

## MEMORANDUM

**TO:** File Number S7-04-21

**FROM:** Sheila Dombal Swartz  
Senior Special Counsel  
Office of Financial Responsibility, Division of Trading and Markets  
U.S. Securities and Exchange Commission

**DATE:** July 14, 2021

**RE:** Meeting with Representatives of Bank of America

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On July 14, 2021, Commission staff met via telephone with Greg Gottschall, Anna Shender, Oscar Anot, Thomas Green, Bryan Lynch, Natasha Joly, Waqaas Fahmawi, Mark DeAngelis, Neil Grindrod, John O'Hara, Mita Jash, Miller Brownstein, Alex Kerdman, and Karen Capalad, representatives of Bank of America, in connection with the proposed order for substituted compliance for security-based swap dealers and major security-based swap participants subject to regulation in United Kingdom. Commission staff included Mike Macchiaroli, Randall Roy, and Sheila Swartz. The Bank of America representatives discussed substituted compliance with respect to Securities Exchange Act rules 18a-1 and 18a-3.