



October 9, 2026

Via CFTC Portal Submissions

Mr. Christopher Kirkpatrick  
Secretary of the Commission  
Office of the Secretariat  
Commodity Futures Trading Commission  
3 Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, DC 20581

**RE: Submission Pursuant to Commission Regulation 40.6(a) – OG.com Markets Welcome Offer Program**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act” or “CEA”), and Section 40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (the “Commission” or “CFTC”), the North American Derivatives Exchange, Inc., which operates the brand OG.com Markets (referred to herein as the “Exchange” or “OG.com Markets”), in its capacity as a designated contract market (“DCM”), hereby certifies to the Commission its Welcome Offer Program (the “Program”). The Program is an Exchange incentive program for eligible new users that are not eligible contract participants. The Program is offered through the OG.com App and OG.com Website. By way of background, OG.com Markets has traditionally offered retail promotions to retail Customers on a voluntary basis based on the Nadex Retail Terms and Conditions and Trading Member Terms of Business, however CFTC Staff has requested that OG.com Markets file promotions going forward, which is the basis for this filing.

Details of the Program are set forth in Exhibit A, and a discussion of the Program’s impact on the Exchange’s compliance with the DCM Core Principles is set forth in Exhibit B, both attached hereto.

The Exchange hereby certifies that the Program complies with the Act and the Commission Regulations adopted thereunder. No substantive opposing views were expressed to the Exchange with respect to the Program. The Exchange hereby certifies that notice of the Program was posted on its website at the time of this filing.

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Should you have any questions regarding the above, please do not hesitate to contact me by e-mail at [scott.kallback@nadex.com](mailto:scott.kallback@nadex.com).

Sincerely,

*/s/*

Scott Kallback  
Chief Compliance Officer/Chief Regulatory Officer

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**EXHIBIT A**  
**OG.com Markets Welcome Offer Program**

**Program Type and Objectives**

The Program is an incentive program for non-eligible contract participants on the OG.com Markets platform. Its purpose is to encourage new users to complete identity verification and engage in an initial bona fide transaction in eligible contracts through the OG.com Markets app and platform. Participation is voluntary, and available on objective, uniformly applied terms to eligible new users and is subject to the Exchange Rules and the requirements described below.

**Program Scope; Contracts and Products Covered**

The Program is offered through the OG.com Markets app and platform and applies to any eligible contract for an event listed on OG.com Markets, subject to the qualifying requirements below. Eligibility, qualifying-trade requirements, and reward type vary by jurisdiction.

A qualifying trade must be a single trade of at least \$10, including fees, on an eligible contract (meaning a contract priced below \$0.80), and the position must be held until settlement. The trade must settle within seven days after identity verification and may not use another reward. The public page is [og.com/football/lp/promos-signup-bonus](https://og.com/football/lp/promos-signup-bonus).

**Participant Obligations and Performance Requirements**

To qualify for an incentive under the Program, a new user must create an account, sign up, verify email, and complete identity verification. Within 7 days after identity verification, the user must complete one qualifying trade of at least \$10, including fees, on an eligible contract (meaning a contract priced below \$0.80), and the trade must settle within that 7-day period. The trade may not use another reward, and the position must be held until settlement. Eligibility, qualifying-trade requirements, and reward type vary by jurisdiction. All activity remains subject to the Exchange Rules, including Exchange Rule 5.19, and qualifying activity excludes wash trades, false trading, self-dealing, circular trading, multi-account abuse, and other abusive, manipulative, or non-bona fide conduct.

