

MEMORANDUM

TO: File No. S7-15-18

FROM: Adam B. Glazer
Counsel to Commissioner Hester M. Peirce

RE: Meeting with Representatives of ProShares

DATE: October 4, 2018

On October 3, 2018, Commissioner Hester M. Peirce and her legal advisor, Adam Glazer, met with the following representatives of ProShares:

- Michael L. Sapir, Co-Founder and CEO; and
- Richard Morris, General Counsel.

The participants discussed, among other things, the Commission's proposed new rule, 6c-11 under the Investment Company Act, in Investment Company Act Release No. 33140 (June 28, 2018).