

MEMORANDUM

To: File No. S7-07-19

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

Re: Meeting with Deutsche Bank

On October 18, 2019, Commissioner Hester Peirce and her legal advisor, Richard Gabbert, participated in a meeting with Stefan Simon and Karin Dohm of Deutsche Bank.

Participants discussed issues relating to cross-border application of Title VII regulatory requirements to security-based swap dealers, including issues related to the certification and opinion of counsel requirements, and background check requirements for certain associated persons.