

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: July 16, 2018

On July 13, 2018, Jaime Klima (Chief Counsel to Chairman Clayton) and Eric Diamond (Senior Advisor to Chairman Clayton) met with Ben Brown (Executive Vice President) of Patomak Global Partners and the following representatives of New York Life Insurance Company:

- Tom English (Deputy General Counsel and Chief Insurance Counsel)
- Mike McDonnell (Vice President and Associate General Counsel)
- Ali O'Donnell (Government Affairs)
- Julie Herwig (Government Affairs)

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