March 2, 2020

Via E-mail to shareholderproposals@sec.gov

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: State Street Corporation
Withdrawal of No-Action Request, dated January 10, 2020, relating to
Exclusion of Shareholder Proposal Submitted by James McRitchie

Ladies and Gentlemen:

We are writing on behalf of our client, State Street Corporation (the “Company”), with regard to our letter dated January 10, 2020 (the “No-Action Request”), concerning the shareholder proposal and supporting statement (collectively, the “Shareholder Proposal”) submitted by James McRitchie (together with his designated proxy, John Chevedden, the “Proponent”) for inclusion in the Company’s proxy statement and proxy to be filed and distributed in connection with its 2020 Annual Meeting of Shareholders (the “Proxy Materials”). In the No-Action Request, the Company requested that the staff (the “Staff”) of the Division of Corporation Finance of the Securities and Exchange Commission (the “Commission”) advise the Company that it would not recommend any enforcement action to the Commission if the Company excluded the Shareholder Proposal from its Proxy Materials pursuant to Rule 14a-8(i)(10) of the Securities Exchange Act of 1934, as amended, on the basis that the Company would have substantially implemented the Shareholder Proposal by the time the Company files its Proxy Materials.

On February 21, 2020, the Proponent withdrew the Shareholder Proposal by email (attached as Exhibit A to this letter). In reliance on the Proponent’s email, the Company is withdrawing the No-Action Request.
March 2, 2020

If the Staff has any questions with respect to the foregoing, please do not hesitate to contact me at lillian.brown@wilmerhale.com or (202) 663-6743, or Jeremy Kream, Head of Legal, Corporate and International, State Street Corporation at JKream@StateStreet.com.

Very truly yours,

\[signature\]

Lillian Brown

Enclosure

cc: Jeffrey N. Carp
Jeremy Kream
John Chevedden
Exhibit A
Ladies and Gentlemen,
We withdraw Mr. James Ritchie’s 2020 rule 14a-8 proposal in return for the management action below.
John Chevedden
cc: James McRitchie

**Item 5.03. Amendments to Articles of Incorporation or Bylaws; Change in Fiscal Year.**
On February 20, 2020, State Street Corporation’s Board of Directors amended Article II Section 3 of the corporation’s by-laws, with immediate effect. The by-laws, as amended, allow for the removal of any director with or without cause at a meeting of shareholders duly called and noticed for that purpose. Prior to this amendment, the by-laws provided for the removal of a director by the shareholders only for cause. Other than this amendment, no other changes were made to the by-laws.
January 10, 2020

Via E-mail to shareholderproposals@sec.gov

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: State Street Corporation
Exclusion of Shareholder Proposal Submitted by James McRitchie

Ladies and Gentlemen:

We are writing on behalf of our client, State Street Corporation (the “Company”), to inform you of the Company’s intention to exclude from its proxy statement and proxy to be filed and distributed in connection with its 2020 Annual Meeting of Shareholders (the “Proxy Materials”) the enclosed shareholder proposal and supporting statement (collectively, the “Shareholder Proposal”) submitted by James McRitchie (together with his designated proxy, John Chevedden, the “Proponent”) requesting that the board of directors of the Company (the “Board”) “undertake such steps as may be necessary to permit removal of directors by a majority vote of shareholders with or without cause.”

The Company respectfully requests that the staff of the Division of Corporation Finance (the “Staff”) of the Securities and Exchange Commission (the “Commission”) advise the Company that it will not recommend any enforcement action to the Commission if the Company excludes the Shareholder Proposal from its Proxy Materials pursuant to Rule 14a-8(i)(10) of the Securities Exchange Act of 1934, as amended (the “Exchange Act”), on the basis that the Company will have substantially implemented the Shareholder Proposal by the time the Company files its Proxy Materials.
Pursuant to Rule 14a-8(j) of the Exchange Act and Staff Legal Bulletin No. 14D (November 7, 2008) (“SLB 14D”), the Company is submitting electronically to the Commission this letter and the Shareholder Proposal and related correspondence (attached as Exhibit A to this letter), and is concurrently sending a copy to the Proponent, no later than eighty calendar days before the Company intends to file its definitive Proxy Materials with the Commission.

