February 25, 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 – CFTC Regulation 40.2(a) Notification Regarding the Initial Listing of the "Will <political stat 1> be <value> <above/below/exactly/at least/between> <political stat 2> <time period>?" Contract

Dear Sir or Madam,

Pursuant to Section 5c(c) of the Commodity Exchange Act and Section 40.2(a) of the regulations of the Commodity Futures Trading Commission, KalshiEX LLC (Kalshi), a registered DCM, hereby notifies the Commission that it is self-certifying the "Will <political stat 1> be <value> <above/below/exactly/at least/between> <political stat 2> <time period>?" contract (Contract). The Contract will initially be listed after close-of-business on **February 25, 2026**; it is listed as the day after because of limitations of the Commission's online submission portal. The Exchange intends to list the contract on a custom basis. The Contract's terms and conditions (Appendix A) includes the following strike conditions:

- **<date>**
- **<political stat 1>**
- **<value>**
- **<above/below/exactly/at least/between>**
- **<political stat 2>**
- **<time period>**

Along with this letter, Kalshi submits the following documents:

- A concise explanation and analysis of the Contract;
- Certification;
- Appendix A with the Contract's Terms and Conditions;
- Confidential Appendices with further information; and
- A request for FOIA confidential treatment.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Xavier Sottile
Head of Markets

KalshiEX LLC
xsottile@kalshi.com

KalshiEX LLC
Official Product Name: “Will <political stat 1> be <value> <above/below/exactly/at least/between> <political stat 2> <time period>?”
Rulebook: POLITICALSTATVALUECOMPARISON
Summary: Relative change between two political statistics
Kalshi Contract Category: Economic/Demographic Measure - non U.S. Govt
Kalshi Internal Category: Politics
February 25, 2026

CONCISE EXPLANATION AND ANALYSIS OF THE PRODUCT AND ITS COMPLIANCE WITH APPLICABLE PROVISIONS OF THE ACT, INCLUDING CORE PRINCIPLES AND THE COMMISSION'S REGULATIONS THEREUNDER

Pursuant to Commission Rule 40.2(a)(3)(v), the following is a concise explanation and analysis of the product and its compliance with the Act, including the relevant Core Principles (discussed in Appendix D), and the Commission's regulations thereunder.

I. Introduction

The “Will <political stat 1> be <value> <above/below/exactly/at least/between> <political stat 2> <time period>?” Contract is a contract relating to Politics.

Further information about the Contract, including an analysis of its risk mitigation and price basing utility, as well as additional considerations related to the Contract, is included in Confidential Appendices B, C, and D.

Pursuant to Section 5c(c) of the Act and CFTC Regulations 40.2(a), the Exchange hereby certifies that the listing of the Contract complies with the Act and Commission regulations under the Act.

General Contract Terms and Conditions: The Contract operates similar to other event contracts that the Exchange lists for trading. The minimum price fluctuation is $0.01 (one cent). Price bands will apply so that Contracts may only be listed at values of at least $0.01 and at most $0.99. Further, the Contract is sized with a one-dollar notional value and has a minimum price fluctuation of $0.01 to enable Members to match the size of the contracts purchased to their economic risks. As outlined in Rule 5.16 of the Rulebook, trading shall be available at all times outside of any maintenance windows, which will be announced in advance by the Exchange. Members will be charged fees in accordance with Rule 3.13 of the Rulebook. Fees, if they are charged, are charged in such amounts as may be revised from time to time to be reflected on the Exchange’s Website. A new Source Agency can be added via a Part 40 amendment. All instructions on how to access the Underlying are non-binding and are provided for convenience only and are not part of the binding Terms and Conditions of the Contract. They may be clarified at any time. Furthermore, the Contract's payout structure is characterized by the payment of an absolute amount to the holder of one side of the option and no payment to the counterparty. During the time that trading on the Contract is open, Members are able to adjust their positions and trade freely. The Expiration Value and Market Outcome are determined at or after Market Close. The market is then settled by the Exchange, and the long position holders and short position holders are paid according to the Market Outcome. In this case, "long position holders" refers to Members who purchased the "Yes" side of the Contract and "short position holders" refers to Members who purchased the "No" side of the Contract. If the Market Outcome is "Yes," meaning that an event occurs that is encompassed within the Payout Criterion, then the long position holders are paid an absolute amount proportional to the size of their position and the short position holders receive no payment. If the Market Outcome is "No," then the short position holders are paid an absolute amount proportional to the size of their position and the long position holders receive no payment. Specification of the circumstances that would trigger a Market Outcome of "Yes" are included below in the section titled "Payout Criterion" in Appendix A.

CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. § 7A-2 AND COMMODITY FUTURES TRADING COMMISSION RULE 40.2, 17 C.F.R. § 40.2

Based on the above analysis, the Exchange certifies that:

- ❏ The Contract complies with the Act and Commission regulations thereunder.
- ❏ This submission (other than those appendices for which confidential treatment has been requested) has been concurrently posted on the Exchange's website at https://kalshi.com/regulatory/filings.

Should you have any questions concerning the above, please contact the exchange at ProductFilings@kalshi.com.

By: Xavier Sottile
Title: Head of Markets
Date: February 25, 2026

Attachments:

Appendix A - Contract Terms and Conditions
Appendix B (Confidential) - Further Considerations
Appendix C (Confidential) - Source Agency
Appendix D (Confidential) - Compliance with Core Principles

APPENDIX A – CONTRACT TERMS AND CONDITIONS

Official Product Name: "Will <political stat 1> be <value> <above/below/exactly/at least/between> <political stat 2> <time period>?"
Rulebook: POLITICALSTATVALUECOMPARISON

POLITICALSTATVALUECOMPARISON

Scope: These rules shall apply to this contract.

Underlying: The Underlying for this Contract is the comparative value of <political stat 1> relative to <political stat 2> by a margin of <value> <time period>. Revisions to the Underlying made after Expiration will not be accounted for in determining the Expiration Value.

Source Agency: The Source Agencies are, in hierarchical order, the statistical agency or entity responsible for the calculation and/or release of <political stat 1> and/or <political stat 2>. Where <political stat 1> and <political stat 2> are measured by different Source Agencies, each statistic will be determined using its respective Source Agency as specified in the Contract listing.

Type: The type of Contract is an Event Contract.

Issuance: After the initial Contract, Contract iterations will be listed on an as-needed basis at the discretion of the Exchange and corresponding to the risk management needs of Members.

<political stat 1>: <political stat 1> refers to a measurable political metric or indicator as specified by the Exchange. This may include (but is not limited to):

- Approval ratings (e.g., presidential approval, congressional approval)
- Polling results or polling averages (e.g., candidate support percentages, generic ballot)
- Vote shares or margins (e.g., percentage of votes received, margin of victory)
- Seat counts or changes (e.g., number of House seats held by a party)
- Turnout statistics (e.g., voter turnout percentage)
- Legislative metrics (e.g., bills passed, confirmation votes)
- Other quantifiable political indicators

<political stat 1> may be expressed as a percentage, index value, count, or other numerical or textual measure as defined by the Exchange. Where applicable, <political stat 1> will be specified with sufficient detail to identify the exact metric, including the entity measured (e.g., "President Biden's job approval rating"), the measuring organization (e.g., "Gallup"), and any relevant qualifications (e.g., "among registered voters," "net approval").

<political stat 2>: <political stat 2> refers to a measurable political metric or indicator as specified by the Exchange, following the same definitional framework as <political stat 1>. <political stat 2> may measure:

- The same type of metric as <political stat 1> for a different entity (e.g., Trump's approval vs. Biden's approval)

- A different type of metric from the same or different entities (e.g., approval rating vs. polling average)
- The same metric from a different time period or different measuring organization

<political stat 2> will be specified with the same level of detail as <political stat 1>, including the entity measured, measuring organization, and relevant qualifications.

