

## 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 29, 2018

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On November 29, 2018, Eric Diamond (Senior Advisor to Chairman Clayton) met with the following representatives of The Guardian Life Insurance Company of America:

- Eric Dinallo, Executive Vice President & Chief Legal Counsel
- Richard Potter, Vice President and Equity Counsel
- Rachel Goldberg, Vice President, Government Affairs
- Katherine Milgram, Vice President, Head of Regulatory Affairs and Chief of Staff to the Chief Legal Counsel
- Tommy Smoot, Vice President, Strategy, Individual Markets
- James Clinger, Daly Consulting Group

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