



May 13, 2026

Via CFTC Portal Submissions

Mr. Christopher Kirkpatrick
Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

**RE: Certification of U.S. Weekly Jobless Claims Event Contract
Submission Pursuant to Commission Regulation 40.2(a)**

Dear Mr. Kirkpatrick:

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"), Rothera Exchange and Clearing LLC (the "Exchange" or "Rothera"), a CFTC designated contract market ("DCM"), hereby certifies:

Contract Name:	U.S. Weekly Jobless Claims Event Contract (the "Event Contract" or "Contract")
Description:	Based on the officially reported seasonally adjusted number of U.S. weekly initial jobless claims is <above/below/between/exactly/at least/at most> <count> for the <week>
Contract Type:	Swap
Listing Date:	The Exchange intends to list the Event Contract for trading on or after May 20, 2026

In connection with this certification, Rothera 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 Rothera has posted a copy of the product submission on its website;
- iv. The intended listing date of the first Event Contract;
- v. The terms and conditions of the Event Contract, 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 derivatives contract that is a tradeable financial instrument on a DCM designed to express a market view related to broad economic and commercial impacts of labor market conditions and employment trends in the United States, as measured by the weekly initial jobless claims data published by the U.S. Department of Labor.

The Event Contract references a binary outcome based on whether the reported seasonally adjusted number of weekly initial jobless claims for a specified <week> satisfies the applicable comparison condition <above/below/between/exactly/at least/at most> relative to the specified <count>, as described in greater detail in Exhibit A. Settlement of the Contract will be determined by reference to the official weekly initial jobless claims figure released by the U.S. Department of Labor.

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 \$0.01 and at most \$0.99. The Contract has a notional value of \$1 and a minimum price fluctuation of \$0.01.

As outlined in Rothera Rule 4.6,¹ 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 Rothera. Rothera 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 Rothera's website.

The contract specifications 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 Freedom of Information Act, in accordance with CFTC Regulation 145.9. All terms that are used but not defined herein have the meaning set forth in the Exchange Rules.²

The Exchange hereby certifies that the product complies with the Act, as amended, and

¹ Reference is made to Rothera's DCM Rulebook, currently submitted for self-certification, and effective as of May 20, 2026.

² Available at: <https://www.rothera.io/reg-notices>.



the Commission Regulations adopted thereunder. No substantive opposing views were expressed to the Exchange by governing boards or market participants with respect to this certification. The Exchange hereby certifies that a copy of this submission was concurrently posted on the Rothera website.

Should CFTC staff have any questions regarding the above, please do not hesitate to contact me by telephone at (773) 703-6365 or by email at kevin@rothera.io.

Sincerely,

/s/

Kevin Dan
Chief Compliance and Regulatory Officer
Rothera Exchange and Clearing LLC

EXHIBIT A

U.S. Weekly Jobless Claims Event Contract

Scope - These terms govern the trading of the U.S. Weekly Jobless Claims Event Contract (the “Contract”), a type of “Event Contract” listed by the Exchange.

Underlying - The Underlying for this Contract is the seasonally adjusted number of initial claims for unemployment insurance for a specified week, as reported in the first official release by the U.S. Department of Labor.

Source Agency - The Source Agency is the U.S. Department of Labor. The data is released via the following website: <https://www.dol.gov/ui/data.pdf>, or a successor website.

Type - Swap.

Issuance - The Contract is based on the outcome of a recurring data release that is published on a weekly basis. Accordingly, Contract iterations will be issued on a recurring basis, and future Contract iterations will generally correspond to subsequent weekly data releases.

<count> - refers to a numerical level of initial jobless claims specified in the contract. The Exchange may list Contract iterations with <count> levels at consecutive increments of 5,000. The Exchange may modify which <count> levels it makes available in future listings in response to market conditions or suggestions from Participants.

<week> - refers to the calendar week for the data coverage, as defined by the source agency, not the week in which the data is released. For example, the data released on Thursday, May 7, 2026 covered the week ending Saturday, May 2, 2026 as indicated by the official News Release.

<above/below/between/exactly/at least/at most> - “Above” means the Underlying is strictly greater than <count>. “Below” means the Underlying is strictly less than <count>. “Exactly” means the Underlying equals <count>. “At least” means the Underlying is greater than or equal to <count>. “At most” means the Underlying is less than or equal to <count>. “Between” requires two numerical values and means the Underlying is greater than or equal to the lower value and less than or equal to the higher value.

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, Rothera 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 Rothera, 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” are 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 Expiration Values where the seasonally adjusted weekly initial jobless claims for <week> are <above/below/between/exactly/at least/at most> <count>. Only the seasonally adjusted figure from the first official release is used for settlement. Figures that are not seasonally adjusted, subsequent revisions, or restatements are not encompassed by the Payment Criterion. Preliminary estimates or unofficial figures from other sources are not encompassed by the Payment Criterion. If the Department of Labor’s initial release is delayed beyond the scheduled Expiration Date, the contract will resolve based on the last fair market price as determined by the Exchange pursuant to Rothera DCM Rule 7.2. Long position holders will receive the number of Contracts held multiplied by the fair market price, and short position holders will receive the number of Contracts held multiplied by \$1 minus the fair market price. If the Department of Labor’s release is cancelled entirely, then the Contract will settle to the fair market price as determined by the Exchange pursuant to DCM Rule 7.2.

Minimum Tick - The Minimum Tick for the Event Contract is \$0.01.

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 - The Last Trading Date of the Contract is the date day of the scheduled release of data or otherwise resolved pursuant to the Payment Criterion.

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 Expiration Date shall be the date on which the Expiration Value of the Underlying is determined, without delay or controversy. The latest Expiration Date of the Contract shall be up to two (2) days after the typically scheduled release date for the relevant <week>. If the data is released earlier in a manner encompassed by the Payment Criterion, 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 CT 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 as documented by the Source Agency on 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 Contract will resolve based on the last fair market price as determined by the Exchange pursuant to Rothera DCM Rule 7.2. Long position holders will receive the number of Contracts held multiplied by the fair market price, and short position holders will receive the number of Contracts held multiplied by \$1 minus the fair market price. Consistent with Exchange Rule 7.2, Rothera 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 prohibited trading practices identified in Chapter 7 of the DCM Rulebook, , certain additional individuals are prohibited from trading the Event Contract. Those persons include:

- Employees and management of the U.S. Department of Labor who are involved in the compilation, review, preparation, or release of the weekly initial jobless claims data used to settle the Contract.
- Household members and immediate family members (siblings, children and parents) of the foregoing where such person reasonably may have access to material nonpublic information regarding the referenced economic event.
- Any other Person who, by sole determination of the Exchange, possesses material nonpublic information relating to the Underlying.



CONFIDENTIAL TREATMENT REQUESTED BY ROTHERA PURSUANT TO 17 CFR 145.9

EXHIBIT B

**COMPLIANCE WITH APPLICABLE PROVISIONS OF THE ACT AND COMMISSION
REGULATIONS THEREUNDER**

[REDACTED]