Shareholder Proposal

On December 2, 2019, the Company received the Shareholder Proposal from the Proponent, which states, in relevant part:

Resolved: State Street Corp (“STT” or “Company”) shareholders ask our board to undertake such steps as may be necessary to permit removal of directors by a majority vote of shareholders with or without cause.

Supporting Statement: Best corporate governance practice is to allow shareholders, by majority vote, to elect their directors and allow for the removal of directors with or without cause by a majority vote of shares voted for and against directors.

In December 2015, the Delaware Court of Chancery (the “Court”) issued a decision, In Re VAALCO Energy, Inc., in which the Court interpreted Section 141(k) of General Corporation Law of the State of Delaware and held that if a company does not have (i) a classified board of directors or (ii) cumulative voting in election of directors, then such company may not provide in its certificate of incorporation or bylaws that its directors may be removed only for cause. Prior to the VAALCO decision, it was unclear whether Section 141(k) prohibited allowing director removal only for cause when a company did not have classified board or did not allow for a cumulative vote.

Although our Company is incorporated in Massachusetts, not Delaware, the Delaware ruling would suggest review of organizational and governing documents is prudent, particularly at companies such as STT, with declassified boards.

Our Company allows shareholders to call a special meeting. The main purpose of calling a special meeting is often to change the board between annual meetings. To obtain a board majority between annual meetings in an emergency situation, shareholders must be able to create vacancies and be able to fill them.

The current right of shareholders to call a special meeting can accomplish little if directors cannot be removed without cause. See The Never-Ending Quest for
Shareholder Rights: Special Meetings and Written Consent by Emiliano Catan and Marcel Kahan, November 2018 at https://corpgov.law.harvard.edu/2019/05/31/the-never-ending-quest-for-shareholder-rights-special-meetings-and-written-consent/.

Shareholder rights to call a special meeting and to act by written consent are two complimentary ways to bring an important matter to the attention of both management and shareholders outside the annual meeting cycle. STT shareholders have no effective right to act by written consent because such consents must be unanimous. Similarly, our right to call a special meeting is constrained by allowing removal of directors only for cause.

Background

The Company’s bylaws provide that, at a shareholder meeting called for the purpose of removing one or more directors, a director may be removed from office only for cause and only by a vote of a majority of the shares issued, outstanding and entitled to vote for the election of directors. This voting standard is consistent with applicable Massachusetts law. The Company’s bylaws may be amended by a vote of a majority of the directors then in office. The Company’s Restated Articles of Organization, as amended, do not contain any provision relating to the removal of directors, other than provisions relating to the removal of preferred directors, who can be removed with or without cause by preferred shareholders.

On or about February 20, 2020, the Board is expected to approve an amendment to the Company’s bylaws (the “Bylaws Amendment”) that would allow shareholders to remove a director with or without cause. Because the Bylaws Amendment does not require shareholder approval, it will become effective immediately after it is approved by the Board. Accordingly, by the time the Proxy Materials are filed, the Bylaws Amendment will have substantially implemented the Shareholder Proposal.

We are submitting this letter before the approval of the Bylaws Amendment to address the timing requirements of Rule 14a-8(j). Once formal action has been taken by the Board to adopt the Bylaws Amendment, the Company will notify the Staff that this action has been taken and provide the full text of the Bylaws Amendment. In addition, we note that we have been in discussions with Mr. Chevedden regarding the intended Bylaws Amendment and understand that the Proponent anticipates withdrawing the Shareholder Proposal following Board approval of the Bylaws Amendment. If Mr. Chevedden withdraws the Shareholder Proposal on behalf of the Proponent before the Staff responds to this no-action request, the Company will promptly notify the Staff and withdraw this request for no-action relief.
Basis for Exclusion

The Shareholder Proposal May Be Excluded Pursuant to Rule 14a-8(i)(10) Because the Company Will Have Substantially Implemented the Shareholder Proposal by the Time the Company Files the Proxy Materials

