MEMORANDUM

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

From: Division of Corporation Finance

Re: Meeting with Robert Jackson, Frank Partnoy, and Stephen Fraidin

Date: January 9, 2023

On August 17, 2022, staff from the Division of Corporation Finance (including Erik Gerding, Michele Anderson, Ted Yu, Nicholas Panos, and Valian Afshar), the Division of Trading and Markets (including Carol McGee), the Division of Economic and Risk Analysis (including Vladimir Ivanov and Qiao Kapadia), and the Office of the General Counsel (including Lisa McCann) met with Robert Jackson of the New York University School of Law, Frank Partnoy of the University of California Berkeley School of Law, and Stephen Fraidin of Cadwalader, Wickersham & Taft LLP to discuss the proposed rulemakings *Modernization of Beneficial Ownership Reporting* and *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.*