

QCX LLC, d/b/a Polymarket US
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Boca Raton, Florida 33433

Via CFTC Portal

September 9, 2025

Mr. Christopher Kirkpatrick
Commodity Futures Trading Commission
1155 21st Street NW Three Lafayette Centre
Washington, DC 20581

Re: QCX LLC 40.6(a) Rule Submission PMX.2025.7

I. Introduction

QCX LLC, d/b/a Polymarket US ("Polymarket US" or the "DCM"), a designated contract market ("DCM") registered with the Commodity Futures Trading Commission ("Commission" or "CFTC"), hereby submits this notice pursuant to Commission Regulation 40.6(a). This filing informs the Commission of proposed revisions to our Market Oversight Manual.

The revised Market Oversight Manual ("Manual") is attached as Exhibit A, and will become effective on September 23, 2025. Terms used in this notice with initial capital letters but not defined herein retain the definitions assigned to them in the Polymarket US Rulebook.

II. Concise Explanation and Analysis of the Revisions, and their Compliance with Applicable Provisions of the Commodity Exchange Act (CEA), including the Core Principles and the Commission's Regulations

The Market Oversight Manual (the "Manual") establishes the procedures and framework for Polymarket US's market oversight functions. The proposed revisions consist primarily of non-substantive modifications to accommodate the d/b/a change to Polymarket US and to update chapter numbering for clarity. Substantively, the Manual has been updated to incorporate revised deposit and withdrawal methods and policies, and to add a new policy to manage the handling of advances pursuant to Polymarket US Rule 5.1(b) and Polymarket Clearing Rule 5.1(b).

These revisions enhance the integrity of the Polymarket US platform and strengthen compliance with the following Core Principles:

- **Core Principle 2 – Compliance with Rules (§ 38.150):** The updated Manual enhances the DCM's capacity to monitor and enforce its rules by clarifying internal procedures governing deposits, withdrawals, the handling of advances under Rule 5.1(b), and Participant onboarding.

- **Core Principle 11 – Financial Integrity of Transactions (§ 38.600):** The revised deposit and withdrawal policies, along with the new policy for handling advances under Polymarket US Rule 5.1(b), directly support this principle by establishing clear and robust procedures for handling ACH advances. These changes additionally strengthen measures for the protection of customer funds, consistent with the requirements of § 38.603.

III. Certification

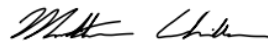
Polymarket US hereby certifies to the CFTC, pursuant to the procedures set forth in Commission Regulation 40.6, that the attached submission complies with the CEA, as amended, and the regulations promulgated thereunder. Further, Polymarket US is not aware of any substantive opposing views expressed regarding the Manual.

Polymarket US requests confidential treatment for Exhibit A as set forth in the FOIA Confidential Treatment request included in this certification. In accordance with CFTC Regulation 40.8, Exhibit A has been provided in redacted form in this document, with unredacted versions submitted in segregated exhibits marked confidential.

Polymarket US additionally certifies that, simultaneously with this filing, a copy of this submission was published on Polymarket US's website, and is accessible at: www.qcex.com

Please contact me using the information below if you have any questions regarding this notice.

Sincerely,



Matthew Childers
Chief Compliance Officer
Polymarket US

Exhibit A
(Redacted)