



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 Pick of the Week 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”) under the Act, 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 the Pick of the Week Program described more fully herein (the “Program”). 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 the full Program terms and public-facing information were posted at OG.com/posts/pick-of-the-week at the time of this filing.

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 Pick of the Week Program**

**Program Type and Objectives**

The Program is a free weekly prediction challenge and promotion for non-eligible contract participants. No purchase is necessary to enter or win, and participation is strictly optional. Its purpose is to provide eligible users with a free opportunity to make a weekly Yes/No pick on a designated Pro Football event and, if the pick is correct, receive a non-transferable 100% Boost that may be used on the user's next trade on any market. The Program is intended to promote transparent engagement with designated sports events and orderly participation in the Exchange's markets.

**Program Scope; Contracts and Products Covered**

The Program is offered through OG.com Markets in connection with Pick of the Week. OG.com Markets is operated by North American Derivatives Exchange, Inc. doing business as OG.com Markets using OG.com technology. The Program covers the retail promotional activity described below and does not change the terms, settlement source, or resolution methodology of any contract listed for trading on the Exchange.

- (i) To participate, a user must sign up for or sign in to an OG.com account and access the Pick of the Week banner under the Pro Football Hub tab or the Promos page.
- (ii) A new Yes/No question goes live every Monday for the designated Pro Football event of the applicable week; each user may submit one answer.
- (iii) The user must select Yes or No and lock the answer by 8:10 p.m. ET on Sunday, ten minutes before kickoff.
- (iv) The designated event settles by reference to an independent public outcome, and the Exchange applies the published resolution methodology to determine whether the answer is correct.

The Program is a free weekly prediction challenge. No purchase is necessary to enter or win, participation is strictly optional, and no deposit or trade is required to submit a pick. A user may receive a Reward only in accordance with the Program terms, any applicable Exchange Rules, including Rule 5.19, and the applicable Official Rules.

**Participant Obligations and Performance Requirements**

To participate, an eligible user submits one Yes/No pick on the designated Pro Football event for the applicable week through OG.com Markets. No purchase, deposit, or trade is required to submit the pick. The user must submit the pick before 8:10 p.m. ET on Sunday, ten minutes before kickoff, after which the pick cannot be changed. Participation and Rewards remain subject to the published Program terms, applicable account and

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geographic restrictions, the Official Rules, the OG Terms & Conditions, the Privacy Notice, and Rule 5.19.

Each week, a new Yes/No question goes live on Monday. Users must lock their answers by 8:10 p.m. ET on Sunday, ten minutes before kickoff. Results are revealed every Monday, and Boosts are credited immediately. A credited Boost may be used on the user's next trade on any market. Boosts expire seven days after issuance at 23:59 ET; the page also states that Boosts expire seven (7) days from the exact time of issuance and are permanently removed if unused. The Exchange applies the published resolution methodology to determine the users entitled to a Reward.

Users with correct picks split the \$10,000 weekly prize pool equally as 100% Boosts. Depending on the number of winners, the individual Boost for a user is capped between \$1 and \$50. Boosts under \$1 are not issued. Each user is capped at \$50 in aggregate Rewards per calendar week, and any excess is forfeited. Total Rewards are capped at \$10,000 per calendar week and are allocated first-come, first-served. OG may pause or terminate distributions for the remainder of the week once the weekly budget is met.

