

March 10, 2022

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. 22-02**

Dear Mr. Kirkpatrick:

LedgerX LLC (d/b/a FTX US Derivatives) (the “**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 update to its Privacy Policy, which is incorporated by reference into Company Participant Agreement. The Participant Agreement and Company User Agreement have also been slightly amended. The attached amendments will become effective on March 24, 2022.

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.

The Participant Agreement has been amended to replace references to the Company’s legal name with references to the “**Company**.” It has also been amended to incorporate by reference the Company User Agreement and the Company Privacy Policy. Similarly, the User Agreement, which is incorporated by reference into the Participant Agreement, has been amended to replace references to the Company’s legal name with references to the “**Company**.”

The Privacy Policy, which is incorporated by reference into the Participant Agreement, has been completely updated to inform the Company’s customers about how the Company uses, stores, processes, and shares customers’ personal information.

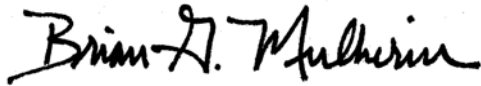
These changes are consistent with **SEF Core Principle 5** in that they clarify the rules allowing the Company to obtain any necessary information. They are also consistent with **SEF Core Principle 9** and **DCM Core Principle 10** in that they clarify our procedures for the recording and safe storage of all identifying trade information. They are also consistent with **DCM Core Principles 18 and 23**, **SEF Core Principle 10**, and **DCO Core Principal K** in that they set forth the Company’s policies on required recordkeeping. They are also consistent with **DCO Core Principal J** in that they clarify the Company’s policies on reporting necessary information to the Commission. Finally, they are also consistent with **DCM Core Principles 3 and 4**, **SEF Core Principle 3**, as well as **DCO Core Principal M**, in that they set forth the Company’s policies relating to information sharing.

The changes and amendments to the Participant Agreement are reflected in a redlined copy designated as **Appendix A**. The final version of the revised Participant Agreement is attached at **Appendix B**. The changes and amendments to the User Agreement are reflected in a redlined copy designated as **Appendix C**. The final version of the revised User Agreement is attached at **Appendix D**. The changes to the Privacy Policy are reflected in a redlined copy designated as **Appendix E**. The final version of the revised Privacy Policy is attached at **Appendix F**.

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