MEMORANDUM

TO: File No. SR-CboeBZX-2023-038

FROM: Edward Cho, Office of Market Supervision, Division of Trading and Markets

DATE: November 20, 2023

SUBJECT: Meeting with Invesco Capital Management LLC re: Invesco Galaxy Bitcoin ETF

On November 20, 2023, Tom McGowan, Randall Roy, Ray Lombardo, Molly Kim, Edward Cho, and Stacia Sowerby from the Division of Trading and Markets participated in a meeting with the following individuals:

Adam Henkel, Invesco Capital Management LLC Eric Pollackov, Invesco Capital Management LLC John Feyerer, Invesco Capital Management LLC Rudolph Reitman, Invesco Capital Management LLC Andy Blocker, Invesco Capital Management LLC Jen Flitton, Invesco Capital Management LLC Ben Brown, Blue Ridge Law and Policy Kyle Murray, Cboe BZX Exchange, Inc. Sarah Tadtman, Cboe BZX Exchange, Inc. Vaishali Javeri, Cboe BZX Exchange, Inc. Robert Marrocco, Cboe BZX Exchange, Inc.

The discussion concerned Cboe BZX Exchange, Inc.'s proposed rule change to list and trade shares of the Invesco Galaxy Bitcoin ETF under BZX Rule 14.11(e)(4).