

## MEMORANDUM

**To:** File Nos. S7-07-19

**From:** Richard Gabbert, Counsel to Commissioner Hester M. Peirce

**Re:** Telephone call with Representatives of BNP Paribas and Société Générale

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On October 23, 2019, Richard Gabbert, legal advisor to Commissioner Hester Peirce, participated in a meeting with the Jeffrey Siegel of BNP Paribas and Joerg Reigel of Société Générale.

Participants discussed the implementation of various Title VII requirements applicable to security-based swap dealers, including the statutory disqualifications applicable to associated persons of security-based swap dealers and related required background checks, as well as the certification and opinion of counsel requirements.