

MEMORANDUM

TO: Procedural Requirements and Resubmission Thresholds
Under Exchange Act Rule 14a-8
(Release No. 34-87457; File No. S7-23-19)

FROM: Judy Lee
Senior Special Counsel, Division of Investment Management (“IM”)

RE: Call with Representative of Fidelity Investments (“Fidelity”)

DATE: March 2, 2020

On March 2, 2020, David Bartels (Deputy Chief Counsel, IM), Raymond Be (Senior Counsel, IM), Judy Lee (Senior Special Counsel, IM), David Orlic (Senior Counsel) and Jessica Shin (Senior Counsel, IM) had a call with the follow representative of Fidelity:

- Brian Blackburn, VP, Associate General Counsel
- Maggie Carey, SVP, Deputy General Counsel
- Jason Goggins, VP, Government Relations
- Jason Pogorelec, VP, Associate General Counsel

Among other things, the participants discussed the SEC’s proposal relating to reaffirmation of shareholder proposals for open-end investment companies.