

October 25, 2022

Sirs,

I am writing in support of the true transparency and equal access to information that proposed Rule 13f-2, File Number S7-08-22 promises.

It should go without saying that in an open, fair marketplace, one participant should not get to play by different rules than others. While the validity of short positions can be debated, their reporting should be as public as any other trade. Short positions represent a bet against the interests of other investors, and while this concept is a cornerstone of any transactional market, it cannot be performed in secret. Short positions affect price, and if the interest of “true price discovery” is authentic, then that information should be made available to all parties interested in participating in either side of a securities investment.

Thank you for your time and consideration,
Durin Gleaves