

MEMORANDUM

To: File No. S7-32-10

From: Coy Garrison, Counsel to Commissioner Hester M. Peirce

Re: Meeting with representatives of Council for Investor Rights and Corporate Accountability (CIRCA)

On Friday, January 14, 2022, Commissioner Hester Peirce, William Middlebrooks, Counsel to Commissioner Hester Peirce, and Coy Garrison met with the following representatives of CIRCA: Brian Gunderson from Elliott Management, Roy Katzovicz from Saddle Point Management, Jeff Cook-McCormac and Josh Targoff from Third Point, Rob Collins from S-3 Group, and Justin Daly and Erik Johnson from Daly Consulting Group. The general topic discussed was the Commission's proposed rules on Prohibition Against Fraud, Manipulation, or Deception in Connection with Security-Based Swaps; Prohibition against Undue Influence over Chief Compliance Officers; Position Reporting of Large Security-Based Swap Positions.