

December 15, 2021

VIA COMMISSION PORTAL

Christopher J. Kirkpatrick
Secretary, Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

**Re: Commission Regulation 40.6(a) – Rule Certification
LedgerX LLC Submission No. 21-26**

Dear Mr. Kirkpatrick:

LedgerX LLC d/b/a FTX US Derivatives (“**Company**”) hereby notifies the Commodity Futures Trading Commission (the “**Commission**”), pursuant to Section 5c(c) of the Commodity Exchange Act (the “**CEA**”) and Commission Regulation 40.6(a), that it is certifying the attached amendments to its Rulebook. The attached amendments will become effective on December 31, 2021.

A concise explanation and analysis of the changes and amendments, and their compliance with applicable provisions of the CEA, including the Core Principles and the Commission’s Regulations, are as follows.

LedgerX has updated its description of “LedgerPrime,” as that term is used in the Rulebook, to include not only LedgerPrime LLC, the CFTC registered commodity pool operator that makes markets in Company products and engages in hedging activities, but also to include funds operated by LedgerPrime LLC, such as the LedgerPrime Digital Asset Opportunities Master Fund, LP, which may also make markets in Company products and engage in hedging activities. *See* Appendix A at 20.

This change is consistent with **SEF Core Principle 12, DCM Core Principle 16, and DCO Core Principle P** in that it reflects the Company’s identification and management of potential conflicts of interest. It is also consistent with **SEF Core Principle 2, DCM Core Principle 2, and DCO Core Principle C** in that it promotes fair and open access by subjecting LedgerPrime to the same access criteria as other Participants. It is also consistent with **DCM Core Principle 12 and SEF Core Principle 2** in that it affirms no LedgerPrime entity receives preferential pricing or other inherent advantage, thereby promoting fair and equitable trading.

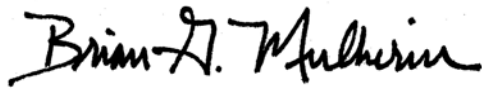
The changes and amendments to the Rulebook are reflected in a redlined copy designated as **Appendix A**. The final version of the revised Rulebook is attached at **Appendix B**.

The Company certifies that the changes and amendments comply with the CEA and Commission Regulations thereunder. The Company additionally certifies that it has concurrently posted a copy of this submission letter and the attachments hereto on the Company

website at <https://derivs.ftx.us>. The Company is not aware of any or substantive opposing views to the changes and amendments.

Please contact the undersigned at gc@ledgerx.com if you have any questions or you would otherwise like to discuss this further.

Sincerely,



Brian G. Mulherin
General Counsel, FTX US Derivatives

