MEMORANDUM

TO: Commission File No. S7-01-19

FROM: Office of Rulemaking

Division of Corporation Finance

U.S. Securities and Exchange Commission

DATE: September 11, 2019

RE: Meeting with Representatives from Better Markets

On September 11, 2019, William Hinman, Elizabeth Murphy, Luna Bloom, and Coy Garrison in the Division of Corporation Finance, and Michael Conley, Bryant Morris, and Kerry Dingle in the Office of General Counsel met with the following representatives of Better Markets:

- Dennis Kelleher
- Stephen Hall
- Lev Bagramian

The topics discussed related to the issues raised by Better Markets in its comment letter submitted on April 29, 2019 regarding the Commission's proposed Securities Act Rule 163B.