MEMORANDUM

To: File No. SR-FINRA-2019-012

From: Richard Gabbert, Counsel to Commissioner Hester M. Peirce

Re: Telephone Call with Stuart Kaswell

On November 21, 2019, Richard Gabbert, legal advisor to Commissioner Peirce, participated in a telephone call with Stuart Kaswell to discuss various issues relating to FINRA's proposed rule change to amend FINRA rule 5110.