COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A)	**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name (b)(3):7	**2. First Name** (b)(3):7		**3. M.I.**
4. Street Address (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			**5. Apartment/Unit#**
6. City (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**7. State/Province** (b)(3):7	**8. ZIP/Postal Code** (b)(3):7	**9. Country** USA
10. Telephone (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** Email
14. Occupation (b)(3):7 U.S.C.			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type** Kalshi Klear LLC is an American financial exchange and prediction market based in Lower Manhattan, New York City, offering contracts.

3. Name Kalshi Klear LLC			
4. Street Address 594 Broadway			**5. Apartment/Unit#**
6. City New York	**7. State/Province** New York	**8. ZIP/Postal Code** 10012	**9. Country** USA
10. Telephone	**11. E-mail Address** support@kalshi.com		**12. Internet Address** HTTPS://help.kalshi.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Unknown

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Email

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	**2. Is the conduct on-going?**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

☑ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**

☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**

☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**

☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**

☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**

☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**

☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**

☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**

☐ **A cash (or physical) contract traded in interstate commerce.**

☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?
Bitcoin predictions

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3):7 U.S.C. is the total money Kalshi deceptively and fraudulently misled me to transfer my money from my bank account. Their live graphs are misleading.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☑ YES ☐ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Kalshi is a scam in the Bitcoin betting market. Their live feed Bitcoin graphs are not accurate and misleading. Kalshi manipulates the market and shows false, misleading data to users, leading to many losses to players. Kalshi defrauded hundreds of dollars betting in the Bitcoin markets from me. On (b)(3):7 U.S.C. Kalshi scammed me twice. The first scam was the (b)(3):7 U.S.C. price of bitcoin. I bet YES between $101,400 - $101,599.99. The live feed graph shows $101,435.38. However, Kalshi said the outcome was $101,380.59. Kalshi said I
lost this bet. I could have won (b)(3): should the Bitcoin price is based on the live feed graph. Another example is my bet YES between $102,200 - $102,399.99 for the Bitcoin price for (b)(3):7 U.S.C. The live feed graph shows the

outcome as $102,238.39. However, Kalshi said the outcome of the Bitcoin price was $102,181.19 and declared my loss. I could have won (b)(3):7 on this bet. The live feed graph is misleading and shows false, inaccurate numbers in real-time to users. Many players, including me, relied on the live feed graph to make predictions on Bitcoin. Kalshi needs to pay me (b)(3):7 based on your graph results. Kalshi is manipulating the market and committing fraud. The Kalshi support team acknowledged that the Kalshi graphs are not a valid source of true expiration values. This clearly admits deception and fraud.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

I have screenshots of the Bitcoin trades with their outcomes declared by Kalshi totally different than their graphs showing the prices of the Bitcoin prices. Kalshi has intent and is willfully deceiving and defrauding players. No where in the betting market did Kalshi make a disclaimer about the graphs. Nor did they acknowledge that the graphs are not to be trusted. This is purely an attempt to decisive the users.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

☐ YES ☑ NO

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

☐ YES ☑ NO

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

☐ YES ☑ NO

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

☐ YES ☐ NO

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

☑ YES ☐ NO

If "Yes," please provide details.

On (b)(3):7 U.S.C. I called my bank about Kalshi defrauding me, and they told me to close the bank account next Monday. I filed a fraud report at (b)(3):7 U.S.C. with report (b)(3):7 U.S.C. , filed a fraud report at (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) reported fraud at (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) received a knowledge from Kalshi support called (b)(3):7 that their graphs are false and not to be trusted, filed a complaint report to (b)(3):7 U.S.C. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board;

the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76

FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.

- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.

- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;

- complete address, including city, state and zip code;

- telephone number and, if available, an alternate number where you can be reached;

- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).

- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7	

4. Street Address	5. Apartment/Unit#
(b)(3):7 U.S.C. §26(h)(2)(A)	

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	United States

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C.		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	email

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	5. State/Province	6. ZIP/Postal Code	7. Country
8. Telephone	9. Fax	10. E-mail Address	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	

3. Name
Kalshi Inc.

4. Street Address			5. Apartment/Unit#
594 Broadway			#407
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
New York	NY	10012	United States
10. Telephone	**11. E-mail Address**		**12. Internet Address**
332-205-9910	support@kalshi.com		kalshi.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 2

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	

3. Name
KalshiEx LLC

4. Street Address			5. Apartment/Unit#
594 Broadway			#407
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
New York	NY	10012	United States
10. Telephone	**11. E-mail Address**		**12. Internet Address**
332-205-9910	support@kalshi.com		kalshi.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 3

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	

3. Name
Kalshi Trading LLC

4. Street Address			5. Apartment/Unit#
594 Broadway			#407
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
New York	NY	10012	United States
10. Telephone	**11. E-mail Address**		**12. Internet Address**
332-205-9910	support@kalshi.com		kalshi.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?

No
If yes, describe how you are, or were, associated with the individual or firm you are complaining about
15. What was the initial form of contact between you and the person against whom you are filing this complaint? Internet Advertisement
If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	**2. Is the conduct on-going?**
(b)(3):7 U.S.C. §26(h)(2)(A)	Yes

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☑ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.
Complaint stems from Kalshi wrongly adjudicating one of its Event Contracts, and describes more related wrongful conduct.

4. Select the type of product/instrument:

- ☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☑ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

- ☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or**

financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?
swaps in excluded commodities

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3):7 U.S.C. §26(h)(2)(A)

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Please see attached Complaint, with Exhibits A through D. This Complaint is about Kalshi failing to follow its own rules. Paragraphs 1 through 24 of the attached Complaint provide relevant background information. Paragraphs 25 through 122 detail Kalshi's mishandling of a market that was supposed to pay out if (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) Paragraphs 123 through 134 describe the potential conflict-of-interest that arises from certain activities of Kalshi, and how Kalshi failed to disclose this conflict-of-interest to Complainant or any of its customers. Paragraphs 135 through 157 describe Kalshi's wrongful manipulation of its Event Contracts, and explain Complainant's beliefs that (i) such manipulation may revoke the classification of some or all of Kalshi's Event Contracts as "excluded commodities," and (ii) that such manipulation is plainly against Kalshi's own Rulebook. Complainant believes the facts stated in the attached Complaint may constitute Kalshi's violations of applicable law including violations of 7 U.S.C. §§ 7(d)(2), 7(d)(7), 7(d)(12), 9(2); and 17 C.F.R. §§ 38.150, 38.400, 38.401(b), 38.650, 38.651.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
Complainant has additional screenshots and emails supporting his factual assertions that were not included in the Complaint so as to keep the Complaint as brief as possible. Any other supporting materials not in Complainant's possession would be in the records of Kalshi.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information

with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.
All information was obtained either via email interactions with Kalshi's employees, searches of public records and court cases on the (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) website and on Westlaw, accessing the National Weather Service's website, or documents and information found on and downloaded from Kalshi's website (and the CFTC's website).

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.
Kalshi is aware that Complainant is upset about its mishandling of the (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) Market, so much of the information contained in the Complaint that is related to th (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) Market would reasonably identify Complainant. In particular, the contents of the emails Kalshi sent to Complainant regarding its "clarification" of the (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) Market would unmistakably reveal Complainant's identity to Kalshi, as would any of the evidence
that Complainant submitted to Kalshi to try to persuade them to correctly resolve the (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) Market.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Have you or your attorney provided the information to any other agency or organization, or has any other (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **quested the information or related information from you?**

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.
Please see attached Complaint.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an

investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 [redacted]

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

KalshiEX LLC
Rulebook

Date: August 8, 2024

Version: 1.13

CHAPTER 1 DEFINITIONS

When used in this Rulebook the following terms shall have the respective meanings as follows:

"Affiliate" means, with respect to any Person, any Person who, directly or indirectly, Controls, is Controlled by, or is under common Control with, such other Person.

"Appeal Committee" means a committee of the Board to consider appeals under Chapter 9 .

"Applicable Law" means, with respect to any Person, any statute, law, regulation, rule or ordinance of any governmental or self-regulatory authority applicable to such Person, including the CEA and CFTC Regulations, and state regulations where applicable.

"Authorized Trader" means a natural person who is either employed by or is an agent of a Member and who is authorized by the Exchange as an Authorized User in accordance with Chapter 3."Board" means the Board of Directors of Kalshi, which manages the Company and is constituted from time to time in accordance with the Operating Agreement.

"CFTC" or "Commission" means the U.S. Commodity Futures Trading Commission or any successor regulatory body.

"CFTC Regulations" means the rules and regulations promulgated by the CFTC, as amended.

"Clearing House" means any clearing house registered with the CFTC as a Derivatives Clearing Organization ("DCO") that the Exchange designates to provide clearing services with respect to any or all Contracts. To the extent that the Exchange designates multiple DCOs to provide clearing services at any given time, the term Clearing House shall refer to any DCO designated to provide such services with respect to the Contract in question.

"Commodity Exchange Act" or "CEA" means the Commodity Exchange Act, as amended from time to time.

"Contract" means any contract, agreement, or transaction approved for trading on Kalshi pursuant to these Rules.

"Contract Market" has the meaning set forth in CFTC Regulation § 1.3(h).

"Contract Specifications" means, with respect to any Contract, the rules or other trading protocols containing specifications for such Contract, as adopted, amended, supplemented or otherwise modified from time to time by the Company.

"Derivatives Clearing Organization" has the meaning set forth in Section 1a(15) of the CEA.

"Director" means any member of the Board.

"Disciplinary Panel" means the panel appointed by the Board at the recommendation of the Chief Compliance Officer to act in an adjudicative role and fulfill various adjudicative responsibilities and duties described in Chapter 9.

"Emergency" means the occurrences or circumstances which, in the opinion of the Board, require immediate action, and which threaten, or may threaten, the fair and orderly trading in, or the settlement or integrity of, any Contract, including, without limitation, the following:

(1) any activity that manipulates or attempts to manipulate a Contract on Kalshi
(2) any circumstance that may materially affect the performance of a Contract, including failure to clear and any failure of the payment systems;
(3) any action taken by any domestic or foreign regulatory, self-regulatory, judicial, arbitral, or governmental (whether national, state or municipal) or quasi-governmental authority, or any agency, department, instrumentality, or sub-division thereof; or other Person exercising, or entitled to exercise any administrative, executive, judicial, legislative, police, regulatory or taxing authority or power; or any other Contract Market, Derivatives Clearing Organization, board of trade, or other exchange or trade association (foreign or domestic) that may have a direct impact on trading on Kalshi or the settlement legality or enforceability of any Contract;
(4) any actual, attempted or threatened corner, squeeze, congestion, manipulative activity or undue concentration of positions in a Contract;
(5) any circumstance that may have a severe, adverse effect upon the functions and facilities of Kalshi, including, but not limited to, acts of God, fire, flood or other natural disasters, bomb threats, acts of terrorism or war, severely inclement weather, or failure or malfunction of all or a portion of the Kalshi Platform, or other system breakdowns or interruptions such as power, computer, communication or transportation systems or the Internet;
(6) the bankruptcy or insolvency of any Derivatives Clearing Organization or the imposition of any injunction or other restraint by any government agency, clearing house, court or arbitrator upon a Derivatives Clearing Organization which may affect the ability of a Derivatives Clearing Organization to trade in or perform on a Contract;
(7) any circumstance in which it appears to the Board that a Derivatives Clearing Organization or any other Person:
    (i) has failed to perform on a Contract;
    (ii) is insolvent; or
    (iii) is in a financial or operational condition or is conducting business such that the Derivatives Clearing Organization or Person cannot be permitted to continue in business without

jeopardizing the safety of Customer funds, Members, Kalshi or the Derivatives Clearing Organization;

(8) any circumstance which may have a material impact on the reliability or transparency of the Underlying related to a Contract; or

(9) any other unusual, unforeseeable or adverse circumstance as determined by the Company.

"Expiration" means the time on the Expiration Date established pursuant to these Rules at which a Contract expires and the Expiration Value of that Contract is determined.

"Expiration Date" means the date established by these Rules on which the Expiration Value of each Contract is determined.

"Expiration Value" means the rate, level, amount, measure, or other value of the Underlying at Expiration.

"Government Agency" means any governmental entity (including the United States, a State, or a foreign government).

"Kalshi" or "Company" means KalshiEX LLC, or any successor thereto.

"Market Maker" means a Member that is designated as a Market Maker and granted certain privileges in exchange for maintaining certain requirements as set forth in Chapter 4 of these Rules.

"Market Outcome" means the result of the Contract. If the Expiration Value is encompassed within the Payout Criterion, then the "Market Outcome" is YES. Otherwise, the "Market Outcome" is NO.

"Material Relationship" has the meaning attributed to such term in Rule 2.2(g).

"Member" means any Person who is authorized to access or utilize Kalshi and is bound by these Rules as they may be amended from time to time.

"Member Account" means an account carried by Clearing House on behalf of a Member.

"Officer" has the meaning attributed to such term in Rule 2.3.

"Order" means either a bid or an offer for a Contract.

"Outcome Review Committee" means a committee of the Board to determine Market Outcomes in accordance with Chapter 7.

"Oversight Panel" means any panel, or any subcommittee thereof, authorized by Kalshi to recommend or establish policies or procedures with respect to Kalshi's surveillance, compliance, rule enforcement, or disciplinary responsibilities.

"Payout Criterion" of a Contract means the Expiration Value or set of Expiration Values that will cause that Contract to pay a Settlement Value to the holder of a long position in such Contract. The holder of a position in a Contract that receives a Settlement Value is considered to be "in-the-money" while the holder of a position in a Contract that does not receive a Settlement Value is considered to be "out-of-the-money".

"Person" means a natural person or entity.

"Platform" means the Kalshi electronic trade execution system that is used for trading Contracts, including any licensed software that is a part thereof from time to time, and any successor electronic trading system thereto.

"Position Accountability Levels" means the level of loss that can be incurred as a result of a position in a Contract that is held or controlled by a Market Maker above which Kalshi may impose restrictions or obligations on the Market Maker as set forth in Rule 4.5.

"Position Limit" means the maximum loss that can be incurred as a result of a position in a Contract that is allowed to be held or controlled by one Member as prescribed by Kalshi and/or the Commission.

"Public Director" means an individual with the qualifications set forth in Rule 2.2(g).

"Regulatory Agency" means any governmental or self-regulatory authority applicable to Kalshi, including the CFTC and applicable foreign regulators.

"Regulatory Oversight Committee" means the committee of the Board constituted in accordance with Rule 2.6.

"Rulebook" or "Rules" means the Kalshi Rulebook, interpretations, orders, resolutions, advisories, notices, statements of policy, decisions, manuals, and directives of the Company or Clearing House.

"Self-Regulatory Organization" shall, unless otherwise provided, have the meaning set forth in CFTC Regulation § 1.3(ee) and, in addition, shall include a Contract Market, Derivatives Clearing Organization, and registered futures association.

"Settlement" means payment to Members who have the right to receive money pursuant to a Contract, held until Expiration.

"Settlement Date" means the date on which Settlement occurs.

"Settlement Value" means the amount which the holder of a Contract may receive for a Contract held until Expiration.

"Source Agency" means the agency that publishes the Underlying and/or Expiration Value for any Contract.

"Trade" or "Transaction" means any purchase or sale of any Contract on Kalshi, either directly or indirectly.

"Underlying" means the index, rate, risk, measure, instrument, differential, indicator, value, contingency, occurrence, or extent of an occurrence the Expiration Value of which determines whether a Contract is in-the-money.

CHAPTER 2 MARKET GOVERNANCE

RULE 2.1 OWNERSHIP

KalshiEX LLC ("Kalshi" or the "Company") is a Delaware limited liability company. The management and operation of Kalshi is governed by the Operating Agreement and the Rules. Member status does not confer any equity interest or voting rights in the Company.

RULE 2.2 BOARD OF DIRECTORS

The Board has the power to manage and direct Kalshi including but not limited to the power to define the standards for membership in Kalshi and the power to amend, adopt, or repeal these Rules, and the power to oversee the business conduct of Members and impose penalties for violation of these Rules.

(a) The Board shall manage the day to day business operations of the Company. The Board has the power and authority to call for review, and to affirm, modify, suspend or overrule, any and all decisions and actions of standing committees or special committees of the Board or any panel of the Officers related to the day to day business operations of the Company.

(b) The chief executive officer of Kalshi shall serve as chairman of the Board.

(c) Any authority or discretion by the Rules vested in any Officer or delegated to any committee or subcommittee shall not be construed to deprive the Board of such authority or discretion and, in the event of a conflict, the determination of the matter by the Board shall prevail. This does not apply to the Outcome Review Committee.

(d) A majority of the Directors serving on the Board, including at least one Public Director, shall constitute a quorum for the transaction of business of the Board. At all times when the Board is conducting business at a meeting of the Board, a quorum of the Board must be present at such meeting, and the Board may act only by the decision of a majority of the Directors constituting a quorum of the Board by vote at a meeting, by unanimous written consent without a meeting, or as otherwise set forth in the Operating Agreement.

(e) The Board shall comprise the number of Directors set forth in the Operating Agreement and shall include Public Directors as no less than 35% of the Board, at all times. Each Director (including Public Directors) shall be appointed in accordance with the Operating Agreement and shall serve until his or her successor is duly appointed, or until his or her earlier resignation or removal, with or without cause.

(f) Each Director is entitled to indemnification pursuant to the Operating Agreement with respect to matters relating to the Company.

(g) To qualify as a Public Director, an individual must be found, by the Board and on the record, to have no Material Relationship, as defined below, with the Company. The Board must make such a finding at the time the Public Director is elected and as often as necessary in light of all circumstances relevant to such Public Director, but in no case less than annually. A Material Relationship is one that reasonably could affect the independent judgment or decision-making of the Director. The Board need not consider previous service as a Director of the Company to constitute a Material Relationship. A Director shall be considered to have a Material Relationship with the Company if any of the following circumstances exist or have existed within the past year:

    (1) Such Director is or was an Officer or an employee of the Company, or an officer or an employee of an Affiliate of the Company;
    (2) Such Director is or was a Member, or an officer or director of a Member; or
    (3) Such Director, or a firm with which the Director is an officer, director, or partner, receives more than $100,000 in combined annual payments from Kalshi, or any Affiliate thereof, for legal, accounting, or consulting services.

(h) If any immediate family of a Director are found to have a Material Relationship, then such Material Relationship will be determined to apply to the Director.

(i) The Board shall have procedures, as may be adopted by the Board from time to time, to remove a Director where the conduct of such Director is likely to be prejudicial to the sound and prudent management of the Company.

(j) The Board shall review its performance and that of its individual directors annually.

RULE 2.3 OFFICERS

(a) The Board shall appoint a Chief Executive Officer, Chief Operating Officer, Chief Compliance Officer, and other such officers of Kalshi as it may deem necessary or appropriate from time to time (collectively, the "Officers").

(b) Any Officer may also be a director, officer, partner or employee of the Company or of any of its Affiliates, subject to disclosure and resolution of conflicts of interest.

(c) The Officers shall have such powers and duties in the management of the Company as the Board may prescribe from time to time, subject to any limitations set forth in the Operating Agreement.

(d) Each Officer is entitled to indemnification pursuant to the Operating Agreement with respect to matters relating to the Company.

RULE 2.4 RESTRICTIONS ON WHO MAY BE MEMBERS OF THE BOARD, MEMBERS OF COMMITTEES , OR TEN PERCENT OR GREATER OWNERS

(a) An individual may not serve as a Director or Officer, serve on a committee or subcommittee established by the Board, including the Disciplinary Panel, or hold a 10% or greater ownership interest in the Company, if the individual:

(1) Within the prior three years has been found, by a final decision of a court of competent jurisdiction, an administrative law judge, the CFTC, or any Self-Regulatory Organization, to have committed a disciplinary offense;
(2) Within the prior three years has entered into a settlement agreement in which any of the findings or, in the absence of such findings, any of the acts charged included a disciplinary offense;
(3) Is currently suspended from trading on a Designated Contract Market or a Swap Execution Facility, is suspended or expelled from membership in a Self-Regulatory Organization, is serving any sentence of probation, or owes any portion of a fine or penalty imposed pursuant to either: a finding by final decision of a court of competent jurisdiction, an administrative law judge, the CFTC or any Self-Regulatory Organization that such person committed a disciplinary offense; or a settlement agreement in which any of the findings or, in the absence of such findings, any of the acts charged included a disciplinary offense;

(4) Is currently subject to an agreement with the CFTC or Self-Regulatory Organization not to apply for registration with the CFTC or for membership in the Self-Regulatory Organization;
(5) Is currently, or within the past three years has been, subject to a revocation or suspension of registration by the CFTC, or has been convicted within the past three years of any of the felonies listed in Section 8a(2)(D)(ii) through (iv) of the CEA;
(6) Is currently subject to a denial, suspension or disqualification from serving on a disciplinary panel, arbitration panel or governing board of any self-regulatory organization as that term is defined in Section 3(a)(26) of the Securities Exchange Act of 1934; or
(7) Is subject to a statutory disqualification pursuant to Section 8a(2) of the CEA.

For purposes of this Rule 2.4(a), the terms "disciplinary offense," "final decision" and "settlement agreement" have the meaning given those terms in CFTC Regulation 1.63(a).

(b) Any Director, Officer, member of a committee established by the Board and any individual nominated to serve in any such role, shall immediately notify the Chief Executive Officer if such individual is subject to one or more of the criteria in Rule 2.4(a). Prior to nomination to the Board, each individual shall certify that he or she is not disqualified pursuant to Rule 2.4(a). Upon appointment, each Director, Officer, and a member of a committee shall provide to the Company, where applicable, changes in registration information within 30 days and certification of compliance accordingly. The Company shall verify information supporting Board compliance with eligibility criteria.

(c) To serve as a Director, an individual must possess the ability to contribute to the effective oversight and management of the Company, taking into account the needs of the Company and such factors as the individual's experience, perspective, skills and knowledge of the industry in which the Company operates.

(d) A Director or Officer must meet any qualifications set forth from time to time in the Operating Agreement and these Rules.

(e) An individual may not serve on any Disciplinary Panel, arbitration panel, or the Appeals Committee during any proceeding affecting or concerning such individual, to be determined in a reasonable manner by the Company.

(f) If the Company determines that an individual subject to this Rule 2.4 no longer meets the criteria set forth in Rule 2.4(a), the Company shall inform the CFTC of such determination. The Company shall provide to the CFTC, upon request, an individual's certification of compliance with the criteria set forth in Rule 2.4(a).

RULE 2.5 COMMITTEES AND SUBCOMMITTEES

(a) The Board may create, appoint Directors to serve on, and delegate powers to, committees and subcommittees. There shall be a Regulatory Oversight Committee, Disciplinary Panel, Outcome Review Committee, and Appeals Committee. The Board shall designate the chairperson of each such committee.

(b) Each committee and subcommittee shall assist in the supervision, management and control of the affairs of the Company within its particular area of responsibility, subject to the authority of the Board.

(c) Subject to the authority of the Board, each committee and subcommittee shall determine the manner and form in which its proceedings shall be conducted. A majority of the members serving on a committee or subcommittee, including at least one Public Director, shall constitute a quorum for the transaction of business of a committee or subcommittee. Each committee and subcommittee may act only by the decision of a quorum, by vote at a meeting or by unanimous written consent without a meeting.

RULE 2.6 REGULATORY OVERSIGHT COMMITTEE

(a) The Regulatory Oversight Committee shall be a standing committee of the Board consisting of only Public Directors, as appointed from time to time. No less than two Public Directors shall serve on the Regulatory Oversight Committee.

(b) Each member of the Regulatory Oversight Committee shall serve for a term of one calendar year from the date of his or her appointment or for the remainder of his or her term as a Public Director, and until the due appointment of his or her successor, or until his or her earlier resignation or removal, with or without cause, as a member of the Regulatory Oversight Committee or as a Public Director. A member of the Regulatory Oversight Committee may serve multiple terms.

(c) The Regulatory Oversight Committee shall oversee the Company's regulatory program on behalf of the Board. The Board shall delegate sufficient authority, dedicate sufficient resources, and allow sufficient time for the Regulatory Oversight Committee to fulfill its mandate. The Regulatory Oversight Committee shall make such recommendations to the Board that will, in its judgment, best promote the interests of the Company. The Regulatory Oversight Committee shall also have such other powers and perform such other duties as set forth in the Rules and as the Board may delegate to it from time to time.

(d) The Regulatory Oversight Committee shall appoint individuals to the Disciplinary Panel in accordance with these Rules, Applicable Law and the composition requirements of the Disciplinary Panel. The Committee shall appoint at least one person who would not be disqualified from serving as a Public Director.

(e) The Regulatory Oversight Committee shall prepare an annual report that assesses the Company's self-regulatory program for the Board and the CFTC. The annual report sets forth the regulatory program's expenses, describes its staffing and structure, catalogues disciplinary actions taken during the year, and reviews the performance of the Disciplinary Panel, as provided in Exhibit B to Part 38 of the CFTC Regulations

(f) Without limiting the generality of the foregoing, the Regulatory Oversight Committee shall have the authority to:

(1) Monitor the regulatory program of the Company for sufficiency, effectiveness, and independence;
(2) Oversee all facets of the regulatory program, including trade practice and market surveillance; audits, examinations, and other regulatory responsibilities with respect to Members (including ensuring compliance with financial integrity, financial reporting, sales practice, recordkeeping, and other requirements); and the conduct of investigations;
(3) Review the size and allocation of the regulatory budget and resources; and the number, hiring, termination, and compensation of regulatory personnel;
(4) Supervise the Chief Compliance Officer of the Company, who will report directly to the Regulatory Oversight Committee;
(5) Recommend changes that would ensure fair, vigorous, and effective regulation; and
(6) Review all regulatory proposals prior to implementation and advise the Board as to whether and how such changes may impact regulation.

RULE 2.7 DISCIPLINARY PANEL, APPEALS COMMITTEE, AND OUTCOME REVIEW COMMITTEE

(a) The Disciplinary Panel shall be:

(1) A standing committee consisting of at least three members, including at least one person who would not be disqualified from serving as a Public Director. No member of the Disciplinary Panel shall also be a member of the Company's compliance staff or any person involved in adjudicating any other stage of the same proceeding. The Board may establish more than one Disciplinary Panel. The Regulatory Oversight Committee will appoint individuals for membership on the Disciplinary Panel. Each Disciplinary Panel shall include members with sufficient differing experience and Member interests so as to ensure fairness and to prevent special treatment or preference for any Person.
(2) Responsible for conducting hearings, rendering decisions, and imposing sanctions with respect to any Disciplinary Action. The Disciplinary Panel shall also have such other powers and perform such other duties as set forth in the Rules and as the Board may determine from time to time.

(b) Each member of the Disciplinary Panel shall serve for a term of one calendar year from the date of his or her appointment, and until the due appointment of his or her successor, or until his or her earlier resignation or removal, with or without cause, as a member of the Disciplinary Panel. A member of the Disciplinary Panel may serve for multiple terms.

(c) The Appeals Committee shall be:

(1) A standing committee consisting of at least three members of the Board. The members of the Appeals Committee and its Chairperson shall be appointed by the Chairperson of the Board, provided that, at all times the Appeals Committee shall include at least one Public Director.
(2) Responsible for conducting hearings of appeals of decisions of the Disciplinary Panel, rendering decisions of such appeals, and imposing sanctions with respect to such appeals. The Appeals Committee shall also have such other powers and perform such other duties as set forth in these Rules and as the Board may determine from time to time.

(d) Each member of the Appeals Committee shall serve for a term of one calendar year from the date of his or her appointment or, if shorter, for the remainder of his or her term as a Public Director, as applicable, until the due appointment of his or her successor, or until his or her earlier resignation or removal, with or without cause, as a member of the Appeals Committee or as a Public Director. A member of the Appeals Committee may serve multiple terms.

(e) The Outcome Review Committee shall be:
a. A standing committee consisting of three members who are appointed by the Regulatory Oversight Committee. At least two of the members must be Public Directors. Members of the Regulatory Oversight Committee may also concurrently serve on the Outcome Review Committee.
b. Responsible for determining Market Outcomes as provided in Rule 7.1.

(f) Each member of the Outcome Review Committee shall serve for a term of one calendar year from the date of his or her appointment or, if shorter, for the remainder of his or her term as a Public Director, as applicable, until the due appointment of his or her successor, or until his or her earlier resignation or removal, with or without cause, as a member of the Outcome Review Committee or as a Public Director. A member of the Outcome Review Committee may serve multiple terms.

RULE 2.8 EMERGENCY RULES

(a) Kalshi may adopt emergency Rules in response to the emergencies that are described in paragraph (c) of this Rule. In the event of one of those emergencies, the Board or at least two members of the management team may, without giving prior notice to, or securing prior approval from the Commission, adopt a temporary emergency rule to address the emergency. Adoption of a temporary emergency rule requires the CEO's approval. Adoption of a temporary emergency rule by the management team requires the written authorization and acknowledgement of two members of the management team, indicating the emergency action to be taken and the reasons for that action, before the action is taken.

(b) Any temporary emergency rule adopted under this Rule may authorize Kalshi to act as the Board or management team deems necessary or appropriate to meet the emergency, and those actions may adversely affect the ability to trade on the Platform. Therefore, the chance of an emergency is one of the risks that Members should consider when deciding whether to trade on the Platform.

(c) For the purposes of this Rule, an "emergency" is

(1) Any activity that manipulates or attempts to manipulate a Contract on the Platform;
(2) Any circumstance that may materially affect the performance of the Contracts traded on Kalshi;
(3) Any action taken by the United States, any foreign government, any state or local governmental body, any other contract market or board of trade, or any other exchange, market, facility, or trade association (foreign or domestic) that may have a direct impact on trading on Kalshi;
(4) Any circumstances that may have a severe, adverse impact upon the physical functions of Kalshi including, for example, natural disasters such as fire or flood, terrorist acts such as bomb threats, physical plant breakdowns such as plumbing, heating, or air conditioning problems, system breakdowns such as power, telephony, cable, trading systems, or computer systems failures or interruptions to communications, the network, or the Internet;
(5) The imposition of any injunction or other restraint by any government agency, court, or arbitrator that may affect the ability of a Member to perform on Contracts;
(6) Any circumstance in which it appears that a Kalshi Member or any other person is in such operational condition, or is conducting business in such a manner, that such person cannot be permitted to continue in business without jeopardizing the safety of Kalshi Members or Kalshi itself; and
(7) Any other unusual, unforeseeable, and adverse circumstance which, in the opinion of the governing board, requires immediate action and threatens or may threaten such things as the fair and orderly trading in, or the liquidation of or delivery pursuant to Contracts traded on Kalshi.

(d) If deemed necessary to combat perceived market threats caused by an emergency, a Kalshi official authorized to do so may suspend trading on the Platform during the duration of the emergency or take any other action that the official thinks is necessary or appropriate. The official will order an end to the action taken in response to the emergency as soon as the official determines that the emergency has sufficiently abated to permit the Platform to function properly. Reasonable actions resulting under this Rule include but are not limited to:

(1) Modification to limits on positions;

(2) Reduction of positions and exposure by participating Members to certain Contracts;
(3) Cancellation of a Contract and the return of any funds paid to enter Trades on the Contract;
(4) Extension/shortening of expiration and/or closing date;
(5) Suspension and curtailing of trading; and
(6) Changing a Contract's terms and conditions and/or specifications.

(e) Kalshi will make every effort practicable to notify the Director of the Division of Market Oversight, his delegates, and/or other persons designated by the Commission's Regulations that Kalshi intends to implement, modify, or terminate a temporary emergency rule pursuant to Rule 2.4(a) or an action in response to an emergency pursuant to Rule 2.4(d) prior to the implementation, modification, or termination of the rule or action. If it is not possible to notify the Commission prior to the implementation, modification, or termination of the rule or action, Kalshi will notify the Commission of the implementation, modification, or termination of the rule or action at the earliest possible time, and in no event more than 24 hours after implementation, modification, or termination.

