

Retrieving SEC No-Action Letters

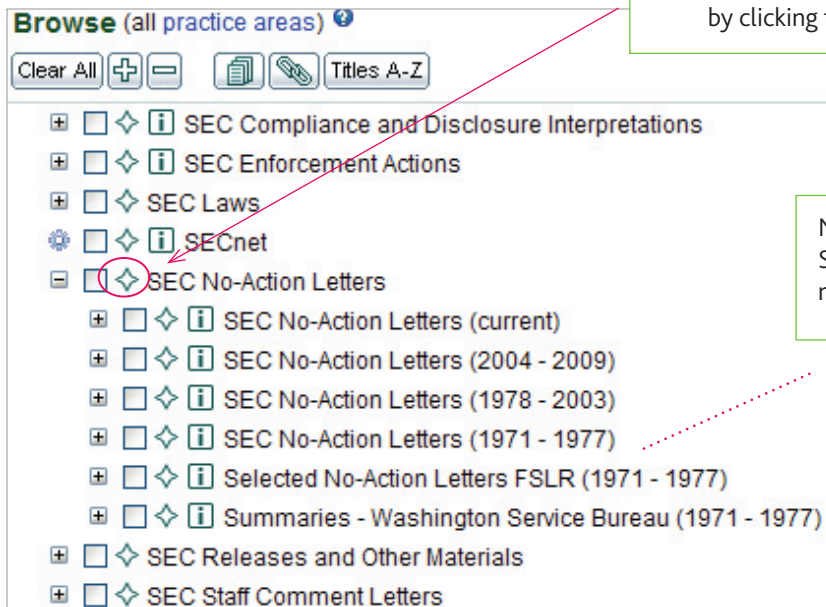
You can retrieve SEC No Action Letters by searching for keyword, company name, law firm name, date, the law/reg/rule that the NAL concerns, or a combination of these.

How to get there

1. Go to: <http://intelliConnect.cch.com>
2. Open **Practice Areas** and confirm that "Federal" (within "Securities") is available and selected. Click **Apply** (and **OK** to save changes, if needed).



3. Locate the SEC No-Action Letters database:



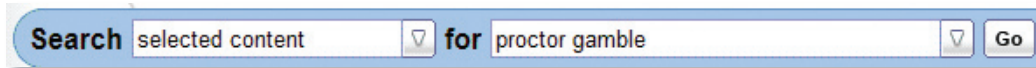
TIP: For quick access in the future, add **SEC No-Action Letters** to **My Favorites** by clicking the diamond

NOTE: The complete archive of SEC No-Action Letters contains material back to 1971.

Searching for SEC No-Action Letters (NALs)

Search for company name: e.g., Procter & Gamble

- Check the box(es) for SEC No-Action Letters. Note: Search scope should read “selected content”
- In the search text field, type company name and click **Go**

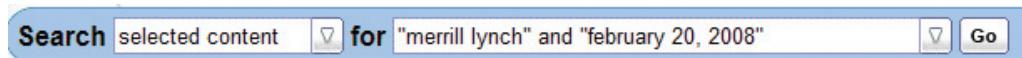


TIP:

- Results are displayed by relevance. NALs with your search term(s) in the title will be at the top.
- Change the display to show results in reverse chronological order by clicking **Most Recent**

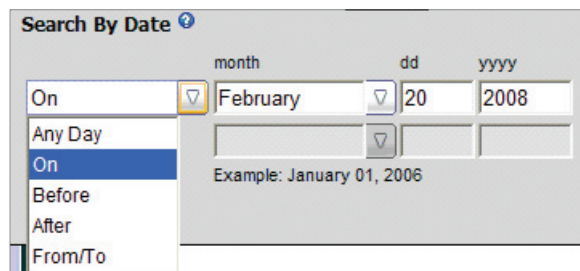
Search for name and specific date: e.g., Merrill Lynch, February 20, 2008

- Target SEC No-Action Letters
- Type the name of the company in quotes and the date in quotes and click **Go**



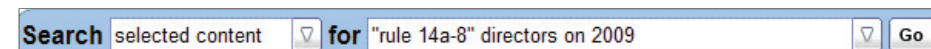
This will find all documents containing both the company name and the date as phrases within the text of the document

TIP: You can also use **Advanced Search** to restrict the search to specific dated documents.



