

MEMORANDUM

TO: File No. S7-09-22

FROM: Nabeel Cheema, Division of Corporation Finance

RE: Meeting with Rapid7

DATE: December 16, 2022

On December 13, 2022, Luna Bloom and Nabeel Cheema of the U.S. Securities and Exchange Commission's Division of Corporation Finance held a videoconference with representatives of Rapid7.

The following individuals participated on behalf of Rapid7: Kyra Ayo Caros (Director, Corporate Securities & Compliance, Rapid7); Jeremiah Dewey (Senior Vice President, Managed Services Delivery, Rapid7); Harley Geiger (Counsel, Venable LLP); Tas Giakouminakis (Chief Technology Officer, Rapid7); Raisa Litmanovich (Senior Vice President & General Counsel, Rapid7); Paul Thornell (Principal, Mehlman Castagnetti Rosen & Thomas).

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