<value>: <value> refers to a specific numeric difference, margin, gap, or offset specified by the Exchange. <value> represents the magnitude by which <political stat 1> must differ from <political stat 2> to satisfy the comparison operator. <value> will be expressed in units consistent with the metrics being compared (e.g., percentage points, index points, absolute counts) and may be specified to one or two decimal places. <value> may also represent a range when used in conjunction with "between." Unless otherwise specified, <value> is assumed to be expressed in the same units and precision as the political statistics being compared.

<above/below/exactly/at least/between>: <above/below/exactly/at least/between> refers to comparison operators. "Above" means greater than (>), "below" means less than (<), "exactly" means equal to (=) when rounded to two decimal places unless specified otherwise, "at least" means greater than or equal to (≥), and "between" means within a range including the lower bound and excluding the upper (≥ lower bound and < upper bound), unless otherwise specified.

<time period>: <time period> refers to a specific range of time as specified by the Exchange, which may include a temporal operator that determines when the relevant statistics are compared. This may be defined by exact dates (e.g., "between January 1, 2026, and December 31, 2026"), dates of publication, dates of distribution, dates of measurement, relative markers (e.g., "before July 1, 2027"), events (e.g. "the 2028 Presidential Election"), broader intervals (e.g., "Q1 2027," "January–March 2026"), or by additional temporal operators. "Between" is inclusive of both endpoints, while "before" and "after" exclude the specified date unless stated otherwise. <time period> may also refer to "Any" or "None", to multiple periods (even if non-consecutive), or to a singular and discrete date or time of publication, measurement, or evaluation (e.g., at exactly 10:00 AM on the 25th of January).

<date>: <date> refers to a calendar date specified by the Exchange. The Exchange may list iterations of the Contract corresponding to variations of <date>.

Payout Criterion: The Payout Criterion for the Contract encompasses the Expiration Values that the difference between <political stat 1> and <political stat 2> is <above/below/exactly/at least/between> <value> as measured <time period>.

For the purposes of this Contract, the difference is calculated as: (<political stat 1> minus <political stat 2>). The calculated difference must satisfy the specified comparison operator relative to <value>.

For example:

- "Will Biden's approval be at least 5 points above Trump's approval?" resolves to Yes if (Biden's approval - Trump's approval) ≥ 5 and (<above/below/exactly/at least/between> is set to "at least">)
- "Will Party A's polling lead be exactly 3 points?" resolves to Yes if (Party A's polling - Party B's polling) = 3.00 when rounded to two decimal places
- "Will the margin be between 2 and 5 points?" resolves to Yes if 2 ≤ (Stat 1 - Stat 2) < 5

Unless explicitly stated otherwise, only the first official or non-preliminary release or publication of the relevant political statistics will be used to resolve the market, and subsequent revisions, corrections, or updates will not affect resolution. Only official data released by the relevant Source Agency will be considered.

Additional clarification(s):

- If one statistic is published but the other is not available at the specified time, the Contract will use the most recent available value for the unavailable statistic, provided it was published within the 30 days prior to the specified time.
- For Contracts containing the word "in" within <time period>, the comparison is evaluated based on whether the condition holds at any point during <time period> using contemporaneous or near-contemporaneous measurements (within 7 days of each other).
- When comparing statistics that use different scales or units (e.g., comparing a percentage to an index), the Contract listing will specify the conversion method or normalization approach.
- When comparing statistics from different measuring organizations, each will be evaluated according to its own Source Agency's reporting conventions.
- If <political stat 1> and <political stat 2> are measured on different schedules (e.g., one is daily, one is weekly), the Exchange will specify the temporal matching rule (e.g., "use the value from the same week" or "use the most recent available value").
- For statistics expressed as percentages or non-integers, rounding follows each Source Agency's convention. If comparing two statistics with different precision levels (e.g., one reports to one decimal place, one reports whole numbers), the comparison will use the lesser precision level unless otherwise specified.
- For "exactly" comparisons, values must match when rounded to two decimal places unless the Contract specifies a different precision level.
- When calculating the difference between <political stat 1> and <political stat 2>, the result will be rounded to two decimal places before applying the comparison operator to <value>, unless otherwise specified.

