UDX

August 14, 2026

Via CFTC Portal Submissions

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

Certification of UDXMLBGAMEWINSPD - Submission Pursuant to Commission Regulation 40.2(a)

Dear Secretary,

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act” or “CEA”) and §40.2(a) of the regulations promulgated by the Commodity Futures Trading Commission (the “CFTC” or “Commission”), Aristotle Exchange DCM, Inc. (the “Exchange” or “UDX”), a CFTC designated contract market (“DCM”), hereby certifies:

Official Product Name:	Will MLB Milwaukee Brewers win MLB Milwaukee Brewers vs. Chicago Cubs game originally scheduled for August 31, 2026 without its point differential being above 2.5?
Summary:	Outcome of Milwaukee Brewers winning the specified MLB game without ever trailing by more than 2.5 runs.
Contract Type:	Swap
Listing Date:	The Exchange intends to list the Contract for trading no earlier than August 18, 2026.

In connection with this certification, UDX is submitting the following:

I. A concise explanation and analysis of the Event Contract;
II. A certification that the Event Contract complies with the Act and Commission Regulations thereunder;
III. A certification that UDX has posted a copy of the product submission on its website;
IV. The intended listing date of the Event Contract;
V. The terms and conditions of the Event Contract with all variables filled, set forth in Exhibit A hereto; and

VI. A discussion of the Event Contract's compliance with applicable provisions of the Act and Commission Regulations thereunder, set forth in Exhibit B hereto.

The Event Contract is a contingent derivatives contract that is a tradeable financial instrument designed to express a market view related to the outcome of a professional sporting event, specifically whether a designated Major League Baseball ("MLB") team wins a specified game without its Point Differential ever being strictly greater than a specified count.

The Event Contract references a binary outcome that depends on two conditions, both of which must be satisfied. First, Milwaukee Brewers must win the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026, as determined by the official final result published by Major League Baseball. Second, the Point Differential for Milwaukee Brewers — defined as its opponent's finalized score minus Milwaukee Brewers' finalized score — must never be strictly greater than 2.5 at any Finalized Scoring State at or after the Measurement Start Time during the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026. A score that is displayed, announced, or provisionally recorded but then overturned, nullified, or otherwise removed before becoming part of the official score is disregarded. The full methodology and an illustrative example are set forth in Exhibit A.

Settlement of the Contract will be determined by reference to the official final result, official box score, and official play-by-play for the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 as published by Major League Baseball, including the sequence of Finalized Scoring States described in Exhibit A. The Exchange has identified the calculation of Point Differential, the strict comparison to 2.5, and the treatment of scoring plays subject to immediate review or nullification.

The Event Contract operates in a manner similar to contracts that other DCMs have certified for trading. Price bands will apply to the Contract so that trading only occurs between $0.001 and, at most, $0.999. The Contract has a notional value of $1 and a minimum price fluctuation of $0.001.

As outlined in UDX Rule 5(b)(iii)(1),[1] trading in the Event Contract will be available at all times outside of any maintenance windows, which will be announced in advance by the Exchange. At least one market maker will be providing liquidity for the Event Contracts available for trading on UDX. UDX has further imposed position limits as described in more detail below. Participants will be charged fees in such amounts as may be revised from time to time and reflected on UDX's website.

The contract specifications, including the filled variables for this Event Contract, are set forth in Exhibit A. A complete index of the Core Principles for designated contract markets, addressing each applicable Core Principle, is set forth in Exhibit B and is submitted pursuant to a petition for confidential treatment under the

1 Reference is made to UDX Rulebook, currently submitted for self-certification, and effective as of July 2, 2026.

Freedom of Information Act, in accordance with CFTC Regulation 145.9. All terms that are used but not defined herein have the meanings set forth in the Exchange Rules.

The Exchange hereby certifies that the Event Contract complies with the Act, as amended, and the Commission Regulations adopted thereunder. No substantive opposing views were expressed to the Exchange with respect to this action. The Exchange hereby certifies that a copy of this submission was concurrently posted on the UDX website.

