

MEMORANDUM

To: Crypto Task Force Meeting Log
From: Crypto Task Force Staff
Re: Meeting with Representatives of 21.Finance AG and Willkie Farr & Gallagher LLP

On August 5, 2025, Crypto Task Force Staff met with representatives from 21.Finance AG and Willkie Farr & Gallagher LLP.

The topic discussed was approaches to addressing issues related to regulation of crypto assets. 21.Finance AG and Willkie Farr & Gallagher LLP representatives provided the attached document, which was discussed during the meeting.

BY ELECTRONIC SUBMISSION

SEC Crypto Task Force
U.S. Securities and Exchange Commission
100 F. Street NE
Washington, DC 20549

July 17, 2025

Re: 21.Finance AG Request for Meeting with the Crypto Task Force

Ladies and Gentlemen,

On behalf of our client, 21.Finance AG d/b/a 21X (“21X”), we respectfully request a meeting with the SEC Crypto Task Force to discuss 21X’s current business model in the European Union and contemplated business activities in the United States.

21X operates a platform in the European Union for trading and settling distributed ledger technology financial instruments that are securities. The platform operates under a pilot regime and subject to a number of exemptions from otherwise applicable regulatory requirements.

21X wishes to facilitate on-chain trading and settlement of digital ledger technology financial instruments that are securities. Entities that trade through 21X would self-custody or custody with third parties. 21X would not provide custody services.

The proposed attendees representing 21X are as follows:

Max Heinzle, Founder and CEO, 21X
John Linnehan, Head of Strategic Relationships, Digital Investment Securities
Matthew Comstock, Partner, Willkie Farr & Gallagher LLP
Benjamin Haskin, Partner, Willkie Farr & Gallagher LLP
Chelsea Pizzola, Partner, Willkie Farr & Gallagher LLP

During the meeting, we wish to present a confidential PowerPoint deck, which we will submit separately following the required Freedom of Information Act confidential treatment request procedures.

If at all possible given Crypto Task Force members’ schedules, we respectfully request that the meeting take place the week of August 4, 2025, when Mr. Heinzle will be in the United States and available for meetings.

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To coordinate scheduling or if you require additional information, please contact Chelsea Pizzola at cpizzola@willkie.com or (202) 303-1092.

Sincerely,

/s/ Chelsea Pizzola
Chelsea Pizzola