

April 21, 2026

BY ELECTRONIC FILING

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

Re: BTNL 2026-23 Self-Certification Pursuant to CFTC Regulation 40.2(a) Certification - Listing of Chainlink US Dollar Spot Contract

Dear Mr. Kirkpatrick,

Bitnomial Exchange, LLC (“BTNL” or the “Exchange”) hereby submits for self-certification to the Commodity Futures Trading Commission (“CFTC” or the “Commission”) under Commission regulation 40.2(a) its plan to list Chainlink US Dollar Spot (“LINKUSD”) contracts to be offered for trading on BTNL for an intended trade date on or after April 23, 2026.

Contract Description

The LINKUSD contract is a physically-settled, margined futures contract based on the price of 0.00000001 LINK (Chainlink). Attached Exchange Rule “Chainlink US Dollar Spot Contract” details the product specifications.

Chainlink (LINK) Market Overview

Chainlink is a decentralized oracle network that connects smart contracts with real-world data and external APIs. It enables secure and reliable data feeds for decentralized applications across multiple blockchains. Chainlink’s technology is widely used in DeFi, gaming, and enterprise solutions, ensuring accurate and tamper-proof information for automated smart contract execution. The LINK token is used to pay for oracle services and incentivize node operators, forming the foundation of the network’s economic model.

Governance: Chainlink currently employs an off-chain governance model managed by the Chainlink Foundation and core team, with plans to introduce more decentralized governance mechanisms.

Consensus Mechanism: Utilizes a decentralized oracle network where node operators stake LINK tokens to provide reliable off-chain data to smart contracts.

Concentration of Ownership: A portion of LINK tokens is allocated to node operators and the Chainlink team, with efforts to incentivize decentralization.

Liquidity: Chainlink has a market capitalization of \$6,664,207,080.00 and a 30-day spot trading volume of \$304,284,774.00, ensuring strong liquidity and accessibility across centralized and decentralized exchanges as well as OTC dealers.

Price History

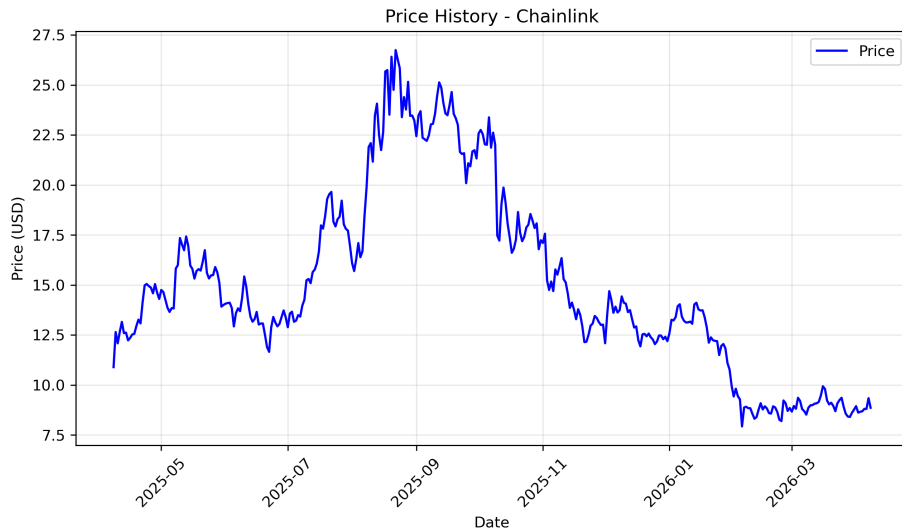


Figure 1: Price Chart

Source: <https://www.coingecko.com>

Volume History

Source: <https://www.coingecko.com>

Deliverable Supply Analysis

- **Current Circulation:** 727,099,970 LINK
- **Total Supply:** 1,000,000,000 LINK
- **Max Supply:** 1,000,000,000 LINK
- **Market Cap:** \$6,664,207,080.00
- **30 Day Volume:** \$304,284,774.00

The Exchange proposes a contract month position limit of Long 11,000,000,000,000 contracts (110000 LINK, 0.0151% of circulating supply) / Short 8,700,000,000,000 contracts (87000 LINK, 0.0120% of circulating supply).

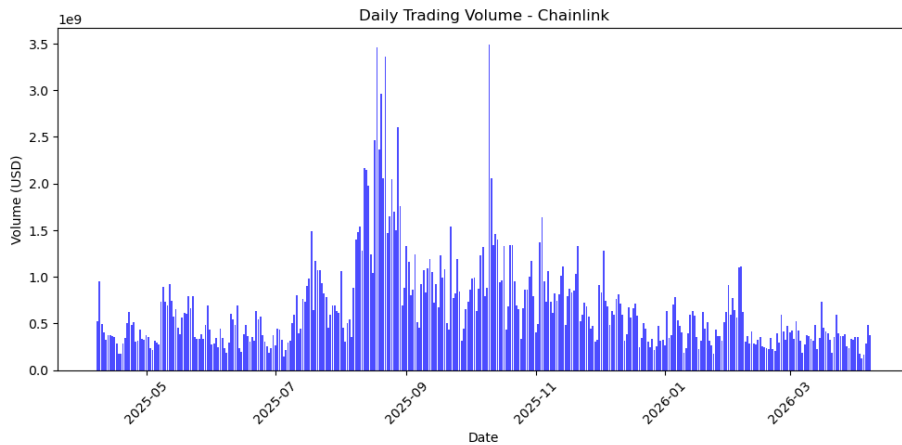


Figure 2: Volume Chart

Core Principle Compliance

BTNL has determined that its rules related to the listing of LINKUSD contracts comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated by the Commission thereunder. BTNL has reviewed the DCM Core Principles and related guidance and determined that the listing of LINKUSD contracts impact the following Core Principles:

Core Principle 2 - Compliance with Rules:

Trading and delivery of LINKUSD contracts are subject to the Business Conduct and Trading Practice Rules found in Chapter 4 of the BTNL Rulebook including Rule 403 which forbids pre-arranged, pre-negotiated non-competitive trades. Trading and delivery in these products will also be subject to Market Operations and Discipline and Enforcement Rules found in Chapters 5 and 6, respectively.