The purpose of the Rule 14a-8(i)(10) exclusion is to “avoid the possibility of shareholders having to consider matters which have already been favorably acted upon by management.” Commission Release No. 34-12598 (July 7, 1976). While the exclusion was originally interpreted to allow exclusion of a shareholder proposal only when the proposal was “fully effected” by the company, the Commission has revised its approach to the exclusion over time to allow for exclusion of proposals that have been “substantially implemented.” Commission Release No. 34-20091 (August 16, 1983) and Commission Release No. 40018 (May 21, 1998). In applying this standard, the Staff has noted that “a determination that the [c]ompany has substantially implemented the proposal depends upon whether [the company’s] particular policies, practices and procedures compare favorably with the guidelines of the proposal.” Texaco, Inc. (March 6, 1991, recon. denied March 28, 1991). In addition, when a company can demonstrate that it already has taken actions that address the “essential objective” of a shareholder proposal, the Staff has concurred that the proposal has been “substantially implemented” and may be excluded as moot, even where the company’s actions do not precisely mirror the terms of the shareholder proposal.

The Staff has concurred in the exclusion of a proposal similar to the Shareholder Proposal under Rule 14a-8(i)(10) where such proposal sought an amendment to a company’s bylaws to “permit removal of a director either with or without cause,” and the company adopted such an amendment prior to filing its proxy materials and submitting a no-action request to the Staff. See Whole Foods Market, Inc. (November 14, 2012). The Staff also has consistently granted no-action requests pursuant to Rule 14a-8(i)(10) in circumstances where a company notifies the Staff that it intends to exclude a shareholder proposal on the basis that the board of directors is expected to take action that will substantially implement the proposal, and the company follows its initial submission with a supplemental notification to the Staff confirming that such action had been taken. See, e.g., Fortive Corporation (March 13, 2019) (elimination of supermajority voting); Invesco Ltd. (March 8, 2019) (elimination of supermajority voting); United Technologies Corporation (March 1, 2019) (elimination of supermajority voting); AbbVie Inc. and Cadence Design Systems, Inc. (February 27, 2019) (elimination of supermajority voting); NCR Corporation (February 15, 2019) (elimination of supermajority voting); State Street Corporation (March 5, 2018) (elimination of supermajority voting); The Southern Company (February 24, 2017) (elimination of supermajority voting); OGE Energy Corp. (March 2, 2016) (elimination of supermajority voting); The Progressive Corporation (February 18, 2016)
January 10, 2020
Page 5

(elimination of supermajority voting); *Berry Plastics Group, Inc.* (December 14, 2016) (proxy access); *The Wendy’s Company* (March 2, 2016) (proxy access); *Reliance Steel & Aluminum Co.* and *United Continental Holdings, Inc.* (February 26, 2016) (proxy access); *Huntington Ingalls Industries, Inc.* (February 12, 2016) (proxy access); and *Spirit AeroSystems Holdings, Inc.* (February 10, 2016) (majority voting for director elections proposal). Consistent with these precedents, and as previously noted, the Company will notify the Staff once formal action has been taken by the Board to adopt the Bylaws Amendment.

As described above, the Company’s bylaws currently allow shareholders holding a majority of the shares issued, outstanding and entitled to vote for the election of directors to remove a director at a shareholder meeting called for that purpose, and the Bylaws Amendment would allow shareholders to remove a director with or without cause. The Shareholder Proposal requests that the Board “undertake such steps as may be necessary to permit removal of directors by a majority vote of shareholders with or without cause.” Thus, consistent with the line of precedent cited above, the Company believes that it will have substantially implemented the Shareholder Proposal before it files its Proxy Materials. In this regard, the Bylaws Amendment compares favorably with the guidelines of the Shareholder Proposal and satisfies its essential objective. Once the Board approves the Bylaws Amendment, the Board will have taken all steps necessary and within its power and will have substantially implemented the Shareholder Proposal. For all of these reasons, the Company believes the Shareholder Proposal may be excluded under Rule 14a-8(i)(10).

**Conclusion**

Based on the foregoing, the Company respectfully requests that the Staff concur that it will take no action if the Company excludes the Shareholder Proposal from its Proxy Materials pursuant to Rule 14a-8(i)(10), on the basis that the Company will have substantially implemented the Shareholder Proposal by the time the Company files the Proxy Materials.

