

**To:** File

**From:** Barbara Roper  
Senior Advisor to the Chair  
U.S. Securities and Exchange Commission

**Date:** April 14, 2022

**Re:** Meeting with Thrivent regarding its Rulemaking Petition to Abrogate or Amend Certain FINRA Arbitration Rules

On Tuesday, April 12, 2022, Barbara Roper, Senior Advisor to the Chair, met with the following representatives of Thrivent and its outside legal counsel: Paul Johnston, EVP and General Counsel, Thrivent Financial for Lutherans; Jim Odland, VP and Managing Counsel, Thrivent Financial for Lutherans; Nicole James Gilchrist, VP and Managing Counsel, Thrivent Financial for Lutherans and Chief Legal Officer, Thrivent Investment Management Inc.; David Westmark, Legal Consultant for Thrivent Financial for Lutherans; Andrew Kay, Partner, Venable LLP; Randy Seybold, Partner, Venable LLP; Richard Choi, Shareholder, Carlton Fields, P.A.; and Ann Furman, Shareholder, Carlton Fields, P.A.

The topic discussed was Thrivent's December 29, 2021 Petition for Rulemaking to Abrogate or Amend Financial Industry Regulatory Authority Rules 2268(d), 12200, and 12204(d), File No. 4-781.