

MEMORANDUM

TO: File No. S7-32-10

FROM: Claire O'Sullivan
Counsel to Commissioner Caroline Crenshaw

RE: Meeting with the International Association of Credit Portfolio Managers

On Thursday October 6, 2022, Commissioner Caroline Crenshaw and Claire O'Sullivan spoke with representatives and members of the International Association of Credit Portfolio Managers, including:

- Jennifer Bearden – Associate Director, IACPM
- Som-lok Leung – Executive Director,
- Michael Cooney – Managing Director, Global Portfolio Group, Citigroup
- Kevin Starrett – Managing Director, Global Portfolio Group, Citigroup
- Bill Ledger – Managing Director, Head of Credit Portfolio Lending Group, JPMorgan
- Gareth Old – Partner, Clifford Chance
- Shea Cunningham – Associate, Clifford Chance
- Carrie Na – Head of Portfolio Strategies, Truist

Among the topics discussed were the Commission's Proposed Rulemaking 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.