BITNOMIAL

August 5, 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 2026-85 - Self-Certification Pursuant to CFTC Regulation 40.2(a) Certification - Listing of TRON US Dollar Kilo 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 TRON US Dollar Kilo Futures ("TRXUK") contracts to be offered for trading on BTNL for an intended trade date on or after August 7, 2026.

<u>Contract Description</u>

The TRXUK contract is a physically-settled, margined futures contract based on the price of 1,000 TRX (TRON). Attached Exchange Rule "TRON US Dollar Kilo Futures Contract" details the product specifications.

<u>TRON (TRX) Market Overview</u>

TRON is a decentralized blockchain platform focused on high-throughput payments, stablecoin settlement, and content and application hosting. It offers low transaction fees and fast block times, which have made it one of the most widely used networks for stablecoin transfers, particularly USDT. The network is compatible with the Ethereum Virtual Machine, allowing developers to port smart contracts and decentralized applications with minimal modification. TRX, the native cryptocurrency, is used to pay for network resources, to stake for bandwidth and energy, and to vote for block producers.

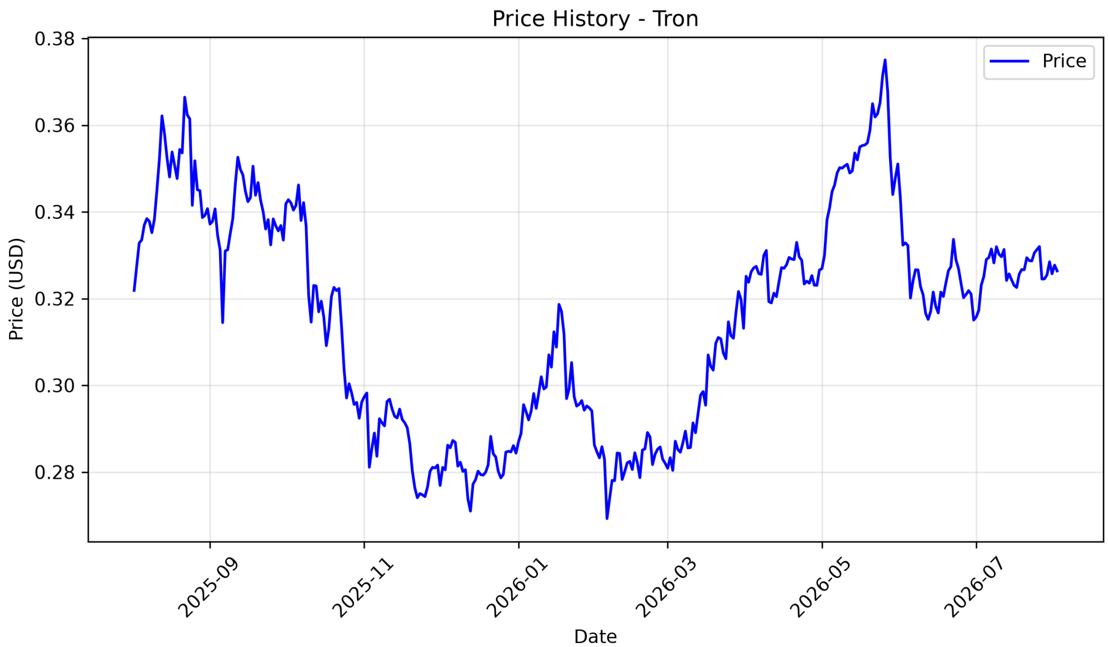
Governance: TRON is governed by an on-chain voting system in which TRX holders stake tokens to elect Super Representatives, who produce blocks and vote on network parameter changes and protocol proposals. The TRON DAO supports ongoing development and ecosystem growth.

Consensus Mechanism: Operates on Delegated Proof-of-Stake (DPoS), under which a fixed set of elected Super Representatives produce blocks in rotation, providing short block intervals and high transaction throughput.

