MEMORANDUM

To: File No. S7-08-19 – Concept Release on Harmonization of Securities Offering Exemptions

From: Charlie Guidry

Division of Corporation Finance

Date: October 30, 2019

RE: Meeting with Broadmark Capital

On October 30, 2019, Jennifer Zepralka, Michael Seaman, and Charlie Guidry from the Division of Corporation Finance met with Joseph L. Schocken, CEO of Broadmark Capital and Chris McCannell of Gray|Robinson. Among the topics participants discussed was the Commission's concept release relating to the harmonization of securities offering exemptions.