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September 11, 2020

Via CFTC Portal Submissions

Mr. Christopher Kirkpatrick
Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington D.C. 20581

RE: **Weekly Notification of Rule Amendments: Nadex Corrects Typographical Error and Amends Strike Widths - Submission Pursuant to Commission Reg. §40.6(d)**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended ("Act"), and Section 40.6(d) of the regulations promulgated by the Commodity Futures Trading Commission (the "Commission") under the Act (the "Regulations"), North American Derivatives Exchange, Inc. ("Nadex", the "Exchange") hereby provides notice that it is correcting a typographical error in its Rules 12.4 and 12.8 and that it amended the strike widths of various contracts during the week of September 8, 2020 due to increased volatility in the underlying markets upon which the Nadex contracts are based.

Section (l) of Rules 12.4 and 12.8 describe the process by which an Index Value is calculated each second in the Nadex Gold and Crude Oil markets. The Index Value is the Expiration Value for a Touch Bracket contract in the event the contract is knocked-out prior to the scheduled expiration time. Certain references in this description refer to "Expiration Value", where "Index Value" should be used. Additionally, to differentiate when the expiration occurs for a Touch Bracket contract as opposed to a contract with a fixed expiration time, Nadex is removing an erroneous reference to the expiration time of a Call Spread, and replacing the language with "Calculation Time", consistent with the explanation provided in Nadex's other Touch Bracket contracts, which are listed for certain currency pairs and US Indices. No characteristics or specifications of the contract are being changed, nor is the Index Value calculation, expiration or settlement process.

Corrections to Rules 12.4 and 12.8 are reflected in Exhibit A. Amended strike widths are reflected in Exhibit B.

Nadex hereby certifies that the additions and amendments contained herein comply with the Act, as amended, and the Commission Regulations adopted thereunder. No substantive opposing views were expressed to Nadex with respect to these additions. Nadex hereby certifies that notice of these events was posted on its website at the time of this filing.

Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (312) 884-0927 or by email at jaime.walsh@nadex.com.

Sincerely,

Jaime M. Walsh
Legal Counsel

EXHIBIT A

Amendments of Rules 12.4, 12.8

(The following Rule amendments are underlined and deletions are stricken out)

RULES 1.1 – 12.3 [UNCHANGED]

RULE 12.4 GOLD VARIABLE PAYOUT CONTRACTS

RULE 12.4.1 GOLD "CALL SPREAD" VARIABLE PAYOUT CONTRACTS

(a) SCOPE –These Rules shall apply to the Class of Contracts referred to as the Gold Variable Call Spread Payout Contracts issued by Nadex.

(b) UNDERLYING – The Underlying for this Class of Contracts is the price, per troy ounce (in US dollars), of the Gold Futures Contracts ("GFC") traded on the COMEX® Division of the New York Mercantile Exchange ("NYMEX"®)[1]. The GFC trade prices that will be used for the Underlying will be taken from the February, April, June, August, or December GFC delivery months (each a "GFC Delivery Month").   The Start and End Date for which Nadex will use a specific delivery month as the Underlying will be set based on the Settlement date of the Underlying futures contract. The date on which a new delivery month will be used as the Underlying for Nadex contracts (i.e. "Start Date") is one calendar day after the End Date for the previous delivery month contract. The last day on which a delivery month will be used as the Underlying for Nadex contracts (i.e. "End Date") is the third to last business day of the month preceding the month of the Underlying futures contracts Expiration Date. For example, the Comex Gold April 2014 futures have an Expiration Date of April 28, 2014. The last day on which the Gold April 2014 futures prices will be used as the Underlying for Nadex contracts and to calculate the Expiration Value on the Expiration Date for the relevant Gold contracts will be the third to last business day of the preceding month, March. Therefore, the End Date for using Comex Gold April 2014 futures will be March 27, 2014 and the Start Date for the next delivery month, Comex Gold June 2014 futures, will be March 28, 2014.

(c) SOURCE AGENCY – The Source Agency is Nadex.

(d) TYPE – The Type of Contract is a Variable Payout Contract.

(e) PAYOUT CRITERION – The Payout Criterion for each Contract will be set by Nadex at the time the Variable Payout Contracts are initially issued. For the Gold Variable Payout Contract, the Payout Criteria for the Contracts will be set as follows:

(i) DAILY GOLD CALL SPREAD VARIABLE PAYOUT CONTRACTS, 1:30 PM ET CLOSE - At the commencement of trading in a Daily Gold Call

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[1] *Supra, at fn 4.*

Spread Variable Payout Contract, referred to as a 'Call Spread', Nadex shall list one (1) Call Spread Contract, which conforms to the Payout Criteria listed below:

(1) DAILY GOLD CALL SPREAD CONTRACT

(aa) CEILING – The Ceiling shall be X + 50.00.