(f) Any time that Kalshi takes action in response to an emergency, either under Rule 2.4(a) or Rule 2.4(d), Kalshi shall publish a notice of such action on its website, notify Members through the API, and notify Members via email. Kalshi will likewise document its decision-making process and reasons for taking emergency action.

RULE 2.9 VOTING BY INTERESTED BOARD MEMBERS

Core Principle 16 of Section 5(d) of the Commodity Exchange Act ("CEA") requires that contract markets have adequate procedures to prevent conflicts of interest. In this regard, Kalshi has adopted provisions of Commission Regulation 1.69 as Rules provided herein. Commission Regulation 1.69 prohibits a member of the Board or any disciplinary or oversight committee or subcommittee from taking part in any deliberations or voting on any matter in which the board, committee, or subcommittee member has an interest or has a relationship with a named party in interest. Regulation 1.69 also requires disclosure by Board, committee, or subcommittee members of interests and relationships in certain circumstances. Consequently, Board, committee, and subcommittee members shall not deliberate or vote on any matter in which the Board, committee, or subcommittee member has an interest or has a relationship with a named party in interest and shall disclose such interests in accordance with Regulation 1.69.

RULE 2.10 INDEMNIFICATION OF DIRECTORS, OFFICERS, AND OTHERS

(a) Kalshi will indemnify, to the full extent authorized by law, any person who was or is a party or is threatened to be made a party to any threatened, pending, or completed action, suit, or proceeding, whether civil, criminal, administrative, or investigative in nature, by reason of the fact that such person is or was a director, officer, employee, or agent of Kalshi or is or was serving at the request of

Kalshi as a director, officer, employee, or agent of Kalshi against expenses, including attorneys' fees, judgments, fines, and amounts paid in connection with such action, suit, or proceeding.

(b) Indemnification shall not be deemed exclusive of any other rights to which a person may be entitled under any agreement or as a matter of law or otherwise.

(c) Kalshi may purchase and maintain insurance on behalf of any person who is or was a director, officer, employee, or agent of Kalshi against any liability asserted against such person and incurred by such person in any such capacity, or arising out of such person's status as such, whether or not Kalshi would have the power to indemnify such person against such liability under the provisions of this Rule.

(d) Notwithstanding the above, no person shall be indemnified from liability for fraud, bad faith, willful misconduct, or gross negligence. Further, no person shall be indemnified against a civil penalty imposed by the Commission under Section 6b of the CEA.

RULE 2.11 PROHIBITION ON USE OF MATERIAL, NON-PUBLIC INFORMATION

(a) Commission Regulation 1.59 prohibits employees and members of the Board from using or disclosing material, nonpublic information gained through their employment or board service in certain circumstances. This Rule prohibits the use and disclosure forbidden by Commission Regulation 1.59. In this regard, Kalshi has adopted provisions of Regulation 1.59 as a Rule of Kalshi in Chapter 11 of these Rules.

(b) No member of the Board or any committee established by the Board or these Rules will use or disclose material, nonpublic information obtained as a result of participation on the Board or such committee for any purpose other than the performance of official duties as a board or committee member.

(c) No employee, consultant, or member of the Board or any committee of Kalshi will disclose to any other person material, nonpublic information obtained as a result of such person's employment for purposes inconsistent with such person's official duties.

(d) No employee, consultant, or member of the Board or any committee of Kalshi will trade for such person's account, or for or on behalf of any other account, in any commodity interest on the basis of any material, non-public information obtained through special access related to the performance of such person's duties as an employee, consultant, or member of the Board or committee.

(e) No Member who inadvertently or otherwise comes into possession of any material, non-public information held by Kalshi or any employee, consultant, or member of the Board or any committee of

Kalshi gained through their employment by or service to Kalshi will disclose to anyone such material, non-public information or trade for such person's account, or for or on behalf of any other account, in any commodity interest on the basis of such material, nonpublic information.

(f) For purposes of this Rule, the terms "material information," "nonpublic information," "linked exchange", "commodity interest," and "related commodity interest" have the same meanings as they do in Commission Regulation 1.59.

(g) Any director, officer, or employee of Kalshi who violates any provision of this Rule will be required to indemnify Kalshi for any losses, damages, or costs caused by that violation.

RULE 2.12 LIMITATION ON TRADING BY AFFILIATES

The Company, pursuant to approval by the Board, permits an affiliated entity (the "Affiliate") to participate on its Platform, subject to the following provisions:

(a) The Affiliate is a Member of the Platform.

(b) The Company has ensured the Affiliate does not have access to the Company's material non-public information, and the Company ensures the Affiliate's access to information is limited to public information available to all Members. (The provision of information to common directors of the Company, any affiliate or the holding company shall not constitute a violation of this proscription.) The Company ensures the Affiliate maintains operational independence from the Company. Operational independence means that the Affiliate member must:

  a. Have and maintain operations, including servers, databases, accounts, tools, software, and development tooling, separate from the Company;
  b. Have no access to Company operations;
  c. Be subject to all of the rules in this Rulebook, including the rules regarding Membership (see Chapter 3);
  d. Have access to the Platform limited to that set forth in the rules in this Rulebook (see Chapter 5);
  e. Not have access to material non-public information, including but not limited to information regarding order flow, trading, settlement, contracts, and compliance; and
  f. Have and maintain physical separation from the Company.

(c) All capital underlying trading by an affiliate will not originate from sources the Company.

(d) Any algorithms employed by any affiliate(s) must not be readily exploitable (e.g., be not readily subject to manipulation, hacking).

(e) Affiliate entities trading on the Platform as Members may have multiple purposes, and there may be multiple affiliate entities trading as Members on the Platform.

a. The Affiliate participates on the Platform and provides liquidity to the Platform by placing orders on either (or both) sides of a market at competitive price levels. The Affiliate's trading activity includes aggressing and/or passive trading. The Affiliate's business purpose is profitability, and liquidity provision is a significant part of its business model. The Affiliate's capitalization derives from the holding company that owns the Company and Entity, and one or more employees of the Company serve on the board of directors of the Company, the Affiliate, and the holding company that owns both.
b. The Affiliate has no obligation to trade all or even any contracts at any time, and other Kalshi Members should not rely on the potential presence of the Affiliate to make markets or otherwise augment or provide liquidity in any contract.
c. If additional affiliates of the Company commence trading on the Platform, or if the information about the trading activities of the Affiliate changes materially, the Company has put in place necessary controls to ensure that it updates this Rulebook and notifies the marketplace promptly to disclose any affiliate's purpose in trading on the Platform, and provides a summary of the procedures in place to manage and disclose actual or potential conflicts of interest and effects on trading to ensure market integrity and fairness are preserved.

RULE 2.13 CONSENT TO JURISDICTION

Any Person initiating or executing a transaction subject to these Rules, directly or indirectly, and any Person for whose benefit such a transaction has been initiated or executed, expressly consents to the jurisdiction of Kalshi and agrees to be bound by and comply with the Rules of the Company in relation to such transactions, including, but not limited to, Rules requiring cooperation and participation in investigatory and disciplinary processes.

RULE 2.14 RECORDKEEPING

(a) Kalshi shall keep, or cause to be kept, complete and accurate books and records of accounts and activities of the Company, including all books, records and other documentation required to be maintained pursuant to the CEA and CFTC Regulations. This includes, among other things, all trade records and investigatory or disciplinary files, in accordance with the requirements of Commission Regulation 1.31.

(b) Kalshi shall retain all such books and records in accordance with the CEA and CFTC Regulations.

(c) Kalshi will provide information required to be maintained or provided pursuant to the CEA and CFTC Regulations to the Commission, the U.S. Securities and Exchange Commission, the U.S. Department of Justice or any representative of a prudential regulator as authorized by the Commission, upon request, in each case in the form and manner required under these Rules, and/or the CEA and CFTC Regulations. This shall include any records relating to swaps defined in section 1a(47)(A)(v) of the Act open to inspection and examination by the U.S. Securities and Exchange Commission.

RULE 2.15 INFORMATION-SHARING AGREEMENTS

(a) Kalshi may enter into any information-sharing agreements or other arrangements or procedures, including an information-sharing agreement or other arrangement or procedure with any Person or body (including but not limited to a Regulatory Agency) if the Company considers such agreement, arrangement or procedures to be in furtherance of the Company's purpose or duties under these Rules or Applicable Law.

(b) Kalshi may provide information to a duly authorized foreign governmental authority, as directed by the CFTC, in accordance with an information-sharing agreement or other arrangements or procedures executed with such foreign governmental authority or the CFTC.

RULE 2.16 RECORDKEEPING AND REPORTING REQUIREMENTS

(a) In the event the Board rejects a recommendation or supersedes an action of the Regulatory Oversight Committee or the Chief Compliance Officer, Kalshi shall maintain documentation detailing:

   (1) The recommendation or action of the Regulatory Oversight Committee or the Chief Compliance Officer as the case may be;
   (2) The rationale for such recommendation or action;
   (3) The rationale of the Board for rejecting such recommendation or superseding such action; and
   (4) The course of action that the Board decided to take contrary to such recommendation or action.

(b) Kalshi shall record and report to the CFTC all data required to be reported to the CFTC under Part 16 of CFTC Regulations, in the form and manner required by CFTC Regulations.

(c) Kalshi shall keep and maintain books and records identifying each Order submitted to the Company and each Transaction effected pursuant to these Rules, including the identification of the execution method (e.g., central limit order book) with respect to each such Order and Transaction. These books and records shall be kept and maintained in accordance with the CEA and CFTC Regulations.

(d) Kalshi shall submit to the CFTC within thirty days after each Board election a list of the Board's Directors, the Member interests they represent, and how the composition of the Board meets the requirements of CFTC Regulation 1.64(b) and the Company's Rules and procedures.

(e) In accordance with the CFTC Letter No 21-11 ("Letter") issued on April 22, 2021, Kalshi relies upon no-action relief with respect to various swap data reporting requirements under Parts 43 and 45 of the

Commission's regulations for contracts traded on or pursuant to the rules of the Company. Kalshi will comply with all conditions of such relief as set forth in that Letter.

RULE 2.17 PUBLIC INFORMATION

(a) Accurate, complete and current copies of these Rules and Contract Specifications will be published on the Company website.

(b) Kalshi shall make public on a daily basis information on settlement prices, volume, open interest, and opening and closing ranges for actively traded Contracts.

(c) Except as provided herein, Kalshi shall publish on its Website a Member Notice with respect to each addition to, modification of, or clarification of, the Rules, the Matching Engine, and any Company Contract Specification prior to the earlier of:

(1) The effective date thereof; and
(2) The filing of such change with the Commission.

(d) If confidential treatment is sought with respect to any information the Company submits to a Regulatory Agency, only the public version of such filing shall be disclosed.

(e) Any Member Notice shall be deemed to have been made to all Members and any other such Person as may be required by sending such Member Notice to the email address on file with the Company and by posting the Member Notice on the Company website.

CHAPTER 3 MEMBERSHIP

RULE 3.1 MEMBERS - APPLICATIONS, AGREEMENTS, ELIGIBILITY CRITERIA, CLASSIFICATIONS, AND PRIVILEGES

(a) Kalshi will provide access to the Platform (including but not limited to the central limit order book) and related services in an impartial, transparent, fair and non-discriminatory manner.

(b) To be eligible to become a Member, an applicant must:

(1) Be a Person;
(2) Provide Kalshi with any information or documentation Kalshi deems necessary in order to verify the applicant's identity, perform a criminal background check, or otherwise review information provided on an application or by a third-party provider;
(3) Maintain an account, or accounts, in the Member's name with a U.S. Financial Institution that the Member will use to fund its Kalshi account at Clearing House, and to receive funds from its Kalshi account, or, if the Member is a non-United States resident, have an account or accounts in

the Member's name with either a US Financial Institution or a Foreign Bank capable of transacting with Clearing House either directly, through a correspondent account, or other acceptable intermediary that the Member will use to fund its Kalshi account at Clearing House, and to receive funds from its Kalshi account via one of the acceptable methods as stated on the Kalshi website;

(4) Not be subject to any economic or trade sanctions programs administered by OFAC or other relevant U.S. or non-U.S. authority; and must not be listed on OFAC's List of Specially Designated Nationals and Blocked Persons; and

(5) Certify the following:

   a. The applicant is old enough to enter into a legally enforceable contract and has reached the required age as stated on the Member Agreement;

   b. The applicant has read, understands and agrees to comply with the Kalshi Rulebook, Terms of Use, Privacy Policy, and Member Agreement;

   c. The applicant will trade only for itself and will not serve as an intermediary for any other Person.

(c) In order to become a Member, an applicant must complete an online member application (the "Member Application") and provide Kalshi with any other relevant information upon request. Kalshi may return any account balance and terminate any account upon the discovery that the Member Application was completed by anyone other than the Person identified on the Member Application. All funds deposited by Members shall constitute "Member Property" in accordance with CFTC Regulations.

(d) Submission of a Member Application to Kalshi constitutes the applicant's agreement to be bound by these Rules and other policies of Kalshi. Among other things, this also includes the applicant's agreement to become a member of Clearing House, and be bound by Clearing House's Rules in its capacity as a Designated Clearing Organization.

(e) Kalshi may in its sole discretion approve, deny, or condition any Member application as Kalshi deems necessary or appropriate.

(1) In the event that Company staff decides to decline or condition an application for admission as a Member, or to terminate a Person's status as Member, Company staff shall notify such Person thereof in a written notice sent to the address provided by the Person in the Member Application and Agreement or maintained in the Company's registry of Members. The written notice will specify the basis for the Company's decision. Such Person may, within 28 business days, request in writing that the Company reconsider the determination.

(2) Within 28 business days of receiving a request for reconsideration, the Company shall confirm, reverse or modify the denial, condition or terminate the Member status of such Person, and shall promptly notify such Person accordingly in writing. The Company may, in its sole discretion,

schedule a hearing (in person or by teleconference), request additional information from such Person or establish any other process that it believes is necessary or appropriate to consider the request for reconsideration.

(3) The Company's decision is the final action of the Company and is not subject to appeal.

(a) A Member may not maintain and/or trade more than one Kalshi account.

(f) Applicants for Member status of the Company may withdraw their applications at any time without prejudice or without losing their right to apply at a future time.

(a) Kalshi will apply Member access criteria in a fair and nondiscriminatory manner that is not anti-competitive.

RULE 3.2 MEMBER OBLIGATIONS

(a) Each Member must comply with these Rules, applicable provisions of the Commodity Exchange Act, and relevant Commission regulations. Each Member must also cooperate promptly and fully with Kalshi, its agents, and/or the Commission in any investigation, call for information, inquiry, audit, examination, or proceeding. Such cooperation shall include providing Kalshi with access to information on the activities of such Member in any referenced market that provides the underlying prices for any Contract. Additionally, each Member must update its e-mail address within 24 hours after any change and update all other information provided in its Member Application within five days after that information has changed. If any Member thereof fails to satisfy these obligations, Kalshi may revoke or suspend the Member's privileges in full or in part. Each Member may also be subject to civil or criminal prosecution.

(b) Each Member consents to allow Kalshi to provide all information Kalshi has about the Member, including the Member's trading activity, to the Commission or any other Regulatory Agency, law enforcement authority, or judicial tribunal, including (as may be required by information sharing agreements or other contractual, regulatory, or legal provisions) foreign regulatory or self-regulatory bodies, law enforcement authorities, or judicial tribunals without notice to the Member.

(c) Each Member consents to Kalshi providing information related to Know Your Customer or Anti-Money Laundering to its Clearing House.

(d) Each Member is required to review the "Notices" section of the Kalshi website to make itself aware of material changes to these Rules or other notices that may affect your rights and obligations as a Member of Kalshi.

(e) Each Member must immediately notify Kalshi in writing upon becoming aware:

(1) That the Member has had access or trading privileges suspended, or membership denied, in any commodity, securities, or swaps exchange, brokerage, association, or Regulatory Agency;
(2) That the Member has been convicted of, pled guilty or no contest to, or entered a plea agreement to, any felony in any domestic, foreign or military court;
(3) That the Member has been convicted of, plead guilty or no contest to, or entered a plea agreement to a misdemeanor in any domestic, foreign or military court which involves:
    (i) Embezzlement, theft, extortion, fraud, fraudulent conversion, forgery, tax evasion, counterfeiting, false pretenses, bribery, gambling, racketeering, or misappropriation of funds, securities or properties; or
    (ii) Any transaction in or advice concerning swaps, futures, options on futures, leveraged transactions or securities;
(4) That the Member has been subject to, or associated with a firm that was subject to regulatory proceedings before any governmental or Regulatory Agency;
(5) That the Member is currently a party to any investigation or proceeding, the resolution of which could result in an event described in Rule 3.3(d)(1)-(4);
(6) Of any other material change in any information contained in the Member Application;
(7) Of becoming subject to early warning reporting under Commission Regulation 1.12;
(8) Of becoming the subject of a bankruptcy petition, receivership proceeding, or the equivalent, or being unable to meet any financial obligation as it becomes due; or
(9) Of information that concerns any financial or business developments that may materially affect the Members' ability to continue to comply with participation requirements.

(f) A Member is not required to engage in trading activity or maintain a minimum balance in its account after initial funding.

(g) Each Member, upon a request of the Company or any Regulatory Agency, must promptly respond to any requests for information, including by providing any necessary information for the Company to perform any of the functions described in CEA Section 5(h).

(h) Each Member shall maintain appropriate books and records of its trading, including records of any activity in the underlying commodity and related derivatives markets, and make such records available, upon request, to Kalshi.

RULE 3.3 REJECTION OF APPLICANT AND LIMITATIONS OF TRADING PRIVILEGES

(a) Notwithstanding Kalshi's authority granted under any other Rule, Kalshi may, in its sole discretion, deny any Member application, or suspend, revoke, limit, condition, restrict, or qualify the trading privileges of any account owner pursuant to this section (a) or authorized trader of an account owner as it deems necessary or appropriate.

(b) An account owner who has had trading privileges limited pursuant to Section (a) of this Rule will be provided, in writing, the reason such action was taken.

(c) If Kalshi denies the Member Application of any Person or places limitations on trading privileges pursuant to this section, the applicant whose trading privileges have been limited may appeal the decision by filing with Kalshi a petition for review of such membership denial or trading limitation. The petition should describe in detail the reasons why the Member Application should be granted, or trading limitations removed. The petition must be filed within twenty-eight (28) calendar days from the date upon which notice of the denial of membership or limitation of trading privileges was provided by Kalshi. The decision of the Company will be final. A Person that has been denied membership by the Company will not be eligible for reapplication during the six months immediately following such denial.

(d) If trading privileges are limited pursuant to Section (a) of this Rule, Kalshi may initiate a transfer of the Member's balance to the bank account on record, or cause for the same to be affected by Clearing House.

(e) Kalshi has full discretion to limit or restrict a Member from trading in specific Contracts or categories of Contracts to mitigate risks of market manipulation

RULE 3.4 COMMUNICATIONS BETWEEN KALSHI AND MEMBERS

(a) Each Member must provide Kalshi with its current electronic mail address and immediately notify the Company of any changes. All communications between Kalshi and its Members, including confirmation of all Transactions executed on a Member Account, may be transmitted by electronic mail on the Kalshi website or via the Kalshi API.

(b) A Member is responsible for promptly reviewing and, if necessary, responding to all electronic communications from Kalshi.

(c) Kalshi may record conversations and retain copies of electronic communications between the Company and Members. Any such recordings may be retained by the Company in such manner and for such periods of time as Kalshi may deem necessary or appropriate. Kalshi shall retain such records for the retention periods necessary to comply with CFTC Regulation 1.35 or such longer period as the Company deems appropriate.

RULE 3.5 MEMBER FUNDS MAINTAINED WITH THE COMPANY

All Member funds deposited with Clearing House shall be held in accordance with CFTC Regulations in accounts identified as Member Accounts. Such funds shall be segregated by Clearing House and treated as belonging to such Members.

RULE 3.6 DUES, FEES, AND EXPENSES PAYABLE BY MEMBERS

(a) Members are not required to pay dues.

(b) Members may be charged fees in connection with the trading of Contracts in such amounts as may be revised from time to time to be reflected on the Company's Website.

(c) Members may be charged fees for Settlement of Contracts in an amount to be reflected from time to time on Kalshi's website.

(d) Kalshi may cause and/or instruct Clearing House to deduct from the Member Account fees or expenses incurred in connection with the Member's trading or account activity or Kalshi's administration in connection with that activity, such as fees for wire transfer or other payment methods processing fees. All such fees will be charged in an amount to be reflected from time to time on the Company's Website.

(e) If Kalshi determines in the future to impose dues or additional fees, the Member will be provided notice of the change at the time the amended fees are filed with the Commission. The new fee structure will be implemented no earlier than on the first available trade date for which the change may be implemented according to the Commission's self-certification filing requirements as set forth in Commission Regulation 40.6(a).

(f) Kalshi may from time to time establish incentive programs that provide participants with incentives that encourage membership and trading.

CHAPTER 4 MARKET MAKERS

RULE 4.1 ELIGIBILITY TO BE DESIGNATED AS A MARKET MAKER

(a) Only Members in good standing may become a Market Maker.

(b) Kalshi shall have sole discretion to allow a Member to become a Market Maker.

(c) Kalshi may set any specific requirements that the Member must abide by in order to become a Market Maker.

(d) A Member must complete and file a market maker agreement with Kalshi to be considered for Market Maker status.

(e) The designation of any Market Maker may be suspended, terminated or restricted by Kalshi at any time and for any reason.

(f) Kalshi may designate more than one Market Maker, and there may be more than one Market Maker participating on the Exchange.

(g) There may be more than one Market Maker program in place at Kalshi at any given time.

RULE 4.2 DESIGNATION AS A MARKET MAKER

(a) To determine whether a Member shall be designated as a Market Maker, Kalshi shall consider the Member's available financial resources, relevant experience, business reputation, and any other relevant factor.

(b) No Member shall be designated as a Market Maker without the Member's consent.

(c) Kalshi may periodically conduct an evaluation of any Market Maker to determine whether it has fulfilled performance standards relating to, among other things, quality of the markets, competitive market making, observance of ethical standards, and administrative soundness. If the Market Maker fails to meet minimum performance standards, Kalshi may, among other things, suspend, terminate or restrict the Market Maker's designation.

RULE 4.3 MARKET MAKER BENEFITS

Market Makers may receive benefits, including but not limited to financial benefits, reduced fees, differing position limits, and enhanced access, in accordance with any relevant Market Maker program in place at Kalshi for fulfilling the market maker obligations.

RULE 4.4 MARKET MAKER OBLIGATIONS

(a) A Market Maker's transactions must be reasonably calculated to contribute to the maintenance of a fair and orderly market, and a Market Maker shall not make bids or offers or enter into transactions that are inconsistent with this goal.

(b) A Market Maker is obligated to perform all requirements and obligations delineated in the relevant Market Maker agreement and in the relevant Market Maker program in place at Kalshi. These requirements and obligations include but are not limited to maintaining two-sided markets within a defined spread and with a minimum depth during trading.

RULE 4.5 MARKET MAKER POSITION ACCOUNTABILITY LEVELS

(a) The provisions in this Rule apply only to Contracts that are included in a market maker program and the Market Maker is required to adhere to the Market Maker Obligations set forth in Rule 4.4(b) in regard to such Contracts. For all other Contracts, Market Makers are subject to the Position Limits set forth in Rule 5.4 and in product certifications.

(b) Market Makers are subject to the following Position Accountability Levels:
   (i) For Contracts with a generally applicable Position Limit of $25k, the Position Accountability Level for market makers will be $1M;
   (ii) For Contracts with a generally applicable Position Limit higher than $25k, the Position Accountability Level will be $10M.

(c) If a Market Maker exceeds the Position Accountability Level, the Market Maker will be required to provide information regarding its position to Kalshi's Compliance staff. The Compliance staff may allow the Market Maker to continue to add to its position, require the Market Maker to exit from the portion of the position that exceeds the position accountability level, or impose a limit on the position that the Market Maker cannot exceed. Market Makers will be allowed to hold positions in excess of the Position Accountability Levels only to the extent necessary for the Market Maker to perform its obligations as a Market Maker, as determined by the Company.

(d) Market Makers are not subject to Position Limits set forth in Rule 5.4 and in product certifications; those Position Limits are generally applicable to all members except for Market Makers. However, in no instance may a Market Maker's position exceed any applicable limit established by the CFTC.

CHAPTER 5 METHOD FOR MEMBERS TO TRADE CONTRACTS

RULE 5.1 PRIOR REVIEW OF THESE RULES AND ACCEPTANCE OF TERMS OF MEMBER AGREEMENT

(a) No Person may become a Member of Kalshi or trade any Contracts on the Platform unless such Person has received, read, understood, and accepted the Kalshi Rulebook, Terms of Use, Privacy Policy, and Member Agreement, and has certified having done so.

RULE 5.2 MEMBER ACCESS TO KALSHI

(a) During the Kalshi Member application process, an applicant to become a Member will be required to choose a unique user identification ("ID") and password. The applicant will be required to enter the ID and password to log onto and access secure portions of the Kalshi website. Each time the applicant submits its ID and password to Kalshi in order to log onto Kalshi, the applicant affirms that it understands and agrees to be bound by these Rules and other policies of Kalshi, as amended.

(b) After a Member Application has been approved by Kalshi, the applicant shall be notified of its designation as a Member. As a Member, such Person will be able to access the Platform, execute Trades, and otherwise access information regarding, or perform functions in, such a Person's account using its ID and password.

(c) For account security and audit trail purposes, each Member agrees that Kalshi may maintain logs of its IP address used to access the Kalshi website.

(d) Each Member will be responsible for protecting its ID and password from improper disclosure. In addition, a Member may not knowingly or negligently permit any Person not authorized by Kalshi and by the Member to use the ID and password to access the secure portion of the Kalshi website. Each Member is required to immediately notify Kalshi if it knows, or has reason to believe, that its ID or password have been disclosed to any Person not authorized by Kalshi and the Member to use such ID and/or password.

(e) Each Member will be liable for all costs and any losses that it may incur from Transactions executed on the Platform by any Person, authorized or not, using its ID and password. Kalshi will not be responsible in any way for unauthorized Transactions in a Member Account.

(f) Each Member is responsible for contracting with an Internet service provider through which it will access the Kalshi website and for having a backup service provider if the Member thinks it is necessary. Each Member is also responsible for maintaining an Internet connection speed adequate for its needs. Kalshi will not be responsible in any way for any orders delayed or trades missed or not executed in a timely fashion because of failure of the Member's Internet service provider or slowness of its Internet connection speed. No communication from a Member will be deemed to have been received by Kalshi until that communication is logged by the Kalshi server.

(g) Kalshi in its discretion may place a Member Account on hold (prohibiting any order activity) or on hold-liquidation only (allowing only orders to liquidate existing positions). In such circumstances, Kalshi will promptly notify the affected Member of the nature of and reason for the action.

RULE 5.3 TRADING CONTRACTS – MEMBERS

(a) Members will be able to trade Contracts by entering Orders on such Contracts. After logging into the secure portion of the Kalshi website, the Member will input its Orders into the Platform.

(b) When a Member's Order is matched by an Order from another Member:

(1) If the Member's Order is to enter into one or more Contracts for which it does not have an offsetting position in its account, Kalshi will check the Member Account to ensure it has enough funds to cover its maximum loss under the Contract(s) it is attempting to enter into. If the Member does not have the necessary funds in its account, Kalshi will cancel its order prior to trade execution. If the Member does have the necessary funds in its account, Kalshi will execute the trade. Upon trade execution, Kalshi will cause and/or instruct Clearing House to:
   (i) Debit the funds from the Member Account in an amount necessary to cover the maximum loss;
   (ii) Credit those funds towards the appropriate settlement account;
   (iii) Place the Contracts that were the subject of the Order into the Member Account; and
   (iv) Notify the Member by electronic mail that the Trade has been executed.

(2) If the Transaction involves entering into one or more Contracts for which a Member has an offsetting position in its account, upon execution of the Trade Kalshi will cause and/or instruct Clearing House to:
   (i) Close the offsetting position in the Member Account;
   (ii) Debit the settlement account in the amount of any gains realized by the offsetting Transaction and any funds that were debited from the Member Account at the time the Contract(s) that is being closed was entered into and that were not also used to pay any losses on such Contract(s);
   (iii) Credit those amounts to the Member Account; and
   (iv) Notify the Member by electronic mail that the Trade has been executed.

(c) If a Member's Order is placed on the Platform and not immediately matched by an Order from another Member, it will rest on the Platform until it is matched and executed in accordance with the procedures outlined above in this Rule, until the Member cancels it, or until it is cancelled by Kalshi or Clearing House upon the Expiration of the Contract or otherwise in accordance with these Rules.

RULE 5.4 ORDER ENTRY

(a) Member Orders

(1) A Member will enter Orders to trade Contracts by electronic transmission over the Internet. Order rate limiter functionality will cap the maximum number of orders that may be submitted to the Exchange per second (or per a specific time period expressed in seconds) per Member in order to prevent a risk of harm to the Company.

(2) A Member will enter an Order to trade one or more Contracts by indicating to Kalshi in the manner required by Kalshi:

   (i) Order direction (i.e., buy/yes or sell/no);
   (ii) Price at which the Member wants to buy or sell the Contract; and

(iii) Number of Contracts the Member wants to buy or sell.

(3) In order to enter an Order to trade one or more Contracts, a Member will be required to submit the Order to Kalshi. Once the Order is accepted by Kalshi, Kalshi will assign to the Order an Order ID. This ID will appear next to the associated Order on the Member's Order Ticket and Order History account pages. The Member will be responsible for any and all Order entries confirmed for its account and accepted by Kalshi.

(4) Any Member submitting Orders, or any other messages directly to Kalshi, including but not limited to messages related to the cancellation or amendment of an Order, whether manually or via automated functionality, must ensure adequate controls are in place to prevent excessive messaging or other activity that may be deemed detrimental or disruptive to the Company.

(b) Kalshi's trading system will keep an electronic record of all orders to trade Contracts, and all executed Contract trades. The records kept by Kalshi will include all of the terms identified in paragraph (a) of this Rule as well as the date and time that the Transaction was completed to the nearest thousandth of a second and the member ID, for all executed Contract trades and to the nearest thousandth of a second for all Orders to trade Contracts.

(c) A Kalshi Contract will not be void or voidable due to:

(1) A violation by Kalshi of the provisions of sections 5 or 5h of the CEA or Part 38 of CFTC Regulations;
(2) Any CFTC proceeding to alter or supplement a rule, term or condition under section 8a(7) of the CEA or to declare an emergency under section 8a(9) of the CEA; or
(3) Any other proceeding where the effect of which is to alter or supplement a specific term or condition or trading rule or procedures, or requires Kalshi to adopt a specific term or condition, trading rule or procedure, or to take or refrain from taking a specific action.

RULE 5.5 HANDLING OF CUSTOMER ORDERS

(a) All trading on Kalshi's Central Limit Order Book is conducted on a fully anonymous basis.

(b) Disclosing Orders Prohibited:

(1) It is a violation of this Rule 5.5 for any Person to disclose another Person's Order to buy or sell any Contracts except as may be requested by Kalshi or the Commission.
(2) It is a violation of this Rule 5.5 for any Person to act or direct another Person to act based on non-public order information, however acquired.

RULE 5.6 DISPUTED ORDERS

(a) If a Member believes that an Order to trade one or more Contracts was incorrectly executed or rejected by Kalshi that Member may request a review of the Order by providing the confirmation number for the order and stating the grounds for its disagreement with the handling of the order.

(b) Upon receipt of a request for review of an Order and the accompanying confirmation number, Kalshi will review its electronic audit trail to determine if the Kalshi trading system correctly interpreted and executed the Order.

(c) If the review described in paragraph (b) of this Rule reveals that the Kalshi trading system made a mistake, the Order will be canceled and the accounts of all Members that were party to the Order will be returned to their state before the Trade was executed.

(d) If the review described in paragraph (b) of this Rule reveals that the Kalshi trading system did not make a mistake, Kalshi will inform the Member who requested the review of its determination that the Order was properly handled, the evidence supporting that determination, and that an adjustment will not be made.