Should CFTC staff have any questions regarding the above, please do not hesitate to contact me by email at nick.thompson@underdogexchange.com.

Sincerely,

/s/

Nick Thompson
Chief Regulatory Officer
Aristotle Exchange DCM, Inc.

EXHIBIT A

UDXMLBGAMEWINSPD

Official Product Name: Will MLB Milwaukee Brewers win MLB Milwaukee Brewers vs. Chicago Cubs game originally scheduled for August 31, 2026 without its point differential being above 2.5?

Scope: These terms govern the trading of the Major League Baseball ("MLB") Supercharged Point Differential Event Contract (the "Contract"), a type of "Event Contract" listed by the Exchange.

Underlying: The Underlying for this Contract has two components: (i) the official outcome of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026, specifically whether Milwaukee Brewers scored more runs than its opposing team in the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026; and (ii) whether the Point Differential for Milwaukee Brewers was ever strictly greater than 2.5 during the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026. Both components are determined from the official final result, official box score, and official play-by-play published by Major League Baseball. Only Finalized Scoring States, as defined below, are used. Revisions made after Expiration will not be accounted for in determining the Expiration Value.

Source Agency: The Source Agencies are, in hierarchical order, Major League Baseball, ESPN, CBS Sports, Fox Sports, the Associated Press, The Wall Street Journal, and the official broadcaster of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026, applied in that order. The official final result, official box score, and official play-by-play published by Major League Baseball are primary. The remaining Source Agencies serve solely as secondary sources, in the hierarchical order listed, where official data is unavailable.

Type: The Type of Contract is a swap.

Issuance: This filing covers the single Event Contract iteration defined by the filled variables specified herein.

Team: Milwaukee Brewers

Game: the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026

Count: 2.5

Point Differential: The “Point Differential” for Milwaukee Brewers at a given Finalized Scoring State is the opposing team’s finalized score minus Milwaukee Brewers’ finalized score, expressed in runs. A positive Point Differential means Milwaukee Brewers is trailing, and a negative Point Differential means Milwaukee Brewers is leading. For example, if Milwaukee Brewers trails 4–2, its Point Differential is 2 runs; if Milwaukee Brewers leads 4–2, its Point Differential is -2 runs.

Finalized Scoring State: A “Finalized Scoring State” is the official score of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 after a scoring play has been recorded as valid in the official play-by-play and/or official box score published by Major League Baseball, including completion of any immediate replay, challenge, scoring review, or correction that determines whether the scoring play counts. A score displayed, announced, or provisionally recorded but then overturned, nullified, or otherwise removed before becoming part of the official score does not create a Finalized Scoring State and is disregarded. A later correction that does not change the official score does not affect the calculation.

Measurement Start Time: The “Measurement Start Time” is the first Finalized Scoring State created after issuance of the Contract. The score and every Point Differential that existed before or at issuance are excluded and are not assessed for payout. Evaluation begins only when the official score changes after issuance and that change becomes a Finalized Scoring State. If no Finalized Scoring State is created after issuance, no Knockout occurs and the Contract is resolved solely under Condition 1 (game outcome).

Evaluation Period: The Point Differential is evaluated at every Finalized Scoring State beginning at the Measurement Start Time and continuing through the official end of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026, including any extra innings. No score or Point Differential existing before or at issuance is evaluated.

Knockout: A “Knockout” occurs if the Point Differential for Milwaukee Brewers is strictly greater than 2.5 at any Finalized Scoring State at or after the Measurement Start Time. If the Point Differential is exactly equal to 2.5, a Knockout does not occur. Upon a Knockout, the Contract resolves to “No” immediately and expiration may be moved to an earlier date and time as determined by the Exchange, without regard to the subsequent outcome of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026.

The following example illustrates the calculation and is provided for clarity.