(bb) FLOOR – The Floor shall be X – 50.00.

(cc) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 10.

(2) In each case, "X" equals the last Gold price, as reported by the Source Agency, rounded to the nearest 50.

(ii) DAILY GOLD CALL SPREAD CONTRACTS, 1:30 PM ET CLOSE - Nadex shall list a set of three (3) Call Spread Contracts with overlapping ranges, which conform to the Payout Criteria listed below:

(1) CONTRACT 1: The Ceiling shall be X; The Floor shall be X – 50.

(2) CONTRACT 2: The Ceiling shall be X + 25; The Floor shall be X – 25.

(3) CONTRACT 3: The Ceiling shall be X + 50; The Floor shall be X.

(4) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 10.

(5) In each case, "X" equals the last Gold price, as reported by the Source Agency, rounded to the nearest 50.

(iii) INTRADAY GOLD CALL SPREAD CONTRACTS, 8AM ET to 1:30 PM ET CLOSE - Nadex shall list a set of three (3) Call Spread Contracts with overlapping ranges, which conform to the Payout Criteria listed below:

(1) CONTRACT 1: The Ceiling shall be X; The Floor shall be X – 40.

(2) CONTRACT 2: The Ceiling shall be X + 20; The Floor shall be X – 20.

(3) CONTRACT 3: The Ceiling shall be X + 40; The Floor shall be X.

(4) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 10.

(5) In each case, "X" equals the last Gold price, as reported by the Source Agency, rounded to the nearest 10.

(iv) INTRADAY 2-HOUR GOLD CALL SPREAD CONTRACTS, 10:00AM, 11:00AM, 12:00PM, and 1:00PM ET CLOSE - Nadex shall list a set of three (3) Call Spread Contracts that open 2 hours prior to the stated closing time(s) above with overlapping ranges, which conform to the Payout Criteria listed below:

(1) CONTRACT 1: The Ceiling shall be X; The Floor shall be X – 15.

(2) CONTRACT 2: The Ceiling shall be X + 7.5; The Floor shall be X – 7.5.

(3) CONTRACT 3: The Ceiling shall be X + 15; The Floor shall be X.

(4) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 10.

(5) In each case, "X" equals the last Gold price, as reported by the Source Agency, rounded to the nearest 10.

(v) Nadex may list additional Call Spread Contracts with different ranges of Payout Criteria on a discretionary basis in accordance with the CEA and Commission Regulations.

(f) MINIMUM TICK – The Minimum Tick size for Gold Call Spread Contracts shall be 0.10.

(g) POSITION LIMIT – The Position Limits for Gold Call Spread Contracts shall be 60,000 Contracts.

(h) LAST TRADING DATE – The Last Trading Date of the Contract is the same date as the Settlement Date.

(i) SETTLEMENT DATE – The Settlement Date of the Contract shall be the same date as the Expiration Date.

(j) EXPIRATION DATE – The Expiration Date of the Contract shall be the date on which the Gold Expiration Value is released by the Source Agency.

(k) SETTLEMENT VALUE – The Settlement Value is the amount paid to the holder of either a Short or Long Variable Payout Contract on Settlement Date. The Settlement Value of a Variable Payout Contract is determined as described in the definition for Long and Short Variable Payout Contracts.

(l) EXPIRATION VALUE – The Expiration Value is the price or value of Gold released by the Source Agency on the Expiration Date. The Expiration Value is calculated by the Source Agency by taking all GFC trade prices occurring in the ten (10) seconds leading up to the close of trading of the Gold Call Spread Contract, provided at least twenty-five (25) trade prices are captured during the ten (10) second period, removing the highest twenty (20) percent of GFC trade prices and the lowest twenty (20) percent of GFC trade prices from the data set[2], and using the remaining GFC trade prices to calculate the Expiration Value. The calculation used is a simple average of the remaining GFC trade prices in the data set, rounded to one decimal point

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[2] If 20% of the data set would result in a non-integer number of trade prices, the number of trade prices to be removed from the set will be rounded down. For example, if the number of trade prices collected during the last 10 seconds prior to the close of trading was 31, 20% of the data set would be 6.2 trade prices. As 6.2 is a non-integer number, the value will be rounded down, and the 6 highest and 6 lowest trade prices will be removed from the data set.

past the precision of the underlying market. In the event the time it takes to collect at least twenty-five (25) GFC trade prices exceeds the ten (10) seconds just prior to the close of trading of the Gold Call Spread Contract, the Expiration Value is calculated by the Source Agency by taking the last twenty-five (25) GFC trade prices just prior to the close of trading of the Gold Call Spread Contract removing the highest five (5) GFC trade prices and the lowest five (5) GFC trade prices, and using the remaining fifteen (15) GFC trade prices to calculate the Expiration Value. The calculation used is a simple average of all fifteen (15) GFC trade prices, rounded to one decimal point past the precision of the underlying market.

