

MEMORANDUM

TO: File No. S7-27-18

FROM: Jacob Krawitz
Branch Chief, Division of Investment Management

RE: Meeting with Trustees of Advent Claymore Convertible Securities and Income Fund and Advent Capital Management

DATE: June 18, 2019

On June 18, 2019, Dalia Blass, Adam Glazer, Naseem Nixon, Jacob Krawitz, Melissa Gainor, Daniele Marchesani, and Sarah ten Siethoff, all staff of the Securities and Exchange Commission, met with the following trustees of Advent Claymore Convertible Securities and Income Fund and Advent Capital Management:

- Daniel L. Black, Trustee
- Randall C. Barnes, Trustee
- Derek Medina, Trustee
- Ronald A. Nyberg, Trustee
- Gerald L. Seizert, Trustee
- Michael A. Smart, Trustee
- Jay Spinola, Willkie Farr & Gallagher LLP.
- Tracy Maitland, Advent Capital Management
- Edward Delk, Advent Capital Management

The participants discussed, among other things, the Commission's Fund of Funds Arrangements proposal, set forth in Investment Company Act Release No. 33329 (December 19, 2018).