

TO: File Nos. S7-07-18, S7-08-18, S7-09-18  
FROM: Benjamin Tecmire, Division of Investment Management  
RE: Meeting with Representatives of Edelman Financial Engines  
DATE: May 28, 2019

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On May 28, 2019, representatives of the Securities and Exchange Commission (“SEC”) participated in a telephone meeting with representatives of Edelman Financial Engines. The SEC representatives that participated on the telephone were: Jennifer Porter, Jennifer Songer, Parisa Haghshenas, Olawale Oriola, Alexis Palascak and Benjamin Tecmire from the Division of Investment Management. The following representatives of Edelman Financial Engines participated by telephone: Christopher L. Jones (Chief Investment Officer & Executive Vice President, Investment Management, Edelman Financial Engines), Amy Conley (Head of Investor Relations, Edelman Financial Engines), David Weiskopf (Principal, Weiskopf Consulting), Dan Crowely (K&L Gates) and Karishma Page (K&L Gates).

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