(m) CONTINGENCIES – If no level is actually announced on the Expiration Date due to a delay, postponement or otherwise in such release announcement by the Source Agency, the Settlement Date will be delayed until the Underlying number is released for that Series.

RULE 12.4.2 GOLD "TOUCH BRACKET" VARIABLE PAYOUT CONTRACTS

(a) SCOPE –These Rules shall apply to the Class of Contracts referred to as the Gold Touch Bracket Variable Payout Contracts issued by Nadex.

(b) UNDERLYING – The Underlying for this Class of Contracts is the price, per troy ounce (in US dollars), of the Gold Futures Contracts ("GFC") traded on the COMEX® Division of the New York Mercantile Exchange ("NYMEX"®)[3]. The GFC trade prices that will be used for the Underlying will be taken from the February, April, June, August, or December GFC delivery months (each a "GFC Delivery Month").   The Start and End Date for which Nadex will use a specific delivery month as the Underlying will be set based on the Settlement date of the Underlying futures contract. The date on which a new delivery month will be used as the Underlying for Nadex contracts (i.e. "Start Date") is one calendar day after the End Date for the previous delivery month contract. The last day on which a delivery month will be used as the Underlying for Nadex contracts (i.e. "End Date") is the third to last business day of the month preceding the month of the Underlying futures contracts Expiration Date. For example, the Comex Gold April 2014 futures have an Expiration Date of April 28, 2014. The last day on which the Gold April 2014 futures prices will be used as the Underlying for Nadex contracts and to calculate the Expiration Value on the Expiration Date for the relevant Gold contracts will be the third to last business day of the preceding month, March. Therefore, the End Date for using Comex Gold April 2014 futures will be March 27, 2014 and the Start Date for the next delivery month, Comex Gold June 2014 futures, will be March 28, 2014.

(c) SOURCE AGENCY – The Source Agency is Nadex.

(d) TYPE – The Type of Contract is a Variable Payout Contract.

(e) PAYOUT CRITERION – The Payout Criterion for each Contract will be set by Nadex at the time the Variable Payout Contracts are initially issued. For the Gold Touch Bracket Contracts, the Payout Criteria for the Contracts will be set as follows:

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[3] *Supra, at fn 4.*

(i) WEEKLY GOLD TOUCH BRACKET VARIABLE PAYOUT CONTRACTS, Close Time is the earlier of 1:30 PM ET on the last Trade Day of the contract listing, or when the Gold Index Value is equal to or greater than the Ceiling, or equal to or less than the Floor. Nadex shall list a set of four (4) Touch Bracket Variable Payout Contracts, referred to as a "Touch Bracket", that open at 6:00PM ET on the first Trade Day of the week, with overlapping ranges, which conform to the Payout Criteria listed below.

(1) CONTRACT 1: The Ceiling shall be $X + 40$; The Floor shall be $X – 10$.

(2) CONTRACT 1: The Ceiling shall be $X + 30$; The Floor shall be $X – 20$.

(3) CONTRACT 1: The Ceiling shall be $X + 20$; The Floor shall be $X – 30$.

(4) CONTRACT 1: The Ceiling shall be $X + 10$; The Floor shall be $X – 40$.

(5) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 10.

(6) In each case, "X" equals the last Gold price, as reported by the Source Agency, rounded to the nearest 1.

(ii) Upon the early Expiration of a Touch Bracket, Nadex may list a new Touch Bracket with a Ceiling of $X + 40$ (or 10) and a Floor of $X – 10$ (or 40) where X equals the Ceiling (or Floor) of the Touch Bracket that expired early. The newly listed Touch Bracket will have the same Last Trade Day as originally established for the expired Touch Bracket and the same Dollar Multiplier as the expired Touch Bracket.

(f) MINIMUM TICK – The Minimum Tick size for Gold Touch Bracket Variable Payout Contracts shall be 0.1.

(g) POSITION LIMIT – The Position Limit for Gold Touch Bracket Variable Payout Contracts shall be 100 Contracts.

