

MEMORANDUM

TO: File No. SR-CboeBZX-2021-051

FROM: Stacia Sowerby
Office of Market Supervision, Division of Trading and Markets

DATE: January 31, 2022

SUBJECT: Meeting re: ARK 21Shares Bitcoin ETF

On January 28, 2022, Haoxiang Zhu, David Saltiel, David Shillman, Meredith Macvicar, Molly Kim, Edward Cho, Sarah Schandler, David Remus, and Stacia Sowerby from the Division of Trading and Markets, and Igor Kozhanov and Robert Garrison from the Division of Economic and Risk Analysis, participated in a meeting with the following individuals:

Ophelia Snyder, 21Shares
Adam Sze, 21Shares
Eliézer Ndinga, 21Shares
Roland Gemayel, 21Shares
Tom Staudt, ARK
Allison Fumai, Dechert LLP
Andrew Schaffer, Dechert LLP
Kyle Murray, Cboe BZX Exchange, Inc.
Laura Morrison, Cboe BZX Exchange, Inc.

The discussion concerned Cboe BZX Exchange, Inc.'s proposed rule change to list and trade shares of the ARK 21Shares Bitcoin ETF under Cboe BZX Rule 14.11(e)(4), Commodity-Based Trust Shares.