

MEMORANDUM

TO: File Nos. S7-07-18, S7-08-18, S7-09-18

FROM: Division of Trading and Markets

RE: Meeting with Eversheds Sutherland (US) LLP (“Eversheds”) for the Committee of Annuity Insurers (“Committee”)

DATE: July 16, 2018

On Thursday, July 12, 2018, representatives of the Securities and Exchange Commission (“SEC”) participated in a meeting with representatives from Eversheds on behalf of the Committee. The SEC representatives present were Adam Bolter, Parisa Haghshenas, Benjamin Kalish, Gena Lai, and Jennifer Songer from the Division of Investment Management; and Bradford Bartels, Roni Bergoffen, Geeta Dhingra, Alicia Goldin, Brett Redfearn, Emily Westerberg Russell, and Heather Seidel from the Division of Trading and Markets. The Committee representatives from Eversheds present were Eric Arnold, Clifford Kirsch, and Stephen Roth. Susan Krawczyk from Eversheds participated by telephone.

The participants discussed, among other things, the SEC’s proposed rules and interpretation relating to standards of conduct for investment professionals.