MEMORANDUM

TO: File Nos. S7-07-18, S7-08-18, S7-09-18
FROM: Geeta Dhingra, Division of Trading and Markets
RE: Meeting with Representatives of Empower Retirement
DATE: May 18, 2018

On Wednesday, May 16, 2018, representatives of the Securities and Exchange Commission ("SEC") participated in a meeting with representatives of Empower Retirement ("Empower"). The SEC representatives present were Jennifer Juergens from the Division of Economic and Risk Analysis; Sara Cortes, Benjamin Kalish, Gena Lai, and Jennifer Porter from the Division of Investment Management; and Bradford Bartels, Geeta Dhingra, Alicia Goldin, Lourdes Gonzalez, and Emily Westerberg Russell from the Division of Trading and Markets. The Empower representatives present were Bob Holcomb, Laura Miller (Great West Financial), Ozzie Palomo (Chartwell Strategy Group), and Carol Waddell.

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