BITNOMIAL

November 16, 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 2026-133 - Self-Certification Pursuant to CFTC Regulation 40.6 – Bitnomial Exchange, LLC Incentive Program 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), the following plans to modify its Participant Liquidity Incentive Program (the "Program"). The Program is intended to increase liquidity in Bitnomial markets. The proposed changes extend the Program by three days to December 4, 2026. Changes to the Program will become effective on December 1, 2026 and will continue through December 4, 2026.

1) Exhibit 1 sets forth the updated terms of the Program (Confidentiality Requested).
2) Exhibit 2 is Bitnomial's FOIA request letter.

Core Principle Compliance

Bitnomial has concluded that its compliance with DCM Core Principles is not adversely affected by this change. 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 rule change pertains to the following Core Principles:

Core Principle 2 - *Compliance with Rules*:
The Program has been established under Bitnomial Rule 314 which allows the Exchange to create programs that provide incentives to participants willing to add liquidity to Bitnomial markets. Bitnomial will continue to enforce the Program requirements through its existing compliance, surveillance, and disciplinary framework.

Core Principle 4 - *Prevention of Market Disruption*:
The Program conforms 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. All trading on the Exchange, including any trading and related activity under the Program, is subject to the Exchange rules, which prohibit fraud, non-competitive trading, market manipulation and abusive and

disruptive trade practices. Additionally, as with all trading on the Exchange, trading in the Program's products will be subject to monitoring, surveillance, and enforcement.

Core Principle 7 - *Availability of General Information*:
Notification of the existence of the Program has been posted to https://bitnomial.com/exchange/regulatory in compliance with this Core Principle. Interested market participants may contact the Exchange for additional information concerning the Program.

Core Principle 9 - *Execution of Transactions*:
The changes are consistent with Core Principle 9 because they do not modify the Exchange's electronic execution system, order handling rules, priority methodology, access standards, or the terms of any contract. The contracts included in the Program are listed for trading in competitive, open, and efficient markets, subject to Exchange rules. All market participants will continue to transact through the same open and competitive execution framework.

Core Principle 12 - *Protection of Markets and Market Participants*:
The Exchange's rules require all participants, including those participating in the Program, to observe high standards of integrity, market conduct, commercial honor, fair dealing, and just and equitable principles of trade and prohibit, among other things, fraud, non-competitive trading, market manipulation, and abusive and disruptive trade practices. The Program will have no effect on the Exchange's duties to protect its markets and market participants from abusive, disruptive, fraudulent, noncompetitive and unfair conduct and trade practices.

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

Core Principle 21 - *Financial Resources*:
The Program will not impact the Exchange'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 the updated Program complies with the Act and regulations thereunder. Bitnomial is not aware of any opposing views to these updates.

Bitnomial certifies that a copy of 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

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Exhibit 2

November 16, 2026

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 Exchange, LLC**

Dear Sir/Madam:

On behalf of Bitnomial Exchange, LLC (the "Company"), we have submitted documents, dated November 16, 2026 (the "Confidential Submission"), to the Commodity Futures Trading Commission ("Commission") related to the Company's Rules. The Company considers these documents to be proprietary and confidential.

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 Regulatory Officer
Bitnomial Exchange, LLC
(312) 883-5851