(e) A Member may appeal a determination under paragraph (d) of this Rule to a Kalshi compliance officer through the electronic mail address provided on the Kalshi website. The Member making the appeal will be required to provide a response to the evidence described in paragraph (d) of this Rule that the order was properly handled, and the Member may provide any other information it wishes to disclose. If the Member's appeal does not contain a response to the evidence described in paragraph (d), it will be rejected. The compliance officer will decide on the appeal no later than 10 days after its receipt, and that decision will be final.

(f) Kalshi will document in writing all requests for review of orders received by Kalshi, the time and manner in which Kalshi reviewed its electronic audit trail in response to the request, the outcome of that review, and the action or actions taken by Kalshi in response to that review, including the results of any appeal filed under paragraph (e) of this Rule and the review conducted by the compliance officer in deciding that appeal.

RULE 5.7 PRIORITY OF ORDERS

Kalshi's central limit order book matches orders in an open and competitive manner. Subject to the provisions of Rule 5.10(b) regarding orders, Kalshi's trading algorithms execute all trades by matching orders according first by price and then time priority. This means that orders and quotes entered at different prices will be executed in order of price, from best to worst, regardless of what time they were placed on the Platform, and orders and quotes placed on the Platform at the same price will be executed in order of time, from oldest to most recent.

RULE 5.8 FILLING ORDERS TO TRADE CONTRACTS

(a) Subject to the provisions of Rule 5.10(b) regarding orders, the Kalshi trading system will fill all orders to trade Contracts on an "or better" basis. To illustrate, if a Member places an Order to buy a Contract or Contracts at a price higher than the price of the best sell offer on the Platform, the system will fill that Order to buy at the better sell offer price(s) until all available sell offers under or equal to that buy Order's limit price are filled or until that buy order is completely filled. Likewise, if a Member enters a sell order at a price lower than the price of the best bid, the system will fill that sell order at the better bid price(s) until all available bids over that sell order's limit price are filled or that sell order is completely filled. If an order is only partially filled, the unfilled portion of that order will remain in the order book as a resting order at the limit price specified. Should an opposite Order at the same price or better than the original Order subsequently be placed on the system, the unfilled portion of the original Order will be executed opposite that new Order at the original Order's limit price.

(b) A written record of all of the terms of each Trade entered into on Kalshi or pursuant to the Rules will be available immediately upon execution on the Kalshi interface on the Member's activity page. Such record shall legally supersede any previous agreement and serve as a confirmation of each such trade. Kalshi will send confirmation messages to Members upon execution of a Trade via the API, mobile application, and/or website, if such Members are online at the time. However, please note that if any applicable Member is not online at the time of execution, such Member will see the confirmation(s) when it next logs on to the interface. The contract type, size, execution time and execution method for each Trade will be made available on the website to all Members after execution of the relevant Trade.

RULE 5.9 CANCELLATION OF ORDERS

(a) A Member can submit instructions, via Kalshi's interface (website, mobile application) or the API, to cancel an Order which that Member has placed on the Platform if that Order has not yet been executed. Upon submission of instructions to either cancel or modify an Order that has not been executed, the Kalshi system will withdraw the Order from the order book and confirm the cancellation of the Order.

(b) Kalshi will attempt to cancel an existing Order as soon as possible after a Member enters a cancellation instruction. However, the Order may be executed before Kalshi is able to cancel it. If an Order has been filled in whole or in part, a Member may cancel only that portion of the Order (if any) that has not been executed.

RULE 5.10 TRADE CANCELLATIONS

(a) As a designated contract market, Kalshi has the authority to adjust Trade prices or cancel Trades when necessary to mitigate market disrupting events caused by malfunctions on its Platform or errors in Orders submitted by Members. However, due to the fully collateralized and short-term nature of trading on Kalshi, the circumstances in which this authority may be exercised are limited.

(b) Kalshi, in its discretion and in accordance with these Rules, may cancel a Trade that has been executed on the market at a price that is inconsistent with prevailing market conditions due to improper or erroneous orders or quotes being matched on the Platform. Likewise, because of the nature of Kalshi Contracts, there will generally be no cancellation or adjustment of an erroneous trade except in extraordinary circumstances as determined by the Company.

(c) In addition to a Contract adjustment raised under Chapter 7 of these Rules, Kalshi may review a Trade based on its own analysis of the market or pursuant to a request for review by a Member or other third party. A request for a review by a Member or other third party must be received by Kalshi no later than fifteen (15) minutes after the trade has been executed on the Platform and before Expiration of the Contract. Kalshi will promptly determine whether the Trade will be subject to review and then promptly post notice indicating that the Trade is under review.

(1) During the review, Kalshi will calculate a fair market value for the Contract at the time of the questioned Trade by utilizing the last value or price of the Contract at the time of the Trade and/or any other relevant market information obtained or presented to the Company.

(2) Once a fair market value has been calculated, a twenty (20) cent range will be added above and below such fair market value to determine the "No Cancellation Range".

(3) If a Trade has been executed within the No Cancellation Range, the executed Trade will stand. If a Trade has not been executed within the No Cancellation Range, Kalshi shall have the authority, but not the obligation, to cancel or adjust such Trade. Once a Trade is determined to be cancelled or adjusted, Kalshi will:

(i) notify all interested Members to the Trade as soon as practicable following such determination; and

(ii) publish its decision on the Kalshi website.

(4) The decisions of Kalshi regarding fair market value of the Contract, the No Cancellation Range, the cancellation of a Trade, or any other determination hereunder shall be final and not subject to appeal.

RULE 5.11 VIEWING THE MARKET AND EXECUTED ORDERS

Kalshi will, at all times, allow its Members to view the current best bid and offer on the Platform, the open interest, the trade volume, as well as the depth of the order book up to the fifth level of prices.

RULE 5.12 HOURS FOR TRADING CONTRACTS

Trading shall be available at all times outside of any maintenance windows, which may be announced from time to time.

RULE 5.13 PROHIBITED TRANSACTIONS AND ACTIVITIES

Except as otherwise permitted by these rules:

(a) Members are prohibited from entering Orders on the Platform if there are insufficient funds or Contracts in the Member's settlement account to satisfy such orders if they are executed. Kalshi may, in its discretion, take such action against a Member if the circumstances warrant, subject to Rule 9.2(f) and Rule 9.6.

(b) No Person shall enter into or attempt to enter into any non-competitive trade on the Platform, including any accommodation trade or any trade that has been directly or indirectly prearranged. For example, a Member may not agree in advance with another Member that one of the Members will enter an order and the other Member will attempt to trade against that order by timing the submission of orders or otherwise.

(c) No Person shall enter into or attempt to enter into any trade on the Platform that:

(1) Does not result in a change in beneficial ownership;
(2) Is designed to unnaturally inflate trading volume;
(3) In any way attempts to circumvent the Platform's order processing, trade ordering, trade execution systems, or otherwise to circumvent exposure of the order to open and competitive bidding on the Platform; or
(4) That has some other illegitimate purpose.

(d) No Person shall enter into any trade designed or used to cause any price for a Contract other than a true and bona fide price to be reported, registered, or recorded by the Platform.

(e) No Person shall trade in, transfer, assign, or otherwise dispose of Contracts other than as provided for in these Rules.

(f) No Person shall enter into or agree to transfer or transfer the benefit of any position in any Contract to another person other than through a transaction executed through the Platform.

(g) (1) No Member shall trade for a Person other than itself.

(2) No Member may deposit funds or allow funds to be deposited into their Kalshi account from any bank account or credit card or debit card or other account not held in the same name as their Kalshi account (except as otherwise provided in these Rules).

(3) The Company may deposit funds into a Member's Kalshi account, including but not limited to, in the event of an order cancellation, trade cancellation, expiration value adjustment, ledger adjustment, refund of wire transfer fees, or incentive program.

(h) No Person shall engage in any activity that presents a risk of harm to Kalshi, its Members, or the public.

(i) No Person shall engage in any activity that adversely affects the integrity of the Platform or its underlying systems.

(j) No Person subject to arbitration under these rules shall fail to abide by an arbitration decision or award handed down under Chapter 10 of these Rules.

(k) No Person shall intentionally provide misleading, erroneous, or fraudulent information to Kalshi on a Member Application or otherwise.

(l) No Person shall create a false appearance of a partnership, agency, employment or affiliate relationship with Kalshi and no Person shall unlawfully solicit customer funds for deposit at Kalshi.

(m) No Member may operate or solicit in any capacity that may require registration with the CFTC without being properly registered.

(n) No Person shall engage in any activity that is intended to, or has the effect of, manipulating the market in violation of Sections 6(c) and 9(a)(2) of the CEA and no Person shall engage in any other activity that would violate the CEA or the Commission's Regulations.

(o) No Member shall deposit funds into its Kalshi account from an account which does not hold sufficient funds at the time of deposit, and at the time the deposit is presented by Kalshi for payment.

(p) No Member shall make a false representation to a third party regarding any deposit made into that Member's Kalshi account which would result in a chargeback or stop payment of funds to the

Member Account.

(q) No Member shall allow its Member Account balance to become negative by any means. In the event that a Member's settlement account balance becomes negative, the Member must immediately deposit additional funds to correct the deficiency. Any Member whose settlement account carries a negative balance for 30 days or more is subject to summary termination of membership. Kalshi may, in its discretion, take such other action against a Member if the circumstances warrant, subject to Rule 9.2(f) and Rule 9.6.

(r) No Member shall engage in conduct or practices inconsistent with just and equitable principles of trade or conduct or practices detrimental to the best interests of the Company.

(s) If a Member is an Insider that has access to material non-public information that is the subject of an Underlying of any Contract or that has the ability to exert any influence on the subject of an Underlying of any Contract, that Member is prohibited from attempting to enter into any trade or entering into any trade, either directly or indirectly, on the market in such Contracts. An "Insider" means any person who has access to or is in a position to have access to material nonpublic information before such information is made publicly available. A Member who is an employee or affiliate of a Source Agency for any Contract is prohibited from attempting to enter into any trade or entering into any trade, either directly or indirectly, on the market in such Contracts.

(t) If a Member is a decision maker, either directly or indirectly, or has any influence, either directly or indirectly, no matter the scale and importance of the influence, on the outcome of the Underlying (event) of any Contract, that Member is prohibited from attempting to enter into any trade or entering into any trade, either directly or indirectly, on the market in such Contracts.

(u) No Person shall engage in any activity that constitutes fraudulent or abusive trading, including but not limited to violating bids or offers, demonstrating intentional or reckless disregard for the orderly execution of transactions during the closing period, or spoofing.

(v) No Person shall engage in any trading activity intended to accomplish a "money pass", "wash trade" or "front-running" as such terms are defined by the Commission and any regulations promulgated thereunder.

(w) No Person shall, directly or indirectly, intentionally or recklessly:

(1) Use or employ, or attempt to use or employ, any manipulative device, scheme, or artifice to defraud;

(2) Make, or attempt to make, any untrue or misleading statement of a material fact or to omit to state a material fact necessary in order to make the statements made not untrue or misleading; or

(3) Engage, or attempt to engage, in any act, practice, or course of business, which operates or would operate as a fraud or deceit upon any Person.

RULE 5.14 POSITION LIMITS

(a) Kalshi has imposed Position Limits on all Contracts as specified in each contract's Terms and Conditions. Any Member who exceeds a Position Limit shall be deemed in violation of this Rule 5.14. In addition, any Member entering bids or offers, if accepted, which would cause that Member to exceed the applicable Position Limit shall be in violation of this rule. As described in Chapter 4, a Market Maker is expressly excluded from this Rule with respect to contracts that are part of a market maker program and the market maker is subject to the obligations described in Chapter 4.

(b) If a Member fails to reduce any position in a manner and time as directed by Kalshi, Kalshi shall have the authority to liquidate the applicable position to a level below the defined Position Limit stipulated under the relevant Contract in Chapter 13 of these Rules.

(c) In addition to the restrictions and requirements imposed in Section 5.14(a) and (b), the first violation of a Position Limit by a Member may result in a letter of warning to be issued by the Kalshi Compliance Department to the Member or the initiation of proceedings in accordance with Chapter 9 of these rules.

(d) In addition to the restrictions and requirements placed in Section 5.14(c), any subsequent violation of a Position Limit by a Member within 12 months after a violation that resulted in a letter of warning, will result in the initiation of proceedings in accordance with Chapter 9 of these Rules.

(e) Position limits shall apply to

(1) All positions in accounts for which any Person by power of attorney or otherwise, directly or indirectly holds positions or controls trading; and

(2) Positions held by two or more Persons acting pursuant to an express or implied agreement or understanding the same as if the positions were held by, or the trading of the position were done by, a single Person.

CHAPTER 6 CLEARING AND SETTLING CONTRACT TRADES, SETTLEMENT, AND MEMBER WITHDRAWAL REQUESTS

RULE 6.1 CLEARANCE

(a) Clearing House shall serve as the clearing party to all orders matched pursuant to Chapter 5.

(b) All Member positions are fully cash collateralized, and no Member can take positions that would lead to an exposure that exceeds the funds deposited in the Member Account.

(c) Upon the successful matching of orders pursuant to Rules 5.3 or 5.4, Clearing House shall immediately, through the process of novation, be substituted as, and assume the position of, seller to the Member buying and buyer to the Member selling the relevant contract. Upon such substitution, the buying and selling Members shall be released from their obligations to each other, and such Member shall be deemed to have bought the contracts from or sold the contracts to Clearing House, as the case may be, and Clearing House shall have all the rights and be subject to all the liabilities of such Member with respect to such transaction. Such substitution shall be effective in law for all purposes.

(d) If a trade is rejected for clearing by Clearing Housefor any reason, such trade is void *ab initio*.

(e) In the event of any conflict or inconsistency between these Rules and the Clearing House Rules with respect to any Member's responsibilities or obligations under the Clearing House Rules, the Clearing House Rules shall prevail. As stated in Rule 3.1(c), all Members are bound by the Clearing House Rules.

RULE 6.2 SETTLING CONTRACT TRADES

Kalshi will maintain, on its system, a record of Member balances and Contracts. The Clearing House, will also maintain a Member Account, which will reflect funds used by Members to buy and sell Contracts. Kalshi may also maintain a "proprietary account," which will be credited with all fees debited from Member Accounts due to trades and Settlements.

RULE 6.3 SETTLEMENT

(a) When a Contract expires and has a Payout Criterion that encompasses the Expiration Value of the Underlying, such Contract will pay the Settlement Value for such Contracts (e.g. $1.00) to the holders of long positions in such Contracts. Conversely, when a Contract expires and has a Payout Criterion that does NOT encompass the Expiration Value of the Underlying, such Contract will pay the Settlement Value for such Contracts (e.g. $1.00) to the holders of short positions in such Contracts.

(b) On the Settlement Date, Kalshi will cause and/or instruct Clearing House to:

(1) Notify all Members whether they will receive a Settlement Value pursuant to Rule 6.3(a),
(2) Settle the Contracts by debiting the settlement account in an amount no less than the Settlement Value for such Contracts multiplied by the total number of outstanding in-the-money Contract positions and credit those funds to the applicable Member Accounts of the Members holding the in-the-money Contract positions following any holding period described in Rule 6.3(c),
(3) Delete all Contracts from Members' accounts, as applicable.

(c) Before Settlement, Kalshi may, at its sole discretion initiate the Market Outcome Review Process as provided in Rule 7.1.

(d) Kalshi will distribute notification via electronic mail at Settlement to all Members who hold the relevant Contract.

RULE 6.4 SETTLING MEMBER WITHDRAWAL REQUESTS

(a) Within one business day of when a Member requests to withdraw funds from its Kalshi account, Kalshi will transmit such request to Clearing House in electronic batch mode transmission. Clearing House will then cause and/or instruct its settlement bank to process the request and distribute funds to the account at the U.S. Financial Institution or Foreign Bank in the case of a non-United States resident Member who does not have an account at a US Financial Institution, registered with Kalshi by the Member (unless the Member has unsatisfied outstanding obligations on Kalshi, in which case such balances may be retained as necessary to satisfy such obligations or until the Member otherwise satisfies such obligations, or unless such transfer would otherwise violate applicable law or regulation as determined by either Kalshi or Clearing House in its sole discretion). The Member should refer to Kalshi's website under the Fee Schedule for all fees and costs associated with withdrawal of funds from the Member's Kalshi account. The processing of a Member withdrawal request may be suspended or denied if circumstances, whether present or imminent, would make the request impossible or impractical to fulfill, cause a potential risk of harm to Kalshi, its Members, or Clearing House, violate applicable law or regulation as determined by either Kalshi or Clearing House in its sole discretion, or if, either Kalshi or Clearing House determine in its sole discretion that the funds are relevant to a pending investigation.

(b) Members are responsible for providing accurate account numbers to allow Kalshi and Clearing House to effect transfers to Members.

CHAPTER 7 MARKET OUTCOME REVIEW AND ADJUSTMENTS NECESSITATED BY MATERIAL CHANGES IN THE UNDERLYING

RULE 7.1 THE MARKET OUTCOME REVIEW PROCESS

(a) Before Settlement, Kalshi may initiate the Market Outcome Review Process, at its sole discretion and by taking into account several factors including any circumstances that may have a material impact on the reliability or transparency of the Underlying related to the Contract. Under this process, the Outcome Review Committee will determine the final Market Outcome. Settlement will occur on the date that the Outcome Review Committee reaches a determination on the Contract's final Market Outcome. If the Market Outcome Review Process is initiated, Kalshi will post on its website that the Contract's Market Outcome is under review.

(b) The Outcome Review Committee shall review all relevant evidence and determine a final Market Outcome within a 24 hour period after the Outcome Review Process is initiated.

(c) The Outcome Review Committee has full discretion in resolving the Market Outcome Review Process. The determinations made by the Outcome Review Committee are final.

RULE 7.2 CONTRACT MODIFICATIONS

If any event or any circumstance which may have a material impact on the reliability or transparency of a Contract's Source Agency or the Underlying related to the Contract arises, including but not limited to if a Contract's Source Agency is unavailable or undergoes significant modifications, Kalshi retains the authority to designate a new Source Agency and Underlying for that Contract and to change any associated contract specifications after the first day of trading. That new Source Agency and Underlying would be objective and verifiable. Kalshi would announce any such decision on its website.

CHAPTER 8 INVESTMENT OF MEMBER ACCOUNT FUNDS

RULE 8.1 INVESTMENT OF MEMBER ACCOUNT FUNDS

(a) Member funds on deposit with Clearing House will be held in a settlement account segregated as Member Property, as that term is defined in CFTC Regulation 190.09(a).

(b) Clearing House may invest such funds subject to the limitations and conditions set forth in Commission Regulations 22.2(e)(1) and 1.25.

(c) Clearing House may pay interest to Members' accounts at a floating rate to be determined by Clearing House on funds in Members' accounts in excess of an amount to be determined by Clearing House.

(d) Clearing House will retain all profit from investment of Member funds not paid to Members.

CHAPTER 9 DISCIPLINE AND RULE ENFORCEMENT

RULE 9.1 MONITORING THE MARKET

(a) Kalshi's trading system will record and store for a period of not less than 5 years in a searchable, read-only database a record of all data entered into the Kalshi trading system, including the Member's identity and the information in Rule 5.4. Such records shall be maintained in a readily available manner during the first two years. Kalshi shall conduct market surveillance and trade practice surveillance using this data with programs designed to alert Kalshi when potentially unusual trading activity takes place. Kalshi, through the compliance department, will initiate review and, where appropriate, investigate such unusual trading activity. The compliance department will also investigate any time it has other reason to believe that inappropriate activity of any sort is taking place on the Kalshi Platform or its website.

(b) All Persons within Kalshi's jurisdiction are subject to this Chapter 9 if they are alleged to have violated, to have aided and abetted a violation, to be violating, or to be about to violate, any Rule or any provision of Applicable Law for which Kalshi possesses disciplinary jurisdiction.

RULE 9.2 INVESTIGATIONS, HEARINGS, AND APPEALS

(a) The Compliance Department shall investigate unusual trading activity or other activity that the Compliance Department has reasonable cause to believe could constitute a violation of these Rules, or upon the receipt of a request from Commission staff. Kalshi's Disciplinary Panel adjudicates findings by the compliance department that are disputed by Members. The Disciplinary Panel and the Compliance Department may not communicate regarding the merits of a matter brought before the hearing officer without informing the Member who is the subject of the communication of its substance and allowing the Member an opportunity to respond. The Compliance Department and Disciplinary Panel may compel testimony, subpoena documents, and require statements under oath from any Member. Disciplinary Panel, Compliance Department staff and other employees or agents of Kalshi working under their supervision, may not be a Member or trade, directly or indirectly, in any commodity interest traded on or subject to the rules of any registered contract market. Members of the Disciplinary Panel shall be individuals that do not have a direct interest (financial, personal or otherwise) in the matter, but in no event may be members of the Compliance Department or any Persons involved in adjudicating any other stage of the same proceeding. Likewise, members of the Disciplinary Panel may not operate under the direction or control of any person or persons with trading privileges on the Platform and may not include persons whose interests conflict with their enforcement duties.

(b) The Compliance Department shall investigate unusual trading activity or other activity that the compliance department has reasonable cause to believe could constitute a violation of these Rules, and shall enforce the Rules and prosecute possible Rule violations within Kalshi's disciplinary jurisdiction. The Compliance Department will endeavor to complete any investigation within twelve months, unless there exists significant reason to extend it beyond such period. Upon the conclusion of any investigation, the Compliance Department will draft a document detailing the facts that led to the opening of the investigation, the facts that were found during the investigation, and the Compliance Department's analysis and conclusion. If the Compliance Department concludes that there is reasonable cause to believe a Member has violated Kalshi's Rules or other applicable statutes or regulations, the Compliance Department will submit to the Member whose activity is the subject of the investigation a notice of charges, by electronic mail to that Member's last known email address, that will include:

(1) The reason the investigation was initiated;
(2) The charges or a summary of the charges, including the rule or rules alleged to have been violated;
(3) The response, if any, or a summary of the response;
(4) A summary of the investigation conducted;
(5) Findings of fact and the Compliance Department's conclusions as to each charge, including which of these Rules the Member or its authorized representative violated, if any;
(6) A summary of the Member's, and any relevant authorized representative's, disciplinary history, if any;
(7) The period within which a hearing on the charges may be requested; and
(8) The penalty, if any, proposed by the Company.

(c) If the Compliance Department initiates an investigation in which any Affiliate of Kalshi is a subject, the Chief Compliance Officer shall notify the Commission's Division of Market Oversight of that fact. At the conclusion of any such investigation, the Chief Compliance Officer shall provide the Commission's Division of Market Oversight with a copy of the documentation specified in paragraph (b) of this Rule.

(d) The Member whose activity is the subject of the investigation may contest the Compliance Department's findings by forwarding a response to those findings by electronic mail to the Compliance Department within 15 days. The Member has a right to examine all relevant books, documents, or other evidence in the possession or under the control of Kalshi, except that Kalshi may withhold from inspection any documents that:

(1) Are privileged or that constitute attorney work product;
(2) Were prepared by any employee of Kalshi but which will not be offered in evidence in the disciplinary proceedings;
(3) May disclose a technique or guideline used in examinations, investigations, or enforcement proceedings; or
(4) Disclose the identity of a confidential source.

The Member's response must contain a detailed response to the findings and conclusions as to each charge and any other information the Member thinks is relevant. The outcome of settlement negotiations between the Member and the Compliance Department may include, but is not limited to, a letter of warning.

(e) The Member whose activity is the subject of the investigation may request to enter settlement negotiations by forwarding a response to the Compliance Department's findings by electronic mail to the Compliance Department within 15 days. The Member has a right to examine all relevant books, documents, or other evidence in the possession or under the control of Kalshi, except that Kalshi may withhold from inspection any documents that:

(1) Are privileged or that constitute attorney work product;
(2) Were prepared by any employee of Kalshi but which will not be offered in evidence in the disciplinary proceedings;
(3) May disclose a technique or guideline used in examinations, investigations, or enforcement proceedings; or
(4) Disclose the identity of a confidential source. The Member's response must contain a response to each charge and the Member may provide any other information the Member thinks is relevant. The outcome of settlement negotiations between the Member and the Compliance Department may include, but is not limited to, a letter of warning.

(f) If the findings of the Compliance Department are not contested by the Member, Kalshi will deem those findings admitted by the Member, the findings of fact and the Compliance Department's conclusions as to each charge shall become final and the Compliance Department shall impose the penalty (if any) proposed by the Compliance Department. The Member will be notified of the imposition of any penalty and sent a copy of the notice of disciplinary action by electronic mail to that Member's last known email address.

(g) If the findings of the Compliance Department are contested, the Compliance Department's report and the Member's response will be submitted to the Disciplinary Panel. The hearing officer may not have a financial, personal or other direct interest in the matter under consideration.

(1) The Disciplinary Panel will conduct a hearing with the Compliance Department and the Member within 20 business days of receipt of the Member's response contesting the compliance officer's finding and/or proposed sanction which the parties may attend telephonically. However, the Member is entitled to appear personally at the hearing, to cross-examine any persons appearing as witnesses at the hearing, and to call witnesses and to present such evidence as may be relevant to the charges.

(2) The formal rules of evidence shall not apply, but the hearing must be fair. The Compliance Department shall present its case on all charges and sanctions that are the subject of the hearing.

(3) Prior to the hearing, the parties may (but need not) submit proposed findings, briefs, and exhibits (including affidavits), and during the hearing the parties may present witnesses. Persons within Kalshi's jurisdiction who are called as witnesses must participate in the hearing and produce evidence, as requested. Kalshi shall likewise make reasonable efforts to secure the presence of all other persons called as witnesses whose testimony would be relevant to the matter at hand.

(4) Within 20 business days after that hearing, the hearing officer will issue findings, which will be delivered to the Member by electronic mail to the Member's last known email address. The findings of the hearing officer will contain the following information:
    (i) A summary of the charges and any answer to the charges;
    (ii) A summary of the evidence received;
    (iii) Findings and conclusions with respect to each charge;
    (iv) An indication of each specific rule that the member was found to have violated;
    (v) A declaration of any penalty to be imposed on the Member as the result of the findings and conclusions;
    (vi) The effective date and duration of that penalty; and
    (vii) A statement that the Member has the right to appeal any adverse decision by the panel to the Appeals Committee and must do so within 15 days.

(5) The panel's decision shall be final on the date it is signed by the hearing Disciplinary Panel. The hearing officer's decision shall become the final decision of Kalshi after the appeal period has lapsed.

(6) The hearing will be recorded, and all information submitted by the parties (including the Compliance Department's report and the Member's response) as well as the recording of the hearing, will be preserved by the Compliance Department, along with the hearing officer's findings, as the record of the proceedings (the "hearing record"). For the avoidance of doubt, if the Member has requested a hearing, a copy of the hearing shall be made and become a part of the record of the proceeding. The record shall be one that is capable of being accurately transcribed; however, it need not be transcribed unless the transcript is requested by Commission staff or the Member, the decision is appealed pursuant to the Rules of Kalshi, or is reviewed by the Commission pursuant to section 8c of the Act. In all other instances a summary record of a hearing is permitted.

(h) Either the Member or the Compliance Department may appeal the decision of the panel within 15 days by filing an appeal by electronic mail with the Appeals Committee and forwarding a copy to the other parties to the appeal. Any penalties will be stayed pending appeal unless the hearing officer determines that a stay pending appeal would likely be detrimental to the Company, other Members, or the public. The Appeals Committee will review the hearing record and any information submitted by the Compliance Department and the Member on appeal and issue its decision, which shall be final on the date of such issuance. The Member shall be notified of the decision by electronic mail to the Member's last known email address. The hearing record, any information submitted on appeal, and the Appeals Committee's decision shall be preserved as the record on appeal. The decision will contain the information listed in paragraph (f) of this Rule, outside of (f)(5), as well as:

(1) A statement that any person aggrieved by the action may have a right to appeal the action pursuant to Part 9 of the Commission's Regulations, within 30 days of service; and
(2) A statement that any person aggrieved by the action may petition the Commission for a stay pursuant to Part 9 of the Commission's Regulations, within 10 days of service.

(i) No Kalshi officer or employee shall interfere with or attempt to influence the process or resolution of any disciplinary action, except to the extent provided under these Rules with respect to a proceeding in which a Person is a member of the relevant Disciplinary Panel or Appeals Committee.

RULE 9.3 SETTLEMENT OF INVESTIGATIONS

(a) Kalshi may enter into settlements with any Member who is the subject of an investigation. The Member may initiate a settlement offer. Any settlement offer shall be forwarded to a Kalshi disciplinary panel with a recommendation by the Compliance Department that the proposed settlement be accepted, rejected, or modified. A settlement offer may be withdrawn at any time before it is accepted by the hearing officer.

(b) The panel may accept or reject a proposed settlement, and the decision of the relevant panel will be final. In addition, the panel may propose a modification to the proposed settlement for consideration by the Member or its authorized representative and the Compliance Department.

(c) Any settlement under this Rule will be written and will state:

(1) The charges or a summary of the charges;
(2) The response, if any, or a summary of the response;
(3) A summary of the investigation conducted;
(4) Findings and conclusions as to each charge, including each act the person charged was found to have committed or omitted, be committing or omitting, or be about to commit or omit, and each of these Rules that such act or practice violated, is violating, or is about to violate; and
(5) Any penalty imposed and the penalty's effective date.

(d) Failed settlement negotiations, or withdrawn settlement offers, will not prejudice a Member or otherwise affect subsequent procedures in the rule enforcement process.

RULE 9.4 NOTICE AND PUBLICATION OF DISCIPLINARY ACTION

(a) Kalshi will provide to the Person charged, notice of the disciplinary action, appeal determination, or settlement in which sanctions are imposed, no later than two business days after it becomes final in accordance with the provisions of Commission Regulation 38.710.

(b) Kalshi will make public notice of the disciplinary action by posting on its website, in accordance with Commission Regulation 9.13, the information required by Commission Regulation 9.11. The disciplinary action will be considered final on the date the notice of the disciplinary action is published on the Kalshi website.

RULE 9.5 PENALTIES

As a result of a disciplinary proceeding or as part of a settlement, Kalshi may impose one or more of the following penalties, commensurate with the violation committed, in consideration of any relevant disciplinary history, and including full restitution where Member harm is identified and where such restitution can be reasonably determined:

(a) A letter of warning, censure, or reprimand (although no more than one such letter may be issued to the same Person found to have committed the same rule violation within a rolling twelve-month period);

(b) A fine or penalty fee for each violation of any Rule or Applicable Law sufficient to deter recidivism, which Kalshi may cause and/or instruct Clearing House to deduct from the Member Account balance;

(c) Disgorgement of profits that resulted from the violation of any Rule, plus the cost of damages to any unoffending counterparties, which Kalshi may cause and/or instruct Clearing House to deduct from the Member Account balance;

(d) Suspension of Member status or privileges for a specified period, including partial suspension of such privileges (for example, suspension of trading privileges in particular types of Contracts or of placement of certain types of orders);

(e) Revocation of Member status or privileges, including partial revocation of such privileges (for example, revocation of trading privileges in particular types of Contracts or of placement of certain types of orders); and

(f) Interest, at the prime rate, as reported by the Wall Street Journal as of the date the amount becomes due, on any outstanding account balance, monetary fine, penalty fee, or disgorgement amount owed, compounded monthly and calculated from the date when the amount was first due and payable.

RULE 9.6 SUMMARY SUSPENSION

(a) Kalshi may summarily suspend or restrict a Member privileges if the Chief Compliance Officer believes suspension or restriction is necessary to protect the markets, Kalshi, the public, or other Members.

(b) Whenever practicable Kalshi will notify the Member whose privileges are to be summarily suspended by electronic mail before the action is taken. If prior notice is not practicable, the Member shall be served with notice by electronic mail at the earliest opportunity. This notice shall:

(1) State the action taken or to be taken;
(2) Briefly state the reasons for the action;
(3) State the time and date when the action became or becomes effective and its duration; and
(4) State that any Member aggrieved by the action may petition the Commission for a stay of the effective date of the action pending a hearing pursuant to Part 9 of the Commission's Regulations, within 10 days of service.

