



August 20, 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. 24-12**

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 Derivatives Clearing Organization (“**DCO**”) Rulebook. The attached amendments will become effective within 10 business days hereof. The current estimated effective date is **September 4, 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.

Subparagraph M of Rule 3.3 has been added to clarify that all Participants, Authorized Users, or other Persons subject to the Company’s jurisdiction must comply with any order of the Board of Directors, any Board Committee, hearing committee, arbitration panel or Company staff. Similarly, Rule 3.3E has been revised to clarify that all Participants must promptly pay all fees and expenses as specified by the Company. These revisions are consistent with **DCO Core Principle H** in that they enable the Company to establish, monitor, and enforce compliance with its rules.

The changes and amendments to the DCO Rulebook are reflected in a redlined copy designated as **Appendix A**. The final version of the revised DCO Rulebook 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-notice>. 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,

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