If the Staff has any questions with respect to the foregoing, or if for any reason the Staff does not agree that the Company may exclude the Shareholder Proposal from its Proxy Materials, please do not hesitate to contact me at lillian.brown@wilmerhale.com or (202) 663-6743, or Jeremy Kream, Head of Legal, Corporate and International, State Street Corporation at JKream@StateStreet.com. In addition, should the Proponent choose to submit any response or other correspondence to the Commission, we request that the Proponent concurrently submit that
January 10, 2020
Page 6

response or other correspondence to the Company, as required pursuant to Rule 14a-8(k) and SLB 14D, and copy the undersigned.

Very truly yours,

[Signature]

Lillian Brown

Enclosures

cc: Jeffrey N. Carp
    Jeremy Kream
    John Chevedden
Mr. Carp,

Please see the attached rule 14a-8 proposal to improve corporate governance and enhance long-term shareholder value at de minimis up-front cost – especially considering the substantial market capitalization of the company.

Sincerely,

John Chevedden
Dear Secretary Carp,

I am pleased to be a State Street shareholder and appreciate the leadership our company has shown on numerous issues. However, unrealized potential can be unlocked through low or no cost measures by making our corporate governance more competitive.

I am submitting the attached shareholder proposal requesting Shareholder Right to Remove Directors for a vote at the next annual shareholder meeting. I will meet Rule 14a-8 requirements including the continuous ownership of the required stock value until after the date of the respective shareholder meeting. Our submitted format, with the shareholder-supplied emphasis, is intended to be used for definitive proxy publication.

This is my delegation to John Chevedden and/or his designee to act as my agent regarding this Rule 14a-8 proposal, and/or modification and presentation of it before and during the forthcoming shareholder meeting. This delegation does not cover proposals that are not rule 14a-8 proposals and does not grant the power to vote.

Please direct all future communications regarding our rule 14a-8 proposal to John Chevedden to facilitate prompt and verifiable communications. Please identify this proposal as my proposal exclusively.

Your consideration and that of the Board of Directors is appreciated in support of the long-term performance of our company. I would be happy to discuss the proposal. Please acknowledge receipt of my proposal promptly by email to

Sincerely,

James McRitchie

Date

December 2, 2019
Resolved: State Street Corp ("STT" or "Company") shareholders ask our board to undertake such steps as may be necessary to permit removal of directors by a majority vote of shareholders with or without cause.

Supporting Statement: Best corporate governance practice is to allow shareholders, by majority vote, to elect their directors and allow for the removal of directors with or without cause by a majority vote of shares voted for and against directors.

In December 2015, the Delaware Court of Chancery (the "Court") issued a decision, In Re VAALCO Energy, Inc., in which the Court interpreted Section 141(k) of General Corporation Law of the State of Delaware and held that if a company does not have (i) a classified board of directors or (ii) cumulative voting in election of directors, then such company may not provide in its certificate of incorporation or bylaws that its directors may be removed only for cause. Prior to the VAALCO decision, it was unclear whether Section 141(k) prohibited allowing director removal only for cause when a company did not have classified board or did not allow for a cumulative vote.

Although our Company is incorporated in Massachusetts, not Delaware, the Delaware ruling would suggest review of organizational and governing documents is prudent, particularly at companies such as STT, with declassified boards.

Our Company allows shareholders to call a special meeting. The main purpose of calling a special meeting is often to change the board between annual meetings. To obtain a board majority between annual meetings in an emergency situation, shareholders must be able to create vacancies and be able to fill them.

The current right of shareholders to call a special meeting can accomplish little if directors cannot be removed without cause. See The Never-Ending Quest for Shareholder Rights: Special Meetings and Written Consent by Emiliano Catan and Marcel Kahan, November 2018 at https://corpgov.law.harvard.edu/2019/05/31/the-never-ending-quest-for-shareholder-rights-special-meetings-and-written-consent/.

Shareholder rights to call a special meeting and to act by written consent are two complimentary ways to bring an important matter to the attention of both management and shareholders outside the annual meeting cycle. STT shareholders have no effective right to act by written consent because such consents must be unanimous. Similarly, our right to call a special meeting is constrained by allowing removal of directors only for cause.

Increase Shareholder Value
Vote for Shareholder Right to Remove Directors – Proposal [4*]
[This line and any below are not for publication]
Number 4* to be assigned by STT
James McRitchie sponsors this proposal.

