

MEMORANDUM

To: File No. S7-15-18

From: Joel Cavanaugh
Division of Investment Management

Date: July 17, 2018

Re: Meeting with Representatives of Invesco Ltd. (“Invesco”)

On July 16, 2018, Dalia Blass (Director, U.S. Securities and Exchange Commission (“SEC”), Division of Investment Management (“IM”)), Sarah ten Siethoff (Associate Director, IM), Daniele Marchesani (Assistant Chief Counsel, IM), Brian Johnson (Associate Director, IM), Jacob Krawitz (Branch Chief, IM), Zeena Abdul-Rahman (Senior Counsel, IM), Adam Bolter (Senior Counsel, IM), Joel Cavanaugh (Senior Counsel, IM), and John Foley (Senior Counsel, IM) met with the following representatives of Invesco: Dan Draper, Anna Paglia, Andy Blocker, Jennifer Flitton, and Ben Brown.

Among other things, the participants discussed the SEC’s proposal relating to exchange-traded funds.