

MEMORANDUM

To: File No. S7-32-10; S7-06-22

From: Robert Cobbs & Claire O'Sullivan, Counsels to Commissioner Caroline Crenshaw, U.S. Securities and Exchange Commission

Date: May 12, 2022

Re: Meeting with Representatives of Elliott Investment Management

On May 12, 2022, Commissioner Caroline Crenshaw, Robert Cobbs, & Claire O'Sullivan met telephonically with the following representatives from Elliott Investment Management:

- Richard Zabel, Partner and General Counsel
- Robert Bruno, Head Trader
- Brian Gunderson, Head of Public Policy
- Christine O'Brien, Head of Investment Stewardship
- Scott Grinsell, Head of Activist Engagement Strategy

The proposals on the 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 & Modernization of Beneficial Ownership Reporting were among the topics discussed.