

July 18, 2025

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: KalshiEX LLC – CFTC Regulation 40.2(a) Notification Regarding the Initial Listing of the “Will <candidate> be <rank> on <list> in <time period>?” Contract

Dear Sir or Madam,

Pursuant to Section 5c(c) of the Commodity Exchange Act and Section 40.2(a) of the regulations of the Commodity Futures Trading Commission, KalshiEX LLC (Kalshi), a registered DCM, hereby notifies the Commission that it is self-certifying the “Will <candidate> be <rank> on <list> in <time period>?” contract (Contract). The Contract will initially be listed after close-of-business on **July 18, 2025**; it is listed as the day after because of limitations of the Commission's online submission portal. The Exchange intends to list the contract on a **custom** basis. The Contract’s terms and conditions (Appendix A) includes the following strike conditions:

- **<date>**
- **<candidate>**
- **<rank>**
- **<list>**
- **<time period>**

Along with this letter, Kalshi submits the following documents:

- A concise explanation and analysis of the Contract;
- Certification;
- Appendix A with the Contract’s Terms and Conditions;
- Confidential Appendices with further information; and
- A request for FOIA confidential treatment.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Xavier Sottile
Head of Markets
KalshiEX LLC
xsottile@kalshi.com

KalshiEX LLC

Official Product Name: “Will <candidate> be <rank> on <list> in <time period>?”

Rulebook: RANKLIST

Summary: Candidate ranking on list within timeframe

Kalshi Contract Category: Political Decision

Kalshi Internal Category: Elections

July 18, 2025

CONCISE EXPLANATION AND ANALYSIS OF THE PRODUCT AND ITS COMPLIANCE WITH APPLICABLE PROVISIONS OF THE ACT, INCLUDING CORE PRINCIPLES AND THE COMMISSION'S REGULATIONS THEREUNDER

Pursuant to Commission Rule 40.2(a)(3)(v), the following is a concise explanation and analysis of the product and its compliance with the Act, including the relevant Core Principles (discussed in Appendix D), and the Commission's regulations thereunder.

I. Introduction

The “Will <candidate> be <rank> on <list> in <time period>?” Contract is a contract relating to Elections.

Further information about the Contract, including an analysis of its risk mitigation and price basing utility, as well as additional considerations related to the Contract, is included in Confidential Appendices B, C, and D.

Pursuant to Section 5c(c) of the Act and CFTC Regulations 40.2(a), the Exchange hereby certifies that the listing of the Contract complies with the Act and Commission regulations under the Act.

General Contract Terms and Conditions: The Contract operates similar to other event contracts that the Exchange lists for trading. The minimum price fluctuation is \$0.01 (one cent). Price bands will apply so that Contracts may only be listed at values of at least \$0.01 and at most \$0.99. Further, the Contract is sized with a one-dollar notional value and has a minimum price fluctuation of \$0.01 to enable Members to match the size of the contracts purchased to their economic risks. As outlined in Rule 5.12 of the Rulebook, trading shall be available at all times outside of any maintenance windows, which will be announced in advance by the Exchange. Members will be charged fees in accordance with Rule 3.6 of the Rulebook. Fees, if they are charged, are charged in such amounts as may be revised from time to time to be reflected on the Exchange’s Website. A new Source Agency can be added via a Part 40 amendment. All instructions on how to access the Underlying are non-binding and are provided for convenience only and are not part of

the binding Terms and Conditions of the Contract. They may be clarified at any time. Furthermore, the Contract's payout structure is characterized by the payment of an absolute amount to the holder of one side of the option and no payment to the counterparty. During the time that trading on the Contract is open, Members are able to adjust their positions and trade freely. The Expiration Value and Market Outcome are determined at or after Market Close. The market is then settled by the Exchange, and the long position holders and short position holders are paid according to the Market Outcome. In this case, "long position holders" refers to Members who purchased the "Yes" side of the Contract and "short position holders" refers to Members who purchased the "No" side of the Contract. If the Market Outcome is "Yes," meaning that an event occurs that is encompassed within the Payout Criterion, then the long position holders are paid an absolute amount proportional to the size of their position and the short position holders receive no payment. If the Market Outcome is "No," then the short position holders are paid an absolute amount proportional to the size of their position and the long position holders receive no payment. Specification of the circumstances that would trigger a Market Outcome of "Yes" are included below in the section titled "Payout Criterion" in Appendix A.

**CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE
ACT, 7 U.S.C. § 7A-2 AND COMMODITY FUTURES TRADING COMMISSION RULE
40.2, 17 C.F.R. § 40.2**

Based on the above analysis, the Exchange certifies that:

- ☐ The Contract complies with the Act and Commission regulations thereunder.
- ☐ This submission (other than those appendices for which confidential treatment has been requested) has been concurrently posted on the Exchange's website at <https://kalshi.com/regulatory/filings>.

Should you have any questions concerning the above, please contact the exchange at ProductFilings@kalshi.com.



By: Xavier Sottile
Title: Head of Markets
Date: July 18, 2025

Attachments:

Appendix A - Contract Terms and Conditions

Appendix B (Confidential) - Further Considerations

Appendix C (Confidential) - Source Agency

Appendix D (Confidential) - Compliance with Core Principles

APPENDIX A – CONTRACT TERMS AND CONDITIONS

Official Product Name: “Will <candidate> be <rank> on <list> in <time period>?”

