

Comments on Concept Release: Harmonization of Securities Offering Exemptions

[Release Nos. 33-10649, 34-86129, IA-5256, IC-33512; File No. S7-08-19]

Submitted Comments

([Click here](#) for meetings with SEC officials)

Dec. 17, 2019	David Zweig
Dec. 6, 2019	Marty Margolis, Managing Director, PFM Asset Management LLC
Nov. 7, 2019	T. W. Kennedy, Regulated Funding Portals Industry Assoc.
Nov. 5, 2019	Joey Jones
Oct. 30, 2019	Sara Hanks, CEO, CrowdCheck, Inc.
Oct. 29, 2019	Joey Jones
Oct. 18, 2019	Gail C. Bernstein, General Counsel, Investment Adviser Association
Oct. 18, 2019	Dagan Bora, Leyline Corporation
Oct. 18, 2019	Tram Nguyen, Chair, Committee on Securities Regulation, et al., New York State Bar Association
Oct. 16, 2019	Robert Buckholz, Chair, Federal Regulation of Securities Committee, Business Law Section, American Bar Association
Oct. 15, 2019	Alfonso Ceja
Oct. 15, 2019	Crowdfunding Professional Association
Oct. 15, 2019	Patrick McHenry, Ranking Member, U.S. House of Representatives Committee on Financial Services
Oct. 14, 2019	Jason Coombs
Oct. 13, 2019	Jason Coombs
Oct. 11, 2019	Christopher Gerold, President, North American Securities Administrators Association, Inc. (NASAA)
Oct. 10, 2019	Michael J. Friedman, Head of Trading, LEX Markets
Oct. 8, 2019	Kamal Jafarnia, Artivest Holdings, Inc.
Oct. 8, 2019	Robert R. Champion, President, MarketPlus Capital Company
Oct. 4, 2019	Greg L. Hansen, CEO, Hans and Company

Oct. 3, 2019	Jeffrey P. Mahoney, General Counsel, Council of Institutional Investors
Oct. 1, 2019	Robert Rutkowski
Oct. 1, 2019	Rutheford B. Campbell, Professor of Law, University of Kentucky
Oct. 1, 2019	Barbara Roper, Director of Investor Protection, and Micah Hauptman, Financial Services Counsel; Consumer Federation of America
Sep. 30, 2019	Atish Davda, Co-Founder & CEO, et al., EquityZen, Inc.
Sep. 30, 2019	Tyler Gellasch, Executive Director, Healthy Markets Association
Sep. 30, 2019	Christian Bilger, Chief Operating Officer, Honeycomb Credit Inc. and Honeycomb Portal LLC (Funding Portal)
Sep. 30, 2019	Americans for Financial Reform Education Fund and AFL-CIO
Sep. 30, 2019	John A. Zecca, Senior Vice President, General Counsel North Ameri, Nasdaq, Inc.
Sep. 27, 2019	Joseph Bonvouloir, ALTI LLC
Sep. 26, 2019	Georgia Quinn, General Counsel, CoinList
Sep. 25, 2019	Rahsan Boykin, Esquire
Sep. 25, 2019	Brett Palmer, President, Small Business Investor Alliance
Sep. 25, 2019	Erik Syvertsen, General Counsel, AngelList
Sep. 25, 2019	William J. Williams
Sep. 24, 2019	Wizipan Little Elk, CEO, Rosebud Economic Development Corporation
Sep. 24, 2019	Mark Berman, Founder and CEO, CompliGlobe Ltd.
Sep. 24, 2019	Terrie Brockie, CEO, Island Mountain Development Group
Sep. 24, 2019	Davis Polk & Wardwell LLP
Sep. 24, 2019	Xavier Becerra, California Attorney General, et al.
Sep. 24, 2019	Herwig Konings, Founding Partner, Security Token Group, et al.
Sep. 24, 2019	James P. Dowd, CEO, North Capital Investment Technology, Inc.
Sep. 24, 2019	Sherwood Neiss, Principal, Crowdfund Capital Advisors, LLC
Sep. 24, 2019	Christine Lazaro, President, and Samuel Edwards, Executive Vice President/President-Elect, Public Investors Advocate Bar Association (PIABA)
Sep. 24, 2019	James E. Bowlus, Vice President and Assistant General Counsel, Wilmington Trust, National Association