A Participant holds a Contract on Milwaukee Brewers with a count of 2.5. The Contract is issued while Milwaukee Brewers trails 1–0. That pre-issuance Point Differential is excluded. If a later

Finalized Scoring State after issuance leaves Milwaukee Brewers trailing 3–0, the Point Differential for Milwaukee Brewers is 3 runs, which is strictly greater than 2.5, so a Knockout occurs. If a one-run scoring play is displayed or announced but is overturned or nullified before becoming part of the official score, that provisional score is disregarded and does not cause a Knockout. If Milwaukee Brewers later wins the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 after a Knockout, the Contract nevertheless remains resolved to “No.”

Trading and Settlement: During the Event Contract trading hours, Participants are able to adjust their positions and trade freely. After trading of the Event Contract has closed, UDX will determine the Expiration Value and whether the Payment Criteria encompasses the Expiration Value (i.e., whether the outcome is “Yes” or “No”). The market is then settled by UDX, and either the long position holders or the short position holders are paid the Settlement Value. In this case, “long position holders” refers to Participants who purchased the “Yes” side of the Event Contract, and “short position holders” refers to Participants who purchased the “No” side of the Event Contract. If the Expiration Value is “Yes,” 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 Expiration Value 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 an Expiration Value of “Yes” is included below in the section titled “Payment Criterion”. The Expiration Date of the Contract is designed to account for multiple possible contingencies regarding the timing of the determination of the event.

Payment Criterion: The Payment Criterion for the Contract encompasses the Expiration Value where both of the following conditions are satisfied:

- Condition 1 (game outcome): Milwaukee Brewers is the winner of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026, meaning Milwaukee Brewers scored more runs (a strictly greater number) than its opponent in the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026, including any extra innings. A tie is not a win, and a tie resolves the Contract to “No.”
- Condition 2 (point-differential ceiling): No Knockout occurred at any Finalized Scoring State at or after the Measurement Start Time through the end of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026.
- If either condition is not satisfied, the Contract resolves to “No.” Both conditions must be satisfied for the Contract to resolve to “Yes.”
- If the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 is shortened, called, or otherwise ended before the regulation number of innings has been played (e.g., due to weather, curfew, or a mercy rule), and Major League Baseball declares the game official and records a

winner, Condition 1 will be determined by that official result, and no scoring state after the official end of play will be evaluated.

- If the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 is abandoned, cancelled, or suspended and is not resumed within 48 hours of its originally scheduled start time, the Contract will resolve based on the last fair market price as determined by the Exchange, unless a Knockout occurred beforehand, in which case the Contract remains resolved to “No.”
- If the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 is suspended during play and resumed within 48 hours of its originally scheduled start time, the Contract will remain open, no scoring state during the suspension will be evaluated, and evaluation will resume when official play resumes.
- If the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 is postponed from its originally scheduled date but is rescheduled and commences within 48 hours of its originally scheduled start time, the Contract will remain open and the Point Differential will be evaluated during the rescheduled game. If the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 does not commence within that 48-hour period, the Contract will resolve based on the last fair market price as determined by the Exchange, unless a Knockout occurred beforehand, in which case the Contract remains resolved to “No.”
- If a team forfeits the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 before the first pitch, the Contract will resolve based on the last fair market price as determined by the Exchange, unless a Knockout occurred beforehand, in which case the Contract remains resolved to “No.” If Milwaukee Brewers forfeits the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 after the first pitch, the Contract will resolve to “No.”
- If the venue of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 is changed but the designated home and away teams remain the same and the game commences within 48 hours of its originally scheduled start time, the Contract will remain open. If the home and away designations are reversed, or if the game does not commence within 48 hours of its originally scheduled start time, the Contract will resolve based on the last fair market price as determined by the Exchange, unless a Knockout occurred beforehand, in which case the Contract remains resolved to “No.”
- A Knockout based on a Finalized Scoring State is final and is not reversed by any later comeback, postponement, suspension, cancellation, forfeit, or venue change. A provisional scoring display or announcement that is overturned or nullified before it becomes part of the official score is not a Finalized Scoring State and cannot cause a Knockout.

