

May 22, 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 2026-55 - Self-Certification Pursuant to CFTC Regulation 40.2(a)
Certification - Listing of Curve DAO 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 Curve DAO US Dollar Spot (“CRVUSD”) contracts to be offered for trading on BTNL for an intended trade date on or after May 27, 2026.

Contract Description

The CRVUSD contract is a physically-settled, margined spot contract based on the price of 0.00000001 CRV (Curve DAO). Attached Exchange Rule “Curve DAO US Dollar Spot Contract” details the product specifications.

Curve DAO (CRV) Market Overview

Curve DAO Token (CRV) is the governance and utility token of Curve Finance, a decentralized exchange protocol built on Ethereum and optimized for low-slippage trading of stablecoins and similarly priced assets. Curve’s automated market maker (AMM) model is specifically designed for capital efficiency in stable asset pools, making it a foundational layer of the decentralized finance (DeFi) ecosystem. The protocol has expanded beyond Ethereum to multiple networks including Arbitrum, Optimism, Polygon, and Avalanche, while maintaining a unified governance structure. CRV is used for governance participation, liquidity incentive distribution, fee sharing, and staking within the Curve ecosystem.

Governance: Curve employs an on-chain governance model centered on vote-escrowed CRV (veCRV), where holders lock CRV tokens for periods of up to four years in exchange for voting power. Longer lock periods grant proportionally greater influence over protocol decisions, including gauge weight allocations that determine how CRV emissions are distributed across liquidity pools, as well as fee parameters and new pool additions.

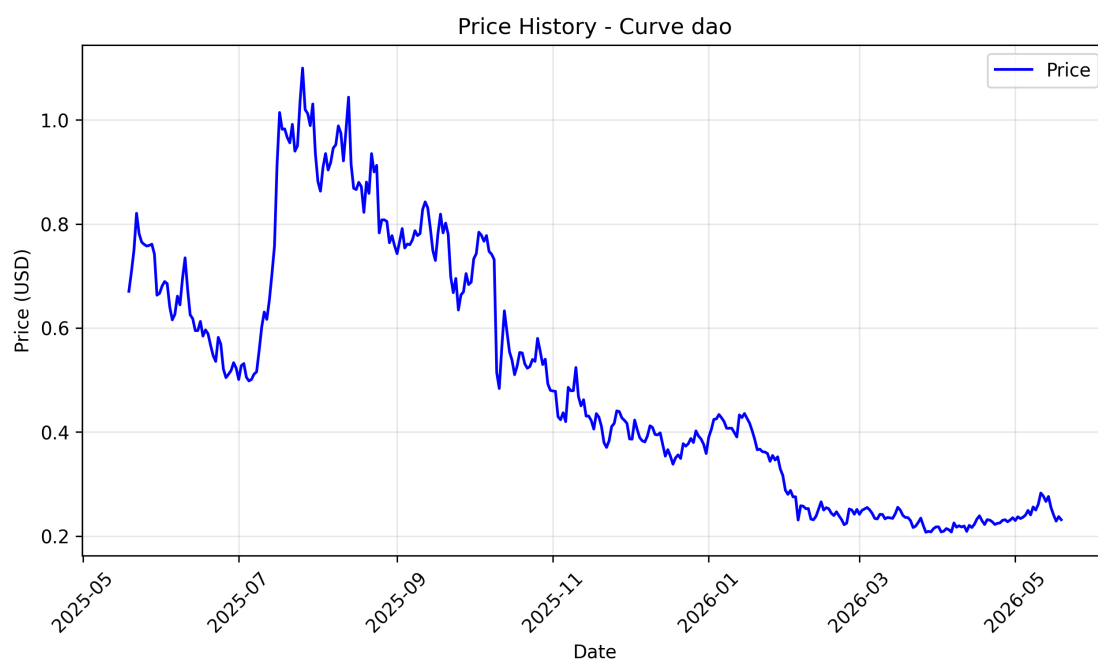
Consensus Mechanism: Curve Finance operates as a smart contract protocol built on top of Ethereum and does not maintain its own consensus mechanism. It inherits the security and

finality of Ethereum’s Proof of Stake (PoS) consensus model, introduced with the Ethereum 2.0 upgrade.

Concentration of Ownership: CRV distribution is moderately concentrated, with significant holdings attributed to the Curve founding team, early investors, and the DAO treasury. Over 45% of circulating supply is actively locked in veCRV contracts, reflecting strong long-term alignment among governance participants, though this also contributes to meaningful concentration among large token holders.

