

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: May 21, 2019

On April 10, 2019, Chairman Jay Clayton and Eric Diamond (Senior Advisor to Chairman Clayton) met with the following representatives of the Institute for Portfolio Alternatives (IPA):

- Tony Chereso, President
- Anya Coverman, Senior Vice President for Government Affairs
- Mark Goldberg, Executive Vice President, Griffin Capital Company
- Mark Quinn, Director of Regulatory Affairs, Cetera Financial Group
- Trisha Miller, Consultant and former CEO of Starwood Capital Group
- Michael Komenda, General Counsel for Public Funds, CIM Group
- Chris McCannell, Senior Government Affairs Consultant, GrayRobinson
- Greg Mesack, Government Affairs Consultant, GrayRobinson

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