

June 14, 2021

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 – DCM Rulebook Amendment - Exhibit M

Dear Sir or Madam,

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), KalshiEX LLC (“Kalshi”) hereby notifies the Commission that it has amended certain of its rules in its Rulebook pursuant to Commission Regulation 40.6(a). The amended Rulebook is attached hereto as **Exhibit M, KalshiEX LLC Rulebook**.

The amendments to the Rulebook consist of the following:

- Chapter 1 - Definitions

Kalshi has added several definitions, including definitions of “Market Outcome,” “Outcome Review Committee,” “Payout Criterion,” “Settlement,” and “Source Agency”. The definitions will help provide further clarity with respect to the procedures in Rules 6.3 and Chapter 7. Kalshi has made several amendments to existing definitions for clarity, including “Settlement Date,” and removed some deprecated definitions.

- Chapter 2 - Market Governance

Kalshi has added language in Chapter 2 regarding the Outcome Review Committee and to be consistent with the changes to Rule 7.1.

- Chapter 5 - Method for Members to Trade Contracts

Kalshi has amended provisions on prohibited transactions and activities to clarify that employees or affiliates of a settlement source used for a Kalshi contract cannot trade in contracts that utilize such settlement source.

- Chapter 6 - Clearing and Settling Contract Trades, Settlement, and Member Withdrawal Requests

Kalshi has made minor amendments to the chapter title and rule names to maintain consistency with the definitions outlined in Chapter 1 and to clarify the sequence of events at expiration and settlement. Kalshi has updated Rule 6.3(c), which references the Outcome Review Process, for consistency with Chapter 7. Kalshi has updated Rule 6.3(d) to clarify that, regardless of dispute, members holding positions at expiry are notified by email when payments are issued.

- Chapter 7 - Market Outcome Review and Adjustments Necessitated by Material Changes in the Underlying

Kalshi has updated the name of the “Settlement Review Process” to “Market Outcome Review Process” for greater clarity. Kalshi has updated the procedure described in Rule 7.1 to clarify the timeline of the Market Outcome Review Process. Kalshi has moved Rule 7.2 unchanged to Chapter 13 for clarity of organization.

- Chapter 13 - Terms of Contracts traded on Kalshi

Kalshi revised the posting of Expiration Values on Kalshi’s website for greater clarity.

In addition, Kalshi made minor editorial changes for clarity and consistency throughout.

[REDACTED]

Kalshi certifies that the amendments comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder. Kalshi is not aware of any substantive opposing views expressed with respect to this filing and certifies that, concurrent with this filing, a notice of pending certification with the Commission, along with a copy of Kalshi’s Rulebook v 1.8 and a redacted version of this letter were posted on the Kalshi website and may be accessed at: <https://kalshi.com/regulatory>.

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

Sincerely,

Elie Mishory
Chief Regulatory Officer
KalshiEX LLC
emishory@kalshi.com