August 14, 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 – Trading Fee Schedule and Make Volume Fee Rebate Program

Dear Sir or Madam,

ProphetX LLC ("ProphetX" or the "Exchange") hereby certifies that, pursuant to ProphetX Rule 3.6, Section 5c(c) of the Commodity Exchange Act ("CEA"), and Commodity Futures Trading Commission ("CFTC") Regulation 40.6(a), it is extending the trading fee schedule and Make Volume Fee Rebate Program (together, the "Program") set forth in Appendix A, which the Exchange previously self-certified on June 12, 2026 and which became effective on June 29, 2026. The Program extension will become effective no earlier than ten (10) business days following the date of this certification, and the Program will continue in effect without interruption on the terms set forth in Appendix A. The Exchange is extending the Program for a term of twelve (12) months, subject to a monthly review by senior management to determine whether to continue, amend, or terminate the Program.

Under the Program, the Exchange will assess a trading fee of 2% on net proceeds, calculated on a per-market basis upon settlement, on single-event contracts transacted on the Exchange platform. To reward Market Participants that contribute significant liquidity, the Exchange will process monthly fee rebates based on each participant's monthly make volume, according to the marginal rebate schedule set forth in Appendix A, which 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(b) authorizes the Exchange to charge fees for trading, settlement, and account activity, and Rule 3.6(d) requires that fee structures be applied in a fair, transparent, and non-discriminatory manner. The fees set forth in the Program apply uniformly to all Market

Participants, and the fee rebate is available to all Market Participants on the same terms based solely on objective monthly make-volume thresholds. Rule 3.6(f) permits the Exchange to establish incentive programs to encourage market participation and trading, and the Make Volume Fee Rebate Program is consistent with this 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. The Exchange's systems will track make volume and trading fees paid to ensure accurate calculation and distribution of rebates. 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 Program is anticipated to be economically sustainable and is not expected to adversely affect ProphetX's satisfaction of its financial resources requirements.

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

Enclosures:
Appendix A – Amended Program terms (clean - public)
Appendix B – Amended Program terms (redlined - public)
Appendix C - Core Principle Analysis (confidential)

APPENDIX A

TRADING FEE SCHEDULE AND MAKE VOLUME FEE REBATE PROGRAM

Purpose

The Trading Fee Schedule and Make Volume Fee Rebate Program (the "Program") establishes the trading fees applicable to transactions on ProphetX (the "Exchange") and is designed to recognize Market Participants that contribute significant liquidity to the Exchange through a monthly fee rebate. Increased trading volume and liquidity benefit all participants through tighter bid/ask spreads and greater size available at each price level.

Scope and Effective Date

The Program will become effective on June 29, 2026, which is no earlier than ten (10) business days following the date of its certification to the CFTC (the "Effective Date"), and will continue until amended or terminated by the Exchange. Rebate tiers are calculated on a calendar-month basis. If the Effective Date does not fall on the first day of a calendar month, the tier thresholds for that month will be prorated based on the number of calendar days remaining in the month.

For purposes of the Program, "make volume" means the aggregate notional matched volume of single-event contract transactions during a calendar month in which the Market Participant provided resting liquidity to the Exchange.

On-Platform Trading Fees

- A trading fee of 2% of net proceeds is assessed on each single-event contract transacted on the Exchange and is calculated on a per-market basis upon settlement of the relevant market.
- Multi-event contracts and requests for quote ("RFQs") are not currently subject to trading fees. If the Exchange elects to assess fees on multi-event contracts or RFQs in the future, such fees will be filed with the CFTC in accordance with Rule 3.6(e) and CFTC Regulation 40.6 prior to taking effect and, once effective, will be eligible for rebates under the Program.

Make Volume Fee Rebate Program

To award value to high-volume liquidity providers, the Exchange will process a fee rebate at the end of each calendar month based on a Market Participant's monthly make volume, according to the following marginal rebate schedule:

Monthly Make Volume Tier	Marginal Rebate Rate
\$0 – \$50,000	0%
\$50,000 – \$750,000	20%
\$750,000 – \$3,000,000	40%
\$3,000,000 – \$7,500,000	60%

Over $7,500,000	80%

The rebate is applied on a marginal basis: each portion of a participant's monthly make volume is rebated at the marginal rate corresponding to its tier. The participant's effective rebate rate equals the volume-weighted average of the applicable marginal rates, and the monthly rebate equals that effective rate multiplied by the trading fees the participant paid to the Exchange during the month.

Illustrative examples:

- A participant with $75,000 of monthly make volume who paid $1,000 in trading fees has an effective rebate rate of ($50,000 × 0% + $25,000 × 20%) ÷ $75,000 = 6.67%, and would receive a rebate of $66.66.
- A participant with $7,500,000 of monthly make volume who paid $100,000 in trading fees has an effective rebate rate of ($50,000 × 0% + $700,000 × 20% + $2,250,000 × 40% + $4,500,000 × 60%) ÷ $7,500,000 = 49.86%, and would receive a rebate of $49,860.

