

MEMORANDUM

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

FROM: Bradford Bartels, Division of Trading and Markets

RE: Meeting with Representatives of Mass Mutual Financial Group

DATE: November 14, 2018

On Tuesday, November 13, 2018, representatives of the Securities and Exchange Commission (“SEC”) participated in a meeting with representatives of Massachusetts Mutual Financial Group (“Mass Mutual”). The SEC representatives were Lourdes Gonzalez, Emily Westerberg Russell, Dan Fisher, Geeta Dhingra, Stephen Benham, and Bradford Bartels from the Division of Trading and Markets; Sara Cortes, Jennifer Porter, Parisa Haghshenas, Jennifer Songer, James McGinnis, Gena Lai, Roberta Ufford, Elizabeth Miller, and Olawale Oriola from the Division of Investment Management; and Jennifer Juergens and James McLoughlin from the Division of Economic Risk and Analysis. The Mass Mutual representatives were John Deitelbaum, Senior Vice President and Deputy General Counsel; Robert Rosenthal, Vice President and Associate General Counsel; James Sonne, Government Relations; and Lendell Porterfield, Counsel from the law firm of Porterfield, Fettig & Sears, LLC.

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