(h) LAST TRADING DATE – The Last Trading Date of the Contract is the same date as the Settlement Date.

(i) SETTLEMENT DATE – The Settlement Date of the Contract shall be the same date as the Expiration Date.

(j) EXPIRATION DATE – The Expiration Date of the Contract shall be the date on which the Gold Touch Bracket Contract Expiration Value is released by the Source Agency.

(k) SETTLEMENT VALUE – The Settlement Value is the amount paid to the holder of either a Short or Long Variable Payout Contract on Settlement Date. The Settlement Value of a Variable Payout Contract is determined as described in the definition for Long and Short Variable Payout Contracts.

(l) GOLD INDEX VALUE – The Source Agency shall calculate and produce a Gold Index Value once each second throughout the life of the Gold Variable Payout Contracts. That

is, each second the Source Agency will calculate a Gold Index Value by taking all GFC trade prices occurring in the ten (10) seconds leading up to the Calculation Time, close of trading of the Gold Call Spread Contract, provided at least twenty-five (25) trade prices are captured during the ten (10) second period, removing the highest twenty (20) percent of GFC trade prices and the lowest twenty (20) percent of GFC trade prices from the data set[4], and using the remaining GFC trade prices to calculate the ExpirationIndex Value. The calculation used is a simple average of the remaining GFC trade prices in the data set, rounded to one decimal point past the precision of the underlying market. In the event the time it takes to collect at least twenty-five (25) GFC trade prices exceeds the ten (10) seconds just prior to the Calculation Time close of trading of the Gold Call Spread Contract, the ExpirationIndex Value is calculated by the Source Agency by taking the last twenty-five (25) GFC trade prices just prior to the Calculation Time close of trading of the Gold Call Spread Contract removing the highest five (5) GFC trade prices and the lowest five (5) GFC trade prices, and using the remaining fifteen (15) GFC trade prices to calculate the Expiration Index Value. The calculation used is a simple average of all fifteen (15) GFC trade prices, rounded to one decimal point past the precision of the underlying market.

       (m) EXPIRATION VALUE – The Expiration Value is the Gold Index Value as released by the Source Agency at Expiration.

       (n) CONTINGENCIES – If no level is actually announced on the Expiration Date due to a delay, postponement or otherwise in such release announcement by the Source agency, the Settlement Date will be delayed until the Underlying number is released for the Series.

RULES 12.5 – 12.7 [UNCHANGED]

RULE 12.8 CRUDE OIL VARIABLE PAYOUT CONTRACTS

       RULE 12.8.1 CRUDE OIL "CALL SPREAD" VARIABLE PAYOUT CONTRACTS

       (a) SCOPE –These Rules shall apply to the Class of Contracts referred to as the Crude Oil Call Spread Variable Payout Contracts issued by Nadex.

       (b) UNDERLYING – The Underlying for this Class of Contracts is WTI Light, Sweet Crude Oil price per barrel (in US dollars), obtained from the WTI Light, Sweet Crude Oil Futures contracts ("CFC") traded on the New York Mercantile Exchange ("NYMEX®"[5]). The CFC trade prices that will be used for the Underlying will be taken from all twelve CFC delivery months: January, February, March, April, May, June, July, August, September, October, November, or December (each a "CFC Delivery Month"). The date on which a new delivery month will be used as the Underlying for Nadex contracts (i.e. "Start Date") is one calendar day after the End Date for the previous delivery month contract. The last day on which a delivery

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[4] If 20% of the data set would result in a non-integer number of trade prices, the number of trade prices to be removed from the set will be rounded down. For example, if the number of trade prices collected during the last 10 seconds prior to the close of trading was 31, 20% of the data set would be 6.2 trade prices. As 6.2 is a non-integer number, the value will be rounded down, and the 6 highest and 6 lowest trade prices will be removed from the data set.

[5] *Supra, at fn 4.*

month will be used as the Underlying for Nadex contracts (i.e. "End Date") is the Friday of the week preceding the Underlying futures contracts Expiration Date. If the Underlying futures contracts Expiration Date falls on a Monday, the End Date for that specific delivery month will be the Friday of the week preceding the week of the Underlying futures contracts Expiration Date, i.e. not the Friday that is one business day prior to the Monday Expiration Date. For example, the Nymex Crude Oil March 2012 futures have an Expiration Date of February 21, 2012. The last day on which the Crude Oil March 2012 futures prices will be used as the Underlying for Nadex contracts and to calculate the Expiration Value on the Expiration Date for the relevant Crude Oil contracts will be the Friday of the preceding week. Therefore, the End Date for using Nymex Crude Oil March 2012 futures will be February 17, 2012 and the Start Date for the next delivery month, Nymex Crude Oil April 2012 futures, will be February 18, 2012. The Nymex Crude Oil November 2012 futures, however, have an Expiration Date of Monday, October 22, 2012. The last day on which the Crude Oil November 2012 futures prices will be as the Underlying for Nadex contracts and to calculate the Expiration Value on the Expiration Date for the relevant Crude Oil contracts will be October 12, 2012, rather than October 19, 2012, and the Start Date for the next delivery month, Nymex Crude Oil December 2012 futures will be October 13, 2012.