Program Term

The initial term of the Make Volume Fee Rebate Program is twelve (12) months from the Effective Date. Following the Effective Date, senior management of the Exchange will review the Program on a monthly cycle to determine whether to continue it for the following month or to amend, phase out, or terminate it prior to the expiration of the twelve (12) month term. In each review, senior management will consider the Program's effect on trading volume and liquidity, any adverse effects on market integrity, and the Program's continued consistency with the Exchange's regulatory obligations. The Exchange may amend, phase out, or terminate the Program at any time following any such review, subject to any required CFTC filings, certifications, or approvals. The Exchange may amend the fee schedule and rebate tiers following the initial term; any such amendment will be filed with the CFTC in accordance with Rule 3.6(e) and CFTC Regulation 40.6 prior to taking effect. 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.

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APPENDIX B

TRADING FEE SCHEDULE AND MAKE VOLUME FEE REBATE PROGRAM

(REDLINED)

Purpose

The Trading Fee Schedule and Make Volume Fee Rebate Program (the "Program") establishes the trading fees applicable to transactions on ProphetX (the "Exchange") and is designed to recognize Market Participants that contribute significant liquidity to the Exchange through a monthly fee rebate. Increased trading volume and liquidity benefit all participants through tighter bid/ask spreads and greater size available at each price level.

Scope and Effective Date

The Program will become effective on June 29, 2026, which is no earlier than ten (10) business days following the date of its certification to the CFTC (the "Effective Date"), and will continue until amended or terminated by the Exchange. Rebate tiers are calculated on a calendar-month basis. If the Effective Date does not fall on the first day of a calendar month, the tier thresholds for that month will be prorated based on the number of calendar days remaining in the month.

For purposes of the Program, "make volume" means the aggregate notional matched volume of single-event contract transactions during a calendar month in which the Market Participant provided resting liquidity to the Exchange.

On-Platform Trading Fees

- A trading fee of 2% of net proceeds is assessed on each single-event contract transacted on the Exchange and is calculated on a per-market basis upon settlement of the relevant market.
- Multi-event contracts and requests for quote ("RFQs") are not currently subject to trading fees. If the Exchange elects to assess fees on multi-event contracts or RFQs in the future, such fees will be filed with the CFTC in accordance with Rule 3.6(e) and CFTC Regulation 40.6 prior to taking effect and, once effective, will be eligible for rebates under the Program.

Make Volume Fee Rebate Program

To award value to high-volume liquidity providers, the Exchange will process a fee rebate at the end of each calendar month based on a Market Participant's monthly make volume, according to the following marginal rebate schedule:

Monthly Make Volume Tier	Marginal Rebate Rate
$0 – $50,000	0%
$50,000 – $750,000	20%
$750,000 – $3,000,000	40%
$3,000,000 – $7,500,000	60%

Over $7,500,000	80%

The rebate is applied on a marginal basis: each portion of a participant's monthly make volume is rebated at the marginal rate corresponding to its tier. The participant's effective rebate rate equals the volume-weighted average of the applicable marginal rates, and the monthly rebate equals that effective rate multiplied by the trading fees the participant paid to the Exchange during the month.

Illustrative examples:

- A participant with $75,000 of monthly make volume who paid $1,000 in trading fees has an effective rebate rate of ($50,000 × 0% + $25,000 × 20%) ÷ $75,000 = 6.67%, and would receive a rebate of $66.66.
- A participant with $7,500,000 of monthly make volume who paid $100,000 in trading fees has an effective rebate rate of ($50,000 × 0% + $700,000 × 20% + $2,250,000 × 40% + $4,500,000 × 60%) ÷ $7,500,000 = 49.86%, and would receive a rebate of $49,860.

Program Term

The initial term of the Make Volume Fee Rebate Program is ~~two (2) months~~twelve (12) months from the Effective Date. Following the Effective Date, senior management of the Exchange will review the Program on a monthly cycle to determine whether to continue it for the following month or to amend, phase out, or terminate it prior to the expiration of the twelve (12) month term. In each review, senior management will consider the Program's effect on trading volume and liquidity, any adverse effects on market integrity, and the Program's continued consistency with the Exchange's regulatory obligations. The Exchange may amend, phase out, or terminate the Program at any time following any such review, subject to any required CFTC filings, certifications, or approvals. The Exchange may amend the fee schedule and rebate tiers following the initial term; any such amendment will be filed with the CFTC in accordance with Rule 3.6(e) and CFTC Regulation 40.6 prior to taking effect. The Program may be extended on the same or modified terms, subject to any required CFTC filings, certifications, or approvals.

Program Administration

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