Notes:
This proposal is believed to conform with Staff Legal Bulletin No. 14B (CF), September 15, 2004 including (emphasis added):

Accordingly, going forward, we believe that it would not be appropriate for companies to exclude supporting statement language and/or an entire proposal in reliance on rule 14a-8(I)(3) in the following circumstances:

• the company objects to factual assertions because they are not supported;
• the company objects to factual assertions that, while not materially false or misleading, may be disputed or countered;
• the company objects to factual assertions because those assertions may be interpreted by shareholders in a manner that is unfavorable to the company, its directors, or its officers; and/or
• the company objects to statements because they represent the opinion of the shareholder proponent or a referenced source, but the statements are not identified specifically as such.

We believe that it is appropriate under rule 14a-8 for companies to address these objections in their statements of opposition.

See also: Sun Microsystems, Inc. (July 21, 2005).

The stock supporting this proposal will be held until after the annual meeting and the proposal will be presented at the annual meeting. Please acknowledge this proposal promptly by email...
Hi Mr. Chevedden,
Thank you for the submission of the shareholder proposal on Mr. McRitchie’s behalf. As requested in the cover letter of the proposal, this email serves as notification of receipt of the shareholder proposal together with the attached letter and related information to request share ownership information in accordance with Rule 14a-8(b) under the Securities Exchange Act of 1934, as amended.
If you have any questions or if I can provide any additional information, please do not hesitate to reach out.
Best Regards –
Shannon
December 10, 2019

VIA EMAIL AND OVERNIGHT COURIER

Re: Notice of Deficiency Relating to Shareholder Proposal

Dear Mr. John Chevedden:

On December 2, 2019, State Street Corporation (the “Company”), received the shareholder proposal submitted by Mr. James McRitchie (the “Proponent”) for consideration at the Company’s 2020 Annual Meeting (the “Submission”). The Submission indicates that communications regarding it should be directed to you as agent serving on Mr. McRitchie’s behalf. Based on the date of electronic transmission of the Submission, the Company has determined that the date of submission was December 2, 2019 (the “Submission Date”).

Rule 14a-8(b) under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), provides that a shareholder proponent must submit sufficient proof of their continuous ownership of at least $2,000 in market value, or 1%, of a company’s shares entitled to vote on the proposal for at least one year prior to and including the Submission Date. The Company’s stock records do not indicate that the Proponent is the record owner of sufficient shares to satisfy this requirement. Therefore, under Rule 14a-8(b), the Proponent must prove its eligibility by submitting either:

- A written statement from the “record” holder of the Proponent’s shares (usually a broker or a bank) verifying that, as of the Submission Date, the Proponent continuously held the requisite number of Company shares for at least one year. As addressed by the SEC staff in Staff Legal Bulletin 14G, please note that if the Proponent’s shares are held by a bank, broker or other securities intermediary that is a Depository Trust Company (“DTC”) participant or an affiliate thereof, proof of ownership from either that DTC participant or its affiliate will satisfy this requirement. Alternatively, if the Proponent’s shares are held by a bank, broker or other securities intermediary that is not a DTC participant or an affiliate of a DTC participant, proof of ownership must be provided by both (1) the bank, broker or other securities intermediary and (2) the DTC participant (or an affiliate thereof) that can verify the holdings of the bank, broker or other securities intermediary. You can confirm whether a particular bank, broker or other securities intermediary is a DTC participant by checking DTC’s participant list, which is available on the Internet at http://www.dtcc.com/downloads/membershipdirectories/dtc/alpha.pdf.
The Proponent should be able to determine who the DTC participant is by asking the Proponent’s bank, broker or other securities intermediary; or

- If the Proponent has filed with the SEC a Schedule 13D, Schedule 13G, Form 3, Form 4 or Form 5, or amendments to those documents or updated forms, reflecting its ownership of the requisite number of Company shares as of or before the date on which the one-year eligibility period begins, a copy of the schedule and/or form, and any subsequent amendments reporting a change in the ownership level and a written statement that the Proponent continuously held the requisite number of Company shares for the one-year period.

The Submission cover letter indicated that the Proponent intends to maintain continuous ownership until after the date of the annual shareholder meeting. However, to date, the Company has not received proof that the Proponent has satisfied Rule 14a-8’s ownership requirements as of the Submission Date. To remedy this defect, the Proponent must submit sufficient proof of its ownership of the requisite number of Company shares during the time period of one year preceding and including the Submission Date.