(c) SOURCE AGENCY – The Source Agency is Nadex.

(d) TYPE – The Type of Contract is a Variable Payout Contract.

(e) PAYOUT CRITERION – The Payout Criterion for each Contract will be set by Nadex at the time the Variable Payout Contracts are initially issued. For the Crude Oil Variable Payout Contract, the Payout Criteria for the Contracts will be set as follows;

(i) DAILY CRUDE OIL CALL SPREAD VARIABLE PAYOUT CONTRACTS, 2:30 PM ET CLOSE - At the commencement of trading in a Daily Crude Oil Call Spread Variable Payout Contract, referred to as a 'Call Spread', Nadex shall list one (1) Call Spread Contract, which conforms to the Payout Criteria listed below:

(1) DAILY CRUDE OIL CALL SPREAD CONTRACT

(aa) CEILING – The Ceiling shall be X + 5.

(bb) FLOOR – The Floor shall be X – 5.

(cc) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 100.

(2) In each case, "X" equals the last Crude Oil price, as reported by the Source Agency, rounded to the nearest 1.

(ii) DAILY CRUDE OIL CALL SPREAD CONTRACTS, 2:30 PM ET CLOSE - Nadex shall list a set of three (3) Call Spread Contracts with overlapping ranges, which conform to the Payout Criteria listed below:

(1) CONTRACT 1: The Ceiling shall be X; The Floor shall be X – 5.

(2) CONTRACT 2: The Ceiling shall be X + 2.50; The Floor shall be X – 2.50.

(3) CONTRACT 3: The Ceiling shall be X + 5; The Floor shall be X.

(4) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 100.

(5) In each case, "X" equals the last Crude Oil price, as reported by the Source Agency, rounded to the nearest 1.

(iii) INTRADAY CRUDE OIL CALL SPREAD CONTRACTS, 8AM ET to 2:30 PM ET CLOSE - Nadex shall list a set of three (3) Call Spread Contracts with overlapping ranges, which conform to the Payout Criteria listed below:

(1) CONTRACT 1: The Ceiling shall be X; The Floor shall be X – 3.

(2) CONTRACT 2: The Ceiling shall be X + 1.50; The Floor shall be X – 1.50.

(3) CONTRACT 3: The Ceiling shall be X + 3; The Floor shall be X.

(4) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 100.

(5) In each case, "X" equals the last Crude Oil price, as reported by the Source Agency, rounded to the nearest 0.50.

(iv) INTRADAY 2-HOUR CRUDE OIL CALL SPREAD CONTRACTS, 10:00AM, 11:00AM, 12:00PM, 1:00PM and 2:00PM ET CLOSE - Nadex shall list a set of five (5) Call Spread Contracts that open 2 hours prior to the stated closing time(s) above with overlapping ranges, which conform to the Payout Criteria listed below:

(1) CONTRACT 1: The Ceiling shall be X – 0.75; The Floor shall be X – 2.25.

(2) CONTRACT 2: The Ceiling shall be X; The Floor shall be X – 1.50.

(3) CONTRACT 3: The Ceiling shall be X + 0.75; The Floor shall be X – 0.75.

(4) CONTRACT 4: The Ceiling shall be X + 1.50; The Floor shall be X.

(5) CONTRACT 5: The Ceiling shall be X + 2.25; The Floor shall be X + 0.75.

(6) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 100.

(7) In each case, "X" equals the last Crude Oil price, as reported by the Source Agency, rounded to the nearest 0.25.

(v) Nadex may list additional Call Spread Contracts with different ranges of Payout Criteria on a discretionary basis in accordance with the CEA and Commission Regulations.

(f) MINIMUM TICK – The Minimum Tick size for Crude Oil Call Spread Contracts shall be 0.01.

(g) POSITION LIMIT – The Position Limits for Crude Oil Call Spread Contracts shall be 25,000 Contracts.

