BITNOMIAL

October 30, 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 2026-131 - Self-Certification Pursuant to CFTC Regulation 40.6 – Bitnomial Clearinghouse, LLC - Procedure Update

Dear Mr. Kirkpatrick:

Bitnomial Clearinghouse, LLC ("Bitnomial" or the "Clearinghouse") hereby submits for self-certification to the Commodity Futures Trading Commission (the "Commission" or "CFTC"), under Commission regulation 40.6(a), updates to Bitnomial's margin methodology procedure. The updates are being made to align with Bitnomial's previously disclosed margin coverage rate minimum for security futures products. The procedure updates will become effective on November 16, 2026.

Exhibit 1: Confidential Updates to Bitnomial's procedure
Exhibit 2: FOIA Request Letter

Core Principle Compliance

Bitnomial will continue to comply with all derivatives clearing organization ("DCO") Core Principles. Bitnomial has reviewed the Core Principles as set forth under Section 5 of the Commodity Exchange Act (the "Act"), and determined that the update may have some bearing on the following DCO Core Principles:

Core Principle B- Financial Resources: Bitnomial will continue to maintain adequate financial resources to discharge its responsibilities as a DCO.

Core Principle D- Risk Management: The changes continue to ensure Bitnomial's ability to manage the risks associated with discharging the responsibilities of a DCO, including limiting exposure to potential losses from defaults, and maintaining margin requirements sufficient to cover potential exposures in normal market conditions.

Core Principle E- Settlement Procedures: Bitnomial will continue to complete money settlements on a timely basis to reduce risk exposure.

Core Principle F- Treatment of Funds: This core principle ensures DCOs properly manage and protect funds held on behalf of Clearing Members and their customers. Bitnomial's updates continue to require the Clearinghouse to manage and protect all margin payments.

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 these changes comply with the Act and regulations thereunder. Bitnomial is not aware of any opposing views to the changes.

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 Compliance Officer
Bitnomial Clearinghouse, LLC

BITNOMIAL

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VIA ELECTRONIC SUBMISSION

Assistant Secretary of the Commission
for FOI, Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, D.C. 20581

Re: **FOIA Confidential Treatment Request - Bitnomial Clearinghouse, LLC**

Dear Sir/Madam:

On behalf of Bitnomial Clearinghouse, LLC (the "Company"), we have submitted documents, dated October 30, 2026 (the "Confidential Submission"), to the Commodity Futures Trading Commission ("Commission") as part of Bitnomial Clearinghouse, LLC's compliance obligations.

We hereby petition the Commission, pursuant to Commission Regulations 145.5 and 145.9, to accept and retain in confidence the aforementioned documents until further notice as against any requestor who files with the Commission a request to inspect such documents pursuant to the Freedom of Information Act.

Confidential treatment is requested, among other things, on the grounds that the Confidential Submission contains data and information which would separately disclose business transactions and trade secrets that may not be disclosed to third parties, as provided in Section 8(a) of the Commodity Exchange Act and Commission Regulation 145.5(c)(1). Confidential treatment also is requested on the grounds that the Confidential Submission is exempt from disclosure under paragraph (b)(4) of the Freedom of Information Act ("FOIA") and Commission Regulations 145.5(d) and 145.9(d)(1)(ii), because it contains commercial and financial information that is confidential and would be of material assistance to competitors. Further, confidential treatment is requested on the grounds that the Confidential Submission includes personal information of the Company and other persons, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.

We understand that if the Commission receives a FOIA request for the Confidential Submission, we will be notified of such request in accordance with the Commission's regulations and be asked to submit, within ten business days, a detailed written justification for confidential treatment of the Confidential Submission. In such event, we request that Commission staff telephone or email the undersigned rather than rely solely upon U.S. mail for such notice.

If the Commission or its staff transmits any of the Confidential Submission to another federal agency, we request that you forward a copy of this letter to any such agency with the Confidential Submission and further request that you advise any such agency of the request that

the material be accorded confidential treatment.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever that are made by, or at the request of, any employee of the Commission (or any other federal agency) and which (1) incorporate, include or relate to any aspect of the Confidential Submission; or (2) refer to any conference, meeting, or telephone conversation regarding the Company relating to the Confidential Submission.
Please direct any questions regarding this request for confidential treatment, as well as any notices pursuant to Commission Regulation 145.9(e), to the attention of the undersigned at james.walsh@bitnomial.com.

Very truly yours,
/s/
James Walsh
Chief Compliance Officer
Bitnomial Clearinghouse, LLC
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Suite 230
Chicago, Illinois 60654
(312) 883-5851