

MEMORANDUM

To: File No. S7-14-19
From: Richard Gabbert, Counsel to Commissioner Hester M. Peirce
Re: Meeting with Representatives of Mitchell Partners, LP

On January 22, 2020, Commissioner Hester Peirce, her legal advisor, Richard Gabbert met with Jim Mitchell of Mitchell Partners, LP and Ben Brown and Walton Liles of Blue Ridge Law & Policy.

The participants discussed the Commission's proposal to amend Exchange Act Rule 15c2-11.