

MEMORANDUM

TO: File No. S7-12-23

FROM: Janet Jun, Senior Counsel, Division of Investment Management

RE: Video Conference with Representatives of Schulte

DATE: February 13, 2024

On February 13, 2024, staff from the U.S. Securities and Exchange Commission (“SEC”) held a video conference with representatives of Schulte Roth & Zabel LLP (“Schulte”).

Participants included SEC staff from the Division of Investment Management: Sarah ten Siethoff, Melissa Harke, Sirimal Mukerjee, Ted Uliassi, Jill Pritzker, David Driscoll, Herman Brown, Frank Buda, Matthew Williams, and Janet Jun; from the Division of Trading and Markets: Glenn Damiano-Szafran, Anand Das, John J. Fahey, Emily Westerberg Russell, Ryan Devin, Kelly S. Shoop, and Kyra Grundeman; from the Division of Economic and Risk Analysis: Andrew Z. Glickman; and the following representatives from Schulte:

- Michael Didiuk, Partner, Schulte
- Marc Elovitz, Partner, Schulte
- Kelly Koscuiszka, Partner, Schulte

The participants discussed, among other things, the SEC’s proposed rule, “Conflicts of Interest Associated with the Use of Predictive Data Analytics by Broker-Dealers and Investment Advisers” (Release Nos. 34-97990; IA-6353).