

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA**

KALSHIEX LLC,

Plaintiff,

v.

COMMODITY FUTURES TRADING
COMMISSION,

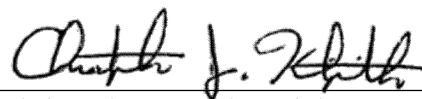
Defendant.

Civil Action No. 1:23-cv-03257 (JMC)

CERTIFIED LIST OF CONTENTS OF ADMINISTRATIVE RECORD

The Commodity Futures Trading Commission (“CFTC” or “Commission”) certifies that the attached listing, at pages 2-5 below, is a list of contents of the administrative record with regard to the September 22, 2023 Commission order that plaintiff KalshiEX LLC (“Kalshi”) is challenging in this litigation.

For the Commission, by its Secretary.



Christopher J. Kirkpatrick
Secretary of the Commission

Dated: January 16, 2024

**CONTENTS OF THE ADMINISTRATIVE RECORD WITH REGARD TO
THE COMMISSION'S SEPTEMBER 22, 2023 ORDER**

KalshiEx LLC v. Commodity Futures Trading Commission, 23-cv-3257-JMC (D.D.C.)				
Document No.	Date	Type	Description	Bates No.
<u>2023 Contract Documents</u>				
1	9/22/2023	Order	September 22, 2023 Commission Order	ROA0000001- ROA0000023
2	6/12/2023	Cover Page	Kalshi 2023 Congressional Control Contracts Submission Cover Page	ROA0000024- ROA0000025
2a	6/12/2023	Attachment	Kalshi Notice of Self-Certification of 2023 Congressional Control Contracts	ROA0000026- ROA0000035
2b	6/12/2023	Attachment	Index of Confidential Appendices for 2023 Congressional Control Contracts Certification	ROA0000036- ROA0000103
2c	6/12/2023	Attachment	Letters from Kalshi's counsel	ROA0000104- ROA0000138
2d	6/12/2023	Attachment	Statement of Commissioner Pham regarding Commission's decision to review Kalshi's 2022 Contract Submission	ROA0000139- ROA0000144
2e	6/12/2023	Attachment	Kalshi's FOIA Confidential Treatment Request	ROA0000145- ROA0000147
3	6/23/2023	Letter	Letter from Commission informing Kalshi of commencement of 90-day review of 2023 Contract Submission	ROA0000148
4	6/23/2023	CFTC Announcement	Public notice of 90-day review of Kalshi's 2023 Contract Submission	ROA0000149
5	6/23/2023	CFTC Document	CFTC questions for public comment related to 2023 Contract Submission	ROA0000150- ROA0000152
5a	4/2/2012	CFTC Announcement and Order	CFTC announcement and order linked in CFTC questions for public comment related to 2023 and 2022 Contract Submissions	ROA0000153- ROA0000157
6	Various	Comments	Public comments received in response to CFTC request for comments on 2023 Contract Submission	ROA0000158- ROA0002820
<u>2022 Contract Documents</u>				
7	3/28/2022	Email	Email from Kalshi to CFTC staff transmitting documents regarding political control contracts	ROA0002821
7a	3/28/2022	Attachment	Draft notice of self-certification of congressional control contracts	ROA0002822- ROA0002840

7b	3/28/2022	Attachment	Draft political control contract	ROA0002841
7c	3/28/2022	Attachment	Kalshi's memorandum in support of political control contracts	ROA0002842- ROA0002897
8	3/28/2022	Email	Email from Kalshi to CFTC staff transmitting slide deck	ROA0002898
8a	3/28/2022	Attachment	Slide deck regarding political control contracts	ROA0002899- ROA0002921
9	3/28/2022	Email	Email exchange between Kalshi and CFTC staff regarding potential third political control contract	ROA0002922
10	5/24/2022	Email	Email from CFTC staff to Kalshi providing list of questions regarding Kalshi's draft political control contract	ROA0002923
10a	5/24/2022	Attachment	List of questions from CFTC staff	ROA0002924- ROA0002925
11	5/26/2022	Email	Email from Kalshi to Division of Market Oversight transmitting response to CFTC staff questions	ROA0002926
11a	5/26/2022	Attachment	Kalshi's response to questions	ROA0002927- ROA0002950
11b	5/26/2022	Attachment	FOIA Confidential Treatment Request	ROA0002951- ROA0002952
12	5/31/2022	Email	Email from Kalshi to CFTC transmitting letter from Kalshi's counsel regarding political event contracts	ROA0002953
12a	5/31/2022	Attachment	Letter from Kalshi's counsel regarding political event contracts	ROA0002954- ROA0002965
12b	5/31/2022	Attachment	FOIA Confidential Treatment Request	ROA0002966- ROA0002967
13	6/2/2022	Email	Email from CFTC staff to Kalshi regarding contract vetting framework as related to proposed political control contracts	ROA0002968
14	6/3/2022	Email	Kalshi response to CFTC staff email regarding contract vetting framework and transmitting draft updated contract vetting framework	ROA0002969- ROA0002970
14a	6/3/2022	Attachment	Draft Updated Kalshi contract vetting framework	ROA0002971- ROA0002975
14b	6/3/2022	Attachment	FOIA Confidential Treatment Request	ROA0002976- ROA0002977