The SEC’s rules require that any response to this letter be postmarked or transmitted electronically no later than 14 calendar days from the date you receive this letter. Please address any response to the undersigned, Shannon Stanley, at scstanley@statestreet.com or by fax to 617.664.8209. The failure to correct the deficiencies within this timeframe will provide the Company with a basis to exclude the proposal contained in the Submission from the Company’s proxy materials for the 2020 Annual Meeting.

If you have any questions with respect to the foregoing, please contact me at 617.664.0589. For your reference, I enclose a copy of Rule 14a-8 and Staff Legal Bulletins 14F and 14G.

Sincerely,
Shannon C. Stanley

cc: Jeffrey N. Carp, Executive Vice President,
Chief Legal Officer and Corporate Secretary

Enclosure[s] – Exchange Act Rule 14a-8
Staff Legal Bulletins 14F and 14G
Dear Ms. Stanley,
Please see the attached broker letter.
Sincerely,
John Chevedden
12/05/2019

James McRitchie
Roth IRA ...

Re: Your TD Ameritrade Account Ending in ***

Dear James McRitchie,

Thank you for allowing me to assist you today. Pursuant to your request, this letter is to confirm that as of the date of this letter, James McRitchie held, and had held continuously for at least 13 months, 50 shares of State Street Corp (STT) common stock in his account ending in *** at TD Ameritrade. The DTC clearinghouse number for TD Ameritrade is 0188.

If we can be of any further assistance, please let us know. Just log in to your account and go to the Message Center to write us. You can also call Private Client Services at 800-400-4078. We’re available 24 hours a day, seven days a week.

Sincerely,

Andrew P. Haag
Resource Specialist
TD Ameritrade

This information is furnished as part of a general information service and TD Ameritrade shall not be liable for any damages arising out of any inaccuracy in the information. Because this information may differ from your TD Ameritrade monthly statement, you should rely only on the TD Ameritrade monthly statement as the official record of your TD Ameritrade account.

Market volatility, volume, and system availability may delay account access and trade executions.

TD Ameritrade, Inc., member FINRA/SIPC (www.finra.org, www.sipc.org). TD Ameritrade is a trademark jointly owned by TD Ameritrade IP Company, Inc. and The Toronto-Dominion Bank. © 2015 TD Ameritrade IP Company, Inc. All rights reserved. Used with permission.
Mr. Chevedden,
Thank you for meeting with me this morning. As noted in our conversation, State Street’s Nominating and Corporate Governance Committee and Board of Directors reviewed and discussed the shareholder proposal Mr. McRitchie submitted (and for which you are acting as agent) to amend the Company bylaws to add in the ability to remove directors at a special shareholder meeting ‘with or without cause’. The Board agreed with the request that shareholders should have the ability to remove directors without cause and plans to amend the Company bylaws at its next Board meeting in February 2020. The proposed edits to Article II Section 3 of bylaws would be simply to remove “only for cause and only” and add “with or without cause” as reflected in the marked excerpt below. With the Board’s agreement to make this amendment, they are hopeful that you would withdraw the shareholder proposal for the 2020 Annual Shareholder Meeting. If you have any questions or if I can provide any further information or assistance, please do not hesitate to reach out at the contact information included below.

SECTION 3. Removal. At any meeting of the shareholders called for the purpose, the notice of which meeting states that purpose, any director may be removed from office any director may be removed from office only for cause and only with or without cause...

Many thanks and happy holidays –
Shannon

Shannon C. Stanley, Managing Director and Senior Counsel
State Street | Legal Division | One Lincoln Street, 2nd Floor, Boston, MA 02111
P +617.664.0589 | scstanley@statestreet.com

The information contained in this e-mail (including any attachments) is intended solely for the use of the intended recipient(s), may be used solely for the purpose for which it was sent, may contain confidential, proprietary, or personally identifiable information, and/or may be subject to the attorney-client or attorney work product privilege or other applicable confidentiality protections. If you are not an intended recipient please notify the author by replying to this e-mail and delete this email immediately. Any unauthorized copying, disclosure, retention, distribution or other use of this email, its contents or its attachments is strictly prohibited.
Dear Ms. Stanley,
Then the effective date of withdrawal would be February 2020.
John Chevedden