

MEMORANDUM

TO: Proposed Rule: Use of Derivatives by Registered Investment Companies and Business Development Companies
(Release No. IC-31933; File No. S7-24-15)

FROM: John Lee
Senior Counsel, Division of Investment Management

RE: Meeting with Representatives of Wellington Management Company LLP

DATE: July 2, 2018

On July 2, 2018, Dalia Blass (Director, U.S. Securities and Exchange Commission (“SEC”), Division of Investment Management (“IM”)), Sarah ten Siethoff (Associate Director, IM), David Bartels (Senior Special Counsel, IM), Thoreau A. Bartmann (Senior Special Counsel, IM), Tim Dulaney (Senior Financial Analyst, IM), Roberta Ufford (Senior Special Counsel, IM), Jacob Sandoval (Branch Chief, IM), Adam Bolter (Senior Counsel, IM), John Lee (Senior Counsel, IM), Amy Miller (Senior Counsel, IM), and Naseem Nixon (Senior Counsel, IM) met with the following representatives of Wellington Management Company LLP:

- Lance C. Dial, Managing Director and Counsel
- Jeremy Forster, Managing Director and Fixed Income Portfolio Manager
- Peter G. Matheos, PhD, Managing Director and Director, Global Risk and Analytics
- Edward G. Maydon, Vice President, Compliance Officer
- Jed Stevenson, Senior Managing Director, Partner, and Fixed Income Trader

Among other things, the participants discussed the SEC’s proposal relating to the use of derivatives by registered investment companies and business development companies.