

LAKE HIGHLANDS

— CAPITAL MANAGEMENT —

11/5/2019

Dear SEC Staff,

Thank you very much for asking for investor input into File No S7-14-19. I am glad that the SEC is trying to accelerate the mutual and widespread goal of protecting investors and making the capital markets safer and more efficient.

After consideration of the proposed rule changes, I believe the SEC's intentions are good, but that we also may need to amend the rule differently in order to achieve the beneficial goal mentioned above.

Under the proposed changes, it seems the markets for several legitimate companies, worth billions of dollars, would immediately go dark. In effect, the proposed changes would render the equity held by millions of retail investors (and even some institutional investors like me), nearly worth 0. I am afraid that by implementing the proposed rule changes, billions of dollars of retail investor capital would effectively be destroyed – which I know the SEC does not want.

Instead, I look forward to an alternative solution which would accelerate the achievement of all legitimate investor goals, while avoiding the destruction of investor capital. The deep institutional knowledge at the SEC likely means you all can come up with a better solution than I, but in the interest of contributing my part, I propose here two potential solutions:

- 1) Require investors wishing to invest in the affected companies to sign a waiver prior to investing. This could be implemented at the brokerage level.
- 2) Require companies to have their latest filings and investor information immediately downloadable from a centralized site (like OTCmarkets.com) or even their own websites. Further, this information could take the form of an XML/XBRL-linked document.

I look forward to reading the SEC's revised thoughts after considering all investor commentary. I hope you will again ask for investor commentary before proceeding with any rule changes.

Thank you again.

Sincere thanks and regards,

-Connor Davis

Founder and Principal, Lake Highlands Capital Management