MEMORANDUM

To: File Nos.S7-31-22 and S7-29-22

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

Re: Citigroup Inc.

On September 29, 2023, Commissioner Hester Peirce and her legal advisors, Richard Gabbert and Sumeera Younis, participated in a videoconference with Brett McIntosh and Adam Kezsbom of Citigroup.

The participants discussed the proposed order competition rule and the proposed amendments to Rule 605.