

MEMORANDUM

TO: File No. S7-09-22
FROM: Ian Greber-Raines, Special Counsel, Division of Corporation Finance
RE: Videoconference with Rapid7
DATE: August 11, 2022

On August 9, 2022, staff from the U.S. Securities and Exchange Commission (“SEC”), held a videoconference with representatives from and on behalf of Rapid7.

Participants in the videoconference included SEC staff from the Division of Corporation Finance: Elizabeth Murphy (Associate Director), Luna Bloom (Office Chief), Ian Greber-Raines (Special Counsel), and Nabeel Cheema (Special Counsel); SEC staff from the Division of Economic and Risk Analysis: Charles Woodworth (Deputy Chief Counsel), Connor Hurley (Financial Economist), Albert Sheen (Financial Economist), and Sejal Naik (Financial Economist).

The following representatives from and on behalf of Rapid7 participated in the videoconference:

- Harley Geiger – Senior Director for Public Policy, Rapid7;
- Raisa Litmanovich – Senior Vice President and General Counsel, Rapid7;
- Jeremiah Dewey – Vice President for Managed Services Delivery Practice, Rapid7;
- Kyra Ayo Caros – Director for Corporate Securities & Compliance, Rapid7;
- Peter Woolverton – Public Policy Intern, Rapid7; and
- David Thomas – Partner, Mehlman Castagnetti Rosen & Thomas on behalf of Rapid7.

The general topic discussed was the SEC’s proposed rules on “Cybersecurity Risk Management, Strategy, Governance, and Incident Disclosure,” set forth in Release Nos. 33-11038, 34-94382, IC-34529 (Mar. 9, 2022).