

March 12, 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. 21-07**

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 March 26, 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, is attached hereto as Appendix A. LedgerX has revised its Operations Manual to update its procedures for managing situations where the key for a accessing a digital currency wallet has been compromised. It has also revised the Operations Manual to allow more flexibility in the time for reconciling accounts.

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.

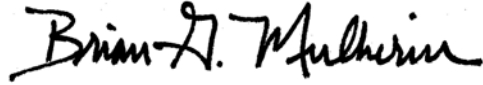
The changes are also consistent with DCM Core Principle 21 to ensure LedgerX has adequate financial, operational, and managerial resources, DCM Core Principle 11 and CFTC Regulation 38.603 to protect customer funds, and DCM Core Principle 20 to reduce operational risk through the development of appropriate controls and procedures.

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.

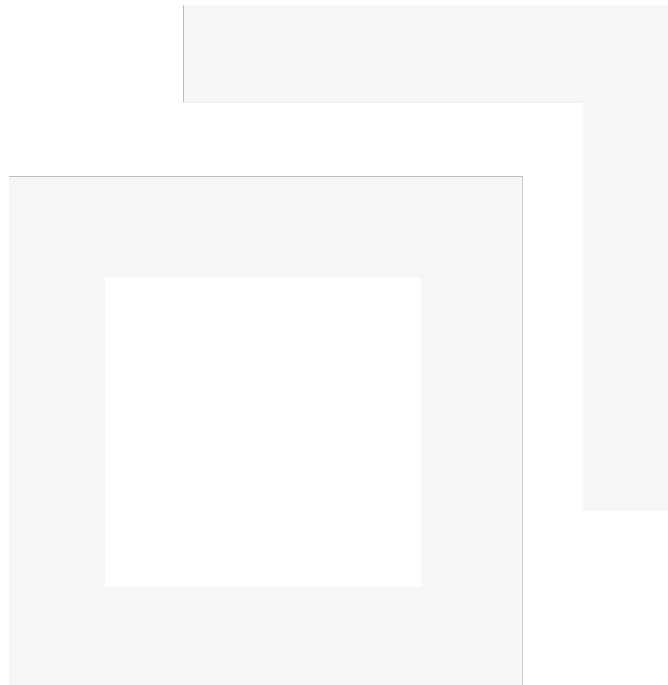
LedgerX certifies that the changes and amendments comply with the CEA and Commission Regulations thereunder. LedgerX additionally certifies that it has concurrently posted a copy of this submission letter and the attachments hereto on LedgerX’s website at <https://ledgerx.com/>. LedgerX is not aware 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,



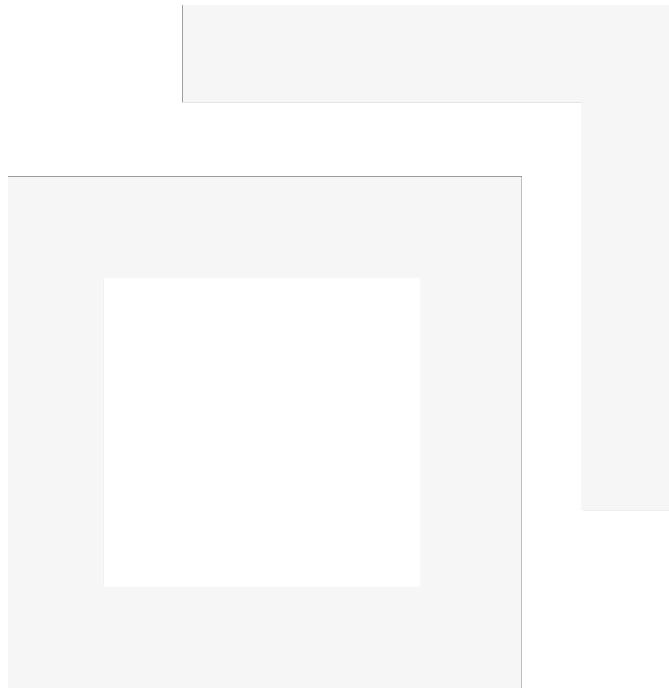
Brian G. Mulherin
General Counsel, LedgerX LLC



FOIA CONFIDENTIAL TREATMENT REQUESTED BY LEDGERX LLC

Appendix A

REDACTED

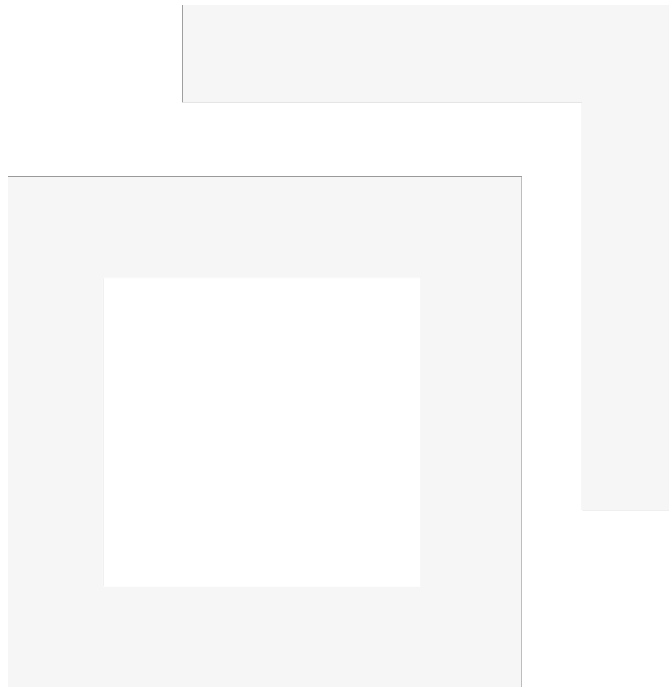


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Appendix B

REDACTED

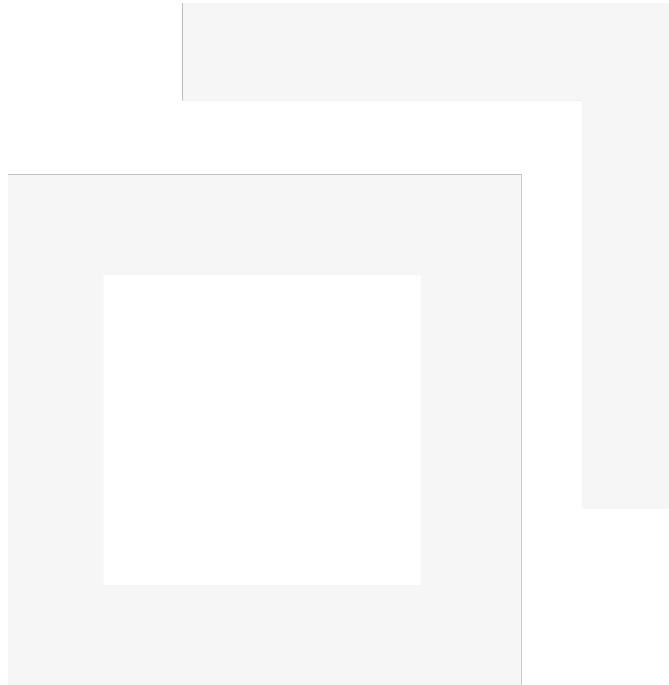


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FOIA CONFIDENTIAL TREATMENT REQUESTED BY LEDGERX LLC

Appendix C

REDACTED



FOIA CONFIDENTIAL TREATMENT REQUESTED BY LEDGERX LLC