MEMORANDUM

TO: Proposed Rule: Safeguarding Advisory Client Assets

(IA-6240; File No. S7-04-23)

FROM: Samuel K. Thomas

Senior Counsel, Division of Investment Management

RE: Videoconference with Representatives of the Committee of Annuity Insurers

DATE: June 13, 2023

On June 13, 2023, staff from the U.S. Securities and Exchange Commission ("SEC") held a videoconference with representatives of the Committee of Annuity Insurers.

Participants included SEC staff from the Division of Investment Management: Sarah ten Siethoff, Melissa Roverts Harke, Christopher Staley, Holly Miller, Samuel Thomas, Christopher Chase, Laura Powell, and Michael Republicano; from the Division of Economic and Risk Analysis: Daniel Deli and Robert Girouard; and representatives from the Committee of Annuity Insurers included:

- Clifford Kirsch, Partner, Eversheds Sutherland
- Michael Koffler, Partner, Eversheds Sutherland
- Issa Hanna, Partner, Eversheds Sutherland
- Andrew Mount, Senior Associate, Eversheds Sutherland

Among other things, the participants discussed the SEC's proposal titled "Safeguarding Advisory Client Assets," set forth in Release No. IA-6240 (Feb. 15, 2023).