

MEMORANDUM

To: File No. S7-27-18

From: William Middlebrooks, Counsel to Commissioner Hester M. Peirce

Re: Meeting with Representatives of the Investment Company Institute and certain of its members

On September 18, 2019, Commissioner Hester M. Peirce and William Middlebrooks, Counsel to Commissioner Peirce, met with the following representatives from the Investment Company Institute and certain of its members:

- Jane Heinrichs (ICI),
- Michael Mundt (Stradley Ronon).

Among the topics discussed were the Commission's Fund of Funds Arrangements rule proposal, set forth in Investment Company Act Release No. 33329 (December 19, 2018).