#### *Reward Terms*

| <b>Reward Term</b> | <b>Program Detail</b>                                                                                                                                                                                                                                                                                              |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Entry cost         | No purchase is necessary to enter or win; participation is strictly optional. No deposit or trade is required to submit a pick.                                                                                                                                                                                    |
| Weekly pick        | A new Yes/No question goes live every Monday for a designated Pro Football event; each user may submit one answer per week.                                                                                                                                                                                        |
| Lock time          | Answers lock at 8:10 p.m. ET on Sunday, ten minutes before kickoff.                                                                                                                                                                                                                                                |
| Weekly pool        | \$10,000 weekly prize pool, split equally among users with correct picks as 100% Boosts.                                                                                                                                                                                                                           |
| Reward allocation  | Individual Boosts are capped between \$1 and \$50 depending on the number of winners; Boosts under \$1 are not issued. Each user is capped at \$50 in aggregate Rewards per calendar week, excess is forfeited, and total Rewards are capped at \$10,000 per calendar week and allocated first-come, first-served. |
| Reward form        | A non-transferable 100% Boost increases net winnings when the prediction is correct and may be used on the user's next trade on any market. For example, apply a 100% Boost to a trade generating up to \$25 in winnings; if the trade settles correctly, earn up to \$25 in additional earnings.                  |
| Expiration         | Results are revealed every Monday and Boosts are credited immediately. Boosts expire seven days after issuance at 23:59 ET; the page also states that Boosts expire seven (7) days from the exact time of issuance and are permanently removed if unused.                                                          |

|                       |                                                                                                                                                                                                                                                                    |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Dates and public page | Campaign Period: September 7, 2026, at 12:01 a.m. ET – ongoing (weekly).<br>Public page: <a href="https://og.com/posts/pick-of-the-week">og.com/posts/pick-of-the-week</a> , “Pick of the Week Is On! Win Up to a \$50 Boost Every Week,” dated September 7, 2026. |
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### **Incentive Structure and Compensation**

The Program provides a non-transferable Reward in the form of a 100% Boost to each user whose pick is correct. Correct pickers split the \$10,000 weekly prize pool equally, subject to an individual Boost range of \$1 to \$50 depending on the number of winners, a \$50 aggregate Reward cap per user per calendar week, the non-issuance of amounts under \$1, and a \$10,000 total weekly cap. Any excess above the per-user cap is forfeited. OG may pause or terminate distributions for the rest of the week once the budget is met. The Boost is available during the period specified in the Program terms and expires as stated below. No Reward is earned for an incorrect pick or a pick that is not timely submitted and locked.

A 100% Boost increases net winnings when a prediction is correct. For example, if a user applies a 100% Boost to a trade generating up to \$25 in winnings and the trade settles correctly, the user may earn up to \$25 in additional earnings. The Boost is non-transferable, is usable on the user’s next trade on any market, and cannot be used on the original pick or to satisfy the requirement to submit a pick. The page does not state a minimum trade or price cap for using a Boost, and this Program imposes none. Boosts are credited immediately and are subject to the expiration terms stated above.

### **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**

The Program is open to eligible users who satisfy the Official Rules for the Sweepstakes (US) or Non-US Official Rules, as applicable, the OG Terms & Conditions, the Privacy Notice, and any applicable account, geographic, and other participation requirements. To participate, a user must sign up for or sign in to an OG.com Markets account, access the Pick of the Week banner under the Pro Football Hub tab or the Promos page, and submit a Yes/No answer before the Sunday lock time. Participation is strictly optional. OG may make final decisions in disputes. OG and the Exchange will monitor for wash trading, circular trading, repetitive opening and closing of positions of minimal duration or volume, manipulation of promotional eligibility, and other abuse. Sanctions may include disqualification from the current and all future campaigns, forfeiture of Rewards, and

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account limitation, including restriction or permanent suspension. The determination is final. Disqualified trades, including wash trades, false trading, self-dealing, and market manipulation, are not counted.

## **EXHIBIT B**

### **DCM Core Principles**

The Exchange has identified the following DCM Core Principles as being impacted by the Program:

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

Core Principle 2 requires the DCM to maintain fair and objective access requirements and the capacity to detect, investigate, and sanction violations of its rules. The Program is available to eligible retail users under uniformly published terms, without individual negotiation. No purchase is necessary to enter or win, participation is strictly optional, and the weekly Yes/No question, Sunday lock time, Pro Football subject, \$10,000 weekly pool, equal-split mechanism, \$1 to \$50 individual Boost range, \$50 per-user weekly aggregate cap, \$10,000 weekly total cap, immediate crediting, and expiration rules apply uniformly to users who satisfy the published requirements. The Exchange and OG will monitor participation and may withhold or recover Rewards, restrict participation, disqualify users from current and future campaigns, or take other action where fraud, abuse, manipulation, or violation of the Program terms or Rule 5.19 is suspected or identified. All Program activity remains subject to the Exchange Rules.