15	7/20/2022	Cover Page	Kalshi 2022 Congressional Control Contracts Submission Cover Page	ROA0002978- ROA0002979
15a	7/20/2022	Attachment	Kalshi Notice of Self-Certification of 2022 Congressional Control Contracts	ROA0002980- ROA0002989
15b	7/20/2022	Attachment	Appendix B to 2022 Congressional Control Contracts Submission	ROA0002990- ROA0003021
15c	7/20/2022	Attachment	Appendix C to 2022 Congressional Control Contracts Submission	ROA0003022- ROA0003032
15d	7/20/2022	Attachment	Appendix F to 2022 Congressional Control Contracts Submission	ROA0003033- ROA0003057
16	7/20/2022	Email	Email from Kalshi to CFTC staff transmitting a copy of entire 2022 Control Contracts Submission and appendices	ROA0003058
16a	7/20/2022	Attachment	2022 Control Contracts Submission and appendices	ROA0003059- ROA0003143
16b	7/20/2022	Attachment	FOIA Confidential Treatment Request	ROA0003144- ROA0003146
17	8/26/2022	Letter	Letter from Commission informing Kalshi of commencement of 90-day review of 2022 Contract Submission	ROA0003147- ROA0003148
18	8/26/2022	CFTC Announcement	Public notice of 90-day review of Kalshi's 2022 Contract Submission	ROA0003149- ROA0003150
19	8/26/2022	CFTC Document	CFTC questions for public comment related to 2022 Contract Submission	ROA0003151- ROA0003152
20	9/21/2022	Email	Email from Jonathan Marcus to CFTC transmitting amended letter in support of Kalshi's 2022 Contract Submission	ROA0003153
20a	9/21/2022	Attachment	Amended letter from Jonathan Marcus to CFTC regarding self-certification of 2022 Contract	ROA0003154- ROA0003161
21	9/25/2022	Letter	Letter from Kalshi addressing Commission's questions for public comment on 2022 Contract Submission	ROA0003162- ROA0003196
22	11/22/2022	Letter	Kalshi's request for an extension of the review period for the 2022 Contract Submission	ROA0003197
23	1/6/2023	Email	Email from Kalshi to CFTC staff transmitting slide deck	ROA0003198
23a	1/6/2023	Attachment	Slide deck regarding political risk contracts	ROA0003199- ROA0003211

23b	1/6/2023	Attachment	FOIA Confidential Treatment Request	ROA0003212- ROA0003214
24	1/6/2023	Letter	Kalshi's request for an extension of the review period for the 2022 Contract Submission	ROA0003215
25	1/23/2023	Email	Email from Kalshi to CFTC staff indicating Kalshi to submit a draft revised 2022 Contract Submission	ROA0003216
26	1/24/2023	Email	Email from Kalshi transmitting draft revised 2022 Contract Submission	ROA0003217
26a	1/24/2023	Attachment	Draft revised 2022 Contract Submission	ROA0003218- ROA0003251
26b	1/24/2023	Attachment	Chart showing updates in draft revised 2022 Contract Submission	ROA0003252
26c	1/24/2023	Attachment	FOIA Confidential Treatment Request	ROA0003253- ROA0003254
27	2/7/2023	Email	Email from Kalshi to CFTC staff transmitting slide deck	ROA0003255
27a	2/7/2023	Attachment	Slide deck summarizing proposed changes to 2022 Contract Submission	ROA0003256- ROA0003263
27b	2/7/2023	Attachment	FOIA Confidential Treatment Request	ROA0003264- ROA0003266
28	3/15/2023	Letter	Kalshi's request for an extension of the review period for the 2022 Contract Submission	ROA0003267
29	4/3/2023	Email	Email from Kalshi to CFTC staff transmitting additional documents regarding proposed revised terms for the 2022 Contract Submission	ROA0003268
29a	4/3/2023	Attachment	Document with political control contract hedging examples	ROA0003269- ROA0003273
29b	4/3/2023	Attachment	Document noting similarities between 2022 Contract and other self-certified products	ROA0003274
30	5/16/2023	Letter	Kalshi's formal notice withdrawing the 2022 Contract Submission	ROA0003275
31	Various	Comments	Public comments received in response to CFTC request for comment on 2022 Contract Submission	ROA0003276- ROA0003855