Core Principle 3 - Contracts Not Readily Subject to Manipulation:

Multiple domestic and foreign markets trade the underlying LINK product, making manipulation unlikely. Additionally, Trading and delivery of LINKUSD contracts are not readily subject to manipulation because they are subject to position limits. Daily and Final settlement will be determined in accordance with BTNL Rule 509.

Core Principle 4 - Prevention of Market Disruption:

Trading and delivery of LINKUSD contracts are subject to prohibitions of market disruption under Chapters 4, 5, and 6 relating to Business Conduct and

Trading Practices, Market Operations, and Discipline and Enforcement, respectively. All trading at BTNL Exchange is subject to market surveillance and a robust disciplinary framework.

Core Principle 5 - Position Limits or Accountability:

Trading and delivery of LINKUSD contracts are subject to position limits set forth in the product specifications. The position limits are consistent with Commission guidance. Position limits may be adjusted based on market needs.

Core Principle 7 - Availability of General Information:

Prior to the launch of trading of LINKUSD contracts, product terms and conditions will be available on the BTNL website. Information on delivery of LINKUSD contracts will be made available on the BTNL website.

Core Principle 8 - Daily Publication of Trading Information:

The Exchange will publish LINKUSD trading volumes, open interest levels, and price information on its website and through quote vendors.

Core Principle 9 - Execution of Transactions:

Execution of all LINKUSD contracts will take place on the BTNL electronic trading platform. Electronic execution provides competitive and transparent transactions. All LINKUSD contracts will be cleared by Bitnomial Clearinghouse, LLC (“BNCH”), a CFTC-registered derivatives clearing organisation (“DCO”), subject to Commission rules and oversight.

Core Principle 10 - Trade Information:

All requisite trade information will be recorded and stored in the audit trail and will be surveilled and monitored in accordance with BTNL Rules.

Core Principle 11 - Financial Integrity of Transactions:

All LINKUSD contracts will be cleared by BNCH, a CFTC-registered DCO, subject to Commission rules and oversight.

Core Principle 12 - Protection of Markets and Market Participants:

BTNL Rules have set forth numerous requirements and protections to prevent intermediaries from disadvantaging customers.

Core Principle 13 - Disciplinary Procedures:

All LINKUSD contracts are subject to the protections provided by Chapter 6 of the BTNL Rulebook. Chapter 6 describes the disciplinary procedures of the Ex-

change that authorize the Exchange to discipline, suspend, or expel Participants that violate Exchange Rules.

Core Principle 14 - Dispute Resolution:

Disputes arising from trading of LINKUSD contracts must be arbitrated in accordance with BTNL Rules found in Chapter 7. All disputes, controversies or claims between or among themselves that relate to or arise out of any contract or otherwise arise out of one or more transactions made or to be made on the Exchange or subject to the Rules and are based upon facts and circumstances that occurred at a time when the parties were Participants or Customers.

Certification

The Exchange has spoken with Clearing Members and market participants who support the decision to launch Chainlink US Dollar Spot contracts. The Exchange is not aware of any substantive opposing views to the LINKUSD contracts. The Exchange certifies that the LINKUSD contracts and related rules certified herein comply with the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at: <https://bitnomial.com/exchange/regulatory>

If you have any questions or require further information, please contact the undersigned at james.walsh@bitnomial.com.

Sincerely, /s/

James A. Walsh
Chief Regulatory Officer
Bitnomial Exchange, LLC

Chainlink US Dollar Spot

| Term | Value |
|---|---|
| Product Name | Chainlink US Dollar Spot |
| Product Code | LINKUSD |
| Contract Size | 0.00000001 LINK (Chainlink) |
| Price Quotation | US Dollars per LINK |
| Tick Size | \$0.00001 per LINK |
| Tick Value | \$0.00000000000001 per contract |
| Price Band Variation | +/- 5% of the BBO midpoint |
| Price Limit | +/- 50% from previous session price |
| Position Limit | Long 11,000,000,000,000 contracts (110000 LINK) / Short 8,700,000,000,000 contracts (87000 LINK) |
| Reportable Position Level | 4,350,000,000,000 contracts (43500 LINK) |
| Market Hours | 24 hours per day, 7 days per week, subject to Rule 501 |
| Contract Listing & Termination | Rule 502 & Rule 514 |

| Term | Value |
|--------------------------------------|--|
| Settlement Method | Deliverable - Rule 813 & Chapter 11; positions below the De Minimis Delivery Threshold are Cash Settled |
| De Minimis Delivery Threshold | \$0.50 |
| Settlement Price | Rule 509 & Chapter 11 |
| Accepted Order Types | Limit, Market, Stop Loss, Stop Loss Limit, Take Profit, Take Profit Limit, Trailing Stop, Trailing Stop Limit, Iceberg |
