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: October 26, 2018

On October 24, 2018, Chairman Jay Clayton and Eric Diamond (Senior Advisor to Chairman Clayton) met with the following representatives of New York Life Insurance Company:

- Ted Mathas, Chief Executive Officer
- Tom English, Senior Vice President and Chief Insurance Counsel
- Julie Herwig, Senior Vice President, Head of Federal Government Affairs
- Alison O'Donnell, Vice President

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