

MEMORANDUM

TO: File No. S7-09-14

FROM: Andrew Schoeffler

RE: Telephonic Meeting with Representatives of Better Markets

DATE: October 28, 2014

On October 28, 2014, Amy Starr and Andrew Schoeffler participated telephonically in a meeting with Stephen Hall, Caitlin Kline, Irina Leonova and Todd Phillips of Better Markets regarding *Treatment of Certain Communications Involving Security-Based Swaps That May Be Purchased Only By Eligible Contract Participant*, Release No. 33-9643 (Sep. 8, 2014), 79 FR 54224 (Sep. 11, 2014).