

## MEMORANDUM

TO: Proposed Rule: Investment Adviser Advertisements; Compensation for Solicitors  
(Release No. IA-5407; File No. S7-21-19)

FROM: Aaron Russ  
Senior Counsel, Division of Investment Management (“IM”)

RE: Call with Representatives of Wellington Management Company LLP  
 (“Wellington”)

DATE: February 2, 2020

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On February 2, 2020, the SEC met with representatives of Wellington. Participants included: Sarah ten Siethoff (Associate Director, IM), Melissa Gainor (Assistant Director, IM), Melissa Harke (Senior Special Counsel, IM), Thoreau Bartmann, (Senior Special Counsel, IM), Emily Rowland (Senior Counsel, IM), Matt Cook (Senior Counsel, IM), Juliet Han (Senior Counsel, IM), Aaron Russ (Senior Counsel, IM), Charles Lin (Financial Economist, Division of Economic and Risk Analysis (“DERA”)), and Mi Wu (Financial Economist, DERA) from the SEC and representatives from Wellington:

- Lance Dial, Managing Director and Counsel
- Michele Born, Managing Director

Among other things, the participants discussed the SEC’s proposed rules relating to investment adviser advertisements and compensation for solicitations.