

## Ledger Holdings Inc

June 24, 2019

### **VIA SEF & DCO COMMISSION PORTALS**

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. 19-11**

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 changes and amendments to its Rulebook. The attached changes and amendments will become effective no earlier than July 9, 2019.

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. A copy of the LedgerX Rulebook is designated as Appendix B.

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 non-confidential 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.

\* \* \* \*

---



---

## Ledger Holdings Inc

Please contact the undersigned at (917) 267-2381 or [juthica@ledgerx.com](mailto:juthica@ledgerx.com) if you have any questions or you would otherwise like to discuss this further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Juthica Chou'.

Juthica Chou  
Chief Operating Officer  
LedgerX LLC



Appendix A

<b>Rule/Section</b>	<b>Explanation</b>	<b>Core Principle or other CEA Provision, Commission Regulation and/or Commission Staff Letter</b>
LedgerX Rulebook	Overall revisions made as part of the LedgerX DCM Application.	No changes to SEF or DCO Core Principles.





---

Ledger Holdings Inc

**Appendix B**

[SEE LEDGERX RULEBOOK]

