

## MEMORANDUM

TO: Proposed Rule: Registration for Index-Linked Annuities; Amendments to Form N-4 for Index-Linked and Variable Annuities (Release No. 33-11250; 34-98624; IC-35028); File No. S7-16-23

FROM: Amy Miller, Senior Counsel, Division of Investment Management

RE: Teleconference with Representatives of Eversheds Sutherland

DATE: October 11, 2023

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On October 11, 2023, staff of the SEC met telephonically with representatives of the law firm Eversheds Sutherland (“Eversheds”). Participants included: Sarah ten Siethoff (Director, Division of Investment Management (“IM”)); Brian McLaughlin Johnson (Assistant Director, IM), Amanda Hollander Wagner (Senior Special Counsel, IM), Bradley Gude (Branch Chief, IM); Michael Kosoff (Senior Special Counsel, IM), Elizabeth Bentzinger (Senior Counsel, IM); Min S. Oh (Senior Counsel, IM); Pamela Ellis (Senior Counsel, IM), Amy Miller (Senior Counsel, IM); Rachael Hoffman (Senior Counsel, IM); and Gregory Scopino (Senior Counsel, IM), as well as the following representatives of Eversheds:

- Dodie C. Kent, partner
- Stephen E. Roth, partner
- Ronald D. Coenen, Jr., partner
- Thomas E. Bisset, partner

The participants discussed, among other things, the SEC’s proposal titled “Registration for Index-Linked Annuities; Amendments to Form N-4 for Index-Linked and Variable Annuities,” set forth in Investment Company Act Release No. 35028 (Sept. 29, 2023).