MEMORANDUM

TO: File No. S7-04-22

FROM: Staff from the Division of Investment Management, U.S. Securities and Exchange

Commission

RE: Meeting with Representatives of Cole-Frieman & Mallon

DATE: March 20, 2024

On March 20, 2024, staff from the U.S. Securities and Exchange Commission met with representatives of Cole-Frieman & Mallon.

SEC staff participants included staff from the Division of Investment Management (Melissa Roverts Harke, Robert Holowka, David Joire, Y. Rachel Kuo, Daniel Levine, Lawrence Pace, Alexis Palascak, and Janet Jun) as well as staff from the Division of Economic and Risk Analysis (Marina Martynova and Ricardo Lopez Rago).

Cole-Frieman & Mallon representatives included John T. Araneo and John Allenza.

Participants discussed the SEC's rulemaking proposal 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).