MEMORANDUM

To: File

From: Caroline Crenshaw

Counsel to Commissioner Robert J. Jackson U.S. Securities and Exchange Commission

Date: October 2, 2018

Re: Discussion with ProShares

On October 1, 2018, Commissioner Robert J. Jackson and his counsel, Caroline Crenshaw, conferred with Michael Sapir and Richard Morris of ProShares. Among the topics discussed was the Commission's proposed ETF rule.