## Reward Terms

| Reward Term       | Requirement                                                                                                  | Reward                                              | Timing and Additional Terms                                                                                                                                                                                                                                                                                                                                                  |
|-------------------|--------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Eligibility       | New user creates an account, signs up, verifies email, and completes identity verification                   | Eligible to participate                             | Complete account and identity-verification steps                                                                                                                                                                                                                                                                                                                             |
| Qualifying trade  | One trade of at least \$10, including fees, on an eligible contract (meaning a contract priced below \$0.80) | Trade \$10, get a \$10 reward; reward of up to \$10 | Trade must settle within 7 days after identity verification; position must be held until settlement; trade may not use another reward                                                                                                                                                                                                                                        |
| Covered contracts | Eligible contract: a contract priced below \$0.80                                                            | Qualifying position                                 | Position must be held until settlement                                                                                                                                                                                                                                                                                                                                       |
| US users          | Eligible user                                                                                                | Rebate of up to \$10                                | After the qualifying trade settles, the reward is issued and appears under Promos in the user's account; expiry dates vary by promotion and are shown with each reward in the Promo Center. Welcome Offer rewards remain valid for 30 days from issuance and unless stated otherwise, rewards expire at 11:59pm. ET on the listed expiry date.<br>May be used only in whole. |

|                         |                                                                                                           |                                                                                             |                                                                                                             |
|-------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Referral-code exclusion | A user cannot participate in both the Referral Reward program and the Welcome Offer with the same account | Not eligible for Welcome Offer                                                              | Cannot combine with Welcome Offer                                                                           |
| Abuse; expiry           | OG determines abuse or failure to satisfy requirements                                                    | Disqualification from this and future campaigns<br>Forfeiture of accrued or pending rewards | OG's abuse determination is final<br>Qualifying trade must settle within 7 days after identity verification |

### **Incentive Structure and Compensation**

Upon satisfying the account, identity-verification, qualifying-trade, settlement, and other disclosed requirements, an eligible participant may receive a reward of up to \$10 under the “Trade \$10, get a \$10 reward” offer. The reward is issued after the qualifying trade settles and appears under Promos in the user’s account. US users receive a rebate, in each case up to \$10. Reward type varies by jurisdiction. Expiry dates vary by promotion and are shown with each reward in the Promo Center. Welcome Offer rewards remain valid for 30 days from issuance and unless stated otherwise, rewards expire at 11:59pm. ET on the listed expiry date. May be used only in whole. The reward is subject to the applicable public terms and the Exchange’s monitoring and abuse-determination rights.

The qualifying trade must settle within 7 days after identity verification, and the qualifying-trade window closes at that time. Beginning September 11, 2026, a user cannot participate in both the Referral Reward program and the Welcome Offer with the same account. The Exchange may withhold, recover, or revoke rewards for ineligibility, abuse, or failure to satisfy the disclosed requirements.

### **Program Terms (Effective Dates and Duration)**

Going forward this Program start date is October 26, 2026, which is the applicable 10-day review period. The Program will remain available as a standing framework until October 31, 2027, unless the Exchange modifies, suspends, extends, or terminates it pursuant to CFTC Regulations including any rule certification that may be required. Individual campaigns will have the launch date, qualifying period, expiry, and end date disclosed to eligible users before launch.

### **Participant Eligibility**

New users who create an account, verify email, complete identity verification, and satisfy the qualifying-trade requirements are eligible for the Program on the same objective terms applicable to their user group. Eligibility, qualifying-trade requirements, and reward type vary by jurisdiction. Eligibility is subject to applicable law, the Exchange Rules, and the disclosed Program terms. There is no limit on the number of eligible participants.

### **Monitoring and Revocation**

The Exchange will monitor KYC, account, trading, settlement, referral-code, reward, and other activity. If OG determines that a user engaged in abuse or failed to satisfy the Program requirements, the user may be disqualified from this and future campaigns and may forfeit accrued or pending rewards. OG's determination of abuse is final.

## **EXHIBIT B**

### **DCM Core Principles**

The Exchange has identified the following DCM Core Principles as being impacted by the Program: Core Principles 2, 3, 4, 7, 9, 12, 18, and 21.

