

October 8th, 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 to promote my support of proposed rule 10c-1, "Reporting of Securities Loans". This intraday 15-minute reporting requirement has my endorsement.

Retail investors cannot be aware of the dangers involved in purchasing securities when short selling activities take place in the shadows and short sale information is published years after a position has been entered (if truthfully, or at all!). This information gap is severely problematic for the common investor since who is required to make investments based on outdated, incomplete or falsified short sale data. There are no checks and balances currently in place to protect our best interests. The expense and effort associated with this rule in my opinion is justified to aid in the early detection of abusive shorting activities, to lessen the capacity of toxic market participants to hide behind loopholes, and to try to prevent such fraud from occurring in the capital markets.

Short sale information should be available to the public immediately, to paint a full picture of what is happening with securities in which the market data available to us is otherwise incomplete and thereby incorrect. This is a competitive advantage that has been abused for too long, and is already causing major turmoil in our markets. We need to hold these large firms accountable that are not playing by the same rules as retail investors. No one will trust in the US markets any longer once they learn the truth of how these firms are able to completely derail the system with the abusive, fraudulent short selling practices they use to influence the markets. With these abusive practices, true price discovery is impossible.

Transaction by transaction reporting gives clarity to the process and should help prevent our system from being overrun with fraud. Aggregated reporting has been shown time and time again for short sales to be falsified and/or mistakenly reported as long sales, or not reported at all. This is the tip of the iceberg when it comes to deceptive practices, or even straight-out fraud. The SEC themselves have before noted these illegal activities are a problem.

For example, in proposed rule 13f-2, the SEC noted its awareness of the ways in which short selling and other tactics are used by large market participants such as hedge funds to defraud retail investors: The SEC 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.'"

Please do the right thing and take the steps needed to protect ALL investors and stop abusive short-selling, otherwise our markets are doomed to eventually fail, and everyone loses. Thank you for your time.

Sincerely,

Alex Datsko