BITNOMIAL

July 23, 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 2026-82 - Self-Certification Pursuant to CFTC Regulation 40.6 – Bitnomial Exchange, LLC and Bitnomial Clearinghouse, LLC Rule 803 Update**

Dear Mr. Kirkpatrick:

Bitnomial Exchange, LLC and Bitnomial Clearinghouse, LLC (collectively, "Bitnomial") hereby submit for self-certification to the Commodity Futures Trading Commission (the "Commission" or "CFTC"), under Commission regulation 40.6(a), an update to Rule 803 of Bitnomial's Rulebook. The update allows for changes to jurisdiction and process of service rules for entity clearing members. This update will become effective on August 6, 2026.

Core Principle Compliance
Bitnomial will continue to comply with all designated contract market ("DCM") and derivatives clearing organization ("DCO") 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 Rulebook and procedure updates may have some bearing on the following DCM and DCO Core Principles:

Core Principal 7 - *Availability of General Information:* Notification of the rule update has been posted to https://bitnomial.com/exchange/regulatory in compliance with this Core Principal.

Core Principal 12 - *Protection of Markets and Market Participants:* The rule update 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 Principle C – *Participant and Product Eligibility*: The amended rule continues to comply with DCO Core Principle C by maintaining comprehensive admission and continuing eligibility standards for all Clearing Members, including minimum financial standing, operational capability, and compliance with applicable CEA and CFTC requirements.

Core Principle L - *Public Information*: Bitnomial is publicly posting this self-certification letter on its website to ensure that market participants receive advance notice of this update.

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 803: Clearing Members**

1. The Clearinghouse shall have two categories of Clearing Membership: ECMs and ICMs. Clearing Membership may be approved and maintained only when the terms and conditions set forth below have been met and continue to be met as determined by the Clearinghouse. The Clearinghouse may approve a Person to be a Clearing Member and the Clearinghouse may revoke Clearing Member approval at any time.

    1. The Clearing Member is a corporation, limited liability company, partnership or other entity in good standing in its jurisdiction of formation, or a natural person who is a U.S. citizen or permanent resident in good standing;
    2. The ECM consents to the exclusive jurisdiction of any federal or state court in the State of Illinois with respect to any action or conduct between ECM and the Clearinghouse and any affiliate of the Clearinghouse that arises out of any agreement or dispute between the parties or ECM's clearing membership. ECM further consents to service of process with respect to such courts by any means permitted by the laws of the United States or the State of Illinois. ~~ECM is qualified to conduct business in the State of Illinois or has an agency agreement in place with an entity qualified in the United States that provides an agent for service of process and other communications from the Clearinghouse in connection with the business of the Clearing Member~~;
    3. The Clearing Member is in compliance with a Clearing Member Agreement.
    4. The Clearing Member is in compliance with the Rules;
    5. The Clearing Member is in good financial standing and meets the minimum financial requirements established by the Clearinghouse;
    6. The Clearing Member has the personnel and systems to effectively conduct its business with the Clearinghouse;
    7. The Clearing Member has established satisfactory relationships with, and designated to the Clearinghouse, a bank or trust company designated by the Board for confirmation and payment of Margin, Collateral, and other settlements with the Clearinghouse (an "Approved Financial Institution");
    8. The Clearing Member has adequate operational capabilities, including the ability to process expected peak volumes and values within required time frames, fulfill Collateral payment and delivery obligations imposed by the Clearinghouse and participate in default management activities; and
    9. The Clearing Member is registered as an FCM with the CFTC and is a member of NFA unless the Clearing Member clears solely Fully Collateralized Swaps for its own accounts.

10. The Clearing Member meets applicable requirements under the CEA and the CFTC's rules, including but not limited to risk management procedures, requirements relating to minimum net capital, financial reporting, and recordkeeping, as determined by the Clearinghouse.

2. The Clearing Member shall immediately notify the Clearinghouse if any of the foregoing requirements are not true and accurate.
3. A Clearing Member may elect to participate in a Board of Trade by providing notice to the Clearinghouse. Participation in a Board of Trade may impact the requirements applicable to the Clearing Member under Rule 803.1.
4. The Board may grant exemptions to the requirements for membership in Rule 803 if the Clearinghouse determines that an exemption would not jeopardize the financial integrity of the Clearinghouse.