PROPHETX

September 22, 2026

VIA CFTC PORTAL SUBMISSION

Assistant Secretary of the Commission for FOIA
Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581
FOIAsubmissions@cftc.gov

Re: FOIA Confidential Treatment Request

Dear Sir or Madam,

We write to inform you that ProphetX LLC ("Exchange," "ProphetX," or "we") submitted on September 22, 2026 to the Commodity Futures Trading Commission ("CFTC") the materials described in the Appendix to this letter (the "Confidential Submission"), as part of product self-certifications filed under Section 5c(c)(1) of the Commodity Exchange Act (the "Act") and CFTC Regulation 40.2(a), via the CFTC Portal to the Secretary of the Commission and the Division of Market Oversight. The Confidential Submission consists of Confidential Appendix C (Core Principle Compliance Analysis) and Confidential Appendix D (Demonstration of Compliance with Appendix C to Part 38) of each of the self-certifications, which are clearly marked and segregated from the public portions of each submission.

Because the self-certifications are filed under Part 40 of the CFTC's regulations, confidential treatment is governed by 17 C.F.R. § 40.8, which incorporates the standards of 17 C.F.R. § 145.9 and provides that a detailed written justification accompany this request. Pursuant to CFTC Regulation 145.9, 17 C.F.R. § 145.9, we hereby request that the CFTC afford confidential treatment to the Confidential Submission and any copies thereof, and any other materials and correspondence related to the self-certifications that is not required by law to be made public. Furthermore, we request confidential treatment of any memoranda, notes, transcripts or other writings of any sort that are made by, or at the request of, any employee of the CFTC (or of any government employee, agent, or agency) and that: (1) incorporate or relate to any aspect of the Confidential Submission; or (2) refer to any conference, meeting, or telephone conversation between the Exchange, its current or former employees, representatives, agents, auditors, or counsel on the one hand and employees of the CFTC (or of any other government agency) on the other hand, relating to the Confidential Submission ("Derivative Materials").

We request confidential treatment on the grounds that, pursuant to 17 C.F.R. § 145.9(d)(1)(ii), the Confidential Submission and any Derivative Materials contain and constitute the Exchange's "trade secrets or confidential commercial or financial information" and other competitively sensitive information. Disclosure of the Confidential Submission or any Derivative Materials would place the Exchange at a competitive disadvantage with competitors who do not publicly reveal such information. Therefore, the Confidential Submission and any Derivative Materials are subject to, at a minimum, the exemption from mandatory disclosure under Exemption Number 4 of the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA").

The Confidential Submission is competitively sensitive in several respects. Confidential Appendices C and D describe, in detail, the proprietary design and operation of the Exchange's regulatory and risk-management program, including the commercial rationale for the contracts and the categories of market participants identified as having economic interests in the underlying outcomes. They further identify the specific tools, vendors, data flows, and escalation procedures the Exchange uses to detect and deter manipulation and to protect settlement integrity — including its third-party surveillance and anomaly-detection systems, its prohibited-persons screening process, the structure of its immutable audit trail, and its step-by-step settlement methodology and source hierarchy — such that public disclosure would furnish a roadmap to persons seeking to evade detection or exploit settlement timing, directly undermining the market-integrity objectives those controls are designed to serve. The Confidential Submission also describes the Exchange's technology architecture, information-security controls, business-continuity posture, and financial-resource sufficiency, none of which the Exchange, a privately held company, discloses publicly. The public portions of each self-certification — the cover letter, the concise explanation, Appendix A (Contract Terms and Conditions), and Appendix B (Trading Prohibitions) — contain the information necessary for the public to understand and trade the contracts and are being posted concurrently on the Exchange's website; the Confidential Submission, by contrast, is not directed to the trading public and is reasonably segregable from the public portions.

We also request confidential treatment pursuant to 17 C.F.R. § 145.9(d)(1)(iii) on the basis that disclosure of the Confidential Submission or any Derivative Materials would constitute a clearly unwarranted invasion of the Exchange's personal privacy and its employees' personal privacy, including the names and signatures of the individual Exchange personnel who reviewed and executed the Appendix D conclusion statement.

If any person (including any government employee who is not an employee of the CFTC) requests an opportunity to inspect or copy any of the Confidential Submission (or any Derivative Materials) or the CFTC receives any FOIA request or any other court order, subpoena or summons for the Confidential Submission (or any Derivative Materials), we request that we be immediately notified of any such request, be promptly furnished with all written materials pertaining to such request, and be given a reasonable opportunity to respond, as provided by 17 C.F.R. § 145.9(e).

If the CFTC or its Staff tentatively concludes that the Confidential Submission, or any specific materials therein, or any Derivative Materials are not exempt from disclosure pursuant to FOIA or applicable CFTC regulations, we request, pursuant to 17 C.F.R. § 145.9(f), an opportunity to be heard on these claims of exemption and that we be given at least ten business days' notice prior to any intended release so that we may pursue any available remedies under 17 C.F.R. § 145.9(g), including the appeal and stay procedures provided therein, if deemed appropriate. Pursuant to 17 C.F.R. § 145.9(d)(2), a copy of this letter is being provided to the relevant members of Staff at the CFTC who received the Confidential Submission. Additionally, we request that a copy of this letter accompany the Confidential Submission and related materials at all times.

In accordance with 17 C.F.R. § 145.9(d)(5), we request that the Confidential Submission and any Derivative Materials be afforded confidential treatment in perpetuity. Thank you for your anticipated cooperation. If you have any questions or require further information, please contact the undersigned at the address and email below.

Sincerely,

/s/ Gabe Wong

Gabe Wong
Chief Regulatory Officer, ProphetX LLC
4 World Trade Center, 150 Greenwich Street, 29th Floor
New York, NY 10007
gabe.wong@prophetexchange.com

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APPENDIX

Confidential Treatment — EuroLeague Basketball Event Contracts

ProphetX requests confidential treatment of the following materials submitted with the two Regulation 40.2(a) self-certification described in the above letter, including but not limited to:

1. "Will Real Madrid win its EuroLeague Basketball game versus Dubai Basketball on September 24, 2026?" Contracts — Self-Certification

- Confidential Appendix C — Core Principle Compliance Analysis
- Confidential Appendix D — Demonstration of Compliance with Appendix C to Part 38
- Any Derivative Materials and other materials and correspondence related to the foregoing, as described in the above letter.

2. "Will Real Madrid win by more than 1.5 points in its EuroLeague Basketball game versus Dubai Basketball on September 24, 2026?" Contracts — Self-Certification

- Confidential Appendix C — Core Principle Compliance Analysis
- Confidential Appendix D — Demonstration of Compliance with Appendix C to Part 38
- Any Derivative Materials and other materials and correspondence related to the foregoing, as described in the above letter.

3. "Will the total points scored in the EuroLeague Basketball game between Dubai Basketball and Real Madrid on September 24, 2026 be over 172.5?" Contracts — Self-Certification

- Confidential Appendix C — Core Principle Compliance Analysis
- Confidential Appendix D — Demonstration of Compliance with Appendix C to Part 38
- Any Derivative Materials and other materials and correspondence related to the foregoing, as described in the above letter.