

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: April 2, 2019

On March 18, 2019, Chairman Clayton and Eric Diamond (Senior Advisor to Chairman Clayton) met with the following representatives of American Council of Life Insurers (ACLI):

- Scott Davison, Chairman, President and CEO, OneAmerica
- Dennis Glass, President and Chief Executive Officer, Lincoln Financial Group
- Dan Houston, Chairman, President and Chief Executive Officer, Principal Financial Group
- Thomas Leonardi, Executive Vice President, Government Affairs, Public Policy & Communications, AIG
- JoAnn Martin, Chair & Chief Executive Officer, Ameritas
- Steve Pelletier, Executive Vice President, Chief Operating Officer, U.S. Businesses, Prudential
- Susan Neely, President & CEO, ACLI
- Alane Dent, Senior Vice President, Federal Regulations, ACLI
- Joyce Meyer, Executive Vice President of Government Relations, ACLI
- Carl Wilkerson, Vice President & Chief Counsel, Securities, ACLI

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