#### **Core Principle 2 (Compliance with Rules)**

Core Principle 2 requires the DCM to have access requirements, including comparable fee structures, and the capacity to detect, investigate, and apply appropriate sanctions to persons who violate the contract market's rules. The Welcome Offer is available on objective, pre-disclosed, uniformly applied terms to eligible new users who create an account, verify email, complete identity verification, and satisfy the disclosed qualifying-trade requirements. Eligibility, qualifying-trade requirements, and reward type vary by jurisdiction. The Exchange does not negotiate individual terms outside the published structure. The Exchange monitors eligibility, qualifying trades, settlement, rewards, and potential abuse and may disqualify users, withhold or recover rewards, and impose sanctions under Exchange Rule 5.19 and other applicable Exchange Rules.

#### **Core Principle 3 (Contracts Not Readily Subject to Manipulation)**

The Program does not change any contract term, settlement source, or resolution methodology. The public page states that the qualifying trade must be on an eligible contract, meaning a contract priced below \$0.80. The available reward is de minimis relative to the cost of influencing any settlement source. Qualification and reward calculations exclude wash trades, false trading, self-dealing, circular trading, multi-account abuse, artificial volume, and other transactions intended to create qualifying activity without bona fide market risk.

#### **Core Principle 4 (Prevention of Market Disruption)**

The Exchange has dedicated compliance and regulatory staff that monitor trading and promotional activity, investigate potential rule violations, and impose sanctions on persons determined to have violated the Rules. The Exchange uses automated trade surveillance and real-time market monitoring of trading activity during all hours the Exchange is open. The Exchange may set surveillance parameters to detect potential wash trades, false trading, self-dealing, circular trading, multi-account abuse, and other abusive or manipulative activity. Exchange Rule 5.19 and Chapter 9 of the Exchange Rulebook provide authority to investigate and sanction violations, and the Exchange may disqualify users and forfeit rewards under the Program.

#### **Core Principle 7 (Availability of General Information)**

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The Exchange will post the full filing publicly and will make the Program terms publicly available on OG.com Markets, including through [og.com/football/lp/promos-signup-bonus](https://og.com/football/lp/promos-signup-bonus). The current promotions listed on the Promos page are Welcome Offer, Refer a Friend, and Pick of the Week. The Exchange will maintain the Program information and terms as required by applicable law and the Exchange Rules.

### **Core Principle 9 (Execution of Transactions)**

Core Principle 9 requires the DCM to provide a competitive, open, and efficient market and mechanism for executing transactions that protects the price discovery process. The Program encourages bona fide retail participation without changing the Exchange's execution mechanisms or price discovery process. The reward is available only when the disclosed KYC, single-trade, eligible-contract, settlement, and other requirements are met. All trading remains subject to the Exchange Rulebook, including Exchange Rule 5.19 and the requirements that the Exchange establish, monitor, and enforce compliance with its Rules and the terms and conditions of contracts traded on the Exchange.

### **Core Principle 12 (Protection of Markets and Market Participants)**

Core Principle 12 requires a DCM to protect markets and market participants from abusive practices committed by any party and to promote fair and equitable trading on the contract market. Chapter 5 of the Exchange Rulebook, including Exchange Rule 5.19, establishes rules protecting the market and market participants from abusive, disruptive, fraudulent, noncompetitive, and unfair conduct and trade practices. The Rules apply to all market participants and transactions, and participants in the Program must comply with them. The Exchange will exclude wash trades, false trading, self-dealing, circular trading, multi-account abuse, and other abusive or manipulative activity from qualification and may impose disqualification and reward-forfeiture sanctions.

### **Core Principle 18 (Recordkeeping)**

Core Principle 18, implemented by Commission Regulation 38.951, requires a DCM to maintain records of all activities relating to the business of the DCM in an acceptable form and manner for at least 5 years. The Exchange will maintain records relating to the Program, including KYC and eligibility information, qualifying trades and settlement, rewards, public terms and communications, referral-code restrictions, abuse determinations, and sanctions, in accordance with applicable Commission Regulations.

### **Core Principle 21 (Financial Resources)**

The cost of rewards under the Program will be funded from Company resources, including revenue from trading fees. The Exchange will not offer or fund rewards if doing so would

impair compliance with Commission Regulation 38.1101 or any other applicable financial-resource requirement.