

MEMORANDUM

TO: File No. S7-27-18

FROM: Adam B. Glazer
Counsel to Commissioner Hester M. Peirce

RE: Meeting with Various Parties Regarding Proposed Rule 12d1-4 under the Investment Company Act

DATE: June 6, 2019

On June 6, 2019, Commissioner Hester M. Peirce and her counsels, Adam Glazer and Thaya Knight, met with the following to discuss proposed rule 12d1-4 under the Investment Company Act:

- Tracy Maitland, Founder and President, Advent Capital Management;
- Tony Huang, Director, Advent Capital Management;
- Rose DiMartino, retired, former Partner, Willkie, Farr, & Gallagher, LLP;
- David Goldman, Vice President, Corporate Development and General Counsel, Gabelli Funds;
- Estuardo Rodriguez, Principal and Co-Founder, The Raben Group; and
- Diego Sanchez, Senior Associate, The Raben Group.

The participants discussed, among other things, the Commission's proposed new rule, 12d1-4 under the Investment Company Act, in Investment Company Act Release No. 33329 (Dec. 19, 2018).