

MEMORANDUM

To: File Nos. S7-27-18

From: Frank A. Buda
Counsel to Commissioner Allison Herren Lee
U.S. Securities and Exchange Commission

Date: August 20, 2019

Re: Meeting with representatives of Gabelli Funds, Advent Capital Management, and
The Raben Group

On August 19, 2019, Commissioner Lee and her counsel, Frank Buda, met with the following individuals: Edward Delk and Laura Bevill of Advent Capital Management; David Goldman of Gabelli Funds; and Estuardo Rodriguez, Diego Sanchez, and Maria Lloyd Price of The Raben Group. Among the topics discussed was the Commission's proposed rulemaking on Fund of Funds Arrangements.