

October 13, 2026

SUBMITTED VIA CFTC PORTAL

Secretary of the Commission
Office of the Secretariat
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: KalshiEX LLC – Settlement of Contracts

Dear Sir or Madam,

KalshiEX LLC (“Kalshi” or “Exchange”) hereby notifies the Commodity Futures Trading Commission (“CFTC”) that it is amending Rule 5.17 of the Exchange Rulebook (“Settlement”), effective October 27, 2026, to provide additional clarity to its rules regarding impermissible activity by Members. The amended Rule makes explicit the existing stance of the Exchange: Kalshi Members may not harass third-parties in connection with trading activity. Kalshi will detect and prosecute violations of this Rule to the fullest extent, consistent with 17 CFR § 38.152-3. Violations of this subsection may lead to independent financial penalties assessed by the Exchange under Chapter 9 of the Rulebook.

This Rule does not supplant, supersede, or otherwise diminish Kalshi’s existing prohibition and prosecution of market and outcome manipulation.

Attached Appendix A contains the proposed addition to Rule 5.17 in clean and tracked format. All existing text is unaffected.

Compliance with Core Principles

Kalshi has concluded that the change to the Rulebook is not inconsistent with the CEA and the CFTC’s regulations. The following core principles most directly pertain to the amendment: **Core Principle 2 - Compliance with Rules; Core Principle 3 - Contracts not Readily Susceptible to Manipulation; Core Principle 12 - Protection of Markets and Market Participants; and Core Principle 13 - Disciplinary Procedures.**

The amendment to the Rulebook codifies and memorializes the exchange’s prohibition of Member harassment in connection with trading activity. This proposed rule will prohibit any public or private conduct that involves or relates to the targeting of an individual person, group, personality, entity, organization, institution, league, team, or other subject in connection with trading activity on the exchange. The proposed rule serves to promote market integrity, limit potential manipulation, and enhance exchange disciplinary procedures. The rule is public,

accurate, and available to all participants. Further, the Exchange will maintain records of its actions under the rule.

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

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

Sincerely,
Richard Heaslip
Chief Regulatory Officer
KalshiEX LLC
rheaslip@kalshi.com

Enclosures:
Appendix A (clean and tracked changes)

Appendix A

Rulebook Amendment (Clean)

RULE 5.17 PROHIBITED TRANSACTIONS AND ACTIVITIES

[Existing subsections (a) through (cc) unchanged.]

(dd) No Person shall intentionally or recklessly engage in conduct reasonably likely to cause emotional distress to a third-party in connection with trading activity. This includes, but is not limited to, any conduct or attempted conduct reasonably likely to bully, frighten, threaten, scare, coerce, harass, or intimidate any third party in connection with trading activity.

Rulebook Amendment (Tracked in Blue)

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