



# Harry Eisenstein

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## Overview

Harry Eisenstein is a regulatory lawyer with more than two decades of experience in insured investment products, including serving as senior special counsel in the Securities and Exchange Commission's Division of Investment Management.

In his 25-plus-year career with the SEC, Harry has been at the forefront of both traditional and innovative investment products and is regarded as a subject matter expert on filings for, and interpretive questions related to, registered index-linked annuities. As the point person for these products since their introduction in 2010, Harry has been deeply involved in the development and implementation of new filing review procedures, effectively shaping the way in which the SEC and industry approach such products. His notable contributions include spearheading the development of standardized disclosure comments for non-variable insurance products generally, training SEC staff on the mechanics of and legal issues arising from these products, and serving as the primary drafter of what are now standardized SEC letters allowing insurers to use statutory accounting principles in place of generally accepted accounting principles in preparing financials statements filed in registration statements for these products. He imparts the insight gained from this experience to clients, providing guidance to drive their proposals expeditiously and foster a proactive approach to regulatory challenges.

In addition, Harry has a wealth of professional experience, including serving with the Chief Counsel's Office, in legal issues arising under the Investment Company Act with respect to variable insurance products and investment companies generally.

# Areas of Focus

## Practices

- Financial Services Regulatory
- International Insurance Regulatory
- Investment Funds
- Life, Annuity, and Retirement Solutions
- Reinsurance
- Securities Transactions and Compliance

## Industries

- Life, Annuity, and Retirement Solutions
- Securities & Investment Companies

## Insights

04.28.2025

Contingent Deferred Annuities: Time for Renewal?

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03.05.2025

SEC's Newly Established Crypto Task Force: An Ambitious Agenda to Fill in the Gaps

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02.01.2025

RILA Rulemaking: Things Left Out in the Cold and Things Left Unsaid

*The Investment Lawyer*

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01.24.2025

Getting Clued In: How the SEC's RILA Rulemaking Affects Variable Annuities

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09.30.2024

Adviser Loses Customer Crypto: Wallet Key Custody Not Airtight

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09.30.2024

Up, Up, and Away for RILA Regulation SEC Adopts Long-Awaited Framework

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09.19.2024

A Sea Change in RILA Regulation: Navigating the New Waters

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09.01.2024

Rules for RILA and MVA Marketing Communications – Still Being Held Back, But There Remains a Crack in the Door

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07.11.2024

New SEC RILA Rules: Implementation Issues and Practical Considerations

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05.09.2024

Last Lap in SEC RILA Rulemaking: Critical Unresolved Issues

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## News

11.01.2023

Harry Eisenstein Featured in Law360: “Carlton Fields Adds Former SEC Regulatory Atty in DC”

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10.31.2023

Former SEC Senior Special Counsel Harry Eisenstein Joins Carlton Fields’ Financial Services Regulatory Practice

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10.31.2023

Harry Eisenstein Featured in Attorney at Law Magazine: “Former SEC Senior Special Counsel Harry Eisenstein Joins Carlton Fields’ Financial Services Regulatory Practice”

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10.31.2023

Harry Eisenstein Featured in Bloomberg Law: “Ex-SEC Senior Special Counsel Joins Carlton Fields in Washington”

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## Speaking Engagements

- "The New SEC Regulatory and Enforcement Landscape," 2025 IRI Annual Conference, Tampa, FL (March 27, 2025)
- “Variable Insurance Products: Current Disclosure Issues and Other Continuing Considerations,” ALI CLE Conference on Life Insurance Products, Washington, D.C. (November 7, 2024)
- "RILA Rulemaking: The Highs, the Lows, and the Unknown," Toppan Merrill (September 16, 2024)

- “The SEC Regulatory Landscape: New Cases, New Rules” and “Lost in the Maze? Navigating Federal Regulation of the Annuity Industry,” 2024 IRI Annual Conference, Nashville, TN (April 3, 2024)

## Credentials

### Education

- University of Pennsylvania Carey Law School (J.D., 1986)
  - Editor, *University of Pennsylvania Law Review*.
- University of Chicago (MBA, 1978)
- Wharton School of the University of Pennsylvania (B.S., cum laude, 1975)

### Bar Admissions

- New York
- District of Columbia

### Languages

- German