(h) LAST TRADING DATE – The Last Trading Date of the Contract is the same date as the Settlement Date.

(i) SETTLEMENT DATE – The Settlement Date of the Contract shall be the same date as the Expiration Date.

(j) EXPIRATION DATE – The Expiration Date of the Contract will be the date on which the Crude Oil Expiration Value is released by the Source Agency.

(k) SETTLEMENT VALUE – The Settlement Value is the amount paid to the holder of either a Short or Long Variable Payout Contract on Settlement Date. The Settlement Value of a Variable Payout Contract is determined as described in the definition for Long and Short Variable Payout Contracts.

(l) EXPIRATION VALUE – The Expiration Value is the price or value of Crude Oil released by the Source Agency on the Expiration Date. The Expiration Value is calculated by the Source Agency by taking all CFC trade prices occurring in the ten (10) seconds leading up to the close of trading of the Crude Oil Call Spread Contract, provided at least twenty-five (25) trade prices are captured during the ten (10) second period, removing the highest twenty (20) percent of CFC trade prices and the lowest twenty (20) percent of CFC trade prices in the data set[6], and using the remaining CFC trade prices in the data set, to calculate the Expiration Value. The calculation used is a simple average of the remaining CFC trade prices in the data set, rounded to one decimal point past the precision of the underlying market. In the event the time it takes to collect at least twenty-five (25) CFC trade prices exceeds the ten (10) seconds just prior to the close of trading of the Crude Oil Call Spread Contract, the Expiration Value is calculated by the Source Agency by taking the last twenty-five (25) CFC trade prices just prior to the close of trading of the Crude Oil Call Spread Contract removing the highest five (5) CFC trade prices and the lowest five (5) CFC trade prices, and using the remaining fifteen (15) CFC trade prices to calculate the Expiration Value. The calculation used is a simple average of all fifteen (15) CFC trade prices, rounded to one decimal point past the precision of the underlying market.

(m) CONTINGENCIES – If no level is actually announced on the Expiration Date due to a delay, postponement or otherwise in such release announcement by the Source Agency, the Settlement Date will be delayed until the Underlying number is released for that Series.

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[6] If 20% of the data set would result in a non-integer number of trade prices, the number of trade prices to be removed from the set will be rounded down. For example, if the number of trade prices collected during the last 10 seconds prior to the close of trading was 31, 20% of the data set would be 6.2 trade prices. As 6.2 is a non-integer number, the value will be rounded down, and the 6 highest and 6 lowest trade prices will be removed from the data set.

RULE 12.8.2 CRUDE OIL "TOUCH BRACKET" VARIABLE PAYOUT
CONTRACTS

(a)   SCOPE –These Rules shall apply to the Class of Contracts referred to as the Crude
Oil Touch Bracket Variable Payout Contracts issued by Nadex.

(b)   UNDERLYING – The Underlying for this Class of Contracts is WTI Light, Sweet
Crude Oil price per barrel (in US dollars), obtained from the WTI Light, Sweet Crude Oil
Futures contracts ("CFC") traded on the New York Mercantile Exchange ("NYMEX®"[7]). The
CFC trade prices that will be used for the Underlying will be taken from all twelve CFC delivery
months: January, February, March, April, May, June, July, August, September, October,
November, or December (each a "CFC Delivery Month"). The date on which a new delivery
month will be used as the Underlying for Nadex contracts (i.e. "Start Date") is one calendar day
after the End Date for the previous delivery month contract. The last day on which a delivery
month will be used as the Underlying for Nadex contracts (i.e. "End Date") is the Friday of the
week preceding the Underlying futures contracts Expiration Date. If the Underlying futures
contracts Expiration Date falls on a Monday, the End Date for that specific delivery month will
be the Friday of the week preceding the week of the Underlying futures contracts Expiration
Date, i.e. not the Friday that is one business day prior to the Monday Expiration Date. For
example, the Nymex Crude Oil March 2012 futures have an Expiration Date of February 21,
2012. The last day on which the Crude Oil March 2012 futures prices will be used as the
Underlying for Nadex contracts and to calculate the Expiration Value on the Expiration Date for
the relevant Crude Oil contracts will be the Friday of the preceding week. Therefore, the End
Date for using Nymex Crude Oil March 2012 futures will be February 17, 2012 and the Start
Date for the next delivery month, Nymex Crude Oil April 2012 futures, will be February 18,
2012. The Nymex Crude Oil November 2012 futures, however, have an Expiration Date of
Monday, October 22, 2012. The last day on which the Crude Oil November 2012 futures prices
will be as the Underlying for Nadex contracts and to calculate the Expiration Value on the
Expiration Date for the relevant Crude Oil contracts will be October 12, 2012, rather than
October 19, 2012, and the Start Date for the next delivery month, Nymex Crude Oil December
2012 futures will be October 13, 2012.

