

June 17, 2026

SUBMITTED VIA CFTC PORTAL

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

Re: Aristotle Exchange DCM, Inc. – Regulation 40.6(a) Rule Certification;
Notification of Amendments to Fee Schedule

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the “Act”), and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission” or “CFTC”), Aristotle Exchange DCM, Inc. (“Aristotle Exchange”), a designated contract market, hereby notifies the Commission that it is amending its fee schedule (“Fee Schedule”), as described more fully in the Exhibits attached hereto. The date of implementation is at least 10 business days following receipt of the certification by the CFTC.

Pursuant to Commission Regulation 40.6, this submission includes:

- (i) A concise explanation and analysis of the amendments to the Fee Schedule and their compliance with applicable provisions of the Act and the Commission regulations thereunder, attached as Exhibit A;
- (ii) The amended Fee Schedule, attached as Exhibit B; and

On March 9, 2026, the ultimate parent company of Aristotle Exchange, Aristotle International, Inc., consummated its merger with Underdog Sports Holdings, Inc. (“Underdog”) (the “Transaction”).

Aristotle Exchange hereby certifies that the amended Fee Schedule complies with the requirements of the Act and Commission regulations thereunder, including the Commission’s Core Principles for designated contract markets, and is made in accordance with Aristotle Exchange Rule 5(i) (“Fees (Applies to DCM and DCO)”). Aristotle Exchange is not aware of any substantive opposing views expressed with respect to this filing and certifies that, concurrent with this filing, a copy of this submission was posted on Aristotle Exchange’s website.

Please contact Nick Thompson, Chief Regulatory Officer, by email at nick.thompson@underdogsports.com with any questions regarding this matter.

Mr. Christopher J. Kirkpatrick
June 17, 2026

Very truly yours,

Aristotle Exchange

By: /s/ Nick Thompson

Name: Nick Thompson

Title: Chief Regulatory Officer

Date: June 17, 2026

Enclosures

cc: CFTC Division of Market Oversight (dmosubmissions@cftc.gov)

Mr. Christopher J. Kirkpatrick
June 17, 2026

EXHIBIT A

Explanation of Amended Fee Schedule

Mr. Christopher J. Kirkpatrick
June 17, 2026

EXHIBIT B

Aristotle Exchange Fee Schedule

Mr. Christopher J. Kirkpatrick
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