(c) The Member whose privileges are to be summarily suspended shall be given an opportunity for appeal under the procedures outlined in Rule 9.2(f) of these Rules. The decision affirming, modifying, or reversing the summary suspension shall be furnished by electronic mail to the suspended Member and the Commission no later than one business day after it is issued. The decision shall contain:

(1) A description of the action taken and the reasons for the action;
(2) A brief summary of the evidence received during the appeal process;
(3) Findings and conclusions;
(4) A determination as to whether the summary action that was taken should be affirmed, modified, or reversed;
(5) A declaration of any action to be taken against the suspended Member as the result of that determination;
(6) The effective date and duration of that action;
(7) A determination of the appropriate relief based on the findings and conclusions;
(8) A statement that any person aggrieved by the action may have a right to appeal the action pursuant to Part 9 of the Commission's Regulations, within 30 days of service; and
(9) A statement that any person aggrieved by the action may petition the Commission for a stay pursuant to Part 9 of the Commission's Regulations, within 10 days of service.

RULE 9.7 REPRESENTATION BY COUNSEL

A Member who is a subject of any proceedings under this Chapter has the right to retain and be represented by counsel or any other representative of its choosing in all succeeding stages of the disciplinary process, except any member of Kalshi's Board of Directors or Disciplinary Panel, any employee of Kalshi, or any person substantially related to the underlying investigations, such as material witness or respondent.

RULE 9.8 REPORTING VIOLATIONS TO THE COMMISSION

(a) Whenever Kalshi suspends, expels, fines or otherwise disciplines or denies any Person access to the Platform, Kalshi will make the disclosures required by Commission Regulations.

(b) Kalshi will submit to the Commission a schedule listing all those Company Rule violations which constitute disciplinary offenses as defined in paragraph (a)(6)(i) of CFTC Regulation 1.63 and, to the extent necessary to reflect revisions, will submit an amended schedule within thirty days of the end of each calendar year. Kalshi will maintain the schedule required by this section and post the schedule on Kalshi's website.

(c) Kalshi will submit to the Commission within thirty days of the end of each calendar year a certified list of any Members or Persons who have been removed from any Disciplinary Panel, the Board or any Company committee pursuant to these Rules or Applicable Law during the prior year.

(d) Whenever Kalshi finds by final decision that a Member or Person has violated a Rule or otherwise committed a disciplinary offense and such finding makes such person ineligible to serve on Kalshi's Disciplinary Panels, Company committees, or the Board, Kalshi shall inform the Commission of such finding and the length of the ineligibility in a notice it is required to provide to the Commission pursuant to either CEA Section 17(h)(1) or CFTC Regulation 9.11.

CHAPTER 10 - ARBITRATION

RULE 10.1 GENERAL

(a) If so elected by a Member, any Claim by the Member against a Member (including any related counterclaims) shall be settled by arbitration in accordance with this Chapter 10.

(b) A Claim brought pursuant to this Rule 10.1 shall be adjudicated by qualified arbitrators appointed in accordance with Rule 10.5 below.

(c) Persons to a dispute resolved in accordance with this Chapter 10 shall have the right to retain and be represented by legal counsel or any other representation of its choosing, except any Director or a member of the Disciplinary Panel or person substantially related to the underlying investigations, such as material witnesses or respondents during such proceedings. Persons to a dispute resolved in accordance with this Chapter 10 shall be responsible for their own costs, expenses and attorneys' fees incurred in connection with the dispute. Notwithstanding the foregoing, the Person that prevails shall be entitled to recover from the other party all costs, expenses and reasonable attorneys' fees incurred in any arbitration arising out of or relating to this Chapter 10, and in any legal action or administrative proceeding to enforce any arbitration award or relief.

(d) Any award or relief granted by the arbitrators hereunder shall be final and binding on the parties hereto and may be enforced by any court of competent jurisdiction.

(e) For purposes of this Chapter 10, the term "Claim" means any dispute which arises out of any Kalshi Contract, which dispute does not require for adjudication the presence of essential witnesses or third parties over whom Kalshi does not have jurisdiction or who are otherwise not available. The term "Claim" does not include disputes arising from underlying commodity transactions which are not a part of, or directly connected with, any Kalshi Contract.

RULE 10.2 FAIR AND EQUITABLE ARBITRATION PROCEDURES

(a) A Person desiring to initiate an arbitration as provided in Rule 10.1 shall file a notice of arbitration (a "Notice") within two years from the time the Claim arose. The Notice must set forth the name and address of the party or parties against whom the Claim is being asserted, the nature and substance of the Claim, the relief requested, and the factual and legal bases alleged to underlie such relief.

(b) The Notice shall be accompanied by a non-refundable check payable to Kalshi in payment of the arbitration fee. The amount of the fee shall be (i) $500 for a Claim requesting relief totaling less than $5,000 in the aggregate or (ii) $1,000 for a Claim requesting relief totaling $5,000 or more in the aggregate.

(c) Upon receipt, Kalshi shall promptly convene an arbitration panel in accordance with Rule 10.5. Kalshi shall deliver a copy of the Notice to each other party and to the arbitration panel.

(d) Within 20 days following the delivery of the Notice, each respondent shall file a written response (a "Response") with Kalshi, with a copy to the claimant, setting forth its or his position and any counterclaims, as applicable. If the Response sets forth one or more counterclaims, the claimant shall file within 20 days a written reply to such counterclaims with the Company, with a copy to the claimant.

(e) Once each party has had an opportunity to respond to the Claim and all counterclaims, the arbitration panel shall promptly schedule a hearing. Notwithstanding, Claims requesting relief totaling less than $5,000 in the aggregate may, in the interests of efficiency and economy, be resolved without hearing.

(f) The chairman of the arbitration panel shall preside over the hearing and shall make such determinations on the relevancy and procedure as will promote a fair and expeditious adjudication.

(g) The arbitration panel shall consider all relevant, probative testimony and documents submitted by the parties. The arbitration panel shall not be bound by the formal rules of evidence.

(h) The final decision of the panel shall be by majority vote of the arbitrators, as applicable.

(i) Within 60 days after the termination of the hearing, the arbitration panel shall render its final decision in writing and deliver a copy thereof either in person or by first-class mail to each of the parties. The arbitration panel may grant any remedy or relief which it deems just and equitable, including, without limitation, the awarding of interest and the arbitration fee.

(j) The final decision of the arbitration panel shall not be subject to appeal within Kalshi.

(k) No verbatim record shall be made of the proceedings, unless requested by a party who shall bear the cost of such record.

RULE 10.3 WITHDRAWAL OF ARBITRATION CLAIM

Any Notice may be withdrawn at any time before the Response is filed in accordance with this Chapter 10. If a Response has been filed, any withdrawal shall require consent of the party against which the Claim is asserted.

RULE 10.4 PENALTIES

(a) Any failure on the part of a Member to arbitrate a dispute subject to this Chapter 10, or the commencement by any such Member of a suit in any court prior to arbitrating a case that is required to be arbitrated pursuant to this Chapter 10, violates these Rules and shall subject such Member to disciplinary proceedings pursuant to Chapter 9.

(b) The Chief Compliance Officer, in consultation with the Regulatory Oversight Committee, may summarily suspend, pursuant to Rule 9.6, a Member that fails to timely satisfy an arbitration award rendered in any arbitration pursuant to this Chapter 10.

RULE 10.5 ARBITRATION PANEL

(a) On an as-needed basis, Kalshi shall convene an arbitration panel to adjudicate an arbitration claim under this Chapter 10. For a Claim requesting relief totaling less than $5,000 in the aggregate, the arbitration panel shall consist of one individual. For a Claim requesting relief totaling $5,000 or more in the aggregate, the arbitration panel shall consist of three individuals.

(b) Members of the arbitration panel shall be individuals that do not have a direct interest (financial, personal or otherwise) in the matter.

(c) Any member of the arbitration panel may disqualify himself for any reason he deems appropriate.

(d) Each member of the arbitration panel shall conduct himself in a manner consistent with the American Bar Association/American Arbitration Association's "Code of Ethics for Arbitrators in Commercial Disputes," which Kalshi hereby adopts as its own code of ethics for arbitrators.

(e) Each member of the arbitration panel must have no less than five years' experience in the financial services industry, and no less than one arbitrator must have no less than five years' experience in the commodity futures or swap industry.

(f) In the event that members of the arbitration panel do not satisfy the requirements of this Rule 10.5, then the Regulatory Oversight Committee may substitute a new member for the arbitration panel or act as the arbitration panel, to the extent that the substituted member or the Regulatory Oversight Committee, as the case may be, does not have a direct interest (financial, personal or otherwise) in the matter.

CHAPTER 11 LIMITATION OF LIABILITY; TIME PERIOD IN WHICH TO BRING ACTIONS; GOVERNING LAW

RULE 11.1 PROPERTY RIGHTS

(a) Each Member hereby acknowledges and agrees that KalshiEX LLC owns and shall retain all right, title and interest in and to Kalshi, all components thereof, including, without limitation, all related applications, all application programming interfaces, user interface designs, software and source code and any and all intellectual property rights therein, including, without limitation, all registered or unregistered, as applicable, copyright, trademark, service mark, trade secret, trade name, data or database rights, design rights, moral rights, inventions, whether or not capable of protection by patent or registration, rights in commercial information or technical information, including know-how, research and development data and manufacturing methods, patent, and other intellectual property and ownership rights, including applications for the grant of any of the same, in or to Kalshi and all other related proprietary rights of Kalshi and/or any of its Affiliates (together, with any and all enhancements, corrections, bug fixes, updates and other modifications to any of the foregoing and any and all data or information of any kind, other than Proprietary Data and Personal Information, transmitted by means of any of the foregoing, including, without limitation, market data, the "Proprietary Information"). Each Member further acknowledges and agrees that the Proprietary Information is the exclusive, valuable and confidential property of Kalshi. Each Member acknowledges and agrees that it shall not reverse engineer, copy, bug fix, correct, update, transfer, reproduce, republish, broadcast, create derivative works based on or otherwise modify, in any manner, all or any part of Kalshi or the Proprietary Information. Each Member further agrees to keep the Proprietary Information confidential and not to transfer, rent, lease, copy, loan, sell or distribute, directly or indirectly, all or any portion of the Company or any Proprietary Information.

(b) Subject to the provisions of this Rule 11.1, each Member hereby acknowledges and agrees that Kalshi is the owner of all rights, title and interest in and to all intellectual property and other proprietary rights (including all copyright, patent, trademark or trade secret rights) in market data, and all derivative works based thereon, and further agree not to distribute, create derivative works based on, or otherwise use or commercially exploit market data and any such derivative works, provided that Members may use market data for their own internal business purposes. Without limiting the generality of the foregoing, Members may not distribute, sell or retransmit market data exchange to any third party.

(c) Notwithstanding any other provision of this Rule 11.1, each Member retains such rights as it may enjoy under applicable law with respect to market data solely in the form such market data was submitted to Kalshi by such Member.

(d) Transaction data shall not be disclosed publicly other than on an aggregated or anonymous basis, or in a manner that does not directly or indirectly identify any Member who has submitted such data.

(e) Kalshi shall not condition access to the Company upon a Member's consent to the use of Proprietary Data and Personal Information for business or marketing purposes. Proprietary Data and Personal Information may not be used by the Company for business and marketing purposes unless the Member has clearly consented to the use of Proprietary Data and Personal Information in such manner. Kalshi, where necessary, for regulatory purposes, may share Proprietary Data and Personal Information with one or more Designated Contract Markets or Derivative Clearing Organizations. Nothing in this Rule shall preclude Kalshi from disclosing Proprietary Data and Personal Information:

(1) As required by Applicable Law or legal process;
(2) As Kalshi may deem necessary or appropriate in connection with any litigation affecting the Company;

(3) To any Company Representative authorized to receive such information within the scope of his or her duties;
(4) To a third party performing regulatory or operational services for the Company, provided that such party has executed a confidentiality and non-disclosure agreement in a form approved by Kalshi;
(5) To a duly authorized representative of the CFTC lawfully requesting Proprietary Data and Personal Information;
(6) In a manner in which a Member consents to such disclosure;
(7) Pursuant to the terms of an information-sharing agreement; or
(8) As permitted by CFTC Regulations.

RULE 11.2 SIGNATURES

Rather than rely on an original signature, Kalshi may elect to rely on a signature that is transmitted, recorded or stored by any electronic, optical, or similar means (including but not limited to telecopy, imaging, photocopying, electronic mail, electronic data interchange, telegram, or telex) as if it were (and the signature shall be considered and have the same effect as) a valid and binding original.

RULE 11.3 LIMITATION OF LIABILITY

(a) EACH MEMBER OF KALSHI AGREES THAT NEITHER KALSHI NOR ITS OFFICERS, DIRECTORS, AGENTS, EMPLOYEES, AND/OR SOFTWARE, HARDWARE, AND SERVICE PROVIDERS (COLLECTIVELY REFERRED TO AS "KALSHI PARTIES") SHALL HAVE ANY RESPONSIBILITY FOR COMPLIANCE BY MEMBER WITH ANY LAW OR REGULATION GOVERNING MEMBER'S CONDUCT. MOREOVER, EACH MEMBER OF KALSHI ALSO AGREES THAT NO KALSHI PARTY SHALL BE LIABLE IN ANY MANNER WHATSOEVER FOR ANY LOSS OR DAMAGE SUSTAINED BY MEMBER, INCLUDING ANY CONSEQUENTIAL LOSS, LOSS OF PROFIT OR LOSS OF TRADING OPPORTUNITY, AS A RESULT OF ANY ACTUAL OR PROPOSED TRANSACTIONS OR AS A DIRECT OR INDIRECT RESULT OF ANY SERVICES PROVIDED BY KALSHI PARTIES (INCLUDING, WITHOUT LIMITATION, ANY FAILURE IN KALSHI'S SYSTEMS OR ANY INACCURATE INFORMATION PROVIDED BY A KALSHI PARTY), UNLESS THE RELEVANT KALSHI PARTY IS DETERMINED BY FINAL RULING OF AN ARBITRATION PROCEEDING TO HAVE ACTED OR FAILED TO ACT IN A MANNER THAT IS GROSSLY NEGLIGENT, RECKLESS, OR FRAUDULENT. FOR THE AVOIDANCE OF DOUBT, NOTHING IN THIS RULE IS INTENDED TO LIMIT THE LIABILITY OF ANY PERSON AS MAY BE PROVIDED IN THE CEA, THE REGULATIONS OF THE COMMISSION, OR BY ACTS OF WILLFUL OR WANTON MISCONDUCT OR FRAUD.

(b) EACH MEMBER OF KALSHI AGREES THAT IT MAY NOT BRING ANY ACTION AGAINST A KALSHI PARTY UNLESS IT BRINGS SUCH ACTION WITHIN 2 YEARS OF THE FIRST

OCCURRENCE OR LACK OF OCCURRENCE OF THE ACT OR OMISSION COMPLAINED OF.

(c) EACH MEMBER OF KALSHI AGREES THAT ANY ACTION IT BRINGS AGAINST A KALSHI PARTY WILL BE GOVERNED BY NEW YORK LAW, WITHOUT REGARD TO STATUTES, PRECEDENT, LEGAL DOCTRINE, OR CONTRACTUAL PROVISIONS THAT WOULD REQUIRE THE APPLICATION OF THE LAWS OF A DIFFERENT JURISDICTION.

(d) EACH MEMBER OF KALSHI AGREES THAT ANY ACTION IT BRINGS AGAINST A KALSHI PARTY OR AGAINST ANOTHER KALSHI MEMBER WILL BE RESOLVED BY BINDING ARBITRATION, IN ACCORDANCE WITH THE RULES OF THIS CHAPTER AND OTHER RULES OF KALSHI, IF APPLICABLE.

CHAPTER 12 COMMISSION REGULATIONS THAT HAVE BEEN ADAPTED TO BE PART OF THE RULES

The following Rules are adaptations of regulations adopted by the Commission. They must be followed by Members and Kalshi itself, and any violation of these regulations will be a punishable violation of the Rules.

RULE 12.1 ACTIVITIES OF SELF-REGULATORY ORGANIZATION EMPLOYEES AND GOVERNING MEMBERS WHO POSSESS MATERIAL, NON-PUBLIC INFORMATION (ADAPTED FROM COMMISSION REGULATION 1.59)

(a) Employees of self-regulatory organizations; Self-regulatory organization rules.

(1) Employees of Kalshi are prohibited from:

(i) Trading, directly or indirectly, in any commodity interest traded on Kalshi;

(ii) Trading directly or indirectly in any commodity interest traded on or cleared by a contract market, swap execution facility, or clearing organization other than Kalshi and in any commodity interest traded on or cleared by a linked exchange if the employee has access to material non-public information concerning such commodity interest.

(2) Employees of Kalshi are prohibited from disclosing to any other person any material, non-public information which such employee obtains as a result of his or her employment at Kalshi where such employee has or should have a reasonable expectation that the information disclosed may assist another person in trading any commodity interest; however, this Rule does not prohibit disclosures made in the course of an employee's duties, or disclosures made to another self-regulatory organization, linked exchange, court of competent jurisdiction or representative of any agency or department of the federal or state government acting in his or her official capacity.

(b) Members of Kalshi's governing boards and committees and Kalshi consultants; Kalshi's Rules. No member of Kalshi's governing board or of a committee of Kalshi and no Kalshi consultant shall use or disclose, for any purpose other than the performance of such person's official duties as a governing board or committee member or consultant, material, non-public information obtained as a result of such person's official duties.

(c) Prohibited conduct.

(1) No person who is an employee of, a member of the governing board of, or a member of any committee of, or a consultant of Kalshi shall:
(i) Trade for such person's own account, or for or on behalf of any other account, in any commodity interest on the basis of any material, non-public information obtained through special access related to the performance of such person's official duties as an employee, board or committee member, or consultant; or
(ii) Disclose for any purpose inconsistent with the performance of such person's official duties as an employee, board or committee member, or consultant, any material, non-public information obtained through special access related to the performance of such duties.
(2) No person shall trade for such person's own account, or for or on behalf of any account, in any commodity interest, on the basis of any material, non-public information that such person knows was obtained in violation of paragraph (c)(1) from an employee of, a member of the governing board of, a member of any committee, or a consultant of a self-regulatory organization.

RULE 12.2 SERVICE ON SELF-REGULATORY ORGANIZATION GOVERNING BOARDS OR COMMITTEES BY PERSONS WITH DISCIPLINARY HISTORIES (ADAPTED FROM COMMISSION REGULATION 1.63)

(a) A person is ineligible to serve on any Kalshi disciplinary committees, arbitration panels, oversight panels or governing board if that person:

(1) Was found within the prior three years by a final decision of a self-regulatory organization, an administrative law judge, a court of competent jurisdiction or the Commission to have committed a disciplinary offense;
(2) Entered into a settlement agreement within the prior three years in which any of the findings or, in the absence of such findings, any of the acts charged included a disciplinary offense;
(3) Currently is suspended from trading on any contract market, is suspended or expelled from membership with any self-regulatory organization, is serving any sentence of probation or owes any portion of a fine imposed pursuant to either:
(i) A finding by a final decision of a self-regulatory organization, an administrative law judge, a court of competent jurisdiction or the Commission that such person committed a disciplinary offense; or

(ii) A settlement agreement in which any of the findings or, in the absence of such findings, any of the acts charged included a disciplinary offense.

(4) Currently is subject to an agreement with the Commission or any self-regulatory organization not to apply for registration with the Commission or membership in any self-regulatory organization;

(5) Currently is subject to or has had imposed on him within the prior three years a Commission registration revocation or suspension in any capacity for any reason, or has been convicted within the prior three years of any of the felonies listed in section 8a(2)(D) (ii) through (iv) of the Act; or

(6) Currently is subject to a denial, suspension or disqualification from serving on the disciplinary committee, arbitration panel or governing board of any self-regulatory organization as that term is defined in section 3(a)(26) of the Securities Exchange Act of 1934.

(b) No person may serve on a disciplinary committee, arbitration panel, oversight panel or governing board of Kalshi if such person is subject to any of the conditions listed in paragraphs (a)(1)-(6) of this Rule.

(c) Kalshi shall submit to the Commission a schedule listing all those rule violations which constitute disciplinary offenses and to the extent necessary to reflect revisions shall submit an amended schedule within 30 days of the end of each calendar year. Kalshi must maintain and keep current the schedule required by this section, post the schedule in a public place designed to provide notice to members and otherwise ensure its availability to the general public.

(d) Kalshi shall submit to the Commission within 30 days of the end of each calendar year a certified list of any persons who have been removed from its disciplinary committees, arbitration panels, oversight panels or governing board pursuant to the requirements of this regulation during the prior year.

(e) Whenever Kalshi finds by final decision that a person has committed a disciplinary offense and such finding makes such person ineligible to serve on that self-regulatory organization's disciplinary committees, arbitration panels, oversight panels or governing board, Kalshi shall inform the Commission of that finding and the length of the ineligibility in any notice it is required to provide to the Commission pursuant to either section 17(h)(1) of the Act or Commission Regulation 9.11.

RULE 12.3 VOTING BY INTERESTED MEMBERS OF SELF-REGULATORY ORGANIZATION GOVERNING BOARDS AND VARIOUS COMMITTEES (ADAPTED FROM COMMISSION REGULATION 1.69)

(a) Kalshi shall maintain in effect Rules that have been submitted to the Commission pursuant to Section 5c(c) of the Act and Part 40 of the Commission Regulations to address the avoidance of conflicts of interest in the execution of its self-regulatory functions. Such Rules provide for the following:

(1) Relationship with named party in interest —

(i) Nature of relationship. A member of Kalshi's governing board, disciplinary committee or oversight panel must abstain from such body's deliberations and voting on any matter involving a named party in interest where such member:

(A) Is a named party in interest;

(B) Is an employer, employee, or fellow employee of a named party in interest;

(C) Is associated with a named party in interest through a "broker association" as defined in Commission Regulation 156.1;

(D) Has any other significant, ongoing business relationship with a named party in interest, not including relationships limited to executing futures or option transactions opposite of each other or to clearing futures or option transactions through the same clearing member; or

(E) Has a family relationship with a named party in interest.

(ii) Disclosure of relationship. Prior to the consideration of any matter involving a named party in interest, each member of a Kalshi governing board, disciplinary committee or oversight panel must disclose to the appropriate Kalshi staff whether he or she has one of the relationships listed in paragraph (a)(1)(i) of this Rule with a named party in interest.

(iii) Procedure for determination. Kalshi must establish procedures for determining whether any member of its governing board, disciplinary committees or oversight committees is subject to a conflicts restriction in any matter involving a named party in interest. Taking into consideration the exigency of the committee action, such determinations should be based upon:

(2) Financial interest in a significant action —

(i) Nature of interest. A member of a Kalshi governing board, disciplinary committee or oversight panel must abstain from such body's deliberations and voting on any significant action if the member knowingly has a direct and substantial financial interest in the result of the vote based upon either exchange or non-exchange positions that could reasonably be expected to be affected by the action.

(ii) Disclosure of interest. Prior to the consideration of any significant action, each member of a Kalshi governing board, disciplinary committee or oversight panel must disclose to the appropriate Kalshi staff the position information referred to in paragraph (a)(2)(iii) of this Rule that is known to him or her. This requirement does not apply to members who choose to abstain from deliberations and voting on the subject of significant action.

(iii) Procedure for determination. Kalshi must establish procedures for determining whether any member of its governing board, disciplinary committees or oversight committees is subject to a conflict restriction under this section in any significant action. Such determination must include a review of:

(A) Gross positions held at Kalshi in the member's personal accounts or "controlled accounts," as defined in Commission Regulation 1.3(j);

(B) Gross positions held at Kalshi in proprietary accounts, as defined in Commission Regulation 1.17(b)(3), at the member's affiliated firm;

(C) Gross positions held at Kalshi in accounts in which the member is a principal, as defined in Commission Regulation 3.1(a);

(D) Net positions held at Kalshi in "customer" accounts, as defined in Commission Regulation 1.17(b)(2), at the member's affiliated firm; and

(E) Any other types of positions, whether maintained at Kalshi or elsewhere, held in the member's personal accounts or the proprietary accounts of the member's affiliated firm that the self-regulatory organization reasonably expects could be affected by the significant action.

(iv) Bases for determination. Taking into consideration the exigency of the significant action, such determinations should be based upon:

(A) The most recent large trader reports and clearing records available to Kalshi;

(B) Information provided by the member with respect to positions pursuant to paragraph (a)(2)(ii) of this Rule; and

(C) Any other source of information that is held by and reasonably available to Kalshi.

(3) Participation in deliberations.

(i) Under the Rules required by this section, a Kalshi governing board, disciplinary committee or oversight panel may permit a member to participate in deliberations prior to a vote on a significant action for which he or she otherwise would be required to abstain, pursuant to paragraph (a)(2) of this Rule, if such participation would be consistent with the public interest and the member recuses himself or herself from voting on such action.

(ii) In making a determination as to whether to permit a member to participate in deliberations on a significant action for which he or she otherwise would be required to abstain, the deliberating body shall consider the following factors:

(A) Whether the member's participation in deliberations is necessary for the deliberating body to achieve a quorum in the matter; and

(B) Whether the member has unique or special expertise, knowledge or experience in the matter under consideration.

(iii) Prior to any determination pursuant to paragraph (a)(3)(i) of this Rule, the deliberating body must fully consider the position information which is the basis for the member's direct and substantial financial interest in the result of a vote on a significant action pursuant to paragraph (a)(2) of this Rule.

(4) Documentation of determination. Kalshi's governing boards, disciplinary committees, and oversight panels must reflect in their minutes or otherwise document that the conflicts determination procedures required by this section have been followed. Such records also must include:

(i) The names of all members who attended the meeting in person or who otherwise were present by electronic means;

(ii) The name of any member who voluntarily recused himself or herself or was required to abstain from deliberations and/or voting on a matter and the reason for the recusal or abstention, if stated; and

(iii) Information on the position information that was reviewed for each member.

CHAPTER 13 TERMS OF CONTRACTS TRADED ON KALSHI

The following Rules set forth the terms of the Contracts traded on Kalshi. You should not trade any Contract unless you are certain that you completely understand and accept its terms. Additional information with respect to each Contract can be found on the homepage for the specific Contract.

RULE 13.1 TERMS THAT ARE UNIFORM ACROSS CONTRACTS

There are certain terms that are uniform across Contracts.

(a) The minimum unit of trading is one Contract.

(b) All Contract prices are quoted in U.S. Dollars and cents per Contract.

(c) The minimum quote increment for each Contract is $0.01 per Contract.

All Market Outcomes will be posted on Kalshi's website no later than 11:59 pm ET on the day that such Market Outcomes are determined. If the Market Outcome Review Process is initiated under Rule 7.1, the final Market Outcome will be posted on Kalshi's website no later than 11:59 pm ET on the day that the Outcome Review Committee reaches a determination on the Contract's final Market Outcome.

(d) Halted Markets – In the event that any market irregularities are declared by the Chief Executive Officer of Kalshi, or to prevent or reduce the potential risk of price distortions or market disruptions, a market may be paused or halted for trading, and the Commission will be notified, if required, pursuant to Commission Regulations. An explanation will be posted on the Kalshi Notices section of the website within a reasonable amount of time but no later than 24 hours after the initiation of the halt.

(e) Discretion to Refrain from Listing Contracts – Kalshi may, in its discretion, temporarily refrain from the listing of any Contract due to the unavailability of the Underlying upon which the Contract is based, or any other condition Kalshi determines may be detrimental to the listing of the Contract.

(f) Contract Modifications – Specifications shall be fixed as of the first day of trading of a Contract, except as provided in Rule 2.8 and Rule 7.2 of these Rules or as set forth in Rules specific to a Contract. If any U.S. governmental agency or body issues an order, ruling, directive or law that conflicts with the requirements of these Rules, such order, ruling, directive or law shall be construed to take precedence and become part of these Rules, and all open and new Contracts shall be subject to such government orders.

(g) Any change in instructions, order, ruling, directive, or law issued or enacted by any court or agency of the Federal Government of the United States that conflicts with the Rules contained in this Rulebook shall take precedence, immediately become a part of these Rules, and be effective for all currently traded and newly listed Contracts.

Kalshi

Notice of Affiliate Entity Member:

September 21st, 2021

Pursuant to Rule 2.12 of the KalshiEX, LLC ("Exchange") Rulebook, the Exchange's board of directors approved Kalshi Trading LLC ("Trading"), an affiliate of the Exchange, to be a member of the Exchange. Beginning June 28, 2021, Trading commenced trading on the Exchange platform. Two members of Trading's board of directors, Tarek Mansour and Luana Lopes Lara, are also members of the board of directors of the Exchange and the holding company that owns the Exchange and Trading, as well as officers of the Exchange.

Trading was established as a profit-making enterprise to help support liquidity on the Exchange, principally through spread trading. From the inception of trading, on most days, Trading has provided liquidity for the Exchange's contracts, often accounting for a substantial portion of relevant quotations and trading volume. Trading both aggresses and enters passive orders on the exchange.

Although Trading has no formal legal obligations imposed by the Exchange to make markets or to provide any minimum amount of liquidity, it has represented to the Exchange that it likely will continue to account for a substantial portion of the Exchange's quotations and trading volume in the short term, and may do so in the long term too.

As a member of the Exchange, Trading is subject to all provisions of the Rulebook, identical to all other Exchange members. The Exchange will treat Trading like any other market participant. Because the activity of Trading creates specific risks with respect to the integrity and fairness of the Exchange, the Exchange has developed policies and procedures to mitigate such risks. Among such measures are strict informational barriers between Trading and the Exchange to preclude the provision of any confidential information regarding any other member to Trading. The Exchange will also ensure members remain informed of actual or potential conflicts arising out of Trading activities.

If any of the above information changes in a material way or additional disclosure is determined to be warranted, the Exchange will disclose to members promptly the updated information. Market participants who have questions should reach out to the Exchange via our support email: Support@kalshi.com.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name (b)(3):7 U.S.C.		**2. First Name** (b)(3):7 U.S.C. §26(h)(2)(A)	**3. M.I.**
4. Street Address (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			**5. Apartment/Unit#** (b)(3):7
6. City (b)(3):7 U.S.C. §26(h)(2)(A)	**7. State/Province** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**8. ZIP/Postal Code** (b)(3):7 U.S.C.	**9. Country** United States
10. Telephone (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication**
14. Occupation			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type** Kalshi.com
3. Name Kalshi	

4. Street Address			5. Apartment/Unit#
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
10. Telephone	**11. E-mail Address**		**12. Internet Address**

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
No

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Email

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☑ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.
promise to withdrawal money 3-5 business days but after 2 weeks the money still haven't been sent nor have I received responses.

4. Select the type of product/instrument:

- ☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3):7 U.S.C. §26(h)(2)(A)

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☑ YES ☐ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
I have traded on Kalshi for the presidental race on (b)(3):7 U.S.C. I have submitted (b)(3):7 U.S.C. towards it. I won an additional money , altogether amounting to (b)(3):7 including the original deposit. Kalshi stated it takes 3-5 business days to receive the money. I have contacted Kalshi Support on (b)(3):7 U.S.C. They had told me there is a glitch in the system stopping people from getting withdrawals. It is now (b)(3):7 U.S.C. and I haven't heard back.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
Initial Deposit Proof Withdrawal Started proof Withdrawal states it has been completed Contacting support proof

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible. When doing research about the company I found out I'm not the only one experiencing this issue: https://ca.trustpilot.com/review/kalshi.com
2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.
3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter? ☐ YES ☑ NO
If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:
4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you? ☐ YES ☑ NO
If "Yes," please provide details.
If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.
5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor? ☐ YES ☑ NO
If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations? ☐ YES ☐ NO
If "Yes," please provide details including the date you took the action(s).
6. Have you taken any other action regarding your complaint? ☐ YES ☑ NO
If "Yes," please provide details.
7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or

representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

SUBMISSION INFORMATION

Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name (b)(3):7 U.S.C. §26(h)(2)(A)		**2. First Name** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**3. M.I.** (b)(3):7 U.S.C.
4. Street Address (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			**5. Apartment/Unit#**
6. City (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**7. State/Province** (b)(3):7 U.S.C.	**8. ZIP/Postal Code** (b)(3):7 U.S.C. §26(h)(2)(A)	**9. Country** US
10. Telephone (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** Email
14. Occupation (b)(3):7 U.S.C. §26(h)(2)(A)			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type** Kalshi Inc. (online prediction market)
3. Name Kalshi Inc.	