(c)   SOURCE AGENCY – The Source Agency is Nadex.

(d)   TYPE – The Type of Contract is a Variable Payout Contract.

(e)   PAYOUT CRITERION – The Payout Criterion for each Contract will be set by
Nadex at the time the Variable Payout Contracts are initially issued. For the Crude Oil Touch
Bracket Contracts, the Payout Criteria for the Contracts will be set as follows:

(i) WEEKLY CRUDE OIL TOUCH BRACKET VARIABLE PAYOUT
CONTRACTS, Close Time is the earlier of 2:30 PM ET on the last Trade Day of the contract
listing, or when the Crude Oil Index Value is equal to or greater than the Ceiling, or equal to or
less than the Floor. Nadex shall list a set of four (4) Touch Bracket Variable Payout Contracts,

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[7] *Supra, at fn 4.*

referred to as a "Touch Bracket", that open at 6:00PM ET on the first Trade Day of the week, with overlapping ranges, which conform to the Payout Criteria listed below.

(1) CONTRACT 1: The Ceiling shall be $X + 4$; The Floor shall be $X - 1$.

(2) CONTRACT 1: The Ceiling shall be $X + 3$; The Floor shall be $X - 2$.

(3) CONTRACT 1: The Ceiling shall be $X + 2$; The Floor shall be $X - 3$.

(4) CONTRACT 1: The Ceiling shall be $X + 1$; The Floor shall be $X - 4$.

(5) DOLLAR MULTIPLIER – The Dollar Multiplier shall be 100.

(6) In each case, "X" equals the last Crude Oil price, as reported by the Source Agency, rounded to the nearest 0.25.

(ii) Upon the early Expiration of a Touch Bracket, Nadex may list a new Touch Bracket with a Ceiling of $X + 4$ (or 1) and a Floor of $X - 1$ (or 4) where X equals the Ceiling (or Floor) of the Touch Bracket that expired early. The newly listed Touch Bracket will have the same Last Trade Day as originally established for the expired Touch Bracket and the same Dollar Multiplier as the expired Touch Bracket.

(f) MINIMUM TICK – The Minimum Tick size for Crude Oil Touch Bracket Variable Payout Contracts shall be 0.01.

(g) POSITION LIMIT – The Position Limit for Crude Oil Touch Bracket Variable Payout Contracts shall be 100 Contracts.

(h) LAST TRADING DATE – The Last Trading Date of the Contract is the same date as the Settlement Date.

(i) SETTLEMENT DATE – The Settlement Date of the Contract shall be the same date as the Expiration Date.

(j) EXPIRATION DATE – The Expiration Date of the Contract shall be the date on which the Crude Oil Touch Bracket Contract Expiration Value is released by the Source Agency.

(k) SETTLEMENT VALUE – The Settlement Value is the amount paid to the holder of either a Short or Long Variable Payout Contract on Settlement Date. The Settlement Value of a Variable Payout Contract is determined as described in the definition for Long and Short Variable Payout Contracts.

(l) CRUDE OIL INDEX VALUE – The Source Agency shall calculate and produce a Crude Oil Index Value once each second throughout the life of the Crude Oil Variable Payout contracts. That is, each second the Source Agency will calculate a Crude Oil Index Value by taking all CFC trade prices occurring in the ten (10) seconds leading up to the Calculation Time, ~~close of trading of the Crude Oil Call Spread Contract,~~ provided at least twenty-five (25) trade prices are captured during the ten (10) second period, removing the highest twenty (20) percent

of CFC trade prices and the lowest twenty (20) percent of CFC trade prices in the data set[8], and using the remaining CFC trade prices in the data set, to calculate the ~~Expiration~~ Index Value. The calculation used is a simple average of the remaining CFC trade prices in the data set, rounded to one decimal point past the precision of the underlying market. In the event the time it takes to collect at least twenty-five (25) CFC trade prices exceeds the ten (10) seconds just prior to the Calculation Time ~~close of trading of the Crude Oil Call Spread Contract~~, the ~~Expiration~~ Index Value is calculated by the Source Agency by taking the last twenty-five (25) CFC trade prices just prior to the Calculation Time ~~close of trading of the Crude Oil Call Spread Contract~~ removing the highest five (5) CFC trade prices and the lowest five (5) CFC trade prices, and using the remaining fifteen (15) CFC trade prices to calculate the ~~Expiration~~ Index Value. The calculation used is a simple average of all fifteen (15) CFC trade prices, rounded to one decimal point past the precision of the underlying market.