- The Exchange may, at its discretion, extend the Expiration Date if data for <political stat 1> or <political stat 2> is expected to be released but delayed, in accordance with Rule 7.2.
- If <political stat 1> is available but <political stat 2> is not available by the Expiration Date (and no value exists within the acceptable lookback period), the Contract resolves to "No."
- If <political stat 2> is available but <political stat 1> is not available by the Expiration Date (and no value exists within the acceptable lookback period), the Contract resolves to "No."
- If neither statistic is available by the Expiration Date, the Contract resolves to "No."

Examples that would resolve the market to YES:

- Gallup releases Biden's approval at 48% and Trump's approval at 42% for January 2026, and the Contract asks "Will Biden's approval be 5 points above Trump's approval in January 2026?" (48 - 42 = 6, which is ≥ 5)
- Congressional approval is at 22% and Presidential approval is at 35% in Q1 2027, and the Contract asks "Will Presidential approval be exactly 13 points above Congressional approval in Q1 2027?" (35 - 22 = 13.00)
- Party A polls at 52% and Party B polls at 46%, and the Contract asks "Will Party A's lead be between 5 and 8 points?" (52 - 46 = 6, which satisfies 5 ≤ 6 < 8)

Examples that would NOT resolve the market to Yes:

- Biden's approval is released but Trump's approval is not, and no Trump approval value exists within the 30-day lookback period.
- The comparison is based on preliminary data that is later revised, but the Contract has already been settled based on the first official release.
- The Contract asks for a lead of "above 5 points" but the calculated difference is exactly 5.00 when rounded to the specified precision (since "above" means strictly greater than).
- The calculated difference satisfies the comparison when using raw values, but does not satisfy it after proper rounding to the specified precision level.

Minimum Tick: The Minimum Tick size for the Contract shall be $0.01.

Position Accountability Level: The Position Accountability Level for the Contract shall be $25,000 per strike, per Member.

Last Trading Date: The Last Trading Date shall be the day of expected release or snapshot of the later-published statistic in <time period>. The Last Trading Time will be one (1) minute prior to the expected release or relevant snapshot of the later-published statistic, if a known discrete time, or one (1) minute prior to the earliest time in a given specified window the later-published statistic may be released.

Settlement Date: The Settlement Date of the Contract shall be no later than the day after the Expiration Date, unless the Market Outcome is under review pursuant to Rule 7.1.

Expiration Date: The latest Expiration Date of the Contract shall be three months after the scheduled release date for the later of <political stat 1> and <political stat 2> for <time period>. If an event described in the Payout Criterion occurs, expiration will be moved to an earlier date and time in accordance with Rule 7.2. Additionally, if no data is released for either statistic, or a Source Agency announces that they will not release the Underlying data, expiration may be moved to an earlier date and time in accordance with Rule 7.2. In the case where data is expected to be delayed and later released, the Exchange may, in its sole discretion, move the Expiration Date in line with Rule 7.2.

Expiration time: The Expiration time of the Contract shall be 10:00 AM ET.

Settlement Value: The Settlement Value for this Contract is $1.00.

Expiration Value: The Expiration Value is the calculated difference between <political stat 1> and <political stat 2> as documented by the respective Source Agencies, compared against <value> using the specified comparison operator, 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 7.1 of the Rulebook. If an Expiration Value cannot be determined on the Expiration Date, Kalshi has the right to determine payouts pursuant to Rule 7.1 in the Rulebook.