Concentration of Ownership: TRX distribution reflects allocations from the network's initial token sale and ongoing ecosystem and foundation holdings, with a meaningful share of supply held by founder- and foundation-associated addresses and by centralized exchanges serving stablecoin settlement flows. A substantial portion of circulating TRX is also staked with Super Representatives for network resources and voting.

Liquidity: TRON has a market capitalization of $31,069,014,023.00 and a 30-day spot trading volume of $423,773,906.00, ensuring strong liquidity and accessibility across centralized and decentralized exchanges as well as OTC dealers.

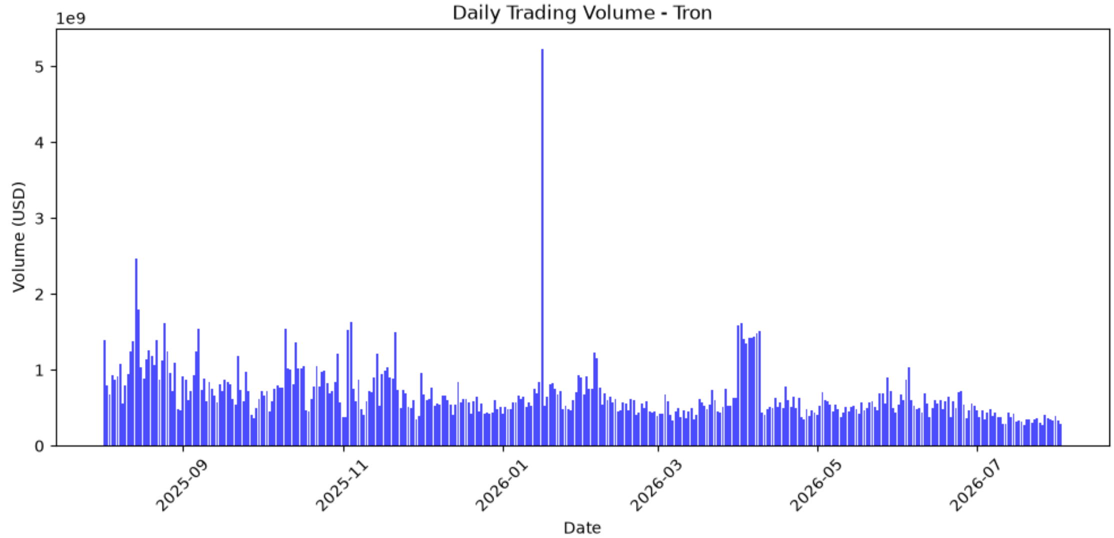
Price History



Price Chart

Source: https://www.coingecko.com

Volume History



Volume Chart

Source: https://www.coingecko.com

Deliverable Supply Analysis

- **Current Circulation**: 94,861,480,237 TRX
- **Total Supply**: 94,861,503,664 TRX
- **Max Supply**: N/A (no fixed maximum supply)
- **Market Cap**: $31,362,519,233
- **30 Day Volume**: $369,967,061

The Exchange proposes a contract month position limit of 285,000 contracts (285,000,000 TRX), representing approximately 0.30% of circulating supply.

<u>Core Principle Compliance</u>

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

Core Principle 2 - Compliance with Rules:

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

Core Principle 8 - Daily Publication of Trading Information:

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

Core Principle 9 - Execution of Transactions:

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

TRON US Dollar Kilo Futures

Term	Value
Product Name	TRON US Dollar Kilo Futures
Product Code	TRXUK
Contract Size	1,000 TRX (TRON)
Price Quotation	US Dollars per TRX
Tick Size	$0.00005 per TRX
Tick Value	$0.05 per contract
Price Band Variation	$0.0002
Price Limit	50%
Position Limit	285,000
Reportable Position Level	2,500 contracts
Market Hours	Rule 501
Contract Listing & Termination	Rule 502
Settlement Method	Deliverable - Rule 813 & Chapter 11
Settlement Price	Rule 509 & Chapter 11