

MEMORANDUM

TO: Commission File No. S7-26-18

FROM: Office of Rulemaking
Division of Corporation Finance
U.S. Securities and Exchange Commission

DATE: September 25, 2019

RE: Meeting with Representatives from Arthur J. Gallagher & Co.

On September 25, 2019, Elizabeth Murphy, Luna Bloom and Charles Kwon in the Division of Corporation Finance met with Ray Iardella and Seth Diehl of Arthur J. Gallagher & Co. and Brian Johnson and Ali Khimji of The Vogel Group.

The topics discussed related to the issues raised by Arthur J. Gallagher & Co. in its comment letters submitted on March 14, 2019 and August 2, 2019 regarding the frequency of interim reporting and advocating a triannual reporting framework.