

May 6, 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 2026-35 - Self-Certification Pursuant to CFTC Regulation 40.6 –
Bitnomial Exchange, LLC Rule 201 Update**

Dear Mr. Kirkpatrick:

Bitnomial Exchange, LLC (“Bitnomial” or the “Exchange”) hereby submits for self-certification to the Commodity Futures Trading Commission (the “Commission” or “CFTC”), under Commission regulation 40.6(a), an update to Rule 201. The update to the Bitnomial Rulebook will become effective on May 20, 2026.

Core Principle Compliance

The Exchange will continue to comply with all DCM Core Principles. The Exchange has reviewed the Core Principles as set forth under Section 5 of the Commodity Exchange Act, as amended (the “Act”), and determined that the change will have no adverse impact on Bitnomial’s compliance with its obligations to adhere to DCM Core Principles.

Certification

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.6(a), Bitnomial certifies that this change complies with the Act and regulations thereunder. Bitnomial is not aware of any opposing views to this change.

Bitnomial certifies that a copy of this submission has been concurrently posted on Bitnomial’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

**Bitnomial Exchange, LLC &
Bitnomial Clearinghouse, LLC**

Rulebook Changes

Rule 201: Ownership

The Exchange is a Delaware limited liability company. The management and operation of the Exchange is governed by the LLC Agreement. All of the equity interests of the Exchange are owned by Bitnomial, ~~Inc.~~[LLC](#).

The Clearinghouse is a Delaware limited liability company. The management and operation of the Clearinghouse is governed by the LLC Agreement. All of the equity interests of the Clearinghouse are owned by the Exchange.