

October 8th, 2022

Vanessa Countryman, Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-0609

**Re: Reporting of Securities Loans (File No. S7-18-21)**

Dear Secretary Countryman:

I am writing in strong support of rule 10c-1, "Reporting of Securities Loans".

In proposed rule *13f-2*, the Commission explicitly noted its awareness of the many ways in which abusive short selling can be used against individual investors and working families, as seen in the quote "...mindful of concerns that certain short selling activity can be carried out pursuant to potentially abusive or manipulative schemes." The Commission then went on to give examples: "For instance, market manipulators may seek to spread false information about an issuer whose stock they sold short in order to profit from a resulting decline in the stock's price. The Commission has previously noted various other forms of manipulation that can be advanced by short sellers to illegally manipulate stock prices..."

The Commission has posted on their website about Protecting Investors that "The federal securities laws we oversee are based on a simple and straightforward concept: everyone should be treated fairly and have access to certain facts about investments and those who sell them." If the Commission truly believes the words that they publish, it stands to reason that it is in the Commission's best interests to implement rule 10c-1, proving that they live by their word. When short selling is allowed to occur in the dark, and 'current' short sale information is kept hidden until long after positions have been opened, the Main Street investor is at a disadvantage of information being withheld from them that prevents them from knowing the true risk that they take on when buying said securities. This act of "short selling in the dark" that occurs today is detrimental to honest competition and hinders price discovery. The retail investor would greatly benefit from increased short sale transparency.

Additionally, companies that are victimized by abusive short selling need greater ability to defend themselves against predatory and illegal attacks on their securities. It's not just companies, though. Working families and every day Main Street investors are victims of the financial predators who participate in abusive "short selling in the dark."

I support transaction-by-transaction reporting due to it eliminating the ability to "hide within the aggregate"; transparency means transparency and aggregates are *not* transparent. Secret short selling could dissuade legitimate investments as funds attempt to scrape profit off the backs of real investors. I also support the 15-minute reporting requirement. I believe that the cost and

effort of complying with said requirements are absolutely justified in efforts to prevent easy opportunities for bad actors within the market to commit fraud and to hide within loopholes.

Sincerely,

A Concerned Investor