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**Via Electronic Mail**

November 20, 2020

Ms. Claudette Ransom  
US Securities and Exchange Commission  
Division of Trading and Markets  
Station Place – Building I  
100 F Street, N.E. – Room 7010  
Washington, DC 20549

**Re: 19b-4(e) – Transmittal (NYSE Arca, Inc.)**

Dear Ms. Ransom:

Enclosed for filing pursuant to Section 19(b) of the Securities Exchange Act of 1934 and Rule 19b-4 thereunder, please find the electronically signed Form 19b-4(e) with respect to the securities listed below.

**JPMorgan BetaBuilders U.S. Small Cap Equity ETF (BBSC)  
Leatherback Long/Short Alternative Yield ETF (LBAY)  
Dimensional US Core Equity Market ETF (DFAU)  
Dimensional International Core Equity Market ETF (DFAI)  
ATAC US Rotation ETF (RORO)  
GraniteShares Bloomberg Commodity Broad Strategy No K-1 ETF (COMB)  
GraniteShares HIPS US High Income ETF (HIPS)  
GraniteShares XOUT U.S. Large Cap ETF (XOUT)  
Virtus Newfleet Dynamic Credit ETF (BLHY)  
Virtus Seix Senior Loan ETF (SEIX)  
InfraCap MLP ETF (AMZA)  
Virtus LifeSci Biotech Clinical Trials ETF (BBC)  
Virtus LifeSci Biotech Products ETF (BBP)  
Virtus Newfleet Multi-Sector Bond ETF (NFLT)  
Virtus InfraCap U.S. Preferred Stock ETF (PFFA)  
InfraCap REIT Preferred ETF (PFFR)  
Virtus Reaves Utilities ETF (UTES)  
Virtus Private Credit Strategy ETF (VPC)  
Virtus Real Asset Income ETF (VRAI)  
US Vegan Climate ETF (VEGN)**

If you have any questions, please do not hesitate to call me at (212) 656-2938.

Sincerely,

Clare F. Saperstein

Enclosures

|                                                                                                                                                                                                                                                                                                                                                                           |  |                               |  |                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------|--|-------------------------------------------------------------------------------------------------|
| For Internal Use Only                                                                                                                                                                                                                                                                                                                                                     |  | Submit 1 Original             |  | OMB Approval No.:                                                                               |
| Sec File No. 91 -                                                                                                                                                                                                                                                                                                                                                         |  | and 9 Copies                  |  | Expires:                                                                                        |
| Estimated average burden hours per response: 2.00                                                                                                                                                                                                                                                                                                                         |  |                               |  |                                                                                                 |
| <p align="center"><b>UNITED STATES</b><br/> <b>SECURITIES AND EXCHANGE COMMISSION</b><br/> Washington, D.C. 20549<br/> <b>FORM 19b-4(e)</b></p>                                                                                                                                                                                                                           |  |                               |  |                                                                                                 |
| <p align="center"><b>Information Required of a Self-Regulatory Organization Listing and Trading a New<br/> Derivative Securities Product Pursuant to Rule 19b-4(e) Under the Securities Exchange Act of 1934</b></p>                                                                                                                                                      |  |                               |  |                                                                                                 |
| <p align="center"><b>READ ALL INSTRUCTIONS PRIOR TO COMPLETING FORM</b></p>                                                                                                                                                                                                                                                                                               |  |                               |  |                                                                                                 |
| <b>Part I</b>                                                                                                                                                                                                                                                                                                                                                             |  | <b>Initial Listing Report</b> |  |                                                                                                 |
| 1. Name of Self-Regulatory Organization Listing New Derivative Securities Product:                                                                                                                                                                                                                                                                                        |  |                               |  |                                                                                                 |
| NYSE Arca, Inc.                                                                                                                                                                                                                                                                                                                                                           |  |                               |  |                                                                                                 |
| 2. Type of Issuer of New Derivative Securities Product (e.g., clearinghouse, broker-dealer, corporation, etc.):                                                                                                                                                                                                                                                           |  |                               |  |                                                                                                 |
| Open-end Management Investment Company                                                                                                                                                                                                                                                                                                                                    |  |                               |  |                                                                                                 |
| 3. Class of New Derivative Securities Product:                                                                                                                                                                                                                                                                                                                            |  |                               |  | <br>20014665 |
| Exchange-Traded Fund Shares                                                                                                                                                                                                                                                                                                                                               |  |                               |  |                                                                                                 |
| 4. Name of Underlying Instrument:                                                                                                                                                                                                                                                                                                                                         |  |                               |  |                                                                                                 |
| n/a                                                                                                                                                                                                                                                                                                                                                                       |  |                               |  |                                                                                                 |
| 5. If Underlying Instrument is an Index, State Whether it is Broad-Based or Narrow-Based:                                                                                                                                                                                                                                                                                 |  |                               |  |                                                                                                 |
| n/a                                                                                                                                                                                                                                                                                                                                                                       |  |                               |  |                                                                                                 |
| 6. Ticker Symbol(s) of New Derivative Securities Product:                                                                                                                                                                                                                                                                                                                 |  |                               |  |                                                                                                 |
| SEIX                                                                                                                                                                                                                                                                                                                                                                      |  |                               |  |                                                                                                 |
| 7. Market or Markets Upon Which Securities Comprising Underlying Instrument Trades:                                                                                                                                                                                                                                                                                       |  |                               |  |                                                                                                 |
| n/a                                                                                                                                                                                                                                                                                                                                                                       |  |                               |  |                                                                                                 |
| 8. Settlement Methodology of New Derivative Securities Product:                                                                                                                                                                                                                                                                                                           |  |                               |  |                                                                                                 |
| Regular way trades settle on T+2/Book entry only held in DTC.                                                                                                                                                                                                                                                                                                             |  |                               |  |                                                                                                 |
| 9. Position Limits of New Derivative Securities Product (if applicable):                                                                                                                                                                                                                                                                                                  |  |                               |  |                                                                                                 |
| Not applicable.                                                                                                                                                                                                                                                                                                                                                           |  |                               |  |                                                                                                 |
| <b>Part II</b>                                                                                                                                                                                                                                                                                                                                                            |  | <b>Execution</b>              |  |                                                                                                 |
| The undersigned represents that the governing body of the above-referenced Self-Regulatory Organization has duly approved, or has duly delegated its approval to the undersigned for, the listing and trading of the above-referenced new derivative securities product according to its relevant trading rules, procedures, surveillance programs and listing standards. |  |                               |  |                                                                                                 |
| Name of Official Responsible for Form:                                                                                                                                                                                                                                                                                                                                    |  |                               |  |                                                                                                 |
| Clare F. Saperstein                                                                                                                                                                                                                                                                                                                                                       |  |                               |  |                                                                                                 |
| Title:                                                                                                                                                                                                                                                                                                                                                                    |  |                               |  |                                                                                                 |
| Associate General Counsel                                                                                                                                                                                                                                                                                                                                                 |  |                               |  |                                                                                                 |
| Telephone Number:                                                                                                                                                                                                                                                                                                                                                         |  |                               |  |                                                                                                 |
| (212) 656-2355                                                                                                                                                                                                                                                                                                                                                            |  |                               |  |                                                                                                 |
| Manual Signature of Official Responsible for Form:                                                                                                                                                                                                                                                                                                                        |  |                               |  |                                                                                                 |
| Clare F. Saperstein                                                                                                                                                                                                                                                                                                                                                       |  |                               |  |                                                                                                 |
| November 20, 2020                                                                                                                                                                                                                                                                                                                                                         |  |                               |  |                                                                                                 |