4. Street Address			5. Apartment/Unit#
594 Broadway			
6. City New York	**7. State/Province** NY	**8. ZIP/Postal Code** 10012	**9. Country** United States
10. Telephone	**11. E-mail Address**		**12. Internet Address** kalshi.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
Heard about in a news article about prediction markets

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Don't Know

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?
Kalshi event contracts

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
The discrepancies I've noted are roughly (b)(3):7 U.S.C. §26(h)(2)(A) but there may have been many more that escaped my attention at the time.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
I sold several contracts and didn't receive the proceeds from them. This is misleading because Kalshi's log of my activity, as well as their emails to me, list these transactions as paid out.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
I have a .csv file of my transactions to date, screenshots of my balance and activity on the Kalshi.com website, and automated emails from Kalshi about my transactions. I have the one email I got back from Kalshi Support, which did not address my complaint at all.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible. I obtained this information from my online Kalshi activity log.
2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.
3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:
4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please provide details.
If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.
5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please provide details including the date you took the action(s).
6. Have you taken any other action regarding your complaint? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please provide details. I have contacted Kalshi support. I have only received what appears to be an automated response.
7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or

representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

<u>**Submission Procedures**</u>

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

<u>**Instructions for Completing Form TCR**</u>

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number
(b)(3):7 U.S.C. §26(h)(2)(A)

Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name
(b)(3):7 U.S.C.

2. First Name
(b)(3):7 U.S.C.

3. M.I.
(b)(3):7

4. Street Address
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Apartment/Unit#

6. City
(b)(3):7

7. State/Province
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

8. ZIP/Postal Code
(b)(3):7 U.S.C. §26(h)(2)(A)

9. Country
United States

10. Telephone
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

11. Alt. Phone
(b)(3):7 U.S.C.

12. Email Address
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

13. Preferred Method of Communication
E-mail

14. Occupation
(b)(3):7 U.S.C.

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City

5. State/Province

6. ZIP/Postal Code

7. Country

8. Telephone

9. Fax

10. E-mail Address

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type
☐ Individual ☑ Entity

2. If an individual, specify profession. If an entity, specify type
financial exchange/prediction market

3. Name

Kalshi Inc.			
4. Street Address 594 Broadway			**5. Apartment/Unit#**
6. City New York	**7. State/Province** New York	**8. ZIP/Postal Code** 10012	**9. Country** United States
10. Telephone	**11. E-mail Address** support@kalshi.com		**12. Internet Address** kalshi.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	**2. Is the conduct on-going?**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Don't Know

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☑ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.
Misleading representations that persuade to trade event contracts and the trading of event contracts based on unreleased information.

4. Select the type of product/instrument:

- ☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**

☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
event contract(s)

5. If applicable, what is the name of product/investment?
AUSHIGH (an event contract based on predicting the temperature in Austin, Texas)

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3):7 U.S.C. §26(h)(2)(A)

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Kalshi provides and manages event contracts for the prediction of the daily high temperature in Austin, Texas. The contracts sold are misleading in both presentation and wording. The event contracts' results are based on data provided by the National Weather Service in Austin, Texas at the Austin-Bergstrom location. The data provided by NWS is inconsistent. The event contract rules do not mention rounding. The event contracts are presented for Austin, Texas but are really for Austin-Bergstrom International Airport. This is all incredibly misleading to traders, consumers, etc. The event contracts stay open for trading even when certain temperature thresholds have been reached thereby rendering any monetary gain possible from them. The contracts are ultimately based on data which is not transparent and cannot be confirmed to be

accurate. https://www.reddit.com/r/IAmA/comments/1ggq905/hi_reddit_my_name_is_tarek_mansour_and_im_the/
Kalsh
i's CEO refers to weather event contracts as "betting" on a public Reddit post. Price movement occurred for the 82 degrees to 84 degrees and 85 degrees or higher contracts before the CLI (daily climate report) was released as well (possible insider trading). In general, it would be easy for someone to abuse this weather data and the fact that it is inconsistent both within the NWS and with other weather reporting (Weather.gov, Accuweather, etc.) is highly concerning.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
Supporting materials in my possession are the rules for the event contract and the NWS's public data. The data for the (b)(3):7 U.S.C. contracts and their price movement is available on kalshi.com.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.
I obtained the information publicly from kalshi's website and the NWS's website. The data for the event contracts themselves is not easily accessible on kalshi's website but I believe it should be available.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.
No information submitted would reveal my identity.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement

organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A)

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

AUSHIGH

Scope: These rules shall apply to this contract.

Underlying: The Underlying for this Contract is the maximum temperature recorded for the specified <date> published in the National Weather Service's ("NWS") Daily Climate Report for Austin Bergstrom. Revisions to the Underlying made after Expiration will not be accounted for in determining the Expiration Value.

Instructions: The Daily Climate Report for Austin Bergstrom can be accessed here. These instructions are provided for convenience only and may be modified or clarified at any time.

Source Agency: The Source Agency is the National Weather Service ("NWS").

Type: The type of Contract is an Event Contract.

Issuance: The Contract is based on the outcome of a recurrent data release which is issued on a daily basis. Thus, Contract iterations will be issued on a recurring basis, and future Contract iterations will generally correspond to the next day

<degrees>: Kalshi may list contracts with <degrees> levels that fall within an inclusive range between a maximum value of 130 degrees Fahrenheit and a minimum value of -30 degrees Fahrenheit at consecutive increments of 1 degree. Due to the potential for variability in the Underlying, the Exchange may modify <degrees> levels in response to suggestions by Members.

<date>: <date> refers to a date specified by Kalshi. Kalshi may list contracts corresponding to different statistical periods of <date>.

Payout Criterion: The Payout Criterion encompasses the Expiration Values that are <greater than/less than/between> <degrees>. If the value of <greater than/less than/between> is "between", then <degrees> shall be a pair of degrees, and an Expiration Value that is greater than or equal to the lower value of the degree pair and less than or equal to the greater value of the degree pair are encompassed in the Payout Criterion. If the value of <greater than/less than/between> is "greater than", then the Payout Criterion only encompasses Expiration Values that are strictly greater than <degrees> (e.g. if the strike variable values are "greater than" and "56 degrees", then an Expiration Value of 56 degrees is not encompassed in the Payout Criterion). If the value of <greater than/less than/between> is "less than", then the Payout Criterion only encompasses Expiration Values that are strictly less than <degrees>.

Minimum Tick: The Minimum Tick size for the referred Contract shall be $0.01.

Position Limit: The Position Limit for the $1 referred Contract shall be $25,000 per Member.

Last Trading Date: The Last Trading Date shall be <date> and the Last Trading Time will be 11:59 PM CT.

Settlement Date: The Settlement Date of the Contract shall be no later than the day after the Expiration Date unless Market Outcome is under review pursuant to Rule 7.1.

Expiration Date: The Expiration Date of the Contract shall be the sooner of the first 7:00 or

8:00 AM ET following the release of the data for <date>, or one week after <date>.

Expiration time: The Expiration time of the Contract shall be the sooner of the first 7:00 or 8:00 AM ET following the release of data for <date>.

Settlement Value: The Settlement Value for this Contract is $1.00.

Expiration Value: The Expiration Value is the value of the Underlying as documented by the Source Agency on the Expiration Date at the Expiration time

Contingencies: Before Settlement, Kalshi may, at its sole discretion, initiate the Market Outcome Review Process pursuant to Rule 6.3(c) of the Rulebook. Additionally, as outlined in Rule 7.2 of the Rulebook, if any event or any circumstance which may have a material impact on the reliability or transparency of a Contract's Source Agency or the Underlying related to the Contract arises, Kalshi retains the authority to designate a new Source Agency and Underlying for that Contract and to change any associated Contract specifications after the first day of trading.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C.

4. Street Address	5. Apartment/Unit#
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	US

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Email

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Country

8. Telephone	9. Fax	10. E-mail Address

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	Kalshi Inc. (online prediction market)

3. Name
Kalshi Inc.

4. Street Address			5. Apartment/Unit#
594 Broadway			
6. City New York	**7. State/Province** NY	**8. ZIP/Postal Code** 10012	**9. Country** United States
10. Telephone	**11. E-mail Address**		**12. Internet Address** kalshi.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
Heard about in a news article about prediction markets

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C.	Don't Know

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?
Kalshi event contracts

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
The discrepancies I've noted are roughly (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) but there may have been many more that escaped my attention at the time.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
I sold several contracts and didn't receive the proceeds from them. This is misleading because Kalshi's log of my activity, as well as their emails to me, list these transactions as paid out.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
I have a .csv file of my transactions to date, screenshots of my balance and activity on the Kalshi.com website, and automated emails from Kalshi about my transactions. I have the one email I got back from Kalshi Support, which did not address my complaint at all.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible. I obtained this information from my online Kalshi activity log.
2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.
3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:
4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please provide details.
If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.
5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please provide details including the date you took the action(s).
6. Have you taken any other action regarding your complaint? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please provide details. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or

representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A) (CEA); Non Responsive	**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA); Non Responsive Record

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name (b)(3):7 U.S.C.	**2. First Name** (b)(3):7 U.S.C.	**3. M.I.** (b)(3):7	
4. Street Address (b)(3):7 U.S.C. §26(h)(2)(A) (CEA); Non Responsive Record		**5. Apartment/Unit#**	
6. City (b)(3):7	**7. State/Province** (b)(3):7	**8. ZIP/Postal Code** (b)(3):7 U.S.C.	**9. Country** United States
10. Telephone (b)(3):7 U.S.C.	**11. Alt. Phone** (b)(3):7 U.S.C.	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** E-mail
14. Occupation (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type** financial exchange/prediction market
3. Name	

Kalshi Inc.			
4. Street Address 594 Broadway			**5. Apartment/Unit#**
6. City New York	**7. State/Province** New York	**8. ZIP/Postal Code** 10012	**9. Country** United States
10. Telephone	**11. E-mail Address** support@kalshi.com		**12. Internet Address** kalshi.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	**2. Is the conduct on-going?**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Don't Know

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☑ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.
Misleading representations that persuade to trade event contracts and the trading of event contracts based on unreleased information.

4. Select the type of product/instrument:

- ☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**

☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
event contract(s)

5. If applicable, what is the name of product/investment?
AUSHIGH (an event contract based on predicting the temperature in Austin, Texas)

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3):7 U.S.C.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Kalshi provides and manages event contracts for the prediction of the daily high temperature in Austin, Texas. The contracts sold are misleading in both presentation and wording. The event contracts' results are based on data provided by the National Weather Service in Austin, Texas at the Austin-Bergstrom location. The data provided by NWS is inconsistent. The event contract rules do not mention rounding. The event contracts are presented for Austin, Texas but are really for Austin-Bergstrom International Airport. This is all incredibly misleading to traders, consumers, etc. The event contracts stay open for trading even when certain temperature thresholds have been reached thereby rendering any monetary gain possible from them. The contracts are ultimately based on data which is not transparent and cannot be confirmed to be

accurate. https://www.reddit.com/r/IAmA/comments/1ggq905/hi_reddit_my_name_is_tarek_mansour_and_im_the/
Kalsh
i's CEO refers to weather event contracts as "betting" on a public Reddit post. Price movement
occurred for the 82 degrees to 84 degrees and 85 degrees or higher contracts before the CLI (daily climate report)
was released as well (possible insider trading). In general, it would be easy for someone to abuse this weather
data and the fact that it is inconsistent both within the NWS and with other weather reporting (Weather.gov,
Accuweather, etc.) is highly concerning.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Supporting materials in my possession are the rules for the event contract and the NWS's public data. The data for the (b)(3):7 U.S.C. §26(h)(2)(A) contracts and their price movement is available on kalshi.com.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

I obtained the information publicly from kalshi's website and the NWS's website. The data for the event contracts themselves is not easily accessible on kalshi's website but I believe it should be available.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

No information submitted would reveal my identity.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **torney had any prior communication(s) with the CFTC concerning this matter?**

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement

organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

AUSHIGH

Scope: These rules shall apply to this contract.

Underlying: The Underlying for this Contract is the maximum temperature recorded for the specified <date> published in the National Weather Service's ("NWS") Daily Climate Report for Austin Bergstrom. Revisions to the Underlying made after Expiration will not be accounted for in determining the Expiration Value.

Instructions: The Daily Climate Report for Austin Bergstrom can be accessed here. These instructions are provided for convenience only and may be modified or clarified at any time.

Source Agency: The Source Agency is the National Weather Service ("NWS").

Type: The type of Contract is an Event Contract.

Issuance: The Contract is based on the outcome of a recurrent data release which is issued on a daily basis. Thus, Contract iterations will be issued on a recurring basis, and future Contract iterations will generally correspond to the next day

<degrees>: Kalshi may list contracts with <degrees> levels that fall within an inclusive range between a maximum value of 130 degrees Fahrenheit and a minimum value of -30 degrees Fahrenheit at consecutive increments of 1 degree. Due to the potential for variability in the Underlying, the Exchange may modify <degrees> levels in response to suggestions by Members.

<date>: <date> refers to a date specified by Kalshi. Kalshi may list contracts corresponding to different statistical periods of <date>.

Payout Criterion: The Payout Criterion encompasses the Expiration Values that are <greater than/less than/between> <degrees>. If the value of <greater than/less than/between> is "between", then <degrees> shall be a pair of degrees, and an Expiration Value that is greater than or equal to the lower value of the degree pair and less than or equal to the greater value of the degree pair are encompassed in the Payout Criterion. If the value of <greater than/less than/between> is "greater than", then the Payout Criterion only encompasses Expiration Values that are strictly greater than <degrees> (e.g. if the strike variable values are "greater than" and "56 degrees", then an Expiration Value of 56 degrees is not encompassed in the Payout Criterion). If the value of <greater than/less than/between> is "less than", then the Payout Criterion only encompasses Expiration Values that are strictly less than <degrees>.

Minimum Tick: The Minimum Tick size for the referred Contract shall be $0.01.

Position Limit: The Position Limit for the $1 referred Contract shall be $25,000 per Member.

Last Trading Date: The Last Trading Date shall be <date> and the Last Trading Time will be 11:59 PM CT.

Settlement Date: The Settlement Date of the Contract shall be no later than the day after the Expiration Date unless Market Outcome is under review pursuant to Rule 7.1.

Expiration Date: The Expiration Date of the Contract shall be the sooner of the first 7:00 or

8:00 AM ET following the release of the data for <date>, or one week after <date>.

Expiration time: The Expiration time of the Contract shall be the sooner of the first 7:00 or 8:00 AM ET following the release of data for <date>.

Settlement Value: The Settlement Value for this Contract is $1.00.

Expiration Value: The Expiration Value is the value of the Underlying as documented by the Source Agency on the Expiration Date at the Expiration time

Contingencies: Before Settlement, Kalshi may, at its sole discretion, initiate the Market Outcome Review Process pursuant to Rule 6.3(c) of the Rulebook. Additionally, as outlined in Rule 7.2 of the Rulebook, if any event or any circumstance which may have a material impact on the reliability or transparency of a Contract's Source Agency or the Underlying related to the Contract arises, Kalshi retains the authority to designate a new Source Agency and Underlying for that Contract and to change any associated Contract specifications after the first day of trading.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	**Submission Received**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	**2. First Name**	**3. M.I.**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.

4. Street Address	**5. Apartment/Unit#**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.

6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.	United States

10. Telephone	**11. Alt. Phone**	**12. Email Address**	**13. Preferred Method of Communication**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Phone

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**

8. Telephone	**9. Fax**	**10. E-mail Address**

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	**2. If an individual, specify profession. If an entity, specify type**
☐ Individual ☑ Entity	DCM

3. Name
Kalshi Exchange

4. Street Address 594 Broadway			**5. Apartment/Unit#**
6. City New York	**7. State/Province** NY	**8. ZIP/Postal Code** 10012	**9. Country** united states
10. Telephone 0000000000	**11. E-mail Address** unknown@unknown.com		**12. Internet Address** kalshi.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
No

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
Market research

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy) (b)(3):7 U.S.C. §26(h)(2)(A)	**2. Is the conduct on-going?** Yes

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☑ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.
Failure to comply with C.F.R § 16.01 Daily Posting on 10/13, 10/31, 11/3 in connection with Presidential Election Markets.

4. Select the type of product/instrument:

- ☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☑ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**
If yes:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **Other**
If other, please describe
5. If applicable, what is the name of product/investment? Event contracts — no daily market data posted for (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
6. Have you suffered a monetary loss? ☐ YES ☑ NO
If yes, describe how much.
7. Has the individual or firm who engaged in the conduct acknowledged their fault? ☐ YES ☑ NO
8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct? ☐ YES ☑ NO
If yes, select the appropriate category:
☐ **Prior complaint to the CFTC.**
☐ **Complaint to another regulator.**
☐ **A state or federal criminal law enforcement entity.**
☐ **A legal action filed against the person or firm in a court of law.**
Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).
9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act. C.F.R § 16.01 requires DCMs to posting daily market statistics no later than 7 AM of the following day. Such postings were not made with respect to trading activity on (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) impacting the public's ability to review market activity, especially with respect to their election markets, in the run-up to the Presidential Election. This harms the public interest.
10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession. No json file is posted in the usual location for these dates as represented by the below error codes (based on attempting to visit the URLs at (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) and at prior times. Attempting to visit https://kalshi.com/trade-data for the respective dates times out and does not display trade data. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Attempting to visit the publicly available market trade data DCMs are required to post under CFR 16.01. https://kalshi.com/trade-data https://kalshi-public-docs.s3.amazonaws.com/reporting/market_data_2024-10-13.json https://kalshi-public-docs.s3.amazonaws.com/reporting/market_data_2024-10-31.json https://kalshi-public-docs.s3.amazonaws.com/reporting/market_data_2024-11-03.json

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Not applicable.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **by the Congress, or any other federal or state authority?**

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **the information that you are submitting to the CFTC?**

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name

(b)(3):7 U.S.C.

☑ **Check this box to agree with the declaration above.**

Date

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.	
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A)		
4. Street Address (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		**5. Apartment/Unit#** (b)(3):7 U.S.C. §26(h)(2)(A)	
6. City (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**7. State/Province** (b)(3):7 U.S.C.	**8. ZIP/Postal Code** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**9. Country** USA
10. Telephone (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** Email
14. Occupation			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			
2. Firm Name (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			
3. Street Address (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			
4. City (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**5. State/Province** (b)(3):7 U.S.C. §26(h)(2)(A)	**6. ZIP/Postal Code** (b)(3):7 U.S.C.	**7. Country** USA
8. Telephone (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**9. Fax**	**10. E-mail Address** (b)(3):7 U.S.C. §26(h)(2)(A)	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	

3. Name
Kalshi

4. Street Address			**5. Apartment/Unit#**
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
10. Telephone	**11. E-mail Address**		**12. Internet Address**

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Unknown

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Email

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	**2. Is the conduct on-going?**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Don't Know

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**
If yes:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☑ **Other**
If other, please describe Election Betting on the DCM.
5. If applicable, what is the name of product/investment? Outcome of US elections.
6. Have you suffered a monetary loss? ☐ YES ☑ NO
If yes, describe how much.
7. Has the individual or firm who engaged in the conduct acknowledged their fault? ☐ YES ☑ NO
8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct? ☐ YES ☑ NO
If yes, select the appropriate category:
☐ **Prior complaint to the CFTC.**
☐ **Complaint to another regulator.**
☐ **A state or federal criminal law enforcement entity.**
☐ **A legal action filed against the person or firm in a court of law.**
Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).
9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act. As a DCM, I did not expect Kalshi to send an email to support a specific outcome of the elections. The subject line is "Think Harris is mispriced? Stop whining, and start winning." Since this email, the market moved tremendously against Trump.
10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
E. WHISTLEBLOWER PROGRAM
1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information

with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Email from Kalshi.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Email and the fact that I am a customer of Kalshi. It seems they also wrote a blog on this topic.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

I just want to bring to this to the Commission's attention because I am appalled... As a DCM, I think pushing an agenda or even just to instigate a trade, seems impartial. DCMs are supposed to be impartial and writing to incite an action to bet on the election is the furthest thing from impartiality as an exchange.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or

representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name (b)(3):7 U.S.C. §26(h)(2)(A)		**2. First Name** (b)(3):7 U.S.C. §26(h)(2)(A)	**3. M.I.** (b)(3):7 U.S.C.
4. Street Address (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			**5. Apartment/Unit#** (b)(3):7 U.S.C.
6. City (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**7. State/Province** (b)(3):7	**8. ZIP/Postal Code** (b)(3):7 U.S.C.	**9. Country** USA
10. Telephone (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** Email
14. Occupation (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type**
3. Name	

Kalshi, BetUS, BetOnline, Betfair, Betsson, Bovada, Bwin, Points Bet, Polymarket, Smarkets

4. Street Address			5. Apartment/Unit#
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
10. Telephone	**11. E-mail Address**		**12. Internet Address** kalshi.com, betus.com, betonline.ag, betfair.com, betsson.com, bovada.com, sports.bwin.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Unknown

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
No contact

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**

☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**

☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**

☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**

☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**

☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**

☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**

☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**

- [ ] **A cash (or physical) contract traded in interstate commerce.**
- [ ] **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

- [ ] **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

- [ ] **Other**

If other, please describe

5. If applicable, what is the name of product/investment?
US Presidential Election betting

6. Have you suffered a monetary loss?
☐ YES ☑ NO

If yes, describe how much.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

- [ ] **Prior complaint to the CFTC.**
- [ ] **Complaint to another regulator.**
- [ ] **A state or federal criminal law enforcement entity.**
- [ ] **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Although I don't have the information behind the bets and odds setting on the mentioned betting websites, the odds currently seem materially off from what is realistic and so it seems reasonable to assume that either the websites are manipulating the odds or market participants are manipulating the odds. The odds on the mentioned websites favor Trump to win the election at a spread of 14% to over 20% (some of the websites are aggregated here: https://www.realclearpolling.com/betting-odds/2024/president). While it is reasonable that Trump wins the election and even possible that he wins by over 14%, that number as the baseline expectation at this point in the election cycle seems completely unrealistic. Polls and websites (such as

https://projects.fivethirtyeight.com/2024-election-forecast/) that have a long history of predicting the vote show the odds as closer to 50/50.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

All information was obtained online from the aforementioned websites

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an

investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	**Submission Received**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	**2. First Name**	**3. M.I.**
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7

4. Street Address	**5. Apartment/Unit#**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	

6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	United States

10. Telephone	**11. Alt. Phone**	**12. Email Address**	**13. Preferred Method of Communication**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Email

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**

8. Telephone	**9. Fax**	**10. E-mail Address**

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	**2. If an individual, specify profession. If an entity, specify ty**
☐ Individual ☑ Entity	Designated Contract Market

3. Name
KalshiEX, LLC

4. Street Address			5. Apartment/Unit#
KalshiEX, LLC			KalshiEX, LLC
6. City KalshiEX, LLC	**7. State/Province** NY	**8. ZIP/Postal Code** 10012-3234	**9. Country** United States
10. Telephone	**11. E-mail Address**		**12. Internet Address** kalshi.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficu that entity or individual?
No

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
Yes

If yes, describe how you are, or were, associated with the individual or firm you are complaining about
I had funds in my Kalshi account and had several positions at the time.

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
I had funds in my Kalshi account and had several positions at the time.

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodit leveraged transactions**

☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, s retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pa someone else or you have asked for the return of your funds and have been refused).**

☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**

☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**

☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed t information.**

☑ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.
They offered a predictions market on a future event, and resolved the outcome of the event incorrectly.

4. Select the type of product/instrument:

☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security fu contract.**

☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a bas securities.**

☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e. less) index of securities.**

☐ **A cash (or physical) contract traded in interstate commerce.**

☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?

☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to mana associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the c counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to mana associated with some other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
Kalshi offers predictions on future events. You can purchase "Yes" or "No" as potential outcomes to future events and are then paid out based on that future outcome.

5. If applicable, what is the name of product/investment?
"World of Warcraft: The War Within" Metacritic score?

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3): 7 personally, however many more lost money unjustly.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violatio Commodity Exchange Act.
Kalshi offered a prediction on whether Metacritic would rate a video game titled: "World of Warcraft: The War Within" as an 85 or better 3 days after it was released. The game was released on 8/26. I purchased a "Yes" outcome. On 8/29 Metacritic had 4 ratings averaging 87.5, but had not posted an official Metacritic Score. Kalshi stated that the outcome was "No score" and that the market resolved to "No". If there was no score, there should not have been an outcome either way. They should not have selected one of the two possibilities just to have an outcome when there was no outcome. Money should have been refunded to everyone who held positions at the value they were purchased at.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting mat your possession.
https://kalshi.com/markets/mcwarwithin/wow-war-within-metacritic-scores?state={%22request_mfa%22:%22false%22,%22sec urity_token%22:%22608y0ys9wfjodt6qhpurk%22,%22utm_landing%22:%22/%22}&code=4/0AQlEd8wWivmRiv_9CRn9sDTM ibpsAU8KQdVwScP_i3GeCiwvvYcfY9WYwfdUw&scope=email%20profile%20https://www.googleapis.com/auth/userinfo.prof 20https://www.googleapis.com/auth/userinfo.email%20openid&authuser=0&prompt=none https://www.metacritic. com/game/world-of-warcraft-the-war-within/critic-reviews/?platform=pc

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtai attorney or in a communication where an attorney was present, identify such information with as much particularity as po addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or informat disclosed to a third party.

I simply checked my account today and saw the market resolved with "No", despite there being no outcome at all, Yes or No.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or org requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if kn

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or con

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMA

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CF member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comp Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Super National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a regi a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (1 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organizat

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by a registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchang 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in co with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, inv prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual considered for the Commission's whistleblower award program, the information provided will also be used by the Commis determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower p authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public pro instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to acc purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; a department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act sy records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* ava FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federa* 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide id information may result in ineligibility for consideration under the Commission's whistleblower award program. Award can be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances ma identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correc complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and i a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Comm dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or f statements or representations, or use any false writing or document knowing that the writing or document contains any fal or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, co

complete to the best of my knowledge, information and belief.
I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewi whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an origina copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whi non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may hav and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document kno writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligat within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.
Print Name of Attorney and Law Firm, if Applicable
☐ **Check this box to agree with the declaration above.**
Date

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.	

4. Street Address	5. Apartment/Unit#
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	United States

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Email

14. Occupation

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Country

8. Telephone	9. Fax	10. E-mail Address

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	

3. Name
Kalshi LLC

4. Street Address 594 Broadway			**5. Apartment/Unit#**
6. City NYC	**7. State/Province** NY	**8. ZIP/Postal Code** 10012	**9. Country** USA
10. Telephone	**11. E-mail Address**		**12. Internet Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA); (b)(6); (b)(7)(C)
13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual? Yes			
14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred? No			
If yes, describe how you are, or were, associated with the individual or firm you are complaining about			
15. What was the initial form of contact between you and the person against whom you are filing this complaint? Email			
If other, please describe			

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy) (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**2. Is the conduct on-going?** Don't Know

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☑ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.
Confusing or missing disclosures

4. Select the type of product/instrument:

- ☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**
If yes:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **Other**
If other, please describe
5. If applicable, what is the name of product/investment?
6. Have you suffered a monetary loss? ☑ YES ☐ NO
If yes, describe how much. (b)(3):7 U.S.C. §26(h)(2)(A)
7. Has the individual or firm who engaged in the conduct acknowledged their fault? ☐ YES ☑ NO
8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct? ☐ YES ☑ NO
If yes, select the appropriate category:
☐ **Prior complaint to the CFTC.**
☐ **Complaint to another regulator.**
☐ **A state or federal criminal law enforcement entity.**
☐ **A legal action filed against the person or firm in a court of law.**
Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).
9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act. I had placed a contract of (b)(3): Yes contracts with an average price (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) - for the market of "Biden 538 approval rating this week, 38.9% to 39.3% on Jan 24, 2024". These contracts were bought on (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) In reviewing the rules of the market as an approved contract with the CFTC. Contracts are set to expire on the day of (In this case Jan 24th) at 10 AM EST. At this time until 11 AM, my contracts were set to win, unfortunately, I do not recall the amount. At 11:12 AM, the market still had not closed nor expired, and subsequently, this market took into consideration 3 new polls which dropped the approval rating from below my selections. The market closed the next day and all my contracts were set as a loss. I seeking a formal complaint given the lack of disclosure of the approved deadline for this market, as previously noted the contract had an expiration for Jan 24th, at 10 AM EST. But when reaching support, they provided a different date - for Jan 25th. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) "Expiration time: The Expiration time of the Contract shall be 10:00 AM ET."

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

n.a

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection

with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

FILES UPLOADED

No files uploaded

<u>**Submission Procedures**</u>

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.

- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.

- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

<u>**Instructions for Completing Form TCR**</u>

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;

- complete address, including city, state and zip code;

- telephone number and, if available, an alternate number where you can be reached;

- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).

- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A)	

4. Street Address	5. Apartment/Unit#
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A)

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C.	(b)(3):7 U.S.C. §26(h)(2)(A)

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Email and phone number.

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Country

8. Telephone	9. Fax	10. E-mail Address

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	Trade and prediction market.

3. Name
Polymarket.

4. Street Address			5. Apartment/Unit#
Lexington Avenue			
6. City New York	**7. State/Province**	**8. ZIP/Postal Code** 1280	**9. Country** United States
10. Telephone	**11. E-mail Address** support@polymarket.com		**12. Internet Address** http://polymarket.com/

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
In app communication.

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Don't Know

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
financial loss, emotional distress, and raises potential violations of consumer and data protection laws.

5. If applicable, what is the name of product/investment?
Bitcoin up and down hourly.

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3):7 U.S.C. §26(h)(2)(A)

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☑ YES ☐ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☑ YES ☐ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☑ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).
Three consecutive days of contact through the platform with no clear response.

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Financial harm: Documented crypto loss of (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) caused solely due to lack of access and transparency during the outage. Mental distress and health aggravation: I suffer from hidradenitis suppurativa, a chronic inflammatory condition that worsens with stress. The three-day delay in communication from Polymarket, paired with uncertainty around my funds, led to extreme anxiety, loss of sleep, and a medical flare-up. Lack of transparent communication: No reliable service updates were provided. Users were advised not to take "duplicate actions," while still being held accountable on-chain — this is a fundamental transparency and fairness concern.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
Video proof, blockchain data and screenshots (photographs).

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

All information obtained by me (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) personally.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **ttorney had any prior communication(s) with the CFTC concerning this matter?**

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee,

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline,

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **available mechanism at the entity for reporting violations?**

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory

organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A)

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.

- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.

- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;

- complete address, including city, state and zip code;

- telephone number and, if available, an alternate number where you can be reached;

- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).

- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.	
4. Street Address			5. Apartment/Unit#
6. City	7. State/Province	8. ZIP/Postal Code	9. Country
10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
14. Occupation			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	5. State/Province	6. ZIP/Postal Code	7. Country
8. Telephone	9. Fax	10. E-mail Address	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	Betting Site
3. Name Polymarket	

4. Street Address			5. Apartment/Unit#
1280 Lexington Avenue			
6. City New York	**7. State/Province** New York	**8. ZIP/Postal Code** 10028	**9. Country** USA
10. Telephone	**11. E-mail Address**		**12. Internet Address**

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
No

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
I had seen posts on X about them. I have not used their services though.

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

- [x] **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- [ ] **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- [ ] **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- [ ] **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- [ ] **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- [ ] **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- [ ] **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- [ ] **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- [ ] **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- [ ] **A cash (or physical) contract traded in interstate commerce.**
- [ ] **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
Cryptocurrency-based bets that can be traded.

