

MEMORANDUM

May 4, 2018

To: File No. S7-08-15

From: John C. Cook
Senior Advisor to Chairman Clayton

Re: Investment Company Reporting Modernization — Release No. IC-31610

On March 26, 2018, Chairman Jay Clayton; Bill Hinman, Director of the Division of Corporation Finance; Paul Cellupica, Deputy Director of the Division of Investment Management; and Raquel Fox and John Cook, Senior Advisors to the Chairman, met with Richard J. Daley, CEO, Broadridge Financial Solutions, Inc. (“Broadridge”), Bob Schifellite, Senior Vice President, Broadridge, and Roel C. Campos, Partner, Hughes Hubbard & Reed LLP (representing Broadridge). The meeting, as well as separate meetings with SEC staff, concerned the advisability of Broadridge’s “Enhanced Notice” approach that Broadridge has described and suggested in connection with the Commission’s proposed rule 30e-3 under the Investment Company Act of 1940 (the “Enhanced Notice” approach is described in the comment file for the rulemaking. See, e.g., Attachments to the Memorandum to File S7-08-15 from J. Matthew DeLesDernier dated April 13, 2018).