Rulebook: RANKLIST

RANKLIST

Scope: These rules shall apply to this contract.

Underlying: The Underlying for this Contract is the official published ranking of <candidate> on <list> during <time period>. Revisions to the Underlying made after Expiration will not be accounted for in determining the Expiration Value.

Source Agency: The Source Agencies are the organization that publishes <list>, The New York Times, the Associated Press, Bloomberg News, Reuters, Axios, Politico, Semafor, The Information, The Washington Post, The Wall Street Journal, ABC, CBS, CNN, Fox News, MSNBC, and NBC.

Type: The type of Contract is an Event Contract.

Issuance: After the initial Contract, Contract iterations will be listed on an as-needed basis at the discretion of the Exchange and corresponding to the risk management needs of Members.

<candidate>: <candidate> refers to an entity, individual, group, institution, location, or item that could appear on <list>. The Exchange may list iterations of the Contract with <candidate> values including but not limited to:

- Educational institutions (universities, colleges, schools)
- Geographic locations (countries, states, cities, regions)
- Companies or organizations
- Individuals or groups of individuals
- Products, services, or brands
- Any other rankable entity
- A singular <candidate> or group of candidates by description of a characteristic (e.g. Any Northeastern school)
- "None" or "No entity" options

<rank>: <rank> refers to a position on <list> specified by the Exchange. The Exchange may list iterations of the Contract with <rank> values including but not limited to:

- Specific numerical positions (e.g., "1st", "5th", "100th")
- Ranges (e.g., "top 10", "11-20", "top 50")
- Thresholds (e.g., "top 25 or better", "below 50th")
- Relative positions (e.g., "highest ranked", "lowest ranked")
- Categories within rankings (e.g., "best in region", "top public institution")
- "Unranked" or "Not listed"

<list>: <list> refers to a published ranking, list, or index specified by the Exchange. The Exchange will specify the publisher's name and specific list name (e.g., "U.S. News & World Report's Best States Rankings", "Forbes 400", "Time 100").

<time period>: <time period> refers to the edition, year, or date range of <list> specified by the Exchange. May include:

- Specific years (e.g., "2025", "2026")
- Date ranges (e.g., "January-June 2025")
- Edition numbers or names (e.g., "39th annual", "Spring 2025 edition")
- "Next published" for lists without predictable schedules

Payout Criterion: The Payout Criterion for the Contract encompasses the Expiration Values where <candidate> achieves <rank> on the official version of <list> for <time period>.

For resolution purposes:

- The ranking must be from the primary publisher's official release, not secondary reporting
- If <list> has multiple categories or subcategories, only the specific category named in the Contract title applies
- Tied rankings shall be resolved using the publisher's official tie-breaking methodology; if none exists, all tied entities share the highest rank among them
- If multiple candidates are tied for a given rank, then their Contracts will resolve to \$1/(the number of candidates tied), rounded down.
- If a tie results in a ranking being skipped (e.g. two candidates tie for the #1 position, and the next rank listed is for #3), then a market on a given candidate being #2 will resolve to No.

Examples that would resolve the market to Yes:

- Florida is ranked 5th on U.S. News & World Report's 2025 Best States Rankings and <candidate> is "Florida" and <rank> is "5th"
- Harvard University appears anywhere in the top 10 of Forbes' 2025 Best Colleges list and <candidate> is "Harvard University" and <rank> is "top 10"
- Elon Musk is ranked between 11th and 20th on Time's 2025 Time 100 and <candidate> is "Elon Musk" and <rank> is "11-20"

Examples that would NOT resolve the market to Yes:

- <candidate> appears on a different list than <list> specified in the Contract
- <candidate> is ranked outside the range specified by <rank>
- The ranking is published outside <time period>

- The ranking comes from an unofficial or secondary source
- <list> is not published during <time period>
- <candidate> appears in an "honorable mention" or "ones to watch" section but not in the actual numbered rankings

Minimum Tick: The Minimum Tick size for the Contract shall be \$0.01.

Position Accountability Level: The Position Accountability Level for the Contract shall be \$25,000 per strike, per Member.

Last Trading Date: The Last Trading Date of the Contract will be the same as the Expiration Date. The Last Trading time will be the same as the Expiration time.

Settlement Date: The Settlement Date of the Contract shall be no later than the day after the Expiration Date, unless the Market Outcome is under review pursuant to Rule 7.1.

Expiration Date: The latest Expiration Date of the Contract shall be one year after the end of <time period>. If an event described in the Payout Criterion occurs, expiration will be moved to an earlier date and time in accordance with Rule 7.2.

Expiration time: The Expiration time of the Contract shall be 10:00 AM ET.

Settlement Value: The Settlement Value for this Contract is \$1.00.

Expiration Value: The Expiration Value is the value of the Underlying as documented by the Source Agency on the Expiration Date at the Expiration time.

Contingencies: Before Settlement, Kalshi may, at its sole discretion, initiate the Market Outcome Review Process pursuant to Rule 6.3(d) of the Rulebook. If an Expiration Value cannot be determined on the Expiration Date, Kalshi has the right to determine payouts pursuant to Rule 6.3(b) in the Rulebook.