Sep. 24, 2019	Maria Wolvin, Vice President & Sr. Counsel, Public Policy, Association for Corporate Growth
Sep. 24, 2019	Anthony Chereso, President & CEO, Institute for Portfolio Alternatives
Sep. 24, 2019	Nicholas Mathews, Co-Founder and CEO, and Benjamin Blieden, CFA, Co-Founder and CFO; MainVest, Inc.
Sep. 24, 2019	Robert F. Licopoli, CEO, 360 Sports, Inc.
Sep. 24, 2019	Jeff Thomas, Chair of Entrepreneurship, Associate Professor, Central Michigan University.
Sep. 24, 2019	Daniel Zinn, General Counsel, and Cass Sanford, Associate General Counsel; OTC Markets Group Inc.
Sep. 24, 2019	Dechert LLP
Sep. 24, 2019	Theodore M. Grannatt, et al., McCarter & English LLP
Sep. 24, 2019	Jade Barker, Silicon Prairie Portal and Exchange
Sep. 24, 2019	Joseph L. Schocken
Sep. 24, 2019	Erik Gerding, Professor of Law and Wolf-Nichol Fellow, University of Colorado Law School, et al.
Sep. 24, 2019	Andrew A. Schwartz, Professor of Law, University of Colorado
Sep. 24, 2019	Henry S. Ward, CEO, et al., eShares, Inc. d/b/a Carta, Inc.
Sep. 24, 2019	Greg Mausz, President, Alternative & Direct Investment Securities Association
Sep. 24, 2019	Simpson Thacher & Bartlett LLP
Sep. 24, 2019	Robert Anderson, Professor of Law, Pepperdine School of Law, et al.
Sep. 24, 2019	Daniel B. Ravicher, Director, et al., Startup Practicum, University of Miami School of Law
Sep. 24, 2019	Tom Quaadman, Executive Vice President, US Chamber of Commerce, Center for Capital Markets Competitiveness
Sep. 24, 2019	Daniel A. Teplin, Forum for U.S. Securities Lawyers in London
Sep. 24, 2019	Aseel M. Rabie, Managing Director and Associate General Counsel, and Lindsey Weber Keljo, Managing Director and Associate General Counsel, Asset Management Group; SIFMA
Sep. 24, 2019	Chris Rabalais, CEO, Crystal World Holdings, Inc. / Managing Director, New Sports Economy Institute
Sep. 24, 2019	Barbara Novick, Vice Chairman, and Joanne Medero, Managing Director, BlackRock, Inc.

Sep. 24, 2019 [Todd J. May, President, The Securities Transfer Association, Inc.](#)

Sep. 24, 2019 [Jason Mulvihill, Chief Operating Officer & General Counsel, American Investment Council](#)

Sep. 24, 2019 [Brian Beckon, Principal, Cutting Edge Counsel Inc.](#)

Sep. 24, 2019 [Lawrence Calcano, CEO, iCapital Network](#)

Sep. 24, 2019 [Davis Polk & Wardwell LLP, Investment Management Group](#)

Sep. 24, 2019 [Mark Schoenfeld, Goodwin Procter LLP](#)

Sep. 24, 2019 [Andrew Vollmer, Senior Affiliated Scholar, Mercatus Center, George Mason University](#)

Sep. 24, 2019 [William F. Galvin, Secretary of the Commonwealth, Commonwealth of Massachusetts](#)

Sep. 24, 2019 [Clifford E. Kirsch, Eversheds Sutherland, on behalf of the Coalition of Collective Investment Trusts](#)

Sep. 24, 2019 [George Humm](#)

Sep. 24, 2019 [Dennis M. Kelleher, President & CEO, and Lev Bagramian, Senior Securities Policy Advisor, Better Markets, Inc.](#)

Sep. 24, 2019 [Gregory L. Wright, President and Head of Banking, Zanbato Securities LLC](#)

Sep. 24, 2019 [Kirk McGregor and Samarth Sandeep](#)

Sep. 24, 2019 [Ropes & Gray LLP](#)

Sep. 24, 2019 [Ropes & Gray LLP](#)

Sep. 24, 2019 [Campbell Pryde, President and CEO, XBRL US](#)

Sep. 24, 2019 [David Burton, Senior Fellow, Economic Policy, Institute for Economic Freedom, The Heritage Foundation](#)

Sep. 24, 2019 [Cynthia Lo Bessette, SVP, Deputy General Counsel, Fidelity Investments](#)

Sep. 24, 2019 [Susan M. Olson, General Counsel, Investment Company Institute](#)

