BITNOMIAL

July 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 2026-81 - Self-Certification Pursuant to CFTC Regulation 40.6 – Bitnomial Exchange, LLC – Rule 504 Update

Dear Mr. Kirkpatrick:

Bitnomial Exchange, LLC ("Bitnomial") 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 504 of Bitnomial's Rulebook. The update allows for changes to Bitnomial's price band methodology. This update will become effective on August 4, 2026.

Core Principle Compliance

Bitnomial will continue to comply with all Designated Contract Market ("DCM") Core Principles. Bitnomial has reviewed the Core Principles as set forth under Section 5 of the Commodity Exchange Act, as amended (the "Act"), and determined that the procedure updates may have some bearing on the following DCM Core Principles:

Core Principle 4 - *Prevention of Market Disruption*: The rule change complies with Core Principle 4 and CFTC Regulation 38.251, which expressly provide that a DCM must adopt and implement rules governing market participants subject to its jurisdiction to prevent, detect, and mitigate market disruptions or system anomalies associated with electronic trading.

Core Principal 12 - *Protection of Markets and Market Participants:* The rule change will have no impact on Bitnomial's duties to protect its markets and market participants from abusive, disruptive, fraudulent, noncompetitive and unfair conduct and trade practices.

Core Principal 18 - *Recordkeeping:* Bitnomial is committed to its duties to maintain records pertaining to trading in a manner that satisfies the relevant criteria set forth in §1.31 of the Commission's Regulations.

Core Principal 20 - *System Safeguards:* All trading activity will be subject to Bitnomial system safeguards. All trading is subject to risk analysis and oversight to identify and minimize operational risk.

Core Principle 21 - *Financial Resources:* The rule change will not impact the Bitnomial's ability to discharge its financial, operational, or managerial responsibilities as a DCM.

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

Rule 504: Exchange Trading

1. **Order Requirements.** To be valid, an Order must consist of the following information:

    1. **Contract:** The Order must be submitted for a Contract for which Orders may be placed.

    2. **Order ID:** Must be present for identification purposes.

    3. **Side:** Must be either buy or sell.

    4. **Quantity:** Number of Contracts to be traded. Must be a positive integer greater than zero and less than maximum Order Quantity as defined in Contract Specifications.

    5. **Price:** As defined by Contract Specification.

    6. **Time-In-Force:** Day, Immediate-or-Cancel ("IOC"), or as otherwise specified in the Contract Specifications. Day orders are cancelled at the end of the day's trading session. IOCs are Orders that are immediately executed against resting Orders. If the Order cannot be fully filled, the remaining Quantity is cancelled.

2. **Order Types.** The Exchange shall support at least the following types of Orders.

    1. **Limit Order.** Allows the buyer to define the maximum purchase Price and the seller to define the minimum sale Price for a Contract. If any portion of the Order can be matched, it will be immediately executed. Buy Limit Orders will only be executed at or below the limit Price. Sell Limit Orders will only be executed at or above the limit Price. If a Limit Order is not immediately executed, it will remain in the book at the limit Price until the Order is either executed, cancelled, or expires at the end of the trading session.

3. **Submission.** Submission of an Order to the Exchange constitutes a representation by the submitting Participant that it is acting as principal in respect of such Order. Orders may be submitted to the Exchange via the API.

    The Exchange reserves the right to temporarily or permanently defer processing Orders that may interfere with the proper functioning of the Exchange. For previously submitted Orders, additional validation checks may be run to ensure that the Order contents are still valid and that the submitting Participant has not been suspended.

    1. **Price Bands.** The Exchange shall apply a price range for aggressive Orders at which new Orders will be accepted, computed as a Reference Price +/- the Price Band variation set by the Exchange Market Operations & Risk Team. The Reference Price is continuously re-calculated from the first available of: the last trade price, best bid-best offer; the index price specified in the Contract Specifications. The Exchange may at its discretion proceed to the next available method. Calendar spread Price Band variation shall be 50% of the Price Band variation listed in the Contract Rules. The Exchange Market Operations & Risk Team may adjust the Price

Bands at its sole discretion based on market conditions.~~The Exchange shall apply a price range for aggressive Orders at which new Orders will be accepted. The initial Price Bands are based on the previous day Settlement Price +/- the Price Band variation set by the Exchange Market Operations & Risk Team. The Price Band variation range is continuously re-calculated from the top-of-book price. Calendar spread Price Band variation shall be 50% of the Price Band variation listed in the Contract Rules.~~

2. **Price Limits.** The Exchange shall apply a price range, which may change throughout the trading session according to Rule 501.4, at which new Orders will be accepted and are computed as follows:

1. **Futures Contracts:** the greater of 50% of the previous day Settlement Price or the price listed in the Contract Specifications.

2. **Options Contracts:** the greater of 100% of the previous day Settlement Price or the price listed in the Contract Specifications.

3. **Calendar spreads:** 50% of the Price Limit listed in the outright Contract Specifications.

3. **Self-Match Prevention.** The Exchange enforces Self-Match Prevention ("SMP") to protect against self-trading that violates the Exchange's Wash Trade prohibition set out in Rule 402.10. SMP prevents the matching of orders with the same Trading Account ID. The Exchange reserves the right to change behavior of SMP from time to time.

4. **Order Modification.** Previously submitted Orders can be modified prior to being fully filled.

5. **Order Cancellation.** Previously submitted Orders can be cancelled prior to being fully filled.

6. **Order Submission Period.** The Exchange will accept Orders during the period as defined in Rule 501 and Rule 502. The Exchange reserves the right to modify this schedule. All submissions, modifications or cancellations will receive acknowledgement after Exchange processing if they have been accepted.

7. **Trade Matching.** The Exchange matches and fills Orders from the interaction of multiple bids and multiple offers using a predetermined, nondiscretionary central limit order book ("CLOB") and a price-time priority algorithm, meaning best prices first then on a first-in-first-out ("FIFO") basis at identical prices, or as otherwise specified in the Contract Specifications.

8. **Clearing.** All matched trades generated by the Exchange after the application of trade risk limits give rise to binding Transactions between the applicable Participants, which will be automatically submitted to the Clearinghouse for registration and novation, as described in Chapter

8 of these Rules. The Exchange reserves the right to cancel erroneous trades submitted to the Clearinghouse in accordance with Rule 508.

9. **Trading Information.** The Exchange shall make public daily information on settlement prices, volume, open interest, and opening and closing ranges for actively traded contracts on the contract market. Trading information will be published on the Exchange Website at the end of the day.

10. **Messaging Policy.** The Exchange enforces a messaging policy that limits the number of messages a Participant can submit to the API.