

MEMORANDUM

TO: File No. S7-23-19

FROM: Matt McNair
Senior Special Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission

DATE: April 6, 2020

RE: Telephone conference with representatives of Mercy Investment Services, Inc.;
Segal Marco Advisors; Shareholder Rights Group; and Trillium Asset
Management

On April 6, 2020, David Fredrickson (Chief Counsel), Tamara Brightwell (Deputy Chief Counsel), and Matt McNair (Senior Special Counsel) had a telephone conference with:

- Susan Makos, Mercy Investment Services, Inc.
- Maureen O'Brien, Segal Marco Advisors
- Sanford Lewis, Shareholder Rights Group
- Jonas Kron, Trillium Asset Management

The meeting participants discussed the proposed rulemaking on Procedural Requirements and Resubmission Thresholds under Exchange Act Rule 14a-8.