Liquidity: Curve DAO has a market capitalization of \$367,661,117.00 and a 30-day spot trading volume of \$37,635,266.00, ensuring strong liquidity and accessibility across centralized and decentralized exchanges as well as OTC dealers.

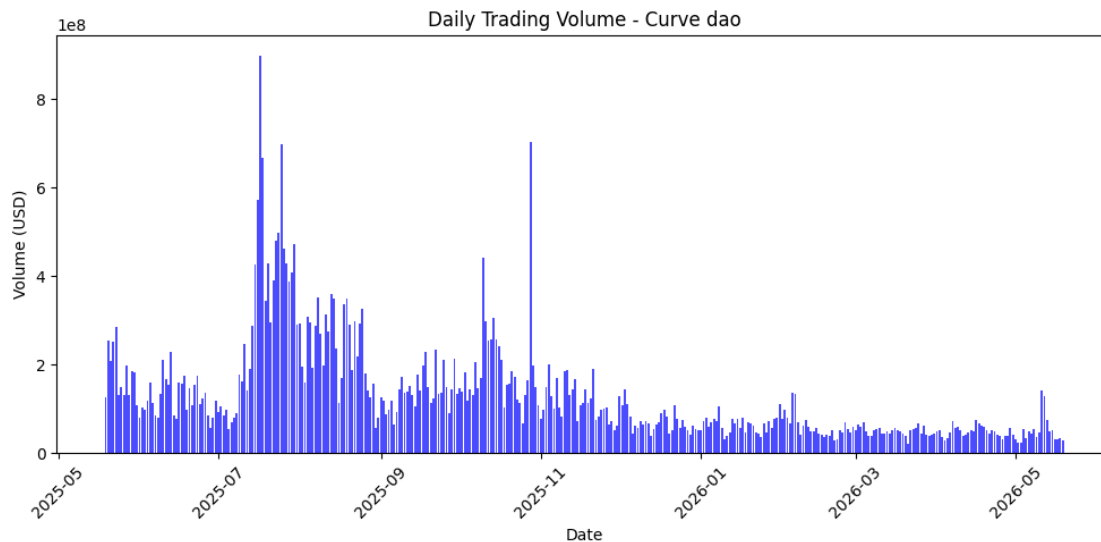
Price History



Price Chart

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

Volume History



Volume Chart

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

Deliverable Supply Analysis

- **Current Circulation:** 1,516,482,574 CRV
- **Total Supply:** 2,382,829,703 CRV
- **Max Supply:** 3,030,303,031 CRV
- **Market Cap:** \$367,661,117.00
- **30 Day Volume:** \$37,635,266.00

The Exchange proposes a contract month position limit of Long 2,300,000 contracts (0.023 CRV, 0.0000% of circulating supply) / Short 1,400,000 contracts (0.014 CRV, 0.0000% of circulating supply).

Core Principle Compliance

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

Core Principle 2 - Compliance with Rules:

Trading and delivery of CRVUSD 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 CRV product, making manipulation unlikely. Additionally, Trading and delivery of CRVUSD 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 CRVUSD 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 CRVUSD 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 CRVUSD contracts, product terms and conditions will be available on the BTNL website. Information on delivery of CRVUSD contracts will be made available on the BTNL website.

Core Principle 8 - Daily Publication of Trading Information:

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

Core Principle 9 - Execution of Transactions:

Execution of all CRVUSD contracts will take place on the BTNL electronic trading platform. Electronic execution provides competitive and transparent transactions. All CRVUSD 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 CRVUSD 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 CRVUSD 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 CRVUSD 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 Curve DAO US Dollar Spot contracts. The Exchange is not aware of any substantive opposing views to the CRVUSD contracts. The Exchange certifies that the CRVUSD 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

Curve DAO US Dollar Spot

Term	Value
Product Name	Curve DAO US Dollar Spot
Product Code	CRVUSD
Contract Size	0.00000001 CRV (Curve DAO)
Price Quotation	US Dollars per CRV
Tick Size	\$0.0001 per CRV
Tick Value	\$0.000000000001 per contract
Price Band Variation	+/- 10% of the BBO midpoint
Price Limit	+/- 50% from previous session price
Position Limit	Long 230,000,000,000,000 contracts (2,300,000 CRV) / Short 140,000,000,000,000 contracts (1,400,000 CRV)
Reportable Position Level	70,000,000,000,000 contracts (700,000 CRV)
Market Hours	24 hours per day, 7 days per week, subject to Rule 501
Contract Listing & Termination	Rule 502 & Rule 514
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