

New York Stock Exchange 11 Wall Street New York, NY 10005

January 16, 2020

Chief, Information Technology Securities and Exchange Commission Division of Corporate Finance 100 F Street, NE MS 3040 Washington, DC 20549

To whom it may concern:

The NYSE Arca certifies its approval for listing and registration of the Shares of beneficial interest, no par value per share of Day Hagan/Ned Davis Research Smart Sector ETF, a series of Strategy Shares under the Exchange Act of 1934.

Sincerely,

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