   (m) EXPIRATION VALUE – The Expiration Value is the Crude Oil Index Value as released by the Source Agency at Expiration.

   (n) CONTINGENCIES – If no level is actually announced on the Expiration Date due to a delay, postponement or otherwise in such release announcement by the Source agency, the Settlement Date will be delayed until the Underlying number is released for the Series.

RULES 12.9 – 12.73 [UNCHANGED]

<center>*End of Rulebook.*</center>

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[8] If 20% of the data set would result in a non-integer number of trade prices, the number of trade prices to be removed from the set will be rounded down. For example, if the number of trade prices collected during the last 10 seconds prior to the close of trading was 31, 20% of the data set would be 6.2 trade prices. As 6.2 is a non-integer number, the value will be rounded down, and the 6 highest and 6 lowest trade prices will be removed from the data set.

EXHIBIT B

Week of September 8, 2020

Contract	Date of Change	Normal Strike Width	Adjusted Strike Width
Daily Gold Binary	September 8, 2020	1.5	6
2-Hour Intraday Gold Binary	September 8, 2020	1	3
Daily Silver Binary	September 8, 2020	0.05	0.1
2-Hour Intraday Silver Binary	September 8, 2020	0.03	0.06
Daily Crude Oil Binary	September 8, 2020	0.1	0.4
Weekly AUD/USD Binary	September 8, 2020	0.005	0.01
Weekly EUR/USD Binary	September 8, 2020	0.005	0.01
Weekly GBP/USD Binary	September 8, 2020	0.005	0.01
Daily GBP/USD Binary	September 8, 2020	0.002	0.004
Weekly USD/CAD Binary	September 8, 2020	0.005	0.01
2-Hour USD/CAD Binary	September 8, 2020	0.001	0.002
Weekly USD/CHF Binary	September 8, 2020	0.005	0.01
Weekly USD/JPY Binary	September 8, 2020	0.5	1
Weekly EUR/JPY Binary	September 8, 2020	0.5	1
Weekly GBP/JPY Binary	September 8, 2020	0.5	1
Daily GBP/JPY Binary	September 8, 2020	0.2	0.4
Weekly EUR/GBP Binary	September 8, 2020	0.005	0.01
Weekly AUD/JPY Binary	September 8, 2020	0.5	1
20-Minute Wall St 30 (Wide)	September 8, 2020 (10:00am-11:20am ET expirations)	6	12
20-Minute Wall St 30 (Narrow)	September 8, 2020 (11:40-12:20pm ET)	4	8
20-Minute Wall St 30 (Wide)	September 8, 2020 (Beginning 2:40pm ET expiration)	6	16
20-Minute Wall St 30 (Narrow)	September 8, 2020 (Beginning 12:40pm ET expiration)	4	16
2-Hour Wall St 30 Binary	September 8, 2020	12	24
Weekly US 500 Binary	September 8, 2020	24	48
20-Minute US 500 (Wide)	September 8, 2020	0.75	3
20-Minute US 500 (Narrow)	September 8, 2020	0.5	2
2-Hour US 500 Binary	September 8, 2020	1.5	3
20-Minute US Tech 100 (Wide)	September 8, 2020 (10:00am–11:20am ET expirations)	2	8
20-Minute US Tech 100 (Narrow)	September 8, 2020 (11:40am-12:20pm ET expirations)	1	6

20-Minute US Tech 100 (Wide)	September 8, 2020 (Beginning 2:40pm ET expiration)	2	16
20-Minute US Tech 100 (Narrow)	September 8, 2020 (Beginning 12:40pm ET expiration)	1	12
2-Hour US Tech 100 Binary	September 8, 2020	4	16
Daily US Tech 100 Binary	September 8, 2020	12	24
Weekly US Tech 100 Binary	September 8, 2020	24	144
20-Minute US SmallCap 2000 (Wide)	September 8, 2020	0.7	1.4
20-Minute US SmallCap 2000 (Narrow)	September 8, 2020	0.6	1.2
2-Hour US SmallCap 2000 Binary	September 8, 2020	1.4	2.8
Weekly US SmallCap 2000 Binary	September 8, 2020	12	24
Daily Japan 225 Binary	September 8, 2020	40	80
Weekly Japan 225 Binary	September 8, 2020	100	200
Daily China 50 Binary	September 8, 2020	20	40
Weekly China 50 Binary	September 8, 2020	100	200