Sep. 24, 2019 [Rashad Kurbanov, CEO, Iownit Capital and Markets, Inc.](#)

Sep. 24, 2019 [Kenneth J. Berman, Debevoise & Plimpton LLP \(on behalf of Private Investor Coalition\)](#)

Sep. 24, 2019 [Amber McDonald, CEO, Indemnis, et al.](#)

Sep. 24, 2019 [Barbara Roper, Director of Investor Protection, Consumer Federation of America](#)

Sep. 24, 2019 [Parth Bhatt, Chief Investment Officer, San Bernardino County,](#)

California

Sep. 24, 2019	Charles Nelson, Chief Executive Officer, Retirement, Voya Financial, Inc.
Sep. 24, 2019	Alison Borland, Executive Vice President, Wealth and Wellbeing Solutions, Alight Solutions
Sep. 24, 2019	Stephen M. Richards
Sep. 24, 2019	Mark D. Epley, Executive Vice-President & Managing Director, Managed Fund Association, and Jiri Król, Deputy CEO, Global Head of Government Affairs, Alternative Investment Management Association
Sep. 24, 2019	Luke Carriere
Sep. 24, 2019	Ken McGuire, President, Aditum Alternatives & Aditum Asset Management
Sep. 24, 2019	Christopher Rohrbacher, Managing Director, Associate General Counsel, Teachers Insurance and Annuity Association of America (TIAA)
Sep. 24, 2019	James Allen, Head, Capital Markets Policy, and Matt Orsagh, Director, Capital Markets Policy, CFA Institute
Sep. 24, 2019	Tyler Gellasch, Executive Director, Healthy Markets Association
Sep. 24, 2019	Craig S. Tyle, Executive Vice President and General Counsel, Franklin Resources, Inc.
Sep. 24, 2019	Kendrick Nguyen, Founder and CEO, Republic
Sep. 24, 2019	Shartsis Friese LLP
Sep. 24, 2019	David V. Duccini, Founder and CEO, Silicon Prairie Portal & Exchange, LLC
Sep. 24, 2019	Steve Nelson, Chief Executive Officer, Institutional Limited Partners Association (ILPA)
Sep. 24, 2019	Ryan M. Feit, CEO & Co-Founder, SeedInvest
Sep. 24, 2019	Joseph J. Cecala, Founder and CEO, Dream Exchange LLC and Ioannis (Yianni) V. Floros, Ph.D., Associate Professor of Finance, University of Wisconsin-Milwaukee
Sep. 24, 2019	Matthew L. Clark, State Investment Officer, South Dakota Investment Council
Sep. 24, 2019	G. Philip Rutledge, Partner, Bybel Rutledge LLP
Sep. 24, 2019	Phoebe A. Papageorgiou, Vice President & Counsel, Trust Policy, American Bankers Association

Sep. 24, 2019	Aron Szapiro, Director of Policy Research, Morningstar, Inc.
Sep. 23, 2019	Nathaniel L. Hoopes, Executive Director, Marketplace Lending Association
Sep. 23, 2019	Joe Wallin, et al.
Sep. 23, 2019	Ken McGuire, President, Aditum Alternatives & Aditum Asset Management
Sep. 23, 2019	Matthew Digesti, Vice President, Government Affairs and Strategic, Blockchains, LLC
Sep. 23, 2019	Ryan Metcalf, Head of U.S. Regulatory Affairs, Funding Circle
Sep. 23, 2019	Patrick Gouhin, CEO, et al., Angel Capital Association
Sep. 23, 2019	Mitch Ackles, President, Hedge Fund Association
Sep. 22, 2019	Dr. Gavin Clarkson, Esq., Managing Director, Native American Capital
Sep. 22, 2019	Michael S. Finke, Frank M. Engle Professor of Economic Security, The American College of Financial Services
Sep. 20, 2019	Thomas Metz, Chair, Legislative Committee, California Municipal Treasurers Association
Sep. 20, 2019	Christopher Nero, CEO, Bridgeport Financial Technology
Sep. 19, 2019	John L. Thornton, Co-Chair, Committee on Capital Markets Regulation; Hal S. Scott, President, Committee on Capital Markets Regulation; and R. Glenn Hubbard, Co-Chair, Committee on Capital Markets Regulation
Sep. 18, 2019	Richard H. Kreger, Advisory Group Equity Services, Ltd. RHK Capital
Sep. 17, 2019	Stuart M. Rigot, Attorney, Wyrick Robbins Yates Ponton LLP
Sep. 16, 2019	Brian Davis
Sep. 16, 2019	Barry Hicks
Sep. 13, 2019	Vinh Nguyen
Sep. 13, 2019	Nicholas Tommarello, Chief Executive Officer, Wefunder
Sep. 12, 2019	Dante Desiderio, Executive Director, Native American Finance Officers Association
Sep. 12, 2019	Sean R. Walters, Chief Executive Officer, Investments Wealth Institute
Sep. 11, 2019	Cody Snyder
Sep. 10, 2019	Paul Arssov

