

MEMORANDUM

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

From: Richard Gabbert, Counsel to Commissioner Hester M. Peirce

Re: Videoconference with Representatives of Elliott Investment Management

On April 29, 2022, Commissioner Hester Peirce and her legal advisor, Richard Gabbert, participated in a videoconference with the following individuals representing Elliott Investment Management:

- Richard Zabel;
- Robert Bruno;
- Brian Gunderson;
- Geoffrey Sorbello; and
- Jeffrey Blum.

Among the issues discussed at the meeting were issues related to proposed antifraud and position disclosure rules for security-based swaps and to proposed beneficial reporting requirements.