Search for NALs dealing with a particular rule and add key words and date: e.g., Rule 144

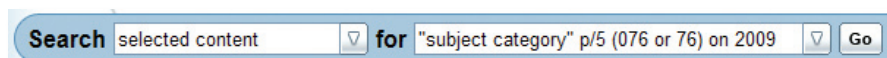
- Target SEC No-Action Letters
- Type the rule in quotes and, if desired, add a word and a date:



Search by category: Include subject category number(s) to locate NALs pertaining to the same topic. For example, Rule 14a-8 is broken down as follows:

- Category 73: Timely submissions
- Category 74: Other procedural exclusions
- Category 75: Substantive exclusions: exec. comp.
- Category 76: Substantive exclusions: director elections
- Category 77: Other substantive exclusions

Example: To find NALS dealing with “director elections” in 2009:



SEC No-Action Letters List of WSB Subject Categories

SEC No-Action Letters (NALs) within IntelliConnect are assigned WSB Subject Categories depending upon their subject matter. You can use these categories to restrict your search to specific SEC NALs.

SEC No-Action Letters (2004 - 2009), E*TRADE Securities, LLC, Securities and Exchange Commission, (Dec. 1, 2005)

Public Availability Date: December 01, 2005

WSB File No. 1128200515

WSB Subject Categories: 70, 131, 132, 134

Note: Always include a 3-digit number when searching for a subject category. For example: "subject category" p/5 (076 or 76)

Category	Act, Section, Rule	Category	Act, Section, Rule
1	Employee Stock Ownership Plans	34	1933 Act Sec. 3(a)(2) Other Governmental Obligations
2	Other Employee Benefit Plans	35	1933 Act Sec. 3(a)(2) Banks
3	Dividend Reinvestment Plans	36	1933 Act Sec. 3(a)(2) Other
4	Regulation S-K	37	1933 Act Sec. 3(a)(3) 'Current Transactions'
5	Accounting Rules, Independence Letters and Regulation S-X	38	1933 Act Sec. 3(a)(3) Other
6	1933 Act Rule 144(a)	39	1933 Act Sec. 3(a)(4) Charitable Organizations
7	1933 Act Rule 144(c)	40	1933 Act Sec. 3(a)(9)
8	1933 Act Rule 144(d)(4)	41	1933 Act Sec. 3(a)(10) Mergers/Acq./Reorgs./ Bankruptcies
9	1933 Act Rule 144(d)(other)	42	1933 Act Sec. 3(a)(10)Other
10	1933 Act Rule 144(e)	43	1933 Act Sec. 3(a) (other)
11	1933 Act Rule 144(k)	44	1933 Act Sec. 3 (other)
12	1933 Act Rule 144 Mergers/Acquisitions/ Reorganizations	45	1933 Act Sec. 4 (1)
13	1933 Act Rule 144—other	46	1933 Act Sec. 4 (2)
14	1933 Act Rule 145 Reclassif./Mergers/ Consolidations/Transfers of Assets	47	1933 Act Sec. 4 (other)
15	1933 Act Rule 145 Change of Domicile	48	1933 Act Sec. 5 Issues Outside the U.S.
16	1933 Act Rule 145 Other	49	1933 Act Sec. 5 Liquidations/Spin Offs
17	1933 Act Rule 147(c)(2)	50	1933 Act Sec. 5 Other
18	1933 Act Rule 147 Other	51	1933 Act Sec. 10
19	1933 Act Rule 414	52	1933 Act Form S-3
20	1933 Act Rule 415	53	1933 Act Form S-8
21	Other 400 Series Rules	54	1933 Act Forms Other
22	1933 Act Rule 501	55	Other 1933 Act Sections
23	1933 Act Rule 502	56	1934 Act Sec. 3(a)(4)
24