TO: File No. S7-07-16

FROM: Jessica Shin, Division of Investment Management

RE: Meeting with Representatives of the American Investment Council

DATE: July 10, 2019

On Wednesday, July 10, 2019, representatives of the Securities and Exchange Commission ("SEC") participated in a meeting with representatives from the American Investment Council ("AIC") and their outside counsel, Debevoise & Plimpton LLP ("Debevoise"). The SEC representatives present in-person were Anne Krauskopf from the Division of Corporation Finance; Paul Cellupica, Naseem Nixon, Sarah ten Siethoff, Jennifer Porter, and Jessica Shin from the Division of Investment Management; and Natasha Greiner from the Division of Trading and Markets. The AIC representatives present were Jason Mulvihill and Morgan Clarke. The Debevoise representatives present were Ken Berman, Meir Katz, Elizabeth Pagel Serebransky, and Rebecca Silberstein.

The participants discussed, among other things, the topics identified in the AIC's letter to the Commission dated July 22, 2016 regarding the proposed rules implementing section 956 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.