

Gemini Titan, LLC
600 Third Avenue
2nd Floor
New York, New York 10016

September 13, 2026

VIA ELECTRONIC SUBMISSION

Christopher J. Kirkpatrick
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: Gemini Titan, LLC — Regulation 40.6 Self-Certification of Fall 2026 Taker Rewards Program

Dear Mr. Kirkpatrick,

Gemini Titan, LLC (“**Gemini Titan**” or the “**Exchange**”) hereby notifies the Commodity Futures Trading Commission (“**CFTC**” or “**Commission**”) pursuant to Commission Regulation 40.6 that it is implementing on or after Thursday, October 1, 2026, the Fall 2026 Taker Rewards Program (the “**Program**”) will remain in effect until the earlier of December 31, 2026, or a date on which Gemini Titan amends or terminates the Program. The specific terms of the Program are set forth in Appendix A.

The Program provides cash rewards to participants who complete qualifying take-side trading activity in eligible event contract markets during the Program Term. The Program is designed to attract and retain high-volume trading participants and enhance market liquidity on the Exchange through a combination of daily volume-based rewards and monthly bonus payments tied to qualifying trading activity. The Program is a promotional marketing initiative and is not a fee rebate, trading commission rebate, or modification to Exchange transaction fees.

Compliance with Core Principles

Gemini Titan has reviewed the DCM Core Principles set forth in Section 5(d) of the Commodity Exchange Act (“**CEA**”) and has concluded that the Program is consistent with the applicable Core Principles. The following core principles most directly pertain to the Program:

Core Principle 2 – Compliance with Rules. All trading on the Exchange, including any trading and related activity by participants under the Program, is subject to the Exchange Rulebook, including Chapter 5, which includes prohibitions against fraudulent, non-competitive, unfair or abusive trading practices. The Program will be monitored and enforced by the Exchange.

Core Principle 3 – Contracts Not Readily Susceptible to Manipulation. The Program incentivizes aggregate trading participation through a combination of daily volume-based cash rewards and monthly tier-based¹ bonus payments tied to qualifying taker-side trading volume during the Program Term. Daily Rewards are calculated based on a trailing 30-day rolling window of executed notional taker-side volume, paid daily, and subject to a 15-day active trading streak requirement before activation. Monthly Bonuses are evaluated on a calendar-month basis and paid following the end of each month. Rewards are based solely on executed trading volume thresholds and do not depend on contract outcomes, directional positions, or market settlement values. The Program does not alter contract design, settlement methodology, or trading priority.

To reduce incentives for abusive trading behavior, only bona fide executed trades are eligible toward qualifying volume thresholds. In addition, only trades executed at contract odds between ten percent (10%) and ninety percent (90%), inclusive, qualify for the Program. The contract odds limitation excludes trading activity at extreme probabilities where incentives for abusive trading behavior may be heightened.

Trading activity remains subject to the Exchange’s Rulebook, including prohibitions against wash trading, manipulative trading, fictitious transactions, disruptive trading practices, and coordinated or collusive activity. The Exchange may exclude any trading activity it determines to be abusive, manipulative, non-competitive, or otherwise inconsistent with the purpose of the Program.

Program rewards are paid to eligible participants as U.S. dollar balances credited to participants’ Exchange accounts following verification of qualifying activity.

Aggregate rewards payable under the Program, including both Daily Rewards and Monthly Bonuses, are subject to a potential cumulative spending cap of \$1,500,000 (the “Program Cap”). The Exchange will post daily updates on both the amount of cumulative spending under the Program and the amount remaining available under the Program, and will reflect in such daily postings any additional funds added to the Program, including funds added after the Program Cap is reached. If the Program Cap is reached, the Exchange may elect to terminate the Program by posting notice to its website; provided that any such termination will not take effect before any accrued rewards are paid. For avoidance of doubt, an Eligible Participant who satisfies a Daily Rewards volume threshold on the day the Program Cap is reached will receive the corresponding Daily Reward, and the Daily Reward portion of the Program will terminate before the next day starts. Similarly, an Eligible Participant who satisfies a Monthly Bonus volume threshold for a Monthly Bonus Period will receive the corresponding Monthly Bonus, and the Monthly Bonus portion of the Program will terminate before the next month starts. Gemini Titan does not believe the Program renders the Exchange’s contracts readily susceptible to manipulation. In addition, no individual Eligible Participant may receive more than \$250,000 in aggregate rewards under the Program (the “Per-Participant Cap”), which further reduces the incentive for manipulation.

Core Principle 4 – Prevention of Market Disruption. Gemini staff will continue to conduct market surveillance and trade practice surveillance, including monitoring participants in the

¹ The Exchange may choose to give the tiers titles for marketing purposes.

Program for manipulative activity, wash trading, spoofing, and other trading violations. The Program does not exempt participants from any surveillance or enforcement activity.

Core Principle 7 – Availability of General Information. The effective terms of the Program, including all Program iterations, will be posted on the Exchange’s website prior to implementation and will be publicly available. Notification of this filing is posted to Gemini’s website, consistent with Core Principle 7.

Core Principle 9 – Execution of Transactions. The Program does not alter the Exchange’s order matching algorithm or give any participant priority in execution. All orders, including those submitted by Program participants, are matched on a price-time priority basis in the central limit order book. The Program does not impact the Exchange’s order execution.

Core Principle 12 – Protection of Markets and Market Participants. The Program’s eligibility criteria are non-discriminatory and designed to reward demonstrated trading activity. The Program is designed to attract and retain high-volume participants in the Exchange’s event contract markets through objective, transparent reward criteria applied uniformly to all Eligible Participants.

The reward structure is calibrated to attract high-volume participants whose trading activity drives meaningful liquidity improvements for all market participants. Daily Rewards and Monthly Bonuses are determined pursuant to objective trading volume thresholds and are applied uniformly to all Eligible Participants who meet such thresholds.

The increased trading activity encouraged by the Program will benefit all participants in the market. Gemini Rule 3.17 allows Gemini to create programs that provide incentives to participants that encourage trading, and the Program is consistent with this Rule.

Core Principle 18 – Recordkeeping. Gemini will maintain records of all payouts under the Program in accordance with CFTC Regulation 1.31.

Core Principle 19 – Antitrust. The Program does not result in any unreasonable restraint of trade. Participation is voluntary and open to all eligible members on equal terms.

Core Principle 21 – Financial Resources. The Program is anticipated to remain economically sustainable. The Program will not negatively impact Gemini’s satisfaction of the financial resources requirements under CFTC Regulation 38.1101.

Gemini Titan 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 Gemini Titan website and may be accessed at: <https://www.gemini.com/titan/notices>.

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

Sincerely,

Andrew Beatty
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