Sep. 9, 2019	Stephen H. Watkins, Chairman and CEO, Entrex Capital Market
Sep. 9, 2019	Jonathan Epstein, President and Founder, Defined Contribution Alternatives Association
Sep. 6, 2019	Jeff LaBerge
Sep. 1, 2019	Nathan Eames
Sep. 1, 2019	John Gerena, Conserve Financial Inc.
Aug. 21, 2019	Philip A. Feigin, Attorney at Law, PFeiginLaw LLC
Aug. 18, 2019	Steven Marshall, Director of Finance and IS
Aug. 15, 2019	Brenda L. Hamilton, Hamilton & Associates Law Group, P.A.
Aug. 11, 2019	Anne Sheehan, Chair, IAC
Aug. 9, 2019	Charlie Uchill
Aug. 7, 2019	J.L.
Aug. 6, 2019	Sam M. Yaffa
Aug. 5, 2019	Marc Steinberg, Professor of Law, Southern Methodist University
Aug. 4, 2019	Stephen R. Steciak
Jul. 29, 2019	Joseph L. Schocken, President & CEO, Broadmark Capital
Jul. 18, 2019	Anonymous
Jul. 11, 2019	Rick A. Fleming, Investor Advocate of the U.S. Securities and Exchange Commission
Jul. 10, 2019	Leonard A. Grover, Founder/CEO, FinToolbox (Screener.co)
Jul. 10, 2019	Jor Law
Jul. 10, 2019	J. C.
Jul. 10, 2019	Robert Gregory
Jul. 6, 2019	Jor Law, Licensed attorney (CA NY)
Jul. 5, 2019	Youngro Lee, President, et al., Association of Online Investment Platforms
Jul. 1, 2019	Chris Corn
Jun. 25, 2019	Kyle Sonlin, CEO, Security Token Market
Jun. 24, 2019	Herwig Konings
Jun. 24, 2019	Logan B.
Jun. 20, 2019	Grant Gulovsen, Owner, Gulovsen Law Office

Jun. 19, 2019 John Tapp

Jun. 19, 2019 Anonymous

Jun. 19, 2019 Andrew Deville

Meetings with SEC Officials

([Click here](#) for submitted comments from the public)

Dec. 16, 2019 Memorandum from the Division of Corporate Finance regarding a December 13, 2019, meeting with representatives of the American Bankers Association and Coalition of Collective Investment Trusts

Nov. 25, 2019 Memorandum from the Office of the Chairman regarding a November 22, 2019, meeting with representatives of the Alternative Investment Management Association Ltd.

Nov. 4, 2019 Memorandum from the Division of Investment Management regarding a November 1, 2019, meeting with representatives of Groom Law Group

Oct. 30, 2019 Memorandum from the Division of Corporation Finance regarding a October 30, 2019, meeting with representatives of Broadmark Capital

Oct. 23, 2019 Memorandum from the Division of Investment Management regarding an October 23, 2019, meeting with representatives of Wellington Management Company LLP

Oct. 3, 2019 Memorandum from the Office of Commissioner Allison Herren Lee regarding an October 1, 2019, meeting with representatives of Invesco

Sep. 18, 2019 Memorandum from the Division of Investment Management regarding a September 13, 2019, meeting with representatives of Drinker Biddle & Reath LLP

Aug. 19, 2019 Memorandum from the Office of Commissioner Allison Herren Lee regarding an August 16, 2019, meeting with representatives of Institutional Limited Partners Association (ILPA)

Aug. 16, 2019 Memorandum from the Office of Commissioner Allison Herren Lee regarding an August 12, 2019, meeting with representatives of the North American Securities Administrators Association

Aug. 1, 2019 Memorandum from the Office of Commissioner Allison Herren Lee regarding a July 26, 2019, meeting with representatives of the Consumer Federation of America

Jul. 23, 2019 Memorandum from the Division of Investment Management regarding a July 22, 2019, meeting with representatives of Ropes
