

October 3, 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. 22-13**

Dear Mr. Kirkpatrick:

LedgerX LLC, d/b/a FTX US Derivatives, (“FUSD”) 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 FUSD Compliance Manual. The attached amendments will become effective on October 18, 2022.

The following is 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. FUSD has revised its compliance manual to minimize potential conflicts of interest with affiliated or related market participants. While this policy previously was scoped to one entity that was part of the FUSD corporate family, it has been expanded to include affiliated or related market participants owned by a controlling shareholder of FUSD, regardless of whether the entity is part of the FUSD corporate family. Additionally, provisions no longer applicable to a previously owned affiliate have been removed.

The above changes are consistent with core principals as follows. They are consistent with **DCM Core Principle 16** in that they minimize potential conflicts of interest between the self-regulatory responsibilities and the commercial interests of the contract market. They are also consistent with **SEF Core Principle 12**, in that they establish rules to minimize conflicts of interest in its decision-making process. They are also consistent with **DCO Core Principle P**, in that it establishes rules to minimize conflicts of interest in the decision making process of the derivatives clearing organization.

Redlines reflecting these changes and amendments to the Compliance Manual are attached hereto as Appendix A. The final version of the revised Compliance Manual is attached at Appendix B.

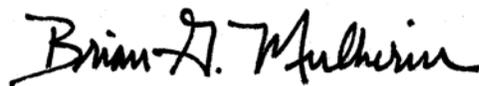
FUSD certifies that the changes and amendments comply with the CEA and Commission Regulations thereunder. FUSD additionally certifies that it has concurrently posted a copy of this

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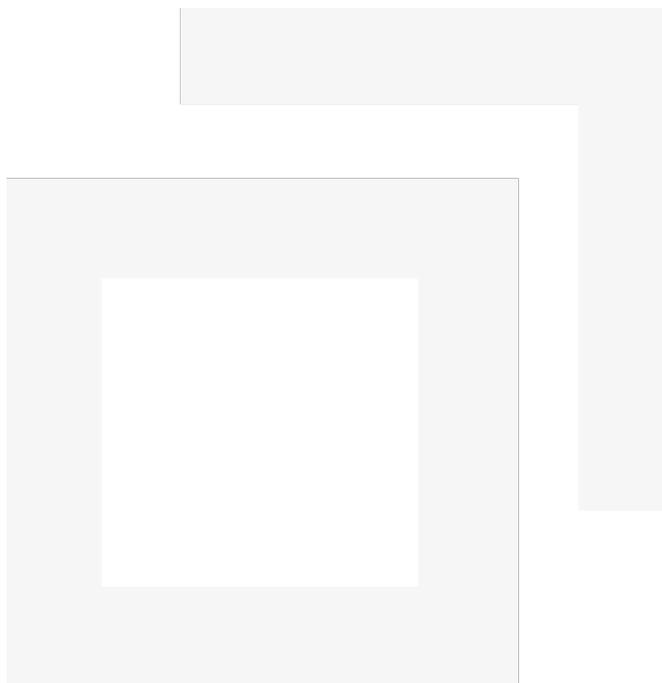
submission letter and the attachments hereto on FUSD's website at <https://derivs.ftx.us/>. FUSD is not aware of any or substantive opposing views to the changes and amendments.

Please contact the undersigned at [brian@ftx.us](mailto:brian@ftx.us) if you have any questions or you would otherwise like to discuss this further.

Sincerely,



Brian G. Mulherin  
General Counsel, FTX US Derivatives

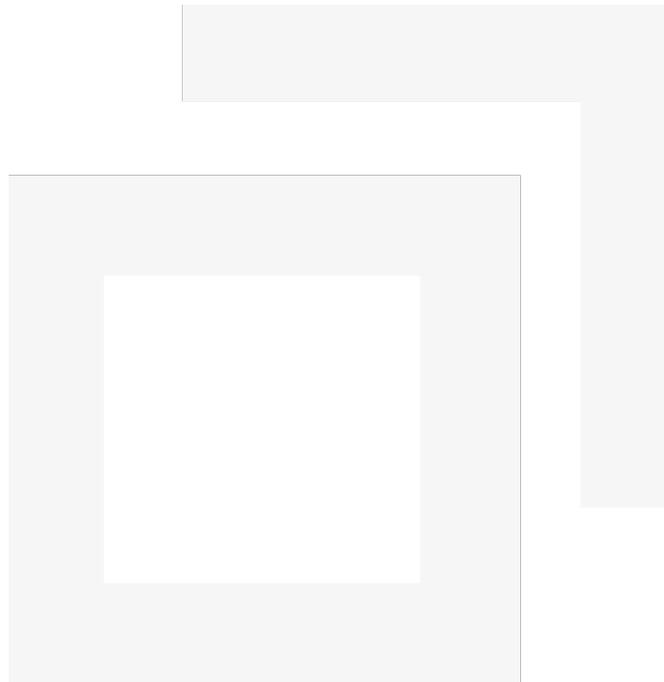


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**FOIA CONFIDENTIAL TREATMENT REQUESTED BY LEDGERX LLC dba FTX US DERIVATIVES**

**APPENDIX A**

**REDACTED**



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**FOIA CONFIDENTIAL TREATMENT REQUESTED BY LEDGERX LLC dba FTX US DERIVATIVES**

**APPENDIX B**

**REDACTED**

