



October 10, 2024

Submitted via CFTC Portal

Assistant Secretary of the Commission
for FOI, Privacy and Sunshine Acts Compliance
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, D.C. 20581

Re: Modifications to Terms and Conditions for Election Contracts

Pursuant to Commodity Exchange Act (“CEA”) Section 5c and Commodity Futures Trading Commission (“CFTC”) Regulation 40.6(a) ForecastEx LLC (“ForecastEx”, or the “Exchange”) is self-certifying the following changes to the terms and conditions of its election contracts to be made effective October 28, 2024.

ForecastEx is amending the last trading time of its election contracts. Currently, the last trading time for ForecastEx’s election contracts is 11:59:59 PM CT the day before the general election. ForecastEx is extending the last trading time of these contracts to be 11:59:59 PM CT two days prior to the Resolution Time.

The specific contracts impacted by this change are all:

- US Presidential Election Forecast Contracts
- US Senate Control Forecast Contracts
- US House Control Forecast Contracts
- US Senate Race Forecast Contracts

In addition to the changes to the last trading time, ForecastEx is also making several non-substantive language changes to the US Senate Control Forecast Contract terms and conditions document. These changes more clearly describe how ForecastEx determines resolution for the US Senate Control Forecast Contract.

ForecastEx certifies that the proposed amendments comply with the Commodity Exchange Act (“CEA”) and CFTC regulations. ForecastEx further certifies that a copy of the non-confidential portions of the 40.6 filing have been posted to the ForecastEx Website.

ForecastEx has reviewed the Core Principles for Designated Contract Markets (“DCMs”) and has determined that the amendments may relate to the following Core Principles.

Core Principle 2 – Compliance with Rules: This core principle requires a DCM establish terms and conditions of any contracts to be traded on the contract market. ForecastEx is amending the terms and conditions document for some of its contracts.



Core Principle 3 – Contracts not Readily Susceptible to Manipulation: This core principle is addressed in the confidential addendum.

Core Principle 4 – Prevention of Market Disruption: This core principle requires a DCM to prevent manipulation, price distortion, and disruptions. In addition to the analysis in the confidential addendum, this change will help to prevent price distortions by ensuring the settlement prices of ForecastEx's election contracts reflect the actual outcomes of elections during the time between election day and Resolution Time.

Core Principle 7 – Availability of General Information: This core principle requires that the contract market shall make public information concerning the terms and conditions of contracts in the market. ForecastEx is making public information related to the terms and conditions of its contracts as well as making non-substantive clarifying amendments so that the terms and conditions of contracts are more clear for Market Participants.

No substantive opposing views were offered in response to this submission.

If there are any questions regarding the submission please contact me at gdeese@forecastex.com.

Respectfully Submitted,

A handwritten signature in black ink that reads "Graham Deese". The signature is written in a cursive, flowing style.

Graham Deese
Chief Regulatory Officer

Exhibits

- Exhibit A - US Presidential Election Forecast Contract
- Exhibit B - US Presidential Election Forecast Contract – Redline
- Exhibit C - US Senate Control Forecast Contract
- Exhibit D - US Senate Control Forecast Contract – Redline
- Exhibit E - US House Control Forecast Contract
- Exhibit F - US House Control Forecast Contract – Redline
- Exhibit G - US Senate Race Forecast Contract
- Exhibit H - US Senate Race Forecast Contract – Redline
- Exhibit I - Confidential