5. If applicable, what is the name of product/investment?
The specific bet this complaint is referencing is "Will Zelenskyy wear a suit before July?"

6. Have you suffered a monetary loss?
☐ YES ☑ NO

If yes, describe how much.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
I am submitting this anonymous complaint under the CFTC Whistleblower Program against Polymarket, a U.S.-based crypto prediction market platform, for suspected fraudulent resolution and market manipulation in its "Will Zelenskyy wear a suit before July?" market, which may violate CFTC regulations governing prediction markets and commodities.On July 1, 2025, at 09:33 AM ET, Polymarket issued a clarification stating, "a consensus of credible reporting has not confirmed that Zelenskyy has worn a suit," despite over 40 credible media outlets (e.g., Reuters, New York Post, Kyiv Post, BBC) reporting that Ukrainian President Volodymyr Zelenskyy wore a suit (black blazer, collared shirt, suit pants) at the NATO Summit on June 24, 2025, in The Hague. Polymarket's own X account (@PolymarketIntel) posted on June 25, 2025, describing Zelenskyy's attire as a suit, and the suit's designer reportedly confirmed it as such. This contradiction violates Polymarket's resolution rules, which require outcomes to be based on "a consensus of credible reporting," and suggests potential fraud.Furthermore, I suspect manipulation by large holders ("whales") of UMA tokens, as Polymarket relies on UMA's Optimistic Oracle for

dispute
resolution. Social media reports (e.g., X posts by (b)(3):7 U.S.C. Reddit threads by (b)(3):7 U.S.C. allege that UMA whales coordinated votes via Discord to favor a "No" resolution, despite overwhelming evidence. A similar incident occurred in a $7 million Ukraine mineral deal market in March 2025, where a single whale allegedly controlled 25% of votes to resolve a market incorrectly, indicating a pattern of manipulation that may affect Polymarket's commodity contracts. Given the CFTC's prior enforcement action against Polymarket in 2022 for operating an unregistered event contract market, I believe this issue warrants investigation for potential violations of the Commodity Exchange Act, including fraud, manipulation, or non-compliance with registration requirements.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

The information is all publicly available.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
Anonymous

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.

- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.

- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;

- complete address, including city, state and zip code;

- telephone number and, if available, an alternate number where you can be reached;

- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).

- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name (b)(3):7 U.S.C.	**2. First Name** (b)(3):7 U.S.C. §26(h)(2)(A)		**3. M.I.** (b)(3):7 U.S.C.
4. Street Address (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			**5. Apartment/Unit#**
6. City (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**7. State/Province** (b)(3):7 U.S.C. §26(h)(2)(A)	**8. ZIP/Postal Code** (b)(3):7 U.S.C. §26(h)(2)(A)	**9. Country** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
10. Telephone (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** email
14. Occupation			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type** A decentralized prediction market.
3. Name Polymarket	

4. Street Address 1280 Lexington Avenue			5. Apartment/Unit#
6. City New York	7. State/Province NY	8. ZIP/Postal Code 10028	9. Country United States
10. Telephone	11. E-mail Address		12. Internet Address

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going? Don't Know

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☑ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.
See information provided to CFTC directly, separately.

4. Select the type of product/instrument:

- ☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
See information provided to CFTC directly, separately.

5. If applicable, what is the name of product/investment?

6. Have you suffered a monetary loss?
☐ YES ☑ NO

If yes, describe how much.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☐ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☐ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
I provided information previously to the CTFC team investigating (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) including (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) including some relevant to Polymarket, and they referred the information to a team (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) including (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) and I provided additional information to them voluntarily, including a Microsoft Teams meeting on (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) See the information provided separately to those (b)(3):7 by phone, email and other avenues for details.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
I provided information previously to the CTFC team investigating (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) ncluding (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) including some relevant to Polymarket, and they referred the information to a team

from the Chicago office including (b)(3):7 U.S.C. and I provided additional information to them voluntarily, including a Microsoft Teams meeting on (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) See the information provided separately to those 2 teams by phone, email and other avenues for details.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory

organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C.

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C.
§26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

CFTC
COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	**Submission Received**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	**2. First Name**	**3. M.I.**
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C.

4. Street Address	**5. Apartment/Unit#**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.

6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	United States

10. Telephone	**11. Alt. Phone**	**12. Email Address**	**13. Preferred Method of Communication**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	

14. Occupation

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**

8. Telephone	**9. Fax**	**10. E-mail Address**

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	**2. If an individual, specify profession. If an entity, specify type**
☐ Individual ☑ Entity	Polymarket, a market for betting on real-world events

3. Name
Polymarket

4. Street Address			5. Apartment/Unit#
1280 Lexington Avenue, NY			
6. City New York	**7. State/Province** NY	**8. ZIP/Postal Code** 10028	**9. Country** United States
10. Telephone	**11. E-mail Address**		**12. Internet Address**

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
Yes

If yes, describe how you are, or were, associated with the individual or firm you are complaining about
I had used tokens paid for and transferred by and through offshore agents to bet on events.

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

- ☑ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☑ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☑ **A foreign currency transaction.**

If a foreign currency transaction:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☑ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☑ NO
☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**
If yes:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **Other**
If other, please describe
5. If applicable, what is the name of product/investment? Blockchain tokens and derivatives thereof.
6. Have you suffered a monetary loss? ☑ YES ☐ NO
If yes, describe how much. (b)(3):7 U.S.C.
7. Has the individual or firm who engaged in the conduct acknowledged their fault? ☐ YES ☑ NO
8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct? ☑ YES ☐ NO
If yes, select the appropriate category:
☑ **Prior complaint to the CFTC.**
☑ **Complaint to another regulator.**
☐ **A state or federal criminal law enforcement entity.**
☐ **A legal action filed against the person or firm in a court of law.**
Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court). (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act. Polymarket operates markets for betting on events, where one's payout is contingent on a particular event happening or not happening. The market in questions was titled, "Will there be a US Government shutdown?" The description of the bet is as below. " This market will resolve to "Yes" if the U.S government shut down occurs between August 30, and December 31, 2024, 11:59 PM ET. Otherwise, this market will resolve to "No". The market will resolve to "Yes" if the acting President fails to sign the relevant bill(s) extending government funding by the applicable deadline(s), even if no government shutdown is explicitly announced. For this market to resolve to "Yes" any shutdown will count. If only a portion of the US government is covered by any signed bill(s) extending funding of the US government, and a portion of the US government goes unfunded, this market will still resolve to "Yes". The primary resolution for this source will be official information from the US government, however a consensus of credible reporting may also be

used." The bet leaves open the possibility of of many sufficient bills where a supplied presidential signature will avert the shut down. 10's of millions were placed on this market under that pretense, with every contingency or possibility to avert the shut down left open before the end of the calendar year. However, an update merely 48 hours before the bet was concluded made the following "clarification", which I believe is not so much a clarification but a proposal for modification based on the fact it is inconsistent with the original offer the vast majority of speculators predicated their stake upon. " As per the rules, "The market will resolve to "Yes" if the acting President fails to sign the relevant bill(s) extending government funding by the applicable deadline(s), even if no government shutdown is explicitly announced." President Biden did not sign a bill extending funding by the midnight deadline (12:00 AM ET) on December 20, hence this market should resolve to "Yes"." Unfortunately, that clarification does not acknowledge that there are multiple possible "deadline(s)" sufficient to avoid a government shut down if a bill is not signed. That was not taken into consideration in the last 48 hours or closing of the bet, and I have to conclude that every speculator who made their bet before the pronouncement and even thereafter was under reasonable impression that every contingency was included in the bet, and that the "clarification" would not occur or was a non-binding proposal for modification, based on its inconsistency with the original rules. Thus, because this misrepresentation was known at the time of the "clarification," that it would misrepresent the original bet, and because it was done to induce a vote to decide if the contingency had been met, it was done to induce consideration, and was thus fraud

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

https://polymarket.com/portfolio. This has the "clarification" and rules. Polymarkets NY HQ, address listed elsewhere in the complaint, will have documents necessary to show who is culpable for the "clarification".

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER

INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

<u>**PRIVACY ACT STATEMENT**</u>

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. <u>PURPOSE</u>

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. <u>AUTHORITY</u>

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. <u>ROUTINE USES</u>

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal

Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.	(b)(3):7 U.S.C.

4. Street Address	5. Apartment/Unit#
3965 N Blue Sage Rd	

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7	(b)(3):7 U.S.C.	USA

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C.		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	email / text / in person

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Country

8. Telephone	9. Fax	10. E-mail Address

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	Polymarket is an online prediction market platform; parent company is either Adventure One QSS Inc or BLOCKRATIZE INC., d.b.a. Polymarket.

3. Name

Polymarket			
4. Street Address Unknown. Headquarters located in Soho, New York City.			**5. Apartment/Unit#** N/A
6. City New York	**7. State/Province** NY	**8. ZIP/Postal Code** Unknown	**9. Country** USA
10. Telephone	**11. E-mail Address** legal@polymarket.com		**12. Internet Address** https://polymarket.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
No

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 2

1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type** UMA is a decentralized oracle service; governed by the RiskLabs Foundation dba UMA.

3. Name
UMA (RiskLabs Foundation)

4. Street Address UMA: Unknown. Based in Ottawa, Ontario, Canada.			**5. Apartment/Unit#** Unknown
6. City Ottawa	**7. State/Province** Ontario	**8. ZIP/Postal Code** Unknown	**9. Country** Canada
10. Telephone	**11. E-mail Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		**12. Internet Address** https://risklabs.foundation/

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
No

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 3

1. Type ☑ Individual ☐ Entity	**2. If an individual, specify profession. If an entity, specify type** Shayne Coplan is CEO and Founder of Polymarket (and CEO of Adventure One QSS Inc. and BLOCKRATIZE INC.).

3. Name
Shayne Coplan

4. Street Address Unknown			**5. Apartment/Unit#** Unknown
6. City New York	**7. State/Province** NY	**8. ZIP/Postal Code** Unknown	**9. Country** USA
10. Telephone	**11. E-mail Address** shayne@polymarket.com		**12. Internet Address** https://polymarket.com, https://www.linkedin.com/in/shaynecoplan

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual? No
14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred? No
If yes, describe how you are, or were, associated with the individual or firm you are complaining about
15. What was the initial form of contact between you and the person against whom you are filing this complaint? Internet Advertisement
If other, please describe

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 4

1. Type ☑ Individual ☐ Entity		**2. If an individual, specify profession. If an entity, specify type** (b)(3):7 U.S.C. §26(h)(2)(A) is Founder and President of UMA/RiskLabs Foundation.	
3. Name (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			
4. Street Address Unknown			**5. Apartment/Unit#** Unknown
6. City Unknown	**7. State/Province** Unknown	**8. ZIP/Postal Code** Unknown	**9. Country** Canada or USA
10. Telephone	**11. E-mail Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		**12. Internet Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual? No
14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred? No
If yes, describe how you are, or were, associated with the individual or firm you are complaining about
15. What was the initial form of contact between you and the person against whom you are filing this complaint? Internet Advertisement
If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy) (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**2. Is the conduct on-going?** Yes
3. Please select the option(s) that best describes your complaint	

☑ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**

☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**

☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**

☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**

☐ **The trading of futures options, or swaps based upon confidential information by someone not**

allowed to use such information.

☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**

☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**

☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**

☐ **A cash (or physical) contract traded in interstate commerce.**

☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?
"Will RFK Jr. drop out by Friday?" (Market ID 1724454141) https://polymarket.com/event/will-rfk-jr-drop-out-by-aug-23?tid=1724454141

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
My personal losses amount to (b)(3):7 The total losses for the organized group of "No" holders I represent exceed (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☑ YES ☐ NO

If yes, select the appropriate category:

- ☑ **Prior complaint to the CFTC.**
- ☐ **Complaint to another regulator.**
- ☐ **A state or federal criminal law enforcement entity.**
- ☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

The 2022 CFTC order against Polymarket (Docket No. 22-09) serves as precedent for the current allegations, demonstrating a history of violations.

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

1. Market Participation: I, along with a group of other individuals, participated in Polymarket's prediction market titled "Will RFK Jr. drop out by Friday?" (Market ID 1724454141). We purchased "No" shares, based on the understanding that the market would resolve to "No" if RFK Jr. did not officially withdraw from the 2024 presidential race by 11:59 PM ET on August 23, 2024. 2. Market Rules: The official rules of the market, as published by Polymarket, explicitly stated that resolution to "Yes" required "Robert F. Kennedy Jr. officially announc[ing] his withdrawal or [being] confirmed to have withdrawn from the 2024 US presidential race" by the specified deadline. The rules further stipulated that the "primary resolution source for this market will be official information from RFK Jr. or his official/legal representatives." 3. Polymarket's "Clarification": Following RFK Jr.'s public address on August 23rd, in which he suspended his campaign but explicitly stated he was not terminating it and would remain on the ballot, Polymarket issued a "clarification." This "clarification" asserted that, based on RFK Jr.'s statements and media reports, he had ended his presidential bid and therefore the market should resolve to "Yes." This "clarification" contradicted the explicit requirement for official confirmation of withdrawal and appeared designed to influence the UMA vote and ultimate market outcome. 4. UMA Vote and Market Resolution: The market resolution was then subjected to a vote by UMA token holders. It is our contention that the misleading "clarification" issued by Polymarket significantly influenced this vote, leading to a "Yes" outcome. Subsequently, Polymarket resolved the market to "Yes," resulting in financial losses for all "No" holders. 5. Evidence of Manipulation: We have collected compelling evidence suggesting potential market manipulation and coordination among certain UMA "whales" to influence the vote and secure a "Yes" resolution. This evidence, detailed in our repository, includes UMA Discord communications where individuals discussed their intentions to acquire UMA tokens to swing the vote and boasts about having the power to determine market outcomes, along with on-chain analysis showing suspicious trading patterns before and after the clarification was added. 6. Inconsistent Resolutions: Polymarket's actions are further suspect due to the inconsistent resolution of other RFK Jr.-related markets on their platform. While resolving the "Dropout Market" to "Yes," Polymarket continued to host active markets where RFK Jr. remained a contender. This inconsistency demonstrates a disregard for their own precedent and raises serious concerns about the integrity of their market resolution process. 7. Financial Harm: As a direct consequence of Polymarket's actions, I and other "No" holders suffered financial losses. I personally lost $[Amount]. The total organized losses for "No" holders that I represent are in excess of (b)(3):7 U.S.C. §26(h)(2)(A) This number does not reflect the losses of international participants and others who have yet to be identified. 8. CEA Violations: We believe that Polymarket's conduct, as detailed above, constitutes a violation of the CEA in several ways: 8.1 Market Manipulation: Polymarket's actions, particularly the issuance of the misleading "clarification," appear to meet the definition of "manipulation" under the CEA. Their attempt to influence the market outcome through extra-contractual means is in direct violation of market integrity principles. 8.2 Prior CFTC Action: Polymarket has a history of regulatory issues with the CFTC, including a 2022 settlement for operating an unregistered swap execution facility. This prior action demonstrates a pattern of disregard for regulations and strengthens the argument for current violations.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

The following supporting materials are provided in the accompanying repository, organized for ease of review. All timestamps for messages and online posts reflect the Central Standard Time (CST) zone. a. Market Rules and Clarifications: - Exhibit A: Screenshot of Polymarket's official rules for the "Will RFK Jr. drop out by Friday?" market. (File: EXHIBIT-A: Polymarker Rules for RFK Market.pdf). * Exhibit B: Screenshot of Polymarket's "clarification" added after RFK Jr.'s speech. (File: EXHIBIT-A-1: PolyMarket Market Clarification.png). b. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Discord Communications: - Exhibit E: Text file containing an archive of all messages from the relevant UMA Discord channels, highlighting comments related to market manipulation. (File: Discord RFK Main Chat Artifacts) and (File: Discord RFK No Holders Chat.txt) d. RFK Jr.'s Public Statements: - Exhibit F: Link to a YouTube video of RFK Jr.'s August 23rd address where he states he is suspending, not terminating, his campaign. (Link: https://www.youtube.com/watch?v=8O-ZM0RxG4g&t=3259s) - Exhibit G: Link to RFK Jr.'s Substack post reiterating his non-withdrawal. (Link: https://robertfkennedyjr.substack.com/p/why-i-am-suspending-my-campaign-for) e. Polymarket's Inconsistent Market Resolutions: - Exhibit H: Screenshots of other active RFK Jr. markets on Polymarket, demonstrating inconsistent resolutions. (File: Polymarket's Inconsistent Market Resolutions.pdf) f. Evidence of Circumvention of U.S. Regulations: - Exhibit I: Screenshots of Polymarket's website accessibility via VPN showing failure to block U.S. customers (File: Exhibit I Polymarket VPN Access.pdf). - Exhibit J: Comparison of Polymarket's terms of service with those of legitimate betting sites like Stake.com (File: Exhibit J Polymarket TOS Comparison.pdf). - Exhibit K:(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) Additional Materials Not in My Possession (Potentially Obtainable Through Discovery): *Polymarket's internal communications and policies related to market resolution and clarification procedures. * UMA's internal communications and policies related to dispute resolution and token holder voting. * Trading data from centralized exchanges related to RFK Jr.'s candidacy. * Communications between Polymarket and UMA officials during the relevant period. * Deleted data on Polymarket and UMA Discord, where admins deleted sensitive data from the server. * Forensics of the eight accounts which were, at one time during the dispute process, on the Yes holders' side and were deleted from the Polymarket server after the resolution was passed. Further forensic investigation of all Yes holders is warranted due to suspicion during the dispute phase of the market. These materials, while not currently in my possession, could provide further insights into the alleged market manipulation and would be highly relevant to the CFTC's investigation. Lastly, I have an organized audit of 24 folders, which all have indexed evidence that provides easy navigation and cross-reference links, enabling identification of fraud, market fixing, breach of contract, and suspicious behavior, such as (b)(3):7 U.S.C. ; Yes-accounts that were deleted from the Polymarket server after resolution, plus more evidence to investigate.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

The information supporting these allegations was obtained through a variety of sources, including: * Direct Participation: I personally participated in the "Will RFK Jr. drop out by Friday?" market on Polymarket and experienced firsthand the events leading to the dispute. * Publicly Available Information: Information regarding the market rules, RFK Jr.'s public statements, and media reports was collected from Polymarket's website, RFK Jr.'s campaign website and Substack, and reputable news sources such as CNN, The Washington Post, NBC News, and
Al Jazeera. Specific links to these sources are provided in Addendum B of this submission.(b)(3):7 U.S.C. §26(h)(2)(A) Evidence of potential market manipulation, including conversations among (b)(3):7 U.S.C. and discussions about influencing the vote, was collected from public channels on the (b)(3):7 U.S.C. §26(h)(2)(A) A full archive of these communications is provided in Exhibit E of the repository.(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

The following information in my submission could potentially reveal my identity: * Discord Username (b)(3):7 U.S.C. My Discord username is linked to my online persona and could be used to identify me through cross-referencing with other online platforms on discord. As of current Go one knows my real personal name, however, there have been random attacks to our google accounts related to the case, and phishing links sent to my twitter of random people during this assemble of information which again brings to my persistence keeping my identity private from the public. * Personal Communications (Within the "No" Holders' Discord Server): While not

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?
☑ YES ☐ NO

If "Yes," please provide details.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

7. Provide any additional information that you think may be relevant.
a. Public Interest and Market Integrity: The alleged market manipulation in the "Will RFK Jr. drop out by Friday?" market has broader implications for the integrity and trustworthiness of prediction markets in general. This incident has generated significant discussion and concern within the cryptocurrency and blockchain community, as evidenced bulene numerous comments and discussions on Polymarket's website, the UMA Discord server, and other online forums. A thorough investigation by the CFTC is crucial for protecting market participants, deterring future misconduct, and maintaining public trust in these emerging financial instruments. b. Pattern of Questionable Conduct: While this specific complaint focuses on the RFK Jr. market, my investigation has uncovered evidence of potentially manipulative practices and inconsistent resolutions in other markets on the Polymarket platform. This suggests a pattern of questionable conduct that extends beyond this single incident and further necessitates regulatory scrutiny. (Details of these other instances can be provided upon request, as they are not directly related to this specific complaint but illustrate a potentially broader pattern of manipulative behavior.) c. Consumer Protection: The alleged misconduct in this case not only resulted in financial losses but also eroded public trust in Polymarket. Many "No" holders viewed Polymarket's actions as deceptive and unfair, which underscores the consumer protection aspects of the alleged CEA violations. In short people's lives are being ruined by these Fraudulent resolution systems as this is an ongoing theme that continues today. d. Impact on Innovation: The growth and development of innovative financial technologies, such as prediction markets, rely on public trust and regulatory clarity. Incidents like the RFK Jr. market manipulation can stifle innovation by discouraging participation and raising concerns about the reliability and fairness of these platforms. The CFTC's active involvement in investigating and addressing such incidents is essential for fostering a healthy regulatory environment that promotes innovation while protecting consumers. We need a fair resolution system that is not UMA and is not subject to market fixing from internal team member inside polymarket. e. International Implications: While not the primary focus of this complaint, it is important to note that the alleged market manipulation has affected participants from multiple countries. The use of USDC, a U.S.-dollar pegged stablecoin, as the trading currency on Polymarket creates a connection to the U.S. financial system and potentially brings international participants within the scope of the CFTC's jurisdiction. (Information on international participants can be provided upon request, though individual identifying information will be withheld at this stage to protect their privacy.) f. Recidivism and Regulatory Disregard: Polymarket's apparent disregard for their prior CFTC sanction (Docket No. 22-09) highlights a pattern of regulatory non-compliance and a potential disregard for the CFTC's authority. This pattern of behavior warrants a thorough investigation and stronger enforcement action to protect market participants and deter further violations. g. Therefore this complaint pertains to both Polymarket and UMA, along with their respective leaders, due to their joint involvement in the alleged market manipulation. While Polymarket operates the prediction market platform, UMA provides the oracle and dispute resolution services that were instrumental in determining the contested market outcome. Therefore, both entities and their leaders share responsibility for the alleged violations. One thing to add, is that owners of UMA were directly voting on the outcome of the market being disputed. A cause of concern of biased interference.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

(b)(3):7 U.S.C. I contacted Polymarket via their Discord platform (b)(3):7 U.S.C. to inquire about the discrepancies between their resolution of the "Will RFK Jr. drop out by Friday?" market and their stated rules. This constitutes an inquiry related to the subject matter of this submission, as it was an attempt to understand the basis for Polymarket's decision and whether it aligned with their stated rules and the CEA. Polymarket failed to provide clarification through Discord. On (b)(3):7 U.S.C. I furthered the formal complaint by sending legal notices to the following individuals: (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) These notices detailed my concerns about
potential market manipulation and requested clarification on the market resolution. This communication also falls under the category of an inquiry related to the subject matter. Polymarket did not directly respond to this inquiry. UMA responded acknowledging the complaint. These notices/complaints are included in the evidence repository as exhibits 1.4.4A and 1.4.4B.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.

- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.

- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;

- complete address, including city, state and zip code;

- telephone number and, if available, an alternate number where you can be reached;

- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).

- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ‘‘anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

CFTC
COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C.	(b)(3):7

4. Street Address	5. Apartment/Unit#
316 Goldenrod Lane	

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7	(b)(3):7 U.S.C. §26(h)(2)(A)	United States

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	email and text

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Country

8. Telephone	9. Fax	10. E-mail Address

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	Polymarket; decentralized prediction market platform where users can trade on the outcome of real-world events

3. Name

Polymarket			
4. Street Address 10000 US			**5. Apartment/Unit#**
6. City New York	**7. State/Province** New York	**8. ZIP/Postal Code**	**9. Country** United States
10. Telephone	**11. E-mail Address**		**12. Internet Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA); (b)(6); (b)(7)(C)

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
Searching through website anonymously

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy) (b)(3):7 U.S.C. §26(h)(2)(A)	**2. Is the conduct on-going?** Yes

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☑ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.
May also need FinCen to investigate for money laundering through Polymarket

4. Select the type of product/instrument:

- ☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
Crypto type futures

5. If applicable, what is the name of product/investment?
event-based futures/prediction markets

6. Have you suffered a monetary loss?
☐ YES ☑ NO

If yes, describe how much.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Polymarket allows users to speculate on the outcome of non-traditional financial events (e.g., elections, weather events), which don't fall neatly under the traditional definition of "commodities" regulated by the CEA. Ongoing scrutiny and potential future penalties may be necessary if platforms like Polymarket continue to operate without full compliance. Monthly volume of Polymarket is 400 million dollars after August 2024 and will continue to grow. I believe the $1.4 million fine imposed by the CFTC on Polymarket in 2021 was insignificant in signaling that event-based prediction markets should comply with U.S. regulations. A larger fine or stricter penalties could act as a stronger deterrent. If the goal is to protect traders and ensure that platforms operate transparently and within the law, stronger enforcement measures, such as registration requirements or closer oversight, should be warranted. Polymarket is built on blockchain technology and uses cryptocurrency (such as USDC) for trading, which complicates regulatory enforcement. Since it's decentralized, the platform may not adhere to traditional structures of futures markets that require registration and reporting to the CFTC. Unlike

typical futures contracts that involve the delivery of a commodity or financial asset, Polymarket's predictions end with the resolution of a yes/no event. This could be seen as different from traditional financial futures and might be why it skirts the CEA.
10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession. If you look at an example user like so, (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) This user is doing excessive trading via large volumes and may be buying and selling rapidly to money launder.
E. WHISTLEBLOWER PROGRAM
1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible. Research from online.
2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
[redacted] CFTC staff member(s) with whom you or your attorney communicated:
4. Have you or your attorney provided the information to any other agency or organization, or has any other (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **requested the information or related information from you?**
If "Yes," please provide details.
If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.
5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **r?**
If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **other available mechanism at the entity for reporting violations?**
If "Yes," please provide details including the date you took the action(s).
6. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **other action regarding your complaint?**
If "Yes," please provide details.
7. Provide any additional information that you think may be relevant. Under FinCEN regulations, any platform that transmits or exchanges money, including cryptocurrencies, might be classified as a money transmitter. I believe Polymarket is facilitating the movement of cryptocurrency between users without registering with FinCEN as a money services business (MSB), which could be in violation of federal regulations. Money transmitters must comply with both state and federal laws, including maintaining AML programs and filing reports on large or suspicious transactions.
F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION
1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement

organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date

(b)(3):7 U.S.C. §26(h)(2)(A)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION			
Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	
A. TELL US ABOUT YOURSELF			
COMPLAINANT 1			
1. Last Name		**2. First Name**	**3. M.I.**
4. Street Address			**5. Apartment/Unit#**
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
10. Telephone	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** Email
14. Occupation			
B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)			
1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	
C. TELL US WHO YOU ARE COMPLAINING ABOUT			
INDIVIDUAL/ENTITY 1			
1. Type ☐ Individual ☑ Entity		**2. If an individual, specify profession. If an entity, specify type** Prediction market	
3. Name Polymarket			
4. Street Address			**5. Apartment/Unit#**

6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
10. Telephone	**11. E-mail Address**		**12. Internet Address**

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
Internet

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	**2. Is the conduct on-going?**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

- [ ] **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- [x] **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- [ ] **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- [x] **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- [ ] **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- [ ] **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- [x] **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- [ ] **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- [ ] **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- [ ] **A cash (or physical) contract traded in interstate commerce.**
- [ ] **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
Event based options

5. If applicable, what is the name of product/investment?

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Polymarket is openly doing rug pulls on a regular basis. It wasn't reported but the Venezuela election is a prime example, this substack explains the process; https://frankmuci.substack.com/p/polymarket-settles-bet-against-its
This week, there has been three examples where the wording was changed while the market was live. This caused one option to rise to 99 cents. The outcome was disputed via UMA, a 'DAO' voting token system. The majority of the tokens to vote are held by the biggest bettors on Polymarket which guarantees the desired outcome. This process is also subject to another pump and dump as the smallest share of tokens are counted first, suggesting the vote is in their favour. Then the lion's share of opposing votes are counted and the price returns to 99 cents. This is freely spoken about on the public Polymarket channel, staffed by employees.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
Everything I have is openly available.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

I have tested some markets and accessed the discord server. It's an open secret amongst twitter and crypto websites.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

It's feasible that any result can be overturned subjected to dispute; to my knowledge, UMA has never gone against Polymarket and vice versa. It would be impossible to accrue enough tokens to have any effect on the voting process. There is scant information of how any of this works upon signing up, which makes new users particularly susceptible. And as the U.S election will be contentious, there is nothing to suggest a repeat of the Venezuelan election couldn't happen, with a more lucrative market.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or

demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name

(b)(3):7

☑ **Check this box to agree with the declaration above.**

Date

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

<u>**Submission Procedures**</u>

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

<u>**Instructions for Completing Form TCR**</u>

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	

4. Street Address	5. Apartment/Unit#
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C.

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Email

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	5. State/Province	6. ZIP/Postal Code	7. Country
8. Telephone	9. Fax	10. E-mail Address	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	

3. Name
POLYMARKET.COM

4. Street Address			5. Apartment/Unit#
6. City	7. State/Province	8. ZIP/Postal Code	9. Country
10. Telephone	11. E-mail Address hello@polymarket.com		12. Internet Address https://polymarket.com/
13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual? Yes			
14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred? No			
If yes, describe how you are, or were, associated with the individual or firm you are complaining about			
15. What was the initial form of contact between you and the person against whom you are filing this complaint? Internet Advertisement			
If other, please describe			

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy) (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	2. Is the conduct on-going? Yes

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☑ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☑ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?
Betting odds on democratic nominee outcome. Bet was closed before such a decision has been made (Democratic Convention 2024). The democratic nominee is decided at the end of the event (August 21), but they have closed the betting market almost 20 days beforehand and took everyone's money (including mine).

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
Around (b)(3):7 U.S.C. §26(h)(2)(A)

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☑ YES ☐ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☑ **Complaint to another regulator.**

☑ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).
I am not sure, but many Polymarket users have claimed to have submitted complaints of their own.

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Polymarket operates a decentralized betting market and they have a "betting market" for the "Democratic Nominee 2024", which should be decided on the 21st of August at the end of the Democratic Convention 2024. The listed end date for the betting market has also indicated that the bets would be resolved on the 21st of August. Unfortunately, they have decided to close the market almost 20 days prior to this date and have collected/distributed the winnings to all bettors worth 327,866,173.00 dollars without a clear outcome and before the end date of the specific market. This is a very large amount to be scammed by the operators of this market and I believe proper business integrity and honesty has absolutely been broken. Please investigate further if you do have the time and ressources and regulate this market. Thank you.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
I have transactions on the Polygon blockchain to prove that I have in fact lost my funds in this betting market as well as thousands of others. The market is still viewable currently and many of the comments are unsatisfied users of this market asking for a class action lawsuit. Here is the link to the betting market: https://polymarket.com/event/democratic-nominee-2024/will-someone-else-win-the-2024-democratic-presidentia
l-nomination?

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.
I have searched online for a way to place a bet on various outcomes and found Polymarket (most probably via search engine Google).

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.
I have in my possession the private keys of the Polygon address I have used to place the bets on this platform as well as saved transcripts of Polymarket's official Discord channel where they discuss it and have support.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) ney had any prior communication(s) with the CFTC concerning this matter?

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) ested the information or related information from you?

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee,
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline,
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) her available mechanism at the entity for reporting violations?

