

MEMORANDUM

To: File Nos. S7-06-22; S7-32-10; S7-08-22

From: Division of Corporation Finance

Re: Meeting with the National Investor Relations Institute

Date: September 27, 2022

On September 21, 2022, staff from the Division of Corporation Finance (including Ted Yu, Nicholas Panos, and Valian Afshar), the Division of Trading and Markets (including Carol McGee, Josephine Tao, Michael Bradley, Rajal Patel, Pamela Carmody, and Richard Mo), the Division of Economic and Risk Analysis (including Vladimir Ivanov, Erin Smith, Qiao Kapadia, Lyndon Orton, and Jovan Stojkovic), and the Division of Investment Management (including Stephan Packs and Terri Jordan) met with members and representatives of the National Investor Relations Institute (including Matt Brusch, Rob Williams, Clay Bilby, Niels Holch, and Dave Dragics) to discuss various matters, including the proposed rulemakings *Modernization of Beneficial Ownership Reporting* (File No. S7-06-22), *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* (File No. S7-32-10), and *Short Position and Short Activity Reporting by Institutional Investment Managers* (File No. S7-08-22).