MEMORANDUM

TO: File No. S7-32-10

FROM: Yue Ding, Counsel to Commissioner Lee

RE: Meeting with Representatives from the American Council of Life Insurers

DATE: June 8, 2022

On June 8, 2022, Commissioner Lee, Parisa Haghshenas, and Yue Ding held a videoconference with:

- Kathleen O'Neill, Associate General Counsel, New York Life
- Joseph J. Demetrick, Managing Director, Derivatives & Liquid Markets, MetLife
- Robert Rose, Vice President, MetLife
- Richard A. Miller, American Council of Life Insurers
- Paul M. Kangas, Vice President, Financial Services, American Council of Life Insurers

The topics discussed were the Commission's proposed rules on prohibition against fraud, manipulation, or deception in connection with security-based swaps and position reporting of large security-based swap positions.