

## MEMORANDUM

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

**From:** Anthony Barone, Office of Small Business Policy, Division of Corporation Finance

**Date:** December 16, 2019

**RE:** Meeting with Representatives of the American Bankers Association and Coalition of Collective Investment Trusts

On December 13, 2019, Jennifer Zepralka, Michael Coco, Anne Krauskopf, Charles Kwon, Charles Guidry and Anthony Barone from the Division of Corporation Finance met in person with Phoebe Papageorgiou, Vice President & Counsel, Trust Policy, of the American Bankers Association and by phone with Clifford Kirsch of the law firm of Eversheds Sutherland, who represented both the American Bankers Association and the Coalition of Collective Investment Trusts. Among the topics participants discussed was the Commission's concept release relating to the harmonization of securities offering exemptions, and specifically, the issues raised in the comment letter by the American Bankers Association, dated September 24, 2019, and the comment letter submitted by Clifford Kirsch, on behalf of the Coalition of Collective Investment Trusts, dated September 24, 2019, both submitted in response to the concept release.