

MEMORANDUM

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

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

Re: Videoconference with Representatives of the Council for Investor Rights and Corporate Accountability

On November 7, 2022, Commissioner Hester Peirce and her legal advisor, Richard Gabbert, participated in a videoconference with members of the Council for Investor Rights and Corporate Accountability (CIRCA).

CIRCA members included:

- Brian Gunderson, Elliott Management
- Roy Katzovicz, Saddle Point Management
- Josh Targoff, Third Point LLC
- Jeff Cook-McCormac, Third Point LLC
- Jose Ceballos, S-3 Group
- Milan Dilal, Tiger Hill Partners
- Justin Daly, Daly Consulting Group

Among the issues discussed at the meeting were Commission proposals to amend disclosure obligations under Schedules 13D and 13G and to establish reporting requirements for security-based swaps.