

June 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. 21-15**

Dear Mr. Kirkpatrick:

LedgerX LLC (“**LedgerX**”) 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 Operations Manual. The attached amendments will become effective on June 29, 2021.

The following is 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. Broadly speaking, LedgerX has revised its operations manual to (1) reflect the replacement of the Director of Finance with the Chief Financial Officer, (2) update its operational procedures pertaining to deposits through the Automated Clearing House (“ACH”) system, (3) address the processes and procedures for managing reversals of ACH deposits and their impact on ACH reserves, and (4) revise the description of the month end accounting process.

These changes are consistent with **DCO Core Principle B** to ensure LedgerX has adequate financial, operational, and managerial resources, **DCO Core Principle F** and CFTC Regulation 39.15(c) to protect and ensure the safety of member and participant assets, and **DCO Core Principle I** to reduce operational risk through the development of appropriate controls and procedures.

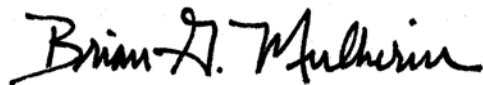
The changes are also consistent with **DCM Core Principle 21** and **SEF Core Principle 13** to ensure LedgerX has adequate financial, operational, and managerial resources. It is also consistent with **DCM Core Principle 11** and CFTC Regulation 38.603 requiring the protection of customer funds. Additionally, they are consistent with **SEF Core Principle 7** and CFTC Regulation 37.702, requiring an exchange to provide for the financial integrity of transactions. The also reduce operational risk through the development of appropriate controls and procedures, consistent with **DCM Core Principle 20** and **SEF Core Principle 14**.

A further explanation of these changes and amendments, and their compliance with Core Principles is attached hereto as Appendix A. The changes and amendments to the Operations Manual are reflected in a redlined copy designated as Appendix B. The final version of the revised Operations Manual is attached at Appendix C.

LedgerX certifies that the changes and amendments comply with the CEA and Commission Regulations thereunder. LedgerX additionally certifies that it has concurrently posted a copy of this submission letter and the attachments hereto on LedgerX's website at <https://ledgerx.com/>. LedgerX 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, LedgerX LLC

