MEMORANDUM

To: File No. S7-08-12

From: Richard Gabbert, Counsel to Commissioner Hester M. Peirce

Re: Telephone Call with Representative of Mizuho

On May 13, 2019, Richard Gabbert, legal advisor to Commissioner Peirce, participated in a telephone call with Adam Hopkins of Mizuho.

Participants discussed briefly various technical issues related to proposed capital requirements for security-based swap dealers.