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

The Program does not change any contract term, settlement source, or resolution methodology. Each weekly question concerns a Pro Football event that settles by reference to an independent public outcome that no participant can control through activity on the Exchange, and the Exchange applies the published outcome objectively. The Reward is designed to be de minimis relative to any potential cost of influencing an independent public outcome and is capped at \$50 per user per calendar week and \$10,000 per week. The Boost applies only to a subsequent bona fide trade and not to the pick itself. The Exchange will exclude wash trades, circular trading, self-dealing, false trading, linked-account activity, artificial volume, and other activity intended to create qualifying activity without bona fide market risk.

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

The Exchange has compliance and regulatory staff, automated trade surveillance, and real-time monitoring of trading activity during all hours the Exchange is open. Those controls cover activity related to the Program, including wash trading, circular trading, repetitive opening and closing of positions of minimal duration or volume, manipulation of promotional eligibility, repeated or coordinated picks, Reward allocation, use of Boosts, and subsequent trades. Chapter 9 and Rule 5.19 of the Exchange Rulebook provide authority to investigate and sanction manipulative, fraudulent, abusive, disruptive, or

otherwise prohibited conduct. Sanctions may include disqualification from the current and all future campaigns, forfeiture of Rewards, account limitation, restriction or permanent suspension, and other action permitted by the Rules. Disqualified trades, including wash trades, false trading, self-dealing, and market manipulation, are not counted, and determinations under the Program are final.

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

The Exchange will make the full Program information publicly available, including the eligibility and entry requirements, optional no-purchase entry, weekly Yes/No question, Pro Football subject, Sunday lock time, independent public-outcome resolution, \$10,000 weekly pool, equal-split mechanism, \$1 to \$50 individual Boost range, \$50 per-user weekly aggregate cap, \$10,000 weekly total cap, 100% Boost mechanics, next-trade use on any market, and expiration rules. The full public-facing terms are posted at [og.com/posts/pick-of-the-week](https://og.com/posts/pick-of-the-week), “Pick of the Week Is On! Win Up to a \$50 Boost Every Week,” dated September 7, 2026, and otherwise disclosed as required by applicable law and the Exchange Rules.

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

The Program does not alter the Exchange's matching, execution, or price-discovery mechanisms. Although a Boost may be used on the user's next trade on any market, that trade must be bona fide and remains subject to the Exchange Rulebook, applicable order-handling requirements, surveillance, and Rule 5.19. The Program does not provide preferential execution, order priority, or access to non-public market information. Disqualified trades are not counted for Program purposes.

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

Core Principle 12 requires the DCM to protect markets and market participants from abusive practices and to promote fair and equitable trading. The Program applies uniform published terms to eligible retail users, limits each user to one weekly Yes/No answer, and uses an objectively determined public outcome. The Exchange and OG will monitor for wash trading, circular trading, repetitive opening and closing of positions of minimal duration or volume, manipulation of promotional eligibility, multiple-account activity, artificial trading, self-dealing, false trading, market manipulation, and other prohibited conduct. Chapter 5 of the Exchange Rulebook, including Rule 5.19, applies to the Program and permits the Exchange to withhold or recover Rewards, disqualify users from current and future campaigns, restrict participation, forfeit Rewards, and impose account limitations, including restriction or permanent suspension, for violations.

### **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

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and manner for at least five years. The Exchange will maintain records relating to the Program, including public postings and versions of the terms, user eligibility, picks and time stamps, designated-event outcomes, reward calculations and credits, profit-boost use and expiration, subsequent qualifying trades, surveillance reviews, exceptions, and enforcement actions, pursuant to applicable Commission Regulations.

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

The costs of the Program, including the \$10,000 weekly pool, profit-boost credits, administration, and any related obligations, will be funded from Company resources, including revenue from trading fees. The Exchange and applicable program operator will not administer the Program in a manner that would impair compliance with Commission Regulation 38.1101 or any other applicable financial resource requirement.