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January 28, 2021

**BY ELECTRONIC SUBMISSION**

Christopher J. Kirkpatrick

Office of the Secretariat

U.S. Commodity Futures Trading Commission

Three Lafayette Centre

1155 21st Street, N.W.

Washington, D.C. 20581

**Re: SwapEx CFTC Submission 01-21: Certification Pursuant to Commission Rule 40.6 – Rule Amendments**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the

regulations of the Commodity Futures Trading Commission (the “CFTC” or “Commission”), SwapEx, LLC (“SwapEx”, or the “Company”) hereby notifies the Commission that it has amended its Rulebook and that it is certifying those amendments. The Rulebook has been amended to conform to requirements for error trades as set out in the amended CFTC Regulation 37.9. The amended Rulebook will become effective on February 16, 2021.

A concise explanation of the amendments to the Rulebook and their compliance with applicable provisions of the Act, including core principles and the Commission’s regulations, is attached hereto as Exhibit A. A clean copy of the amended Rules is attached hereto as Exhibit B, and a copy of the Rules marked to show changes against the version submitted to the Commission as part of the Rule certification on March 5, 2020, is attached hereto as Exhibit C. SwapEx hereby certifies that: (i) the amended Rulebook complies with the Act and the Commission’s regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on SwapEx’s web site. There were no substantive opposing views to the amendments to the Rulebook.

If you have questions, please contact the undersigned at (212) 259-3126 or [KAAluise@statestreet.com](mailto:KAAluise@statestreet.com)

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Sincerely,

Karen A. Aluise

Chief Compliance Officer

Encl. (Exhibits A, B and C)