

MEMORANDUM

TO: File Nos. S7-07-18, S7-08-18, S7-09-18
FROM: James McGinnis, Division of Investment Management
RE: Meeting with Representatives of Guardian Life Insurance Company of
America
DATE: November 29, 2018

On Thursday, November 29, 2018, representatives of the Securities and Exchange Commission (“SEC”) participated in a meeting with representatives of Guardian Life Insurance Company of America. The SEC representatives present in person were Paul Cellupica, Sara Cortes, Roberta Ufford, and James McGinnis from the Division of Investment Management; Emily Westerberg Russell, Alicia Goldin, Bradford Bartels, and Stephen Benham from the Division of Trading and Markets; and Jennifer Juergens, Narahari Phatak, and Iulian Obreja from the Division of Economic and Risk Analysis. The Guardian Life Insurance Company of America representatives present in person were Eric Dinallo, Richard Potter, Rachel Goldberg, Katherine Milgram, Jim Clinger, and Thomas Smoot.

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