

## MEMORANDUM

To: File No. S7-41-11

From: Jennifer B. McHugh  
Senior Advisor to the Chairman

Date: February 22, 2012

Re: Meeting with the Financial Services Roundtable and Insurance Companies

On February 16, 2012, representatives from the Financial Services Roundtable (FSR) and certain insurance companies met with SEC staff to discuss the rule proposal titled “Prohibitions and Restrictions on Proprietary Trading and Certain Interests in, and Relationships With, Hedge Funds and Private Equity Funds.” The FSR and insurance company representatives reiterated the points made in FSR’s February 3, 2012 comment letter on issues relevant to insurance companies, available at <http://www.sec.gov/comments/s7-41-11/s74111-105.pdf>.

The following representatives from FSR and insurance companies attended the meeting:

James Fifield	Principal
Christopher Payne	Principal
Lucia Riddle	Principal
Julia Marie Lawler-Johnson	Principal
Sheila Greenwood	Prudential
John Bronson	Prudential
Gerald T. Lins	ING
Sean Cassidy	ING
Molly Wilkinson	Regions
Byron Anderson	Transamerica
Harry Hallowell	Nationwide
Bridget Flynn Hagan	Nationwide
Chris Black	Nationwide
Michael J. Mazzola	MetLife
William K. Ding	MetLife
Paul Lee	Debevoise & Plimpton
Samuel Proctor	Debevoise & Plimpton
John Dembeck	Debevoise & Plimpton
Peter Freeman	FSR
Scott Talbott	FSR
Julie Spiezo	ACLI

The following representatives from the SEC attended the meeting:

Jennifer McHugh	Office of the Chairman
Caite McGuire	Division of Trading and Markets
Lisa Skrzycki	Division of Trading and Markets
Josephine Tao	Division of Trading and Markets
Gregg Berman	Division of Trading and Markets
Daniel Kahl	Division of Investment Management
Tram Nguyen	Division of Investment Management
Keith Carpenter	Division of Investment Management
David Beaning	Division of Corporation Finance