

June 14, 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. 21-14**

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 a manual pertaining to the custody of digital currency. The attached amendments will become effective on June 28, 2021.

The following is a concise explanation and analysis of the changes and amendments to the manual pertaining to the custody of digital currency, and their compliance with applicable provisions of the CEA, including the Core Principles and the Commission’s Regulations. These revisions are all consistent with **DCO Core Principle I**, as well as CFTC Regulation 39.18 requiring LedgerX to establish and maintain emergency procedures and a plan for disaster recovery. *See* CEA § 5b(c)(2)(I); *see also* 17 C.F.R. § 39.18.

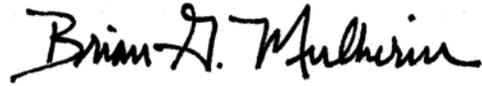
1. The date of the revised manual is reflected.
2. New procedures have been added to address the addition of a new vendor which enhances security in connection with custodied digital currency.
3. Outdated procedures reflecting the former system of securing the custody of digital currency have been eliminated.

The changes and amendments to the manual pertaining to the custody of digital currency are reflected in a redlined copy designated as Exhibit A. The final version of the revised manual pertaining to the custody of digital currency is attached at Exhibit B.

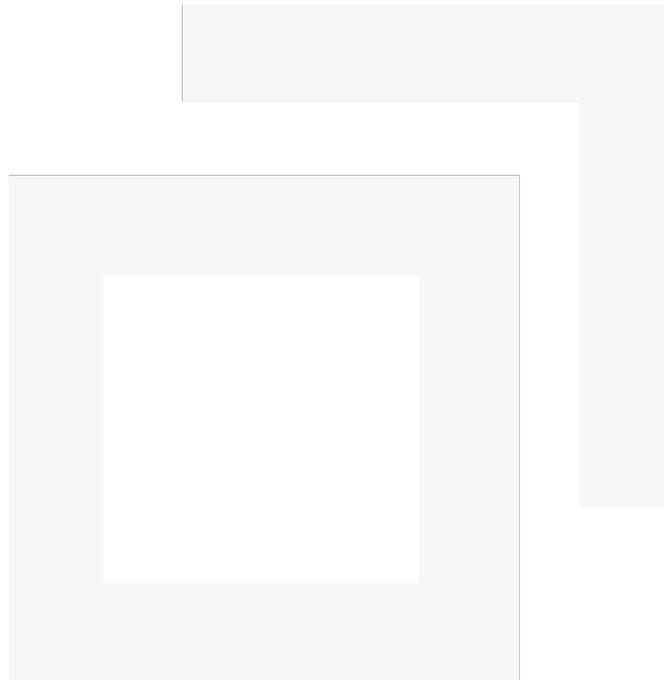
LedgerX certifies that the changes and amendments comply with the CEA and Commission Regulations thereunder. LedgerX additionally certifies that it has concurrently posted a copy of this submission letter and the attachments hereto on LedgerX’s website at <https://ledgerx.com/>. LedgerX is not aware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

Please contact the undersigned at [gc@ledgerx.com](mailto: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

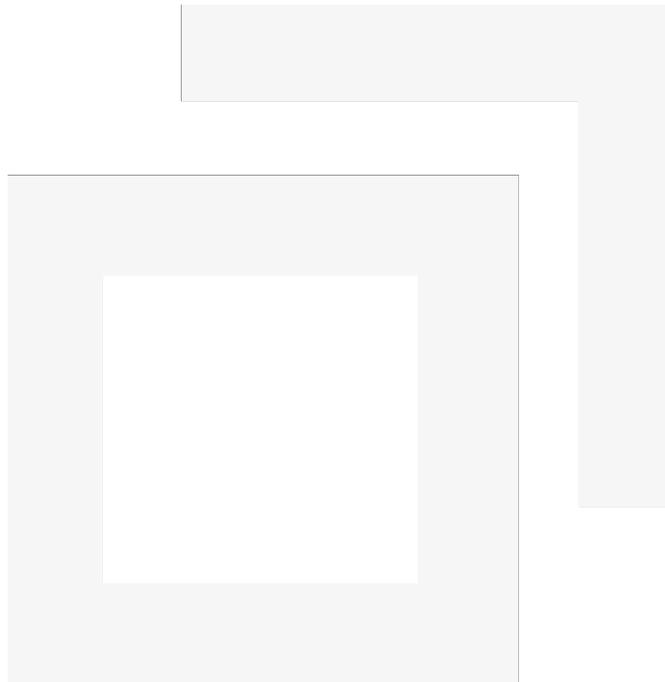


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**FOIA CONFIDENTIAL TREATMENT REQUESTED BY LEDGERX LLC**

**Exhibit A**

**REDACTED**



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FOIA CONFIDENTIAL TREATMENT REQUESTED BY LEDGERX LLC

Exhibit B

**REDACTED**

