

## MEMORANDUM

TO: File No. S7-23-19 – Procedural Requirements and Resubmission Thresholds  
under Exchange Act Rule 14a-8

FROM: Katherine Kelly, Counsel to Commissioner Lee

RE: Meeting with ICCR

DATE: August 12, 2020

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On June 23, 2020, Eric Juzenas and Katherine Kelly, counsel to Commissioner Lee, met telephonically with representatives from the Interfaith Center on Corporate Responsibility including Jeff Zinner, Mary Beth Gallagher, Nora Nash, Mary Minette, Rob Fohr, Rachel Kahn-Troster, Heidi Welsh, Sanford Lewis, and Mary Vaccari. Among the topics discussed was the SEC's proposal regarding Procedural Requirements and Resubmission Thresholds under Exchange Act Rule 14a-8.