## **MEMORANDUM**

TO: File

FROM: James P. Sinnott

RE: Consultation with the Committee of Annuity Insurers regarding Business Conduct

Standards

DATE: November 22, 2010

On November 4, 2010, Robert Bagnall, Lourdes Gonzalez, Cindy Oh, and Joanne Rutkowski of the Securities and Exchange Commission ("SEC") and Katherine Driscoll, Ted Kneller, Barry McCarty, Michael Solinsky, Peter Sanchez, Brian Conlon, and Vivek Jain of the Commodity Futures Trading Commission ("CFTC") consulted with Cliff Kirsch and James Cain of Sutherland Asbill & Brennan.

The participants discussed the business conduct provisions of the Dodd-Frank Act. The participants provided an overview of the use of swaps in the insurance industry.

