

MEMORANDUM

To: File Nos. S7-32-10; S7-06-22

From: Coy Garrison, Counsel to Commissioner Hester M. Peirce

Re: Meeting with representatives of Elliott Investment Management

On Friday, April 29, 2022, Commissioner Hester Peirce, Richard Gabbert, Counsel to Commissioner Peirce, and Coy Garrison met with the following individuals:

- Richard Zabel, Partner and General Counsel, Elliott Investment Management
- Robert Bruno, Head Trader, Elliott Investment Management
- Brian Gunderson, Head of Public Policy, Elliott Investment Management
- Geoffrey Sorbello, Director of Engagement, Elliott Investment Management
- Jeffrey Blum, Senior Compliance Counsel, Elliott Investment Management

The general topics discussed were the Commission's proposed rules on (1) Prohibition Against Fraud, Manipulation, or Deception in Connection with Security-Based Swaps; Prohibition against Undue Influence over Chief Compliance Officers; Position Reporting of Large Security-Based Swap Positions and (2) Modernization of Beneficial Ownership Reporting.