

MEMORANDUM

TO: File Nos. S7-07-18, S7-08-18, S7-09-18

FROM: Division of Trading and Markets

RE: Meeting with Representatives of Fidelity Investments

DATE: July 16, 2018

On Wednesday, July 11, 2018, representatives of the Securities and Exchange Commission (“SEC”) participated in a meeting with representatives of Fidelity Investments (“Fidelity”). The SEC representatives present were Vanessa Countryman, Jennifer Juergens, and Iulian Obreja from the Division of Economic and Risk Analysis; Adam Bolter, Parisa Haghshenas, Elizabeth Miller, Jennifer Porter, Emily Rowland, and Jennifer Songer from the Division of Investment Management; and Bradford Bartels, Roni Bergoffen, Geeta Dhingra, Lourdes Gonzalez, David Metzman, Brett Redfearn, and Emily Westerberg Russell from the Division of Trading and Markets. The Fidelity representatives present were Ralph Derbyshire, Jim Febeo, David Forman, and Alice Joe.

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