



June 7, 2024

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. 24-10**

Dear Mr. Kirkpatrick:

LedgerX LLC d/b/a MIAx Derivatives Exchange (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 amendments to the Company’s **Privacy Policy**. The attached amendments will become effective within 10 business days hereof. The current estimated effective date is **June 24, 2024**.

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 Privacy Policy has been amended to add references to the Company’s new d/b/a “MIAx Derivatives Exchange.” A summary description of the business of the Company has also been updated to reflect that the Company is a “derivatives exchange and clearinghouse,” instead of a “cryptocurrency trading” venue. For clarity, the Privacy Policy has also been revised to substitute reference to a “financial information privacy notice” with an internal reference to the Privacy Policy itself, which incorporates relevant information. Specific reference to where the Privacy Policy will be posted has also been removed from the policy itself. Erroneous references to Terms of Service have been corrected and substituted with reference to agreements and rules, as appropriate to the context. Finally, the corporate address of the Company has been updated. Other minor grammatical and typographical errors have also been corrected.

These changes are consistent with **DCO Core Principle R**, in that they reinforce a well-founded, transparent, and enforceable legal framework. They are also consistent with **DCM Core Principle 2**, **SEF Core Principle 2**, and **DCO Core Principle H** in that they enable the Company to establish, monitor and enforce compliance with its rules. Additionally, they are consistent with **SEF Core Principle 5** in that they make clear the rules allowing the Company to obtain any necessary information. They are also consistent with **DCM Core Principle 10** in that they establish procedures for the recording and safe storage of all identifying trade information.



Consistent with **DCM Core Principles 18 and 23**, **SEF Core Principle 10**, and **DCO Core Principle K**, they also reinforce the Company's policies on required recordkeeping.

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

The Company certifies that the above 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://ledgerx.com/reg-notices>. The Company is not aware of any substantive opposing views to these 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,

A handwritten signature in black ink that reads "Brian G. Mulherin". The signature is written in a cursive, flowing style.

Brian G. Mulherin, General Counsel
LedgerX LLC d/b/a MIAX Derivatives Exchange