

MEMORANDUM

TO: File No. SR-CboeBZX-2023-040

FROM: Stacia Sowerby, Office of Market Supervision, Division of Trading and Markets

DATE: December 21, 2023

SUBJECT: Meeting re: VanEck Bitcoin Trust

On December 21, 2023, David Shillman, Eric Juzenas, Thomas McGowan, Randall Roy, Sarah Schandler, and Stacia Sowerby, from the Division of Trading and Markets, and Justin Dobbie, Andrew Schoeffler, and Sebastian Gomez Abero, from the Division of Corporation Finance, participated in a meeting with the following individuals:

Adam Phillips, VanEck
Greg Krenzer, VanEck
Kyle Dacruz, VanEck
James Kim, VanEck
Matthew Babinsky, VanEck
Cliff Cone, Clifford Chance
Kyle Murray, Cboe BZX Exchange, Inc.
Sarah Tadtman, Cboe BZX Exchange, Inc.

The discussion concerned Cboe BZX Exchange, Inc.'s proposed rule change to list and trade shares of the VanEck Bitcoin Trust under BZX Rule 14.11(e)(4).