

MEMORANDUM

TO: File Nos. S7-32-10

FROM: Brandon Hill – Counsel to Commissioner Jaime Lizárraga – U.S. Securities and Exchange Commission

RE: International Association of Credit Portfolio Managers (IACPM)

DATE: February 14, 2023

On February 14, 2023, Commissioner Jaime Lizárraga, Parisa Haghshenas, Brandon Hill, and Diem-Mi Lu met with the following representatives of IACPM:

- Jennifer Bearden – *Associate Director*, IACPM
- Som-lok Leung – *Executive Director*, IACPM
- 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 Cunnington – *Associate*, Clifford Chance
- Carrie Na – *Head of Portfolio Strategies*, Truist

Among the topics discussed was the Commission's proposed rule 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.