

October 9th, 2022

Vanessa Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609

Re: Reporting of Securities Loans (File No. S7-18-21)

Dear Secretary Countryman:

I am writing in strong support of rule 10c-1, "Reporting of Securities Loans".

As an individual investor I find it imperative, that institutional investors are required to disclose their short position due to several, very important reasons:

The risk assessment for retail investors becomes significantly impaired, when short selling happens in the dark pools. Therefore, I'm writing in full support of the intraday 15 minute reporting requirement. Although I'm aware that it's costly, I also think that it's necessary for identifying predatory short selling that benefits from multiple loopholes, effectively draining retail investors from capital. Additionally, I'm also writing in strong support for transaction-by-transaction reporting, as it eliminates hiding within the aggregate.

Another reason for my support of the rule is that this transparency would help the targeted companies defend themselves from abusive short selling, which harms true competition and price discovery. It would also effectively turn retail investors into watchdogs for the SEC, helping fulfill its mandate of protecting the market from predatory practices at no additional cost for the Commission.

I see this proposal to be fully in-line with the current SEC strategy (FY-22-26) of "protecting working families against fraud, manipulation, and misconduct".

The Commission, in proposed rule 13f-2, also explicitly noted its awareness of the many ways in which short selling can be used to abuse individual investors and working families. In proposed rule 13f-2, the Commission stated that it is "...mindful of concerns that certain short selling activity can be carried out pursuant to potentially abusive or manipulative schemes." For instance, market manipulators may seek to spread false information about an issuer whose stock they sold short in order to profit from a resulting decline in the stock's price. The Commission has previously noted various other forms of manipulation that can be advanced by short sellers to illegally manipulate stock prices, such as "bear raids".

To summarize, I find it outrageous that this is even a conversation. With the SEC's mission to protect retail investors, I would think that those practices would never be allowed in the first place, yet here we are.

Especially considering the economic hardship that so many suffer from at the moment, I think that improving transparency in favor of retail investors is of paramount importance. The working families deserve to have access to a free and transparent market, without worrying about multi-billion dollar funds short selling their assets in predatory ways. This is about economic justice and it's the SEC's job to bring it.

Sincerely,

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