Minimum Tick: The Minimum Tick for the Event Contract shall be $0.001.

Position Limits: The Position Limit for the Event Contract is 2,500,000 Contracts for Participants. The Position Limit for Market Makers is 25,000,000 Contracts.

Last Trading Date: A Contract may be issued and traded before or during the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026. The Last Trading Date and Last Trading Time for each Contract iteration will be specified by the Exchange and will not be later than the official end of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026. For a Contract issued after the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 has commenced, Point Differential evaluation begins at the Measurement Start Time and excludes every score and Point Differential existing before or at issuance.

Settlement Date: The Settlement Date is the date on which money is paid to the account of a Participant in whose favor the contract settled pursuant to an Event Contract held until Expiration, and on which money is paid from the account of a Participant who is obligated to pay money pursuant to an Event Contract held until Expiration. The Settlement Date of the Contract shall be no later than the day after the Expiration Date.

Expiration Date: The latest Expiration Date of the Contract shall be three days after the originally scheduled date of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026. If a Knockout occurs, or if Milwaukee Brewers is determined not to be the winner of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026, expiration will be moved to an earlier date and time as determined by the Exchange.

Expiration Time: The Expiration Time of the Event Contract shall be 10:00 AM ET on the Expiration Date.

Settlement Value: The Settlement Value is the amount paid to the holder of the in-the-money Event Contract on the Settlement Date. The Settlement Value of an in-the-money Event Contract is $1.

Expiration Value: The Expiration Value is the value of the Underlying, comprising (i) the official outcome of the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026 and (ii) the sequence of Finalized Scoring States during the Major League Baseball game between the Milwaukee Brewers and the Chicago Cubs originally scheduled for August 31, 2026, as documented by Major League Baseball, in each case as of the Expiration Date at the Expiration Time.

Contingencies: If the Source Agency does not actually announce a result consistent with the settlement methodology or the Payment Criterion on or before the Expiration Date due to a delay, postponement, cancellation or otherwise in such release announcement by the Source Agency, the Settlement Date, Expiration Date and Expiration Time will be delayed until the Underlying outcome or results are released or as otherwise set forth on the Exchange pursuant to Rule 5.a.v. Consistent with Rule 5.a.v, UDX reserves the right to make settlement determinations.

Trading Prohibitions: In addition to the prohibition against the misappropriation of material nonpublic information under CFTC Regulation 180.1 and the Exchange's prohibited trading practices identified in Chapter 7 of the DCM Rulebook, certain additional individuals are prohibited from trading the Event Contract. Those persons include:

- Any player, manager, coach, assistant coach, or other on-field personnel participating in or employed by a team involved in Major League Baseball, whether on an active roster, injured list, minor league assignment, or otherwise under contract.
- Any umpire, replay official, or other league official assigned to, supervising, or with authority over the referenced Major League Baseball game.
- Any front-office, baseball operations, scouting, analytics, medical, training, or clubhouse personnel of any team participating in the referenced Major League Baseball game.
- Any employee, officer, or contractor of Baseball Advanced Media, or any league-controlled or league-affiliated entity who has access to information relating to game operations, scheduling, officiating assignments, disciplinary actions, or competitive conditions.
- Any sports agent, advisor, or representative of a player or team participating in the referenced Major League Baseball game.
- Any immediate family member or household member of any of the foregoing persons, where such person reasonably may have access to material nonpublic information regarding the referenced Major League Baseball game.
- Any other Person who, by sole determination of the Exchange, possesses material nonpublic information relating to the Underlying.

CONFIDENTIAL TREATMENT REQUESTS BY UDX PURSUANT TO 17 C.F.R. § 145.9

EXHIBIT B

COMPLIANCE WITH APPLICABLE PROVISIONS OF THE ACT AND COMMISSION REGULATIONS THEREUNDER

[REDACTED]