the CFTC's regulations promulgated thereunder, and further certifies that, concurrent with this filing, a copy of this submission has been posted on the ProphetX website and may be accessed at: https://www.prophetx.co/lobby/t-c/filings.

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

Sincerely,

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

PROPHETX

APPENDIX A

DESCRIPTION OF NEW MARKET PARTICIPANT BONUS PROGRAM

Purpose

The New Market Participant Bonus Program (the "Program") is intended to broaden participation in the contracts offered by ProphetX (the "Exchange") and to deepen the liquidity available in each of its markets. Greater liquidity benefits all Market Participants (each, a "Participant") by tightening bid/ask spreads and increasing the size available at each price level.

Scope

The Program is available to all new Participants who meet the eligibility requirements while the Program is in effect. The Program is not limited to a particular subset of the Exchange's contracts. All Participants in the Program are subject to the Exchange's Rulebook.

Eligibility

A Participant is eligible to participate in the Program if they:

- Sign up as a first-time Participant who has not previously registered with the Exchange or affiliate of the Exchange;
- Are approved by the Exchange to open a trading account; and
- Execute an initial trade using at least $10.00 of funds from the Participant's account within 30 calendar days of account approval.

The qualifying initial trade must occur in one transaction. If the funds used to satisfy the $10.00 qualifying trade requirement are returned by the Exchange's payment processor or settlement bank for any reason, the Participant will be disqualified from the Program. A Participant who has received Incentive Funds (as defined below) based on such trading will be required to return the Incentive Funds.

To remain eligible for the Program, a Participant must not be the subject of an open compliance investigation or review and must not have a suspended or restricted account at the time the Incentive Funds are credited or used.

Continued eligibility for the Program is also conditioned on the accuracy and completeness of the information provided during the Participant's account opening process. If the Exchange determines that a Participant was not eligible for the Program based on information submitted in connection with the application, the Participant may have their eligibility revoked, be disqualified from the Program, and be required to return any Incentive Funds previously received.

Incentive Funds

Upon satisfying all eligibility requirements, the Exchange will credit $20.00 (the "Incentive Funds") to the Participant's Exchange account within 1 calendar day.

Incentive Funds may be used as funds on new trades and may be withdrawn only upon position settlement. Upon opening positions, Incentive Funds will be utilized before other funds to collateralize the new positions. Incentive Funds must be used for trading within 45 calendar days of being credited. After 45 calendar days, unused Incentive Funds will be automatically forfeited back to the Exchange. Each Participant is eligible to receive Incentive Funds under the Program only once.

Program Term

The Program applies to all markets and all Market Participants on the Exchange. The Program will be effective on June 29, 2026, which is no earlier than ten (10) business days following its certification to the CFTC.

The end date of the Program is the later of:

- Fifty-two (52) weeks from the start date; and
- 500,000 Participants successfully onboarded under the Program,

unless extended or earlier terminated by the Exchange. The Program may be extended on the same or modified terms, subject to any required CFTC filings, certifications, or approvals.

Program Administration

The Program is subject to the Exchange's Rulebook and all applicable provisions of the Commodity Exchange Act and CFTC regulations promulgated thereunder. Participation in the Program is subject to the Exchange's authority and obligations under its Rulebook and applicable law. The Exchange may modify, suspend, terminate, withdraw, or otherwise amend the Program from time to time, subject to any required CFTC filings, certifications, or approvals.