

MEMORANDUM

To: File

From: Jonathon Zytnick
Counsel to Commissioner Robert J. Jackson
U.S. Securities and Exchange Commission

Date: July 31, 2018

Re: Discussion with Hartfield, Titus, & Donnelly

On July 31, 2018, Jonathon Zytnick, counsel to Commissioner Robert J. Jackson, spoke by phone with Chris Ferreri and Edward Smith from Hartfield, Titus, & Donnelly. Among the topics discussed were the Commission's proposed amendments to Exchange Act Rule 15c2-12.