

January 13, 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 – Fee Rebate Program**

Dear Sir or Madam,

KalshiEX LLC (“Kalshi” or “Exchange”) hereby notifies the Commodity Futures Trading Commission (“CFTC”) that it is implementing on January 28, 2025 the Fee Rebate Program (“Program”) as set forth in Appendix A. Under the Program, Kalshi will rebate the amount of exchange trading fees<sup>1</sup> that a member paid during the month according to the terms of the Program. As set forth in the terms, no rebate is applied to first \$99.99 of fees, a 20% rebate is applied to the \$100 - \$250 of fees, a 40% rebate is applied to the \$250.01 - \$750 of fees, a 60% rebate is applied to the \$750.01 - \$2,000 of fees, and an 80% rebate is applied to the fees more than \$2,000.

Appendix A contains the Program’s terms.

**Compliance with Core Principles**

Kalshi has concluded that the Program is not inconsistent with the CEA and the CFTC’s regulations. 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; Core Principle 21 - Financial Resources.**

Kalshi Rule 3.6(f) allows Kalshi to create programs that provide incentives to Participants that encourage trading, and the amendments to the Program do not change this. The Program does not impact Kalshi’s ability to perform its trade practice and market surveillance obligations under the CEA. The Program also does not render the Exchange’s contracts readily susceptible to manipulation. Chapter 5 of Kalshi’s Rulebook includes prohibitions against fraudulent, non-competitive, unfair or abusive practices, all of which apply to trading under the Program.

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<sup>1</sup> All references to “fees” in this filing refer to exchange trading fees, and do not include clearing, banking or any other type fee that may from time to time be imposed by the Exchange or its clearing house partner.

Kalshi staff will continue to monitor for manipulative trading, market abuse and other trading violations, including by participants in the Program. Additionally, Kalshi's systems will continue to track Program participants' volume to ensure proper implementation of the Program. The effective terms of the Program will be posted on the Exchange's website and publicly available. The Program does not impact the Exchange's order execution. The eligibility criteria for the amended Program are set forth in Appendix A, and are non-discriminatory and designed to encourage wide participation in the Program amongst Kalshi's members. The increased volume and liquidity encouraged by the Program will enhance the competitiveness and efficiency of the market. The Program is anticipated to be economically sustainable. Notification of the filing is posted to Kalshi's website. The terms of all Program iterations will be posted on the Exchange's website prior to implementation. Kalshi will keep records of participation in the Program. Finally, the Program will not negatively impact Kalshi's satisfaction of the financial resources requirements.

Kalshi accordingly certifies that the program complies with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder, and certifies that, concurrent with this filing, a copy of this submission was posted on the Kalshi website and may be accessed at: <https://kalshi.com/regulatory/notices>.

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

Enclosure:  
Appendix A

# Appendix A

## Fee Rebate Program (“Program”) Terms and Conditions

### Program Purpose

The purpose of this Program is to increase volume and liquidity on the central limit order book and enhance pricing efficiency. More volume, more liquidity, and more efficient pricing benefit all participants in the marketplace.

### Program Scope and Duration

The Program applies to all Kalshi markets. The Program will be effective January 28th, 2025, and continue until the earlier of January 27th, 2027, or the date that Kalshi amends or terminates the Program.

### Eligible Participants

All Kalshi members are eligible to participate in the Program, except affiliates of Kalshi are not eligible to participate in the Program, and members who have executed a Market Maker Agreement or FCM Agreement with Kalshi are not eligible to participate in the Program. Participants in this Program are ineligible for participation in Kalshi’s Volume Incentive Program.

### Program Terms

- Obligations:

In order to be eligible to receive the incentives, participants must have paid fees exceeding the below associated thresholds.

- Incentives:

Participants that satisfy the obligations will receive a fee rebate on the exchange trading fees that the participant paid to Kalshi each month for non-intermediated trading according to the following schedule:

% Fee rebate
0% on the first \$99.99 in fees (inclusive)
20% rebate on the fees between \$100-\$250 (inclusive)
40% rebate on the fees between \$250.01-\$750 (inclusive)
60% rebate on the fees between \$750.01-\$2,000 (inclusive)
80% rebate on the fees greater than \$2,000.01 (inclusive)

**Note: all trading is subject to the rules in Kalshi's Rulebook Chapter 5.13, among other relevant Federal laws and regulations.**

**Monitoring and Termination of Status**

Kalshi shall monitor trading activity and participants' performance and shall retain the right to revoke participant status if Kalshi's Chief Regulatory Officer concludes from review that a participant's participation in the program is abusive or in any way inconsistent with the purpose of the Program.

Kalshi may end the Program at any time.