

**MEMORANDUM**

**To:** File No. S7-06-22; File No. S7-32-10

**From:** Corey Klemmer  
Policy Counsel to the Chair  
U.S. Securities and Exchange Commission

**Date:** March 9, 2023

**Re:** Discussion with Americans for Financial Reform

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On Friday, January 20, 2023, Corey Klemmer, Policy Counsel to the Chair, and Heather Percival, Policy Counsel to the Chair, met virtually with Andrew Park, Senior Policy Analyst and Natalie Renta, Lead on Corporate Governance from Americans for Financial Reform (AFR) to discuss proposed rule *Modernization of Beneficial Ownership Reporting* (Release Nos. 33-11030; 34-94211; File No. S7-06-22) and the proposed rule *Prohibition Against Fraud, Manipulation, or Deception in Connection with Security-Based Swaps; Prohibition against Undue Influence over Chief Compliance Officers; Position Reporting of Large Security-Based Swap Positions* (Release No. 34-93784; File No. S7-32-10).