

coinbase DERIVATIVES

LMX Labs, LLC
d/b/a Coinbase Derivatives
20 N. Wacker Drive
Suite 3000
Chicago, IL 60606

LMX Labs, LLC Submission #2022-09E

April 12, 2021

Mr. Christopher J. Kirkpatrick
Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
VIA CFTC Electronic Filing

Re: CFTC Regulation 40.6 Certification: Supplemental Lead Market Maker Program

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission (“CFTC” or “Commission”) Regulation 40.6(a), LMX Labs, LLC, d/b/a Coinbase Derivatives (the “Exchange”) hereby submits for self-certification its Supplemental Lead Market Maker Program (the “Program”). The Program will incentivize liquidity and volume in the Exchange’s products. The terms and conditions of the Program are set forth in Exhibit A. The Program will become effective on April 26, 2022.

Compliance with Core Principles

The Exchange has reviewed the designated contract market (“DCM”) core principles (“Core Principles”) set forth in the Commodity Exchange Act and has identified that the Program may most directly implicate the following Core Principles:

Core Principle 2 -- Compliance with Rules and Core Principle 4 -- Prevention of Market Disruption

All trading on the Exchange, including any trading and related activity by participants under the Program, is subject to the LMX Labs Rulebook (the “Rulebook”) including Chapter 5, which prohibits fraud, non-competitive trading, market manipulation and abusive and disruptive trade practices. Capitalized terms not otherwise defined herein are defined in the Rulebook. Additionally, as with all trading on the Exchange, trading in the Program’s products will be subject to monitoring and surveillance by the Market Regulation Department, which has the authority to investigate and enforce Exchange rules, as described in Chapter 7.

Core Principle 9 -- Execution of Transactions

The Program’s products are listed for trading on the Exchange’s trading system, which provides for efficient, competitive, and open execution of transactions pursuant to the Exchange rules.

Core Principle 12 -- Protection of Markets and Market Participants

Chapters 4 and 5 of the Rulebook require all market participants, including those participating in the Program, to observe high standards of integrity, market conduct, commercial honor, fair dealing, and just and equitable principles of trade and prohibits, among other things, fraud, non-competitive trading, market manipulation, and abusive and disruptive trade practices. As with all contracts traded on the Exchange, trading in the Program's products will be subject to monitoring and surveillance by the Market Regulation Department and compliance with the Program will be monitored and enforced by the Exchange.

Core Principle 18 – Recordkeeping

Records related to the Program will be maintained by the Exchange in compliance with its recordkeeping policies and the requirements of the Commodity Exchange Act and CFTC Rules.

Certification

The Exchange is not aware of any substantive opposing views to the Program. The Exchange certifies that the Program complies with the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at: www.lmxlabs.com.

If you have any questions or require any further information, please contact me at 773-409-4128 or anne.loranger@coinbase.com

Sincerely,

/s/

Anne Loranger
Chief Regulatory Officer

Attachments: Exhibit A

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APPENDIX A

SUPPLEMENTAL LEAD MARKET MAKER PROGRAM OBLIGATIONS AND INCENTIVES

As of April 26, 2022

SUPPLEMENTAL LEAD MARKET MAKER OBLIGATIONS

Quoting Obligations

REDACTED

Incentives

REDACTED

THE EXCHANGE:

Coinbase Derivatives

By: _____

Its: Chief Executive Officer

Printed Name: Boris Ileyky

SUPPLEMENTAL LEAD MARKET MAKER:

Its: _____

Printed Name: _____