

## MEMORANDUM

October 20, 2022

**TO:** File Nos. S7-32-10 and S7-06-22

**FROM:** Charles Lee  
Office of Commissioner Mark T. Uyeda

**RE:** Meeting with Representatives of Council for Investor Rights and Corporate  
Accountability (CIRCA)

On October 18, 2022, Commissioner Mark T. Uyeda and his counsels, Robert Fisher and Charles Lee, had a meeting with CIRCA. Commissioner Uyeda and the attendees met virtually. CIRCA representatives in attendance consisted of:

- Brian Gunderson, Head of Policy at Elliott Investment Management
- Darcy Bradbury, Managing Director at D.E. Shaw Group
- Jose Ceballos, Principal at S-3 Group
- Justin Daly, Founder at Daly Consulting Group
- Roy Katzovicz, Chief Executive Officer at Saddle Point Management
- Jeff Cook-McCormac, Head of Public Affairs at Third Point

The participants discussed CIRCA's comment letters filed in connection with the following proposed rulemaking: (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) Rule 10b5-1 and Insider Trading.