

May 14, 2026

BY ELECTRONIC FILING

Mr. Christopher J. Kirkpatrick  
Office of the Secretariat  
Commodity Futures Trading Commission  
Washington, D.C. 20581

**Re: BTNL Self-Certification Pursuant to CFTC Regulation 40.2(a)  
Certification - Listing of Pax Gold US Dollar Deci Perpetual Futures  
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 Pax Gold US Dollar Deci Perpetual Futures (“PPXGUI”) contracts to be offered for trading on BTNL for an intended trade date on or after May 18, 2026.

### **Contract Description**

The PPXGUI contract is a cash-settled, margined perpetual futures contract referenced to the **CF Pax Gold Mid-Price Spot Rate** published by CF Benchmarks (methodology: CF Mid-Price Spot Rates Methodology Guide). The contract size is 0.1 PAXG (Pax Gold). Daily and final settlement prices are calculated under BTNL Rule 509 using the methodology described in Digital Asset Perpetual Pricing, with the Implied Spot Price fixed to the CF Pax Gold Mid-Price Spot Rate. Attached Exchange Rule “Pax Gold US Dollar Deci Perpetual Futures Contract” details the product specifications.

### **Pax Gold (PAXG) Market Overview**

PAX Gold (PAXG) is an asset-backed token where one token represents one fine troy ounce of a London Good Delivery gold bar, stored in professional vault facilities. Anyone who owns PAXG has ownership rights to that gold under the custody of Paxos Trust Company. Since PAXG represents physical gold, its value is tied directly to the real-time market value of that physical gold. PAXG gives customers the benefits of actual physical ownership of specific gold bars with the speed and mobility of a digital asset, and supports fractional ownership of physical bars. On the Paxos platform, customers can convert their tokens to allocated gold, unallocated gold, or fiat currency (and vice versa) quickly and efficiently, reducing their exposure to settlement risk. PAXG is also available for

trading on Paxos' itBit exchange and on other crypto-asset exchanges, wallets, and lending platforms across the crypto ecosystem.

**Governance:** Pax Gold is administered by Paxos Trust Company, a New York limited purpose trust company regulated and supervised by the New York State Department of Financial Services (NYDFS). Issuance, redemption, and custody of the underlying gold are governed by Paxos under NYDFS oversight.

**Consensus Mechanism:** PAXG is an ERC-20 token on the Ethereum blockchain and inherits Ethereum's Proof of Stake consensus mechanism. Token transfers are validated by Ethereum's validator set; gold ownership is reconciled off-chain by Paxos and its custodians.

**Concentration of Ownership:** Token supply is fully backed by physical gold held in professional vault facilities, with circulating supply currently around 470,000 tokens and a market capitalization of approximately \$2.2 billion. Secondary-market ownership is distributed across a broad base of retail and institutional holders trading on centralized venues including Binance, Gate, Coinbase, Kraken, and Bitget, as well as decentralized exchanges via the Ethereum contract address.

## Core Principle Compliance

BTNL has determined that its rules related to the listing of PPXGUI 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 PPXGUI contracts impact the following Core Principles:

### Core Principle 2 - Compliance with Rules:

Trading of PPXGUI contracts is 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 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 PAXG product, making manipulation unlikely. Additionally, PPXGUI contracts are not readily subject to manipulation because they are subject to position limits and the daily and final settlement prices are determined by reference to the CF Pax Gold Mid-Price Spot Rate published by CF Benchmarks, the most widely trusted and referenced digital asset benchmark authority globally. Daily and Final settlement will be determined in accordance with BTNL Rule 509.

**Core Principle 4 - Prevention of Market Disruption:**

Trading of PPXGUI contracts is 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 of PPXGUI contracts is 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 PPXGUI contracts, product terms and conditions will be available on the BTNL website.

**Core Principle 8 - Daily Publication of Trading Information:**

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

**Core Principle 9 - Execution of Transactions:**

Execution of all PPXGUI contracts will take place on the BTNL electronic trading platform. Electronic execution provides competitive and transparent transactions. All PPXGUI 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 PPXGUI 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 PPXGUI contracts are subject to the protections provided by Chapter 6 of the BTNL Rulebook. Chapter 6 describes the disciplinary procedures of the Exchange that authorize the Exchange to discipline, suspend, or expel Participants that violate Exchange Rules.

**Core Principle 14 - Dispute Resolution:**

Disputes arising from trading of PPXGUI 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 Pax Gold US Dollar Deci Perpetual Futures contracts. The Exchange is not aware of any substantive opposing views to the PPXGUI contracts. The Exchange certifies that the PPXGUI 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](mailto:james.walsh@bitnomial.com).

Sincerely, /s/

James A. Walsh  
Chief Regulatory Officer  
Bitnomial Exchange, LLC

## Pax Gold US Dollar Deci Perpetual Futures

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<b>Term</b>	<b>Value</b>
<b>Product Name</b>	Pax Gold US Dollar Deci Perpetual Futures
<b>Product Code</b>	PPXGUI
<b>Contract Size</b>	0.1 PAXG (Pax Gold)
<b>Price Quotation</b>	US Dollars per PAXG
<b>Tick Size</b>	\$0.5 per PAXG
<b>Tick Value</b>	\$0.05 per contract
<b>Margin</b>	US Dollars
<b>Price Band Variation</b>	\$640
<b>Price Limit</b>	\$6400
<b>Position Limit</b>	2000
<b>Reportable Position Level</b>	25
<b>Market Hours</b>	24/7; otherwise subject to Rule 501
<b>Contract Listing &amp; Termination</b>	Rule 502
<b>Settlement Method</b>	Cash Settled - Chapter 8 & Rule 509
<b>Settlement Price</b>	Rule 509 - See “CF Mid-Price Spot Rates Daily Settlement Prices”
<b>Options Product Code</b>	N/A
<b>Options Exercise Style</b>	N/A
<b>Options Strike Price</b>	N/A
<b>Listing Interval</b>	

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### CF Mid-Price Spot Rates Daily Settlement Prices

The Perpetual Futures Contract Settlement Price is calculated per Digital Asset Perpetual Pricing and Rule 509. For this contract, the Implied Spot Price referenced in the perpetual pricing documentation is fixed to the **CF Pax Gold Mid-Price Spot Rate** published by CF Benchmarks.