

## MEMORANDUM

**TO:** File Nos. S7-04-22, S7-09-22

**FROM:** David Joire,  
Senior Special Counsel, Division of Investment Management

**RE:** Videoconference with Representatives of Axio and Venn Strategies

**DATE:** April 22, 2022

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On April 20, 2022, staff from the U.S. Securities and Exchange Commission (“SEC”) held a videoconference with representatives of Axio and Venn Strategies.

Participants included SEC staff from the Division of Investment Management: David Joire (Senior Special Counsel), and Christopher Staley (Branch Chief); SEC staff from the Division of Corporation Finance: Elizabeth Murphy (Associate Director), Luna Bloom (Office Chief), and Ian Greber-Raines (Special Counsel); and the following representatives from Axio and Venn Strategies:

- Scott Kannry – Axio (Chief Executive Officer)
- David White – Axio (President)
- Ben Steinberg – Venn Strategies (Executive Vice President)
- Peter Fawley – Venn Strategies (Senior Associate)

Among other things, the participants discussed the SEC’s proposals titled “Cybersecurity Risk Management for Investment Advisers, Registered Investment Companies, and Business Development Companies,” set forth in Release Nos. 33-11028; 34-94197; IA-5956; IC-34497 (Feb. 9, 2022); and “Cybersecurity Risk Management, Strategy, Governance, and Incident Disclosure,” set forth in Release Nos. 33-11038; 34-94382; IC-34529 (Mar. 9, 2022).