

	LUDLOW EXCHANGE, LLC DESIGNATED CONTRACT MARKET	Ticker NFLSTACH
NFL¹ STATISTICAL ACHIEVEMENT Class Certification of NFL Statistical Achievement Swaps Pursuant to CFTC Regulation 40.2(d) Includes: 1. Cover Letter (with Certifications) (Public)		

¹ The National Football League is not affiliated or associated with Ludlow Exchange, LLC. Neither the National Football League nor any of its affiliates sponsors, endorses, sells, promotes, approves, or is otherwise involved with this Contract or any other product offered by Ludlow Exchange. Any reference to the National Football League is solely for purposes of identifying the underlying event and the applicable settlement source.

SUBMITTED VIA CFTC PORTAL

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

Re: Class Certification of NFL Statistical Achievement Swaps Pursuant to Section 5c(c) of the Commodity Exchange Act and CFTC Regulation 40.2(d)

Dear Sir or Madam:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”), 7 U.S.C. § 7a-2(c), and Commission Regulation 40.2(d), 17 C.F.R. § 40.2(d), Ludlow Exchange, LLC (“Ludlow” or the “Exchange”), a registered designated contract market doing business as Novig, hereby certifies a class of NFL Statistical Achievement swaps (the “Class”) for listing on the Exchange.

A description of the Class and the certifications required by Regulation 40.2(d) follow:

The Previously Certified Contract. On July 31, 2026, the Exchange submitted and certified the NFL Statistical Achievement Contract pursuant to Commission Regulation 40.2(a), CFTC Submission No. 2607-3116-3611-78 (the “Previously Certified Contract”). The submission included the complete terms and conditions governing the Previously Certified Contract, including its pricing sources, formulas, procedures, and methodologies for determining reference values and payment obligations.

The Class. Each particular swap within the Class is an event contract based on the official outcome of a specified NFL statistical achievement, either a statistical distinction resolved as an outright contract or a numerical threshold on an officially recorded measure resolved as a numeric contract. Each swap will be governed by the terms and conditions of the Previously Certified Contract. The values assigned to <participant>, <achievement>, <measure>, <comparison operator> (numeric contracts only), and <count> (numeric contracts only) may vary among swaps within the Class and will be specified by the Exchange before the applicable swap is listed. No other term affecting the pricing source, calculation of the reference value, payment obligations, settlement procedure, or settlement currency may vary among swaps within the Class.

Identical Pricing Sources and Methodology. Each swap within the Class will use the NFL as the Source Agency and the identical source hierarchy specified in the Previously Certified Contract, applied in order: (i) the official results publication of the NFL; (ii) any other official channel maintained or expressly authorized by the NFL, including any body that officially confers or records <achievement>; (iii) the official records of any renamed, reorganized, or successor Governing Body of <achievement>; and (iv) a result reported concordantly by at least two credible independent sources. If the first official final result of <achievement> is, or is achieved by, <participant> (outright swap), or if the official <measure> accumulated by <participant> over the period to which <achievement> relates is <comparison operator> <count> (numeric swap), the YES side receives the \$1.00 Settlement Value; if not, the NO side receives it. Under the Dead-Heat Rule, if multiple participants are reported as the result of

<achievement>, each resolves YES at \$1.00 and NO at \$0.00, unless the Market Title or Market Description expressly provides for dead-heat treatment, in which case YES resolves at $\$1.00 \div (\text{number of participants declared as the result of } <\text{achievement}>)$, rounded down to the nearest Minimum Tick, and NO at \$1.00 minus the YES Payout. Under the Numeric Form Rule, an Expiration Value exactly equal to <count> on a two-way “above” or “below” line settles to Void, unless the Contract is quoted on the exact value or the Market Title or Market Description states otherwise; a half-integer <count> may make an exact-equality outcome impossible. Each swap is also subject to the identical Final-Event Timing Rule, Early Conclusion Rule, Withdrawal Rule, Disqualification Rule, Elimination Rule, Re-Entry Rule, Settlement Finality Rule, Extraordinary Circumstances Rule, General Market Suspension Rule, and Contingencies provision. If the Expiration Value cannot be determined, the swap settles to Void. Any Void or fair-value settlement, including under the Cancellation Rule, will be determined under the identical Fair Value Settlement Rule, including the same reference time, calculation window, composite pricing sources, normalization methodology, data-integrity exclusions, fallbacks, and payment allocation. Each swap will be denominated and settled in United States dollars.

Certifications. Pursuant to Section 5c of the Act and Commission Regulations 40.2(a)(3)(iv), 40.2(a)(3)(vi), and 40.2(d), the Exchange hereby certifies that:

- (i) each particular swap within the Class is based upon an excluded commodity specified in Commission Regulation 40.2(d)(1), specifically an occurrence, extent of an occurrence, or contingency within Section 1a(19)(iv) of the Act;
- (ii) each particular swap within the Class is based upon an excluded commodity with an identical pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations;
- (iii) the pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations in each particular swap within the Class are identical to those used in the Previously Certified Contract;
- (iv) each particular swap within the Class is based upon an excluded commodity involving an identical currency, the United States dollar;
- (v) each particular swap within the Class complies with the Act and the Commission’s regulations thereunder; and
- (vi) concurrently with the filing of this submission, the Exchange has posted on its public website at <https://www.ludlowexchange.com/filings> a notice of pending class certification and a copy of this submission.

Submission Timing. The Exchange has filed this submission electronically through the CFTC Portal and will not list or facilitate trading in any swap within the Class unless the Commission has received this submission by the open of business on the business day preceding the listing, as required by Commission Regulation 40.2(a)(2).



Sincerely,

Calvin Smith
Head of Markets
Ludlow Exchange, LLC