

MEMORANDUM

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

From: Eric Diamond, Senior Advisor to Chairman Jay Clayton

Re: Standards of Conduct for Investment Professionals

Date: November 14, 2018

On November 13, 2018, Alan Cohen (Senior Policy Advisor to Chairman Clayton) and Eric Diamond (Senior Advisor to Chairman Clayton) met with the following representatives of MassMutual:

- John Deitelbaum, Senior Vice President and Deputy General Counsel
- Bob Rosenthal, Vice President and Associate General Counsel
- James L. Sonne, Assistant Vice President, Federal Government Relations
- Lendell Porterfield, Porterfield, Fettig & Sears, LLC

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