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.	
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C.		
4. Street Address			**5. Apartment/Unit#**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
10. Telephone	**11. Alt. Phone**	**12. Email Address**	**13. Preferred Method of Communication**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	email
14. Occupation			
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	https://polymarket.com/
3. Name	
https://polymarket.com/	

4. Street Address			5. Apartment/Unit#
6. City	7. State/Province	8. ZIP/Postal Code	9. Country
10. Telephone	11. E-mail Address hello@polymarket.com		12. Internet Address https://polymarket.com/

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A)	Yes

3. Please select the option(s) that best describes your complaint

- [x] **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- [x] **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- [x] **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- [x] **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- [x] **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- [ ] **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- [x] **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- [ ] **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- [ ] **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- [ ] **A cash (or physical) contract traded in interstate commerce.**
- [ ] **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Got scammed at the polymarket.com site (prediction market web3 website), which uses UMA (https://uma.xyz/) as a resolution/dispute platform. The market where the rigging happened was the 'Venezuelan Presidential Election' with a volume traded of 6.1 Millions USDC. A description of the events below. Thank you very much. @Polymarket design ensures that each market is closed through voting by @UMAprotocol holders. UMA functions as an oracle with built-in motivations for token holders to vote. On July 28, Venezuelan elections were held, and Polymarket took bets on this event. Before the election, Maduro had a 75-80% chance of winning (despite exit polls showing much less). Shares for Maduro 'Yes' win were trading at around 85c. What did the market believe? That Maduro was highly likely to win (fairly or unfairly) and the opposition wouldn't manage to win. Importantly, the market rules stated: "The primary resolution source for this market will be official information from Venezuela, however a consensus of credible reporting will also suffice." What happened next? The elections concluded, and the Venezuelan electoral commission (CNE) announced that Maduro won with

51.2%.
The market at this time surged to 95% YES for Maduro. @Polymarket tweeted this https://x.com/Polymarket/status/1817950373325283826 . Around this time, @UMAprotocol h began a dispute over the YES for Maduro's victory. Three proposals (In order to put a proposal someone has to bond $750) were rejected with the outcome P4 (too early). Meanwhile, countries recognizing the Venezuelan election results congratulated Maduro, while the opposition started presenting evidence of election fraud. Over the next 24 hours, a discussion in UMA argued it was too early (P4) to declare a winner, suggesting that the CNE data looked suspicious and more concrete data was needed. Consequently, the YES Maduro market began to reverse, and some large players started buying cheap NO Maduro and YES Gonzalez (which were worth around 10c each). In the UMA discord, there was clear lobbying to distrust the official data and wait. The @UMAprotocol community voted—it was too early to make a conclusion. Over the next week (July 29 - August 5), the market stabilized at 70-75c YES for Maduro. Intense debates/shilling continued in the UMA discord, focusing on: 1) The word "Primary" could be devalued by "However." 2) Opposition data from voting machines could be considered official, whereas CNE data was deemed untrustworthy. 3) UMA should rely on a trusted consensus (Carter Center information, Blinken's statements, opposition data, etc.). On August 5, a dispute concluded with YES for Gonzalez. The UMA whales who bought shares on the cheap (around 10c) decided Gonzalez won, making each share worth $1, effectively profiting a quick 10x, because they control the majority of the UMA tokens. Maduro's value to drop from 75c to 0. This essentially meant Polymarket and UMA recognized someone who officially lost as the winner, and people familiar with the Venezuelan situation, who knows how Latam institutions work and who were trying to hedge against Maduro Win lost their money. The silence from Polymarket Team around this has been obscene. It seems the killer app of this cycle is a scam and can be easily manipulated by a few UMA whales. During that week, the CNE (official body from Venezuela) proclaimed Maduro winner two times. Armed forces reiterated they support Maduro and the Attorney General from Venezuela is prosecuting Edmundo Gonzalez for providing false information. So the UMA decision just doesn't match reality whatsoever. https://edition.cnn.com/2024/08/05/americas/venezuela-investigation-edmundo-gonzalez-maria-machado-intl-latam/index.html https://x.com/Polymarket/status/181795037 3325283826

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Information can be verified online and thru different social platforms (X.com)

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

myself

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

☐ YES	☑ NO

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.
This platform already got fine by CFTC for running unregistered markets https://www.dlapiper.com/en/insights/publications/2022/1/cftc-settles-enforcement-action-against-defi-platform-polymarket

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

<u>**PRIVACY ACT STATEMENT**</u>

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

CFTC
COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	**Submission Received**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	**2. First Name**	**3. M.I.**
(b)(3):7 U.S.C.	(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7

4. Street Address	**5. Apartment/Unit#**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA); (b)(6); (b)(7)(C)	

6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C. §26(h)(2)(A)	United States

10. Telephone	**11. Alt. Phone**	**12. Email Address**	**13. Preferred Method of Communication**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	email

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	**2. If an individual, specify profession. If an entity, specify type**
☐ Individual ☑ Entity	Polymarket is a crypto betting platform that is located in the United States and operates betting markets on multiple cryptocurrency blockchains.

3. Name Blockratize, Inc. d/b/a Polymarket.com			
4. Street Address Unknown, they refused to give when asked.			**5. Apartment/Unit#**
6. City New York	**7. State/Province** New York	**8. ZIP/Postal Code**	**9. Country** United States
10. Telephone	**11. E-mail Address** hello@polymarket.com		**12. Internet Address** polymarket.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	**2. Is the conduct on-going?**
(b)(3):7 U.S.C. §26(h)(2)(A)	Yes

3. Please select the option(s) that best describes your complaint

☑ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**

☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**

☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**

☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**

☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**

☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**

☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**

☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**

☐ **A cash (or physical) contract traded in interstate commerce.**

☐ **A foreign currency transaction.**
If a foreign currency transaction:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**
If yes:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☑ **Other**
If other, please describe It is an election betting market
5. If applicable, what is the name of product/investment? https://polymarket.com/event/venezuela-election-winner/
6. Have you suffered a monetary loss? ☑ YES ☐ NO
If yes, describe how much. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
7. Has the individual or firm who engaged in the conduct acknowledged their fault? ☐ YES ☑ NO
8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct? ☐ YES ☑ NO
If yes, select the appropriate category:
☐ **Prior complaint to the CFTC.**
☐ **Complaint to another regulator.**
☐ **A state or federal criminal law enforcement entity.**
☐ **A legal action filed against the person or firm in a court of law.**
Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).
9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act. Bets were made on the Venezuela election using Polymarket.com, a crypto betting platform. The betting market rules clearly stated "The primary resolution source for this market will be official information from Venezuela, however a consensus of credible reporting will also suffice." Over 6 million dollars worth of bets were placed on this market. Polymarket themselves tweeted about the conclusion of the election and acknowledged a victory by Maduro. However, the market resolved to "Yes" for Gonzales, despite the official announcement required by the rules clearly stating that Maduro was the winner. The discrepancy was caused by the "oracle" system that Polymarket uses to confirm its results, called UMA (uma.xyz). UMA is purportedly run by independent parties separate from Polymarket. The results transmitted by UMA are confirmed by a small number of

related parties (although they will claim it is "decentralized" that is untrue because 2 parties have enough "UMA tokens" to control the vote). Whether through social engineering, or simply blatant fraudulent collusion, these people voted for Gonzales as the winner. Instead of Polymarket stepping in as they have the ability to do, they watched as fraudulent traders made cheap bets, then went to social media and chat rooms to proclaim that the rules allowed for the election to be proclaimed fraudulent (they clearly do not), and insert Gonzales as the winner instead. Gonzales was declared the winner. Despite being clearly untrue, this was a fraudulent action. In the UMA Discord chat room there were multiple people openly mocking bettors, and speaking about their collusion in the UMA vote. It is definitely an "open secret" if you could call it a secret at all Six million dollars was only the final amount locked in the betting contract. In reality, many more people lost money selling before finalization as they realized that the manipulated vote was going against them. There are at least three distinct parties involved in the fraud. Polymarket, UMA, and the manipulating bettors on the Polymarket website (more than one). There is clearly evidence of collusion between UMA and the bettors. I also have messages from the Polymarket CEO proving he knew it was happening a few hours before the vote was resolved, when Polymarket could still block distribution of the fraudulent winnings. Instead, Polymarket allowed the winnings to be distributed to the exact opposite parties that it should have been. Many of the affected parties are Venezuelans. The facts constitute a violation of the Commodity Exchange Act because Polymarket offered an election futures market with clear rules that were unquestionably ALLOWED to be broken. On top of that, even though Mr. Coplan was directly informed of the broken rules while his company could still halt the payouts, he chose to instead let the fraud continue and once again pay out the 'manipulative bettors'

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Materials in my posession: 1 (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) 2. Screenshot of betting results from polymarket.com 3. Screenshot of personal losses and money owed from polymarket.com 4. Screenshots of collusive admissions by voting parties from UMA discord chat Additional materials needed: 1. Logs of UMA discord chatrooms (discord.uma.xyz) specifically the 'voting-discussion' and 'evidence-rationale' rooms. Any private chats if possible. This chat room and many of the people in it are the main proponents and facilitators of this fraud. 2. Logs of Polymarket discord. Specifially 'general' and 'market-review.' There is not much evidence here besides hundreds of incredulous messages wondering why the bet was allowed chosen with the wrong outcome. 3. Blockchain information on the Polygon blockchain about the 'manipulative bettors' and their history. All information about the financial movement involving the bets will be there.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. **Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. **Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

☐ YES ☐ NO

If "Yes," please provide details including the date you took the action(s).

6. **Have you taken any other action regarding your complaint?**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. **Provide any additional information that you think may be relevant.**

I am not a litigious person. I am only submitting this because it is the most blatant case of fraud I have ever seen. The real losers are all of the Venezuelans who made bets based on what they thought was a trustworthy set of rules and got defrauded of their money. Right after they were defrauded of their election. I am submitting this as soon as possible because I believe they know enforcement will be coming from this

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. **Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. **Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3. **Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. **Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. **Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. **If you answered "Yes" to any of Questions 1 through 5 above, please provide details.**

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

   The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

   The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

   The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

   The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

   Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.

- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.

- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;

- complete address, including city, state and zip code;

- telephone number and, if available, an alternate number where you can be reached;

- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).

- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	

4. Street Address	5. Apartm
(b)(3):7 U.S.C. §26(h)(2)(A)	

6. City	7. State/Province	8. ZIP/Postal Code	9. Countr
(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	US
10. Telephone (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	11. Alt. Phone	12. Email Address (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	13. Prefer email

14. Occupation

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Countr
8. Telephone	9. Fax	10. E-mail Address	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity
☐ Individual ☑ Entity	

3. Name
Polymarket (Blockratize, Inc)

4. Street Address	5. Apartm

160 West End Avenue			
6. City New York	**7. State/Province** New York	**8. ZIP/Postal Code** 10023	**9. Countr** USA
10. Telephone	**11. E-mail Address** hello@polymarket.com		**12. Intern** polymarke

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficu individual?
No

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
Yes

If yes, describe how you are, or were, associated with the individual or firm you are complaining about
I have been approached on multiple occasions to collaborate with the firm/individual i am complaining about. They have divulged various aspects of their current business which are in violation of a 2022 settlement agreement with the CFTC

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Telephone

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	**2. Is the conduct on-going?**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodit**

☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, s or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else return of your funds and have been refused).**

☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**

☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**

☑ **The trading of futures options, or swaps based upon confidential information by someone not allowed t**

☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security fu**

☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a bas**

☑ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e. securities.**

☐ **A cash (or physical) contract traded in interstate commerce.**

☑ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☑ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to mana other asset or liability?
☐ YES ☑ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the c** someone acting in concert with the offeror or counterparty.

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to mana other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
Cryptocurrency

5. If applicable, what is the name of product/investment?
polymarket betting markets

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
I dedicated advertising space on my website to the entity which went unpaid

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violatio
Blockratize/Polymarkets is in violation of its Jan 3, 2022 settlement agreement. Not only is the company actively marketing to potential new clients to bypass the mandated ban on US users through the use of VPNs, but it is also using cryptocurrencies to bypass banking system onrails in the US and other markets. Furthermore, the company is actively soliciting new users in the US at such venues as the Republican National Convention (see Bloomberg article below). The company is also paying influencers on X to market its services directly to US users even though that is in violation of the settlement agreement. Finally, on information and belief and following conversations with the CEO, it has emerged that the company is commingling deposited cryptocurrency funds (similar to FTX) in order to fund personal expenses and accelerate company growth. Furthermore, none of these developments have been disclosed in a recent private fundraising round to sophisticated investors who invested over $45 million in the company.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting mat
Information has been collected following convernsations with the CEO Shayne Coplan. Read more here on the company's illegal marketing methods targeting a US-based audience which is illegal based on the 2022 CFTC settlement agreement.
https://www.bloomberg.com/news/articles/2024-08-01/polymarket-rides-election-betting-frenzy-that-defies-a-us-ba
n?accessToken=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJzb3VyY2UiOiJTdWJzY3JpYmVyR2lmdGVkQXJ0aWNsZSIsIm
NTgxOSwiZXhwIjoxNzIzMjUwNjE5LCJhcnRpY2xlSWQiOiJTR0daTldUMEcxS1cwMCIsImJjb25uZWN0SWQiOiIxRDIwME
2NDg4MDQ5QUU4MiJ9.2BSsc-JunzGilCJSWSpXAgQAGy89KlnvSBouDAJl6P8 https://www.bloomberg.com/news/articles/2
/betting-on-the-us-election-political-wagers-soar-as-chaotic-race-draws-gamblers?accessToken=eyJhbGciOiJIUzI1NiIsIn
R5cCI6IkpXVCJ9.eyJzb3VyY2UiOiJTdWJzY3JpYmVyR2lmdGVkQXJ0aWNsZSIsImlhdCI6MTcyMjY0NTg4NSwiZXhwIjox
Y2xlSWQiOiJTSExaSFNUMVVNMFcwMCIsImJjb25uZWN0SWQiOiIxRDIwMEFENTcxNjE0NDUxOEVBOUU2NDg4MD
DLHmkGBXIZeFiPy_00PuOzRcc

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtai communication where an attorney was present, identify such information with as much particularity as possible. In additio obtained from a public source, identify the source with as much particularity as possible.

All information was obtained through private communications with the CEO Shayne Coplan, and various current and former employees of Polymarkets. Also the following public information reveals the soliciting of clients in violation of the CFTC settlement agreement https://www.bloomberg.com/news/articles/2024-08-01/polymarket-rides-election-betting-frenzy-that-defies-a-us-ban?accessToken=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJzb3VyY2UiOiJTdWJzY3JpYmVyR2lmdGVkQXJ0aW CI6MTcyMjY0NTgxOSwiZXhwIjoxNzIzMjUwNjE5LCJhcnRpY2xlSWQiOiJTR0daTldUMEcxS1cwMCIsImJjb25uZWN0SW NDUxOEVBOUU2NDg4MDQ5QUU4MiJ9.2BSsc-JunzGilCJSWSpXAgQAGy89KlnvSBouDAJl6P8 https://www.bloomberg.co /2024-08-02/betting-on-the-us-election-political-wagers-soar-as-chaotic-race-draws-gamblers?accessToken=eyJhbGciOiJ IUzI1NiIsInR5cCI6IkpXVCJ9.eyJzb3VyY2UiOiJTdWJzY3JpYmVyR2lmdGVkQXJ0aWNsZSIsImlhdCI6MTcyMjY0NTg4NSw jg1LCJhcnRpY2xlSWQiOiJTSExaSFNUMVVNMFcwMCIsImJjb25uZWN0SWQiOiIxRDIwMEFENTcxNjE0NDUxOEVBOU 6Td2CusF9uoDLHmkGBX1ZeFiPy_00PuOzRcc

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to

No such documents exist

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

☐ YES ☑ NO

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or org information or related information from you?

☐ YES ☑ NO

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if kn

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or con

☐ YES ☑ NO

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any entity for reporting violations?

☐ YES ☐ NO

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

☐ YES ☑ NO

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMA

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CF of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the I Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory or the Securities Exchange Act of 1934 (15 U.S.C.78c(a)); a law enforcement organization; or a foreign regulatory authority

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organizat

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connectio Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in co that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

   The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, inv the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considerec whistleblower award program, the information provided will also be used by the Commission to determine the individual's

2. AUTHORITY

   The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower pr § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

   The Commission may disclose this information when required to a defendant or respondent in connection with a public pro Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purp public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency o attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self- in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

   The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act sy CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A c for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

   Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide id ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correc knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblow information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false wri the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date

(b)(3):7 U.S.C. §26(h)(2)(A)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, c
my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewi
unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this f
whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide th
Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Co
concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or repres
writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry;
obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commi

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

CFTC
COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name (b)(3):7 U.S.C. §26(h)(2)(A)	**2. First Name** (b)(3):7 U.S.C.		**3. M.I.**
4. Street Address			**5. Apartment/Unit#**
6. City (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**7. State/Province** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**8. ZIP/Postal Code** (b)(3):7 U.S.C.	**9. Country** USA
10. Telephone (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** email or phone
14. Occupation (b)(3):7 U.S.C. §26(h)(2)(A)			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type**
3. Name Polymarket.com	

4. Street Address			5. Apartment/Unit#
6. City	7. State/Province	8. ZIP/Postal Code	9. Country
10. Telephone	11. E-mail Address		12. Internet Address

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
No

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going? Yes

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☑ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☑ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
Swaps including security based swaps

5. If applicable, what is the name of product/investment?

6. Have you suffered a monetary loss?
☐ YES ☐ NO

If yes, describe how much.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☐ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☐ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Please see the attached materials.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.
3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter? ☑ YES ☐ NO
If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated: The Director of Enforcement, Mr. Ian McGinley, and Mr. Brian Young.
4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you? ☐ YES ☐ NO
If "Yes," please provide details.
If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.
5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor? ☐ YES ☐ NO
If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations? ☐ YES ☐ NO
If "Yes," please provide details including the date you took the action(s).
6. Have you taken any other action regarding your complaint? ☐ YES ☐ NO
If "Yes," please provide details.
7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. **If you answered "Yes" to any of Questions 1 through 5 above, please provide details.**

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date

(b)(3):7 U.S.C.

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C.	(b)(3):7

4. Street Address	5. Apartment/Unit#
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7	(b)(3):7 U.S.C.	(b)(3):7 U.S.C. §26(h)(2)(A)

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Email

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Country

8. Telephone	9. Fax	10. E-mail Address

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	Blockratize, Inc. d/b/a Polymarket // Shayne Coplan

3. Name
Polymarket

4. Street Address			5. Apartment/Unit#
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
10. Telephone	**11. E-mail Address**		**12. Internet Address** polymarket.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
Shayne & I developed somewhat of a relationship & would talk on Discord & Twitter

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

- ☑ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☑ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☑ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☑ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?
I don't know exactly how to classify them but Polymarket are offering the same Real World Options Contracts they were initially in trouble for as per this release https://www.cftc.gov/PressRoom/PressReleases/8478-22

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
Looks like (b)(3):7 U.S.C. in this instance, plus other instances of foul play which I have kind of written off and forgotten about

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☑ YES ☐ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Polymarket has previously been stung by the CFTC before - https://www.cftc.gov/PressRoom/PressReleases/8478-22 Since then they launched a "polymarket.us" site, which has never had one market posted and is to act as a facade to regulators. Polymarket agreed to no longer serve American users, however there are countless American users who are using VPN's to still use the site, and Polymarket/Shayne 100% know this (a lot of their highest volumes user, he's met with many etc). Who I can provide real names, photos, online aliases, and crypto addresses for some. Some of the markets essentially act are mercenary assassination markets, such as "Will Biden drop out?", which pays out even if a market participant assassinate the president. They allowed users to Tornado Cash to use the platform, this is also a breach of OFAC sanctions as via the VPN anyone, form any sanctioned jurisdiction can use the site, creating a pool

of clean and dirty money. Polymarket originally said they would outsource the resolution process, they did this for a couple of years, but have now revert to a point where they will tell the jury how to vote. This lack of separation of duties opens up a clear path for insider trading by those who know which side Polymarket will clarify in favour for, essentially changing the rules after 2 parties have paid for a fair dispute to be voted on by the jury at UMA protocol. Ambitious rules, in correct market resolutions. Insider trading. They will eventually do an "airdrop" which might fall under SEC area but this will also include US users, they just have to lie and check a box saying they aren't in the USA. Undisclosed Ads with influencers. I could really go on forever but the violations are blatant, consistent and flagrant.
10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession. I have lots of chat logs with Shayne the CEO directly, calls on Twitter. Photo album of him meeting American users in NYC before initial enforcement action. I have names, photos, crypto address, online aliases, Twitter accounts of (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) maybe of the users Shayne knows is (b)(3):7 U.S.C. §26(h)(2)(A) name a few, can produce many more with their crypto addresses.
E. WHISTLEBLOWER PROGRAM
1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible. This is all primary information I have gathered myself as a user and ex-friend of Shayne Coplan.
2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party. Chat logs, etc, I Don't particularly need protections, they will know I am the one complaining anyway, I tried to resolve it.
3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:
4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please provide details.
If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.
5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **available mechanism at the entity for reporting violations?**
If "Yes," please provide details including the date you took the action(s).
6. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **action regarding your complaint?**
If "Yes," please provide details. tried to resolve the issue and talk to the CEO Shayne about it but got blamed for proposing the outcome of the market via the 3rd party arbiter.
7. Provide any additional information that you think may be relevant. Not sure, I don't have any more info RE: whistleblower protections, just want a cut of the pie, they just raised A LOT of money
F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION
1. Are you currently, or were you at the time that you acquired the original information that you are submitting

to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.

- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.

- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;

- complete address, including city, state and zip code;

- telephone number and, if available, an alternate number where you can be reached;

- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).

- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

CFTC
COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7 U.S.C.	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7

4. Street Address	5. Apartment/Unit#
35 Rainbird Cct	(b)(3):7

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C.	(b)(3):7	(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C.

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C.		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Email

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Country

8. Telephone	9. Fax	10. E-mail Address

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	Blockratize, Inc. d/b/a Polymarket // Shayne Coplan

3. Name
Polymarket

4. Street Address			5. Apartment/Unit#
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
10. Telephone	**11. E-mail Address**		**12. Internet Address** polymarket.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
Shayne & I developed somewhat of a relationship & would talk on Discord & Twitter

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

- ☑ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☑ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☑ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☑ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**
If yes:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **Other**
If other, please describe
5. If applicable, what is the name of product/investment? I don't know exactly how to classify them but Polymarket are offering the same Real World Options Contracts they were initially in trouble for as per this release https://www.cftc.gov/PressRoom/PressReleases/8478-22
6. Have you suffered a monetary loss? ☑ YES ☐ NO
If yes, describe how much. Looks lik(b)(3):7 U.S.C. n this instance, plus other instances of foul play which I have kind of written off and forgotten about
7. Has the individual or firm who engaged in the conduct acknowledged their fault? ☑ YES ☐ NO
8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct? ☐ YES ☑ NO
If yes, select the appropriate category:
☐ **Prior complaint to the CFTC.**
☐ **Complaint to another regulator.**
☐ **A state or federal criminal law enforcement entity.**
☐ **A legal action filed against the person or firm in a court of law.**
Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).
9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act. Polymarket has previously been stung by the CFTC before - https://www.cftc.gov/PressRoom/PressReleases/8478-22 Since then they launched a "polymarket.us" site, which has never had one market posted and is to act as a facade to regulators. Polymarket agreed to no longer serve American users, however there are countless American users who are using VPN's to still use the site, and Polymarket/Shayne 100% know this (a lot of their highest volumes user, he's met with many etc). Who I can provide real names, photos, online aliases, and crypto addresses for some. Some of the markets essentially act are mercenary assassination markets, such as "Will Biden drop out?", which pays out even if a market participant assassinate the president. They allowed users to Tornado Cash to use the platform, this is also a breach of OFAC sanctions as via the VPN anyone, form any sanctioned jurisdiction can use the site, creating a pool

of clean and dirty money. Polymarket originally said they would outsource the resolution process, they did this for a couple of years, but have now revert to a point where they will tell the jury how to vote. This lack of separation of duties opens up a clear path for insider trading by those who know which side Polymarket will clarify in favour for, essentially changing the rules after 2 parties have paid for a fair dispute to be voted on by the jury at UMA protocol. Ambitious rules, in correct market resolutions. Insider trading. They will eventually do an "airdrop" which might fall under SEC area but this will also include US users, they just have to lie and check a box saying they aren't in the USA. Undisclosed Ads with influencers. I could really go on forever but the violations are blatant, consistent and flagrant.
10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession. I have lots of chat logs with (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) I have names, photos, crypto address, online aliases, Twitter accounts of maybe of the users (b)(3):7 U.S.C. knows is American; (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) (b)(3):7 to name a few, can produce many more with their crypto addresses.
E. WHISTLEBLOWER PROGRAM
1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible. This is all primary information I have gathered myself as a user and (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party. Chat logs, etc, I Don't particularly need protections, they will know I am the one complaining anyway, I tried to resolve it.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **orney had any prior communication(s) with the CFTC concerning this matter?**
If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:
4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," please provide details.
If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.
5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **available mechanism at the entity for reporting violations?**
If "Yes," please provide details including the date you took the action(s).
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **ther action regarding your complaint?**
If "Yes," please provide details. tried to resolve the issue (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
7. Provide any additional information that you think may be relevant. Not sure, I don't have any more info RE: whistleblower protections, just want a cut of the pie, they just raised A LOT of money
F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION
1. Are you currently, or were you at the time that you acquired the original information that you are submitting

to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

(b)(3):7

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name (b)(3):7 U.S.C.	**2. First Name** (b)(3):7 U.S.C.		**3. M.I.**
4. Street Address			**5. Apartment/Unit#**
6. City (b)(3):7 U.S.C. §26(h)(2)(A)	**7. State/Province** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**8. ZIP/Postal Code** (b)(3):7 U.S.C.	**9. Country** USA
10. Telephone (b)(3):7 U.S.C.	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** email or phone
14. Occupation (b)(3):7 U.S.C. §26(h)(2)(A)			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type**
3. Name Polymarket.com	

4. Street Address			5. Apartment/Unit#
6. City	7. State/Province	8. ZIP/Postal Code	9. Country
10. Telephone	11. E-mail Address		12. Internet Address

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
No

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going? Yes

3. Please select the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☑ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☐ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☑ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
Swaps including security based swaps

5. If applicable, what is the name of product/investment?

6. Have you suffered a monetary loss?
☐ YES ☐ NO

If yes, describe how much.

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☐ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☐ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Please see the attached materials.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.
3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter? ☑ YES ☐ NO
If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated: The Director of Enforcement, Mr. Ian McGinley, and Mr. Brian Young.
4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you? ☐ YES ☐ NO
If "Yes," please provide details.
If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.
5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor? ☐ YES ☐ NO
If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations? ☐ YES ☐ NO
If "Yes," please provide details including the date you took the action(s).
6. Have you taken any other action regarding your complaint? ☐ YES ☐ NO
If "Yes," please provide details.
7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above? (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.

- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.

- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;

- complete address, including city, state and zip code;

- telephone number and, if available, an alternate number where you can be reached;

- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).

- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.

4. Street Address	5. Apartm
2 Bramshill drive	

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	US

10. Telephone	11. Alt. Phone	12. Email Address	13. Prefer
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	email

14. Occupation

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Country

8. Telephone	9. Fax	10. E-mail Address

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity
☐ Individual ☑ Entity	

3. Name
Polymarket (Blockratize, Inc)

4. Street Address	5. Apartm

160 West End Avenue

6. City	7. State/Province	8. ZIP/Postal Code	9. Countr
New York	New York	10023	USA

10. Telephone	11. E-mail Address	12. Intern
	hello@polymarket.com	polymarke

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficu individual?
No

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
Yes

If yes, describe how you are, or were, associated with the individual or firm you are complaining about
I have been approached on multiple occasions to collaborate with the firm/individual i am complaining about. They have divulged various aspects of their current business which are in violation of a 2022 settlement agreement with the CFTC

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Telephone

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodit**

☐ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, s or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else return of your funds and have been refused).**

☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**

☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**

☑ **The trading of futures options, or swaps based upon confidential information by someone not allowed t**

☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security fu**

☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a bas**

☑ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e. securities.**

☐ **A cash (or physical) contract traded in interstate commerce.**

☑ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☑ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to mana other asset or liability?
☐ YES ☑ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the**

someone acting in concert with the offeror or counterparty.

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to mana other asset or liability?
☐ YES ☐ NO

☑ **Other**

If other, please describe
Cryptocurrency

5. If applicable, what is the name of product/investment?
polymarket betting markets

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
I dedicated advertising space on my website to the entity which went unpaid

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violatio
Blockratize/Polymarkets is in violation of its Jan 3, 2022 settlement agreement. Not only is the company actively marketing to potential new clients to bypass the mandated ban on US users through the use of VPNs, but it is also using cryptocurrencies to bypass banking system onrails in the US and other markets. Furthermore, the company is actively soliciting new users in the US at such venues as the Republican National Convention (see Bloomberg article below). The company is also paying influencers on X to market its services directly to US users even though that is in violation of the settlement agreement. Finally, on information and belief and following conversations with the CEO, it has emerged that the company is commingling deposited cryptocurrency funds (similar to FTX) in order to fund personal expenses and accelerate company growth. Furthermore, none of these developments have been disclosed in a recent private fundraising round to sophisticated investors who invested over $45 million in the company.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting mat
Information has been collected following convernsations with the CEO Shayne Coplan. Read more here on the company's illegal marketing methods targeting a US-based audience which is illegal based on the 2022 CFTC settlement agreement.
https://www.bloomberg.com/news/articles/2024-08-01/polymarket-rides-election-betting-frenzy-that-defies-a-us-ba
n?accessToken=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJzb3VyY2UiOiJTdWJzY3JpYmVyR2lmdGVkQXJ0aWNsZSIsIm
NTgxOSwiZXhwIjoxNzIzMjUwNjE5LCJhcnRpY2xlSWQiOiJTR0daTldUMEcxS1cwMCIsImJjb25uZWN0SWQiOiIxRDIwME
2NDg4MDQ5QUU4MiJ9.2BSsc-JunzGilCJSWSpXAgQAGy89KlnvSBouDAJl6P8 https://www.bloomberg.com/news/articles/2
/betting-on-the-us-election-political-wagers-soar-as-chaotic-race-draws-gamblers?accessToken=eyJhbGciOiJIUzI1NiIsIn
R5cCI6IkpXVCJ9.eyJzb3VyY2UiOiJTdWJzY3JpYmVyR2lmdGVkQXJ0aWNsZSIsImlhdCI6MTcyMjY0NTg4NSwiZXhwIjoxN
Y2xlSWQiOiJTSExaSFNUMVVNMFcwMCIsImJjb25uZWN0SWQiOiIxRDIwMEFENTcxNjE0NDUxOEVBOUU2NDg4MDQ
DLHmkGBXIZeFiPy_00PuOzRcc

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtai communication where an attorney was present, identify such information with as much particularity as possible. In additio obtained from a public source, identify the source with as much particularity as possible.

All information was obtained through private communications with the CEO Shayne Coplan, and various current and former employees of Polymarkets. Also the following public information reveals the soliciting of clients in violation of the CFTC settlement agreement https://www.bloomberg.com/news/articles/2024-08-01/polymarket-rides-election-betting-frenzy-that-def ies-a-us-ban?accessToken=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJzb3VyY2UiOiJTdWJzY3JpYmVyR2lmdGVkQXJ0aW CI6MTcyMjY0NTgxOSwiZXhwIjoxNzIzMjUwNjE5LCJhcnRpY2xlSWQiOiJTR0daTldUMEcxS1cwMCIsImJjb25uZWN0SWQ NDUxOEVBOUU2NDg4MDQ5QUU4MiJ9.2BSsc-JunzGilCJSWSpXAgQAGy89KlnvSBouDAJl6P8 https://www.bloomberg.co /2024-08-02/betting-on-the-us-election-political-wagers-soar-as-chaotic-race-draws-gamblers?accessToken=eyJhbGciOiJ IUzI1NiIsInR5cCI6IkpXVCJ9.eyJzb3VyY2UiOiJTdWJzY3JpYmVyR2lmdGVkQXJ0aWNsZSIsImlhdCI6MTcyMjY0NTg4NSw jg1LCJhcnRpY2xlSWQiOiJTSExaSFNUMVVNMFcwMCIsImJjb25uZWN0SWQiOiIxRDIwMEFENTcxNjE0NDUxOEVBOUU 6Td2CusF9uoDLHmkGBX1ZeFiPy_00PuOzRcc

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to

No such documents exist

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or org ...mation from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if kn

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or con

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any ...ons?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMA

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CF of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the I Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory or the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. ... information pursuant to a cooperation agreement with the CFTC or another agency or organizat

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connectio ...deral or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in co that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, inv the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered whistleblower award program, the information provided will also be used by the Commission to determine the individual's

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower pr § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public pro Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purp public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency o attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self- in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act sy CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A c for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide id ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correc knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblow information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false wri the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, c my knowledge, information and belief.
I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewi unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this f whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide th Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Co concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or repres writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commi
Print Name of Attorney and Law Firm, if Applicable
☐ **Check this box to agree with the declaration above.**
Date

FILES UPLOADED

No files uploaded

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

CFTC
COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7

4. Street Address	5. Apartment/Unit#
404 Country Rdg	

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C.	(b)(3):7	United States

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	email

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name

2. Firm Name

3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Country

8. Telephone	9. Fax	10. E-mail Address

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	Polymarket is a crypto betting platform that is located in the United States and operates betting markets on multiple cryptocurrency blockchains.

3. Name
Blockratize, Inc. d/b/a Polymarket.com

4. Street Address Unknown, they refused to give when asked.			**5. Apartment/Unit#**
6. City New York	**7. State/Province** New York	**8. ZIP/Postal Code**	**9. Country** United States
10. Telephone	**11. E-mail Address** hello@polymarket.com		**12. Internet Address** polymarket.com

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy) (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**2. Is the conduct on-going?** Yes

3. Please select the option(s) that best describes your complaint

☑ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**

☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**

☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**

☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**

☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**

☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**

☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**

☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**

☐ **A cash (or physical) contract traded in interstate commerce.**

☐ **A foreign currency transaction.**
If a foreign currency transaction:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**
If yes:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☑ **Other**
If other, please describe It is an election betting market
5. If applicable, what is the name of product/investment? https://polymarket.com/event/venezuela-election-winner/
6. Have you suffered a monetary loss? ☑ YES ☐ NO
If yes, describe how much. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
7. Has the individual or firm who engaged in the conduct acknowledged their fault? ☐ YES ☑ NO
8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct? ☐ YES ☑ NO
If yes, select the appropriate category:
☐ **Prior complaint to the CFTC.**
☐ **Complaint to another regulator.**
☐ **A state or federal criminal law enforcement entity.**
☐ **A legal action filed against the person or firm in a court of law.**
Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).
9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act. Bets were made on the Venezuela election using Polymarket.com, a crypto betting platform. The betting market rules clearly stated "The primary resolution source for this market will be official information from Venezuela, however a consensus of credible reporting will also suffice." Over 6 million dollars worth of bets were placed on this market. Polymarket themselves tweeted about the conclusion of the election and acknowledged a victory by Maduro. However, the market resolved to "Yes" for Gonzales, despite the official announcement required by the rules clearly stating that Maduro was the winner. The discrepancy was caused by the "oracle" system that Polymarket uses to confirm its results, called UMA (uma.xyz). UMA is purportedly run by independent parties separate from Polymarket. The results transmitted by UMA are confirmed by a small number of

related parties (although they will claim it is "decentralized" that is untrue because 2 parties have enough "UMA tokens" to control the vote). Whether through social engineering, or simply blatant fraudulent collusion, these people voted for Gonzales as the winner. Instead of Polymarket stepping in as they have the ability to do, they watched as fraudulent traders made cheap bets, then went to social media and chat rooms to proclaim that the rules allowed for the election to be proclaimed fraudulent (they clearly do not), and insert Gonzales as the winner instead. Gonzales was declared the winner. Despite being clearly untrue, this was a fraudulent action. In the UMA Discord chat room there were multiple people openly mocking bettors, and speaking about their collusion in the UMA vote. It is definitely an "open secret" if you could call it a secret at all Six million dollars was only the final amount locked in the betting contract. In reality, many more people lost money selling before finalization as they realized that the manipulated vote was going against them. There are at least three distinct parties involved in the fraud. Polymarket, UMA, and the manipulating bettors on the Polymarket website (more than one). There is clearly evidence of collusion between UMA and the bettors. I also have messages from the Polymarket CEO proving he knew it was happening a few hours before the vote was resolved, when Polymarket could still block distribution of the fraudulent winnings. Instead, Polymarket allowed the winnings to be distributed to the exact opposite parties that it should have been. Many of the affected parties are Venezuelans. The facts constitute a violation of the Commodity Exchange Act because Polymarket offered an election futures market with clear rules that were unquestionably ALLOWED to be broken. On top of that, even though Mr. Coplan was directly informed of the broken rules while his company could still halt the payouts, he chose to instead let the fraud continue and once again pay out the 'manipulative bettors'

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Materials in my posession: (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) 2. Screenshot of betting results from polymarket.com 3. Screenshot of personal losses and money owed from polymarket.com 4. Screenshots of collusive admissions by voting parties from UMA discord chat Additional materials needed: 1. Logs of UMA discord chatrooms (discord.uma.xyz) specifically the 'voting-discussion' and 'evidence-rationale' rooms. Any private chats if possible. This chat room and many of the people in it are the main proponents and facilitators of this fraud. 2. Logs of Polymarket discord. Specifially 'general' and 'market-review.' There is not much evidence here besides hundreds of incredulous messages wondering why the bet was allowed chosen with the wrong outcome. 3. Blockchain information on the Polygon blockchain about the 'manipulative bettors' and their history. All information about the financial movement involving the bets will be there.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

The reason I am personally blowing this whistle is the (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

The documents that would reveal my identity are: 1(b)(3):7 U.S.C. §26(h)(2)(A) (CEA) 2. Screenshots of discord chats that include the handle '(b)(3):7 U.S.C.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **requested the information or related information from you?**

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **available mechanism at the entity for reporting violations?**

If "Yes," please provide details including the date you took the action(s).

6. (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **action regarding your complaint?**

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

I am not a litigious person. I am only submitting this because it is the most blatant case of fraud I have ever seen. The real losers are all of the Venezuelans who made bets based on what they thought was a trustworthy set of rules and got defrauded of their money. Right after they were defrauded of their election. I am submitting this as soon as possible because I believe they know enforcement will be coming from this

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **by the Congress, or any other federal or state authority?**

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **with the information that you are submitting to the CFTC?**

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

   The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

   The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

   The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

   The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

   Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name (b)(3):7 U.S.C. §26(h)(2)(A)	**2. First Name** (b)(3):7 U.S.C.	**3. M.I.**	
4. Street Address (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			**5. Apartment/Unit#**
6. City (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**7. State/Province** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**8. ZIP/Postal Code** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**9. Country** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
10. Telephone (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** email
14. Occupation (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)			

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type** https://polymarket.com/
3. Name https://polymarket.com/	

4. Street Address			5. Apartment/Unit#
6. City	7. State/Province	8. ZIP/Postal Code	9. Country
10. Telephone	11. E-mail Address hello@polymarket.com		12. Internet Address https://polymarket.com/

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Yes

3. Please select the option(s) that best describes your complaint

☑ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**

☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**

☑ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**

☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**

☑ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**

☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**

☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**

☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**

☐ **A cash (or physical) contract traded in interstate commerce.**

☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
Got scammed at the polymarket.com site (prediction market web3 website), which uses UMA (https://uma.xyz/) as a resolution/dispute platform. The market where the rigging happened was the 'Venezuelan Presidential Election' with a volume traded of 6.1 Millions USDC. A description of the events below. Thank you very much. @Polymarket design ensures that each market is closed through voting by @UMAprotocol holders. UMA functions as an oracle with built-in motivations for token holders to vote. On July 28, Venezuelan elections were held, and Polymarket took bets on this event. Before the election, Maduro had a 75-80% chance of winning (despite exit polls showing much less). Shares for Maduro 'Yes' win were trading at around 85c. What did the market believe? That Maduro was highly likely to win (fairly or unfairly) and the opposition wouldn't manage to win. Importantly, the market rules stated: "The primary resolution source for this market will be official information from Venezuela, however a consensus of credible reporting will also suffice." What happened next? The elections concluded, and the Venezuelan electoral commission (CNE) announced that Maduro won with

51.2%.
The market at this time surged to 95% YES for Maduro. @Polymarket tweeted this https://x.com/Polymarket/status/1817950373325283826 . Around this time, @UMAprotocol h began a dispute over the YES for Maduro's victory. Three proposals (In order to put a proposal someone has to bond $750) were rejected with the outcome P4 (too early). Meanwhile, countries recognizing the Venezuelan election results congratulated Maduro, while the opposition started presenting evidence of election fraud. Over the next 24 hours, a discussion in UMA argued it was too early (P4) to declare a winner, suggesting that the CNE data looked suspicious and more concrete data was needed. Consequently, the YES Maduro market began to reverse, and some large players started buying cheap NO Maduro and YES Gonzalez (which were worth around 10c each). In the UMA discord, there was clear lobbying to distrust the official data and wait. The @UMAprotocol community voted—it was too early to make a conclusion. Over the next week (July 29 - August 5), the market stabilized at 70-75c YES for Maduro. Intense debates/shilling continued in the UMA discord, focusing on: 1) The word "Primary" could be devalued by "However." 2) Opposition data from voting machines could be considered official, whereas CNE data was deemed untrustworthy. 3) UMA should rely on a trusted consensus (Carter Center information, Blinken's statements, opposition data, etc.). On August 5, a dispute concluded with YES for Gonzalez. The UMA whales who bought shares on the cheap (around 10c) decided Gonzalez won, making each share worth $1, effectively profiting a quick 10x, because they control the majority of the UMA tokens. Maduro's value to drop from 75c to 0. This essentially meant Polymarket and UMA recognized someone who officially lost as the winner, and people familiar with the Venezuelan situation, who knows how Latam institutions work and who were trying to hedge against Maduro Win lost their money. The silence from Polymarket Team around this has been obscene. It seems the killer app of this cycle is a scam and can be easily manipulated by a few UMA whales. During that week, the CNE (official body from Venezuela) proclaimed Maduro winner two times. Armed forces reiterated they support Maduro and the Attorney General from Venezuela is prosecuting Edmundo Gonzalez for providing false information. So the UMA decision just doesn't match reality whatsoever. https://edition.cnn.com/2024/08/05/americas/venezuela-investigation-edmundo-gonzalez-maria-machado-intl-latam/index.html https://x.com/Polymarket/status/181795037 3325283826

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Information can be verified online and thru different social platforms (X.com)

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

myself

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

[redacted] details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.
This platform already got fine by CFTC for running unregistered markets https://www.dlapiper.com/en/insights/publications/2022/1/cftc-settles-enforcement-action-against-defi-platform-polymarket

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **the Congress, or any other federal or state authority?**

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **with the information that you are submitting to the CFTC?**

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ **Check this box to agree with the declaration above.**

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☑ **Check this box to agree with the declaration above.**

Date (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)
FILES UPLOADED
No files uploaded

<u>Submission Procedures</u>

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

<u>Instructions for Completing Form TCR</u>

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

COMMODITY FUTURES TRADING COMMISSION

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION			
Confirmation Number (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**Submission Received** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)		
A. TELL US ABOUT YOURSELF			
COMPLAINANT 1			
1. Last Name	**2. First Name**	**3. M.I.**	
4. Street Address		**5. Apartment/Unit#**	
6. City	**7. State/Province**	**8. ZIP/Postal Code**	**9. Country**
10. Telephone	**11. Alt. Phone**	**12. Email Address** (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	**13. Preferred Method of Communication** Email
14. Occupation			
B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)			
1. Attorney's Name			
2. Firm Name			
3. Street Address			
4. City	**5. State/Province**	**6. ZIP/Postal Code**	**7. Country**
8. Telephone	**9. Fax**	**10. E-mail Address**	
C. TELL US WHO YOU ARE COMPLAINING ABOUT			
INDIVIDUAL/ENTITY 1			
1. Type ☐ Individual ☑ Entity	**2. If an individual, specify profession. If an entity, specify type** Prediction market		
3. Name Polymarket			
4. Street Address		**5. Apartment/Unit#**	

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
10. Telephone	**11. E-mail Address**		**12. Internet Address**

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
No

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Other

If other, please describe
Internet

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	2. Is the conduct on-going?
(b)(3):7 U.S.C.	Yes

3. Please select the option(s) that best describes your complaint

☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**

☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**

☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**

☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**

☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**

☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

☑ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**

☐ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**

☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**

☐ **A cash (or physical) contract traded in interstate commerce.**

☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**
If yes:
Are you an individual that trades or invests more than $10,000,000 on a discretionary basis? ☐ YES ☐ NO
Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability? ☐ YES ☐ NO
☑ **Other**
If other, please describe Event based options
5. If applicable, what is the name of product/investment?
6. Have you suffered a monetary loss? ☑ YES ☐ NO
If yes, describe how much. (b)(3):7 U.S.C. §26(h)(2)(A)
7. Has the individual or firm who engaged in the conduct acknowledged their fault? ☐ YES ☑ NO
8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct? ☐ YES ☑ NO
If yes, select the appropriate category:
☐ **Prior complaint to the CFTC.**
☐ **Complaint to another regulator.**
☐ **A state or federal criminal law enforcement entity.**
☐ **A legal action filed against the person or firm in a court of law.**
Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).
9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act. Polymarket is openly doing rug pulls on a regular basis. It wasn't reported but the Venezuela election is a prime example, this substack explains the process; https://frankmuci.substack.com/p/polymarket-settles-bet-against-its This week, there has been three examples where the wording was changed while the market was live. This caused one option to rise to 99 cents. The outcome was disputed via UMA, a 'DAO' voting token system. The majority of the tokens to vote are held by the biggest bettors on Polymarket which guarantees the desired outcome. This process is also subject to another pump and dump as the smallest share of tokens are counted first, suggesting the vote is in their favour. Then the lion's share of opposing votes are counted and the price returns to 99 cents. This is freely spoken about on the public Polymarket channel, staffed by employees.
10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession. Everything I have is openly available.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

I have tested some markets and accessed the discord server. It's an open secret amongst twitter and crypto websites.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **requested the information or related information from you?**

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

☐ YES ☐ NO

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

It's feasible that any result can be overturned subjected to dispute; to my knowledge, UMA has never gone against Polymarket and vice versa. It would be impossible to accrue enough tokens to have any effect on the voting process. There is scant information of how any of this works upon signing up, which makes new users particularly susceptible. And as the U.S election will be contentious, there is nothing to suggest a repeat of the Venezuelan election couldn't happen, with a more lucrative market.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or

demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information that you are submitting to the CFTC?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 through 4 above?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

Print Name

(b)(3):7

☑ **Check this box to agree with the declaration above.**

Date

(b)(3):7 U.S.C. §26(h)(2)(A)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ **Check this box to agree with the declaration above.**

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.

FORM TCR
TIP, COMPLAINT OR REFERRAL
OMB Approval Number: 3038-0082
UNITED STATES
COMMODITY FUTURES TRADING COMMISSION

Please be advised that pursuant to 5 C.F.R. § 1320.5(b)(2)(i), you are not required to respond to this collection of information unless it displays a currently valid OMB control number. Information provided on this Form TCR, and its related attachments and addendums, is CONFIDENTIAL and cannot be distributed outside of the Commission without the written approval of the CFTC Whistleblower Office and the Division of Enforcement.

SUBMISSION INFORMATION

Confirmation Number	Submission Received
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

A. TELL US ABOUT YOURSELF

COMPLAINANT 1

1. Last Name	2. First Name	3. M.I.
(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	(b)(3):7 U.S.C.

4. Street Address	5. Apartment/Unit#
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	

6. City	7. State/Province	8. ZIP/Postal Code	9. Country
(b)(3):7 U.S.C. §26(h)(2)(A)	(b)(3):7 U.S.C.	(b)(3):7 U.S.C.	USA

10. Telephone	11. Alt. Phone	12. Email Address	13. Preferred Method of Communication
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	email

14. Occupation
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

B. YOUR ATTORNEY'S INFORMATION (If Applicable - See Instructions)

1. Attorney's Name
2. Firm Name
3. Street Address

4. City	5. State/Province	6. ZIP/Postal Code	7. Country
8. Telephone	9. Fax	10. E-mail Address	

C. TELL US WHO YOU ARE COMPLAINING ABOUT

INDIVIDUAL/ENTITY 1

1. Type	2. If an individual, specify profession. If an entity, specify type
☐ Individual ☑ Entity	

3. Name
Robinhood Derivatives LLC

4. Street Address	5. Apartment/Unit#

85 Willow Rd			
6. City Menlo Park	**7. State/Province** CA	**8. ZIP/Postal Code** 94025	**9. Country** USA
10. Telephone (650) 761-7789	**11. E-mail Address** support@robinhood.com		**12. Internet Address** https://robinhood.com/us/en/support/robinhood-derivatives/

13. If you are complaining about a firm or individual that has custody or control of your investments, have you had difficulty contacting that entity or individual?
Yes

14. Are you, or were you, associated with the individual or firm when the alleged conduct occurred?
Unknown

If yes, describe how you are, or were, associated with the individual or firm you are complaining about

15. What was the initial form of contact between you and the person against whom you are filing this complaint?
Internet Advertisement

If other, please describe

D. TELL US ABOUT YOUR COMPLAINT

1. Occurrence Date (mm/dd/yyyy)	**2. Is the conduct on-going?**
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)	Don't Know

[redacted] the option(s) that best describes your complaint

- ☐ **Fraudulent representations that persuaded you to trade futures, options, swaps, forex, retail commodity, or leveraged transactions**
- ☑ **Some type of cheating or fraud that occurred after you had deposited funds to trade futures, options, swaps, forex, retail commodity, or leveraged transactions (for example, if someone used the funds you deposited to pay off someone else or you have asked for the return of your funds and have been refused).**
- ☐ **Someone or some firm that should be registered under the Commodity Exchange Act, but is not.**
- ☑ **Disruptive or manipulative trading activity in the futures, options or swaps markets.**
- ☐ **The trading of futures options, or swaps based upon confidential information by someone not allowed to use such information.**
- ☐ **Complaint does not fit into any of the above-described categories**

If your complaint does not fit into any of the above-described categories please describe below.

4. Select the type of product/instrument:

- ☐ **A futures contract, including a single stock futures contract, a narrow based or broad based security future contract.**
- ☑ **An option on a futures contract, an option on a commodity, BUT NOT an option on a security or a basket of securities.**
- ☐ **A swap, including a mixed swap BUT NOT a swap based on a single security or based on a narrow (i.e., nine or less) index of securities.**
- ☐ **A cash (or physical) contract traded in interstate commerce.**
- ☐ **A foreign currency transaction.**

If a foreign currency transaction:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **A commodity transaction entered into or offered on a leveraged or margined basis, or financed by the offeror, the counterparty, or someone acting in concert with the offeror or counterparty.**

If yes:

Are you an individual that trades or invests more than $10,000,000 on a discretionary basis?
☐ YES ☐ NO

Are you an individual that trades or invests more than $5,000,000 and enters into the foreign currency agreement to manage the risk associated with some other asset or liability?
☐ YES ☐ NO

☐ **Other**

If other, please describe

5. If applicable, what is the name of product/investment?
Robinhood Prediction Markets - Climate category

6. Have you suffered a monetary loss?
☑ YES ☐ NO

If yes, describe how much.
(b)(3):7 U.S.C. commission

7. Has the individual or firm who engaged in the conduct acknowledged their fault?
☐ YES ☑ NO

8. Have you or anyone else taken any action against the firm or person who engaged in the alleged conduct?
☐ YES ☑ NO

If yes, select the appropriate category:

☐ **Prior complaint to the CFTC.**

☐ **Complaint to another regulator.**

☐ **A state or federal criminal law enforcement entity.**

☐ **A legal action filed against the person or firm in a court of law.**

Additional comments based on above selection (e.g., Who, When, Contact, To whom made, Case Number, Court).

9.State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.
I "invested" in Robinhood Prediction Markets in the climate category yesterday. I predicted that the temperature in Houston, TX would exceed 56 degrees. The exact NWS report that Robinhood says they use clearly shows
the high for the day was 58 degrees. I have been dipping my toes into this market for a couple of weeks and have noticed similar discrepancies several times. Something is rotten in this market.

10. Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.
I have a screen shot of the settlement screen from Robinhood, as well as the National Weather Service Report showing the high temperature.

E. WHISTLEBLOWER PROGRAM

1. Describe how and from whom you obtained the information that supports your allegations. If any information was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Everything I have came from the Robinhood app, Robinhood website, and the National Weather Service website.

2. Identify with particularity any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

The screenshot of my settlement statement may be identifiable.

3. Have you or your attorney had any prior communication(s) with the CFTC concerning this matter?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please identify the CFTC staff member(s) with whom you or your attorney communicated:

4. Have you or your attorney provided the information to any other agency or organization, or has any other agency or organization requested the information or related information from you?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

If "Yes," please provide the name and contact information of the point of contact at the other agency or organization, if known.

5. Does this complaint relate to an entity of which you are or were an officer, director, counsel, employee, consultant or contractor?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," have you reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details including the date you took the action(s).

6. Have you taken any other action regarding your complaint?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

If "Yes," please provide details.

7. Provide any additional information that you think may be relevant.

F. WHISTLEBLOWER ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you currently, or were you at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: the CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C.78c(a))); a law enforcement organization; or a foreign regulatory authority or law enforcement organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

2. Are you providing this information pursuant to a cooperation agreement with the CFTC or another agency or organization?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

3.Before you provided this information, did you(or anyone representing you) receive any request, inquiry or demand that relates to the subject matter of this submission(i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934(15 U.S.C.78c(a))), or(iii) in connection with an investigation by the Congress, or any other federal or state authority?

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

4. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal (b)(3):7 U.S.C. §26(h)(2)(A) (CEA) **with the information that you are submitting to the CFTC?**

5. Did you acquire the information being provided to the CFTC from any person described in Questions 1 (b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

6. If you answered "Yes" to any of Questions 1 through 5 above, please provide details.

G. PRIVACY NOTICE AND WHISTLEBLOWER'S DECLARATION

PRIVACY ACT STATEMENT

PRIVACY ACT STATEMENT

The collection, maintenance, and disclosure of this information is governed by the Privacy Act of 1974 (5 U.S.C. § 552a).

1. PURPOSE

The information provided will help the Commodity Futures Trading Commission ("CFTC" or "Commission") identify, investigate, and prosecute violations of the Commodity Exchange Act ("CEA") or the regulations promulgated thereunder. If an individual wishes to be considered for the Commission's whistleblower award program, the information provided will also be used by the Commission to determine the individual's eligibility for payment of an award.

2. AUTHORITY

The Commission's collection of this information from persons seeking to participate in the Commission's whistleblower program is authorized under 7 U.S.C. § 26 and 17 C.F.R. § 165.

3. ROUTINE USES

The Commission may disclose this information when required to a defendant or respondent in connection with a public proceeding instituted by the Commission. In addition, if the Commission determines such disclosure is necessary or appropriate to accomplish the purposes of the CEA or to protect the public, the Commission may disclose this information to the Department of Justice; an appropriate department or agency of the Federal Government; a state attorney general; any appropriate department or agency of a state; a registered entity, registered futures association, or self-regulatory organization (as defined in Section 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. § 78c(a)); or, a foreign futures authority.

The information will be maintained and any disclosures will be made in accordance with the Commission's Privacy Act system of records notices (SORNs) CFTC-49, *Whistleblower Records* available at 77 FR 41378, CFTC-10, *Investigatory Records* available at 76 FR 5973, and CFTC-16, *Enforcement Case Files* available at 76 FR 5973, exercised in accordance with the confidentiality provisions in the CEA and 17 C.F.R. § 165.4. A complete set of blanket routine uses for Commission SORNs is published in the *Federal Register* at 76 FR 5974 (Feb. 2, 2011).

4. EFFECT OF NOT PROVIDING INFORMATION

Furnishing information on or through this form is voluntary and may be done anonymously. However, failure to provide identifying information may result in ineligibility for consideration under the Commission's whistleblower award program. Award candidates must be identified to a limited number of Commission staff for a final eligibility determination, and in unusual circumstances may need to be identified publicly for trial.

WHISTLEBLOWER'S DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other

dealings with the Commodity Futures Trading Commission, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry.

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

☑ Check this box to agree with the declaration above.

Date
(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

H. COUNSEL CERTIFICATION

I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief.

I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower's valid, unexpired government issued identification(e.g., driver's license, passport) and will retain an original, signed copy of this form, with Section G signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower's non-waivable consent to provide the Commodity Futures Trading Commission with his or her original signed Form TCR upon request in the event that the Commodity Futures Trading Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within seven(7) calendar days of receiving such a request from the Commodity Futures Trading Commission.

Print Name of Attorney and Law Firm, if Applicable

☐ Check this box to agree with the declaration above.

Date

FILES UPLOADED

(b)(3):7 U.S.C. §26(h)(2)(A) (CEA)

Submission Procedures

Questions concerning this form may be directed to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581.

- If you are submitting information for the CFTC's whistleblower award program, you *must* submit your information using this Form TCR.
- You may submit this form electronically, through the Web portal found on the CFTC's *Web site* at *http://www.whistleblower.gov*. You may also print this form and submit it by mail to Commodity Futures Trading Commission, Whistleblower Office, Three Lafayette Centre, 1155 21st Street, NW, Washington, DC 20581, or by facsimile to (202) 418-5975.
- You have the right to submit information anonymously. If you do not submit anonymously, please note that the CFTC is required by law to maintain the confidentiality of any information which could reasonably identify you, and will only reveal such information in limited and specifically - defined circumstances. See 7 U.S.C. 26(h)(2); 17 CFR 165.4. However, in order to receive a whistleblower award, you will need to be identified to select CFTC staff for a final eligibility determination, and in unusual circumstances, you may need to be identified publicly for trial. You should therefore provide some means for the CFTC's staff to contact you, such as a telephone number or an email address.

Instructions for Completing Form TCR

General

- All references to "you" and "your" are intended to mean the complainant.

Section A: Tell Us about Yourself

Questions 1-14: Please provide the following information about yourself:

- last name, first name, and middle initial;
- complete address, including city, state and zip code;
- telephone number and, if available, an alternate number where you can be reached;
- your e-mail address (to facilitate communications, we strongly encourage you to provide an email address, especially if you are filing anonymously).
- your preferred method of communication; and

- your occupation

Section B: Your Attorney's Information

Complete this section only if you are represented by an attorney in this matter.

Questions 1-10: Provide the following information about your attorney:

- attorney's name;
- firm name;
- complete address, including city, state and zip code;
- telephone number and fax number; and

  e-mail address.

Section C: Tell Us Who You Are Complaining About

Questions 1-2: Choose one of the following that best describes the individual's profession or the type of entity to which your complaint relates:

- For **Individuals**: accountant, analyst, associated person, attorney, auditor, broker, commodity trading advisor, commodity pool operator, compliance officer, employee, executing broker, executive officer or director, financial planner, floor broker, floor trader, trader, unknown or other (specify).
- For **Entities**: bank, commodity pool, commodity pool operator, commodity trading advisor, futures commission merchant, hedge fund, introducing broker, major swap participant, retail foreign exchange dealer, swap dealer, unknown or other (specify).

Questions 3-12: For each individual and/or entity, provide the following information, if known:

- full name
- complete address, including city, state and zip code;
- telephone number;
- e-mail address; and
- internet address, if applicable.

Question 13: If you are complaining about a firm or individual that has custody or control of your investments, indicate if you have had difficulty contacting that entity or individual.

Question 14: Identify if you are, or were, associated with the individual or firm you are complaining about. If yes, describe how you are, or were, associated with the individual or firm you are complaining about.

Question 15: Identify the initial form of contact between you and the person against whom you are filing this complaint.

Section D: Tell Us About Your Complaint

Question 1: State the date (mm/dd/yyyy) that the alleged conduct occurred or began.

Question 2: Identify if the conduct is on-going.

Question 3: Choose the option that you believe best describes the nature of your complaint. If you are alleging more than one violation, please list all that you believe may apply.

Question 4: Select the type of product or instrument you are complaining about.

Question 5: If applicable, please name the product or instrument. If yes, please describe.

Question 6: Identify whether you have suffered a monetary loss. If yes, please describe.

Question 7: Identify if the individual or firm you are complaining about acknowledged their fault.

Question 8: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered yes, provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question 9: State in detail all facts pertinent to the alleged violation. Explain why you believe the facts described constitute a violation of the Commodity Exchange Act.

Question 10: Describe all supporting materials in your possession and the availability and location of any additional supporting materials not in your possession.

Section E: Whistleblower Program

Question 1: Describe how you obtained the information that supports your allegations. If any information

was obtained from an attorney or in a communication where an attorney was present, identify such information with as much particularity as possible. In addition, if any information was obtained from a public source, identify the source with as much particularity as possible.

Question 2: Identify any documents or other information in your submission on this Form TCR that you believe could reasonably be expected to reveal your identity. Explain the basis for your belief that your identity would be revealed if the documents or information were disclosed to a third party.

Question 3: State whether you or your attorney have had any prior communication(s) with the CFTC concerning this matter. If you answered "yes", identify the CFTC staff member(s) with whom you or your attorney communicated.

Question 4: Indicate whether you or your attorney have provided the information you are providing to the CFTC to any other agency or organization, or whether any other agency or organization has requested the information or related information from you. If you answered "yes", provide details and the name and contact information of the point of contact at the other agency or organization, if known.

Question 5: Indicate whether your complaint relates to an entity of which you are, or were in the past, an officer, director, counsel, employee, consultant or contractor. If you answered "yes", state whether you have reported this violation to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism at the entity for reporting violations. Please provide details, including the date on which you took the action.

Question 6: Indicate whether you have taken any other action regarding your complaint, including whether you complained to the CFTC, another regulator, a law enforcement agency, or any other agency or organization, or initiated legal action, mediation, arbitration or any other action. If you answered "yes", provide details, including the date on which you took the action(s) described, the name of the person or entity to whom you directed any report or complaint, and contact information for the person or entity, if known, and the complete case name, case number and forum of any legal action you have taken.

Question7: Provide any additional information you think may be relevant.

Section F: Whistleblower Eligibility Requirements and Other Information

Question 1: State whether you are currently, or were at the time that you acquired the original information that you are submitting to the CFTC, a member, officer or employee of: The CFTC; the Board of Governors of the Federal Reserve System; the Office of the Comptroller of the Currency; the Board of Directors of the Federal Deposit Insurance Corporation; the Director of the Office of Thrift Supervision; the National Credit Union Administration Board; the Securities and Exchange Commission; the Department of Justice; a registered entity; a registered futures association; a self-regulatory organization

(as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)); a law enforcement organization; or a foreign regulatory authority or law enforcement organization.

Question 2: State whether you are providing the information pursuant to a cooperation agreement with the CFTC or with another agency or organization.

Question 3: State whether you are providing this information before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of this submission (i) from the CFTC, (ii) in connection with an investigation, inspection or examination by any registered entity, registered futures association or self-regulatory organization (as defined in 3(a) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)), or (iii) in connection with an investigation by the Congress, or any other federal or state authority.

Question 4: State whether you are currently a subject or target of a criminal investigation, or whether you have been convicted of a criminal violation, in connection with the information that you submitted to the CFTC and upon which your application for an award is based.

Question 5: State whether you acquired the information that you provided to the CFTC from any individual described in Questions 1 through 4 of this section.

Question 6: If you answered "Yes" to any of Questions 1 through 5 of this section, please provide details.

Section G: Privacy Notice and Whistleblower's Declaration

You must sign this Declaration if you are submitting this information pursuant to the CFTC whistleblower program and wish to be considered for an award. If you are submitting your information using the electronic version of Form TCR through the CFTC's web portal, you must check the box to agree with the declaration. If you are submitting your information anonymously, you must still sign this Declaration (using the term ''anonymous'') or check the box as appropriate, and, if you are represented by an attorney, you must provide your attorney with the original of this signed form, or maintain a copy for your own records.

Section H: Counsel Certification

If you are submitting this information pursuant to the CFTC whistleblower program and you are doing so anonymously through an attorney, your attorney must sign the Counsel Certification Section. If your attorney is submitting your information using the electronic version of Form TCR through the CFTC's web portal, he/she must check the box to agree with the certification. If you are represented in this matter but you are not submitting your information pursuant to the CFTC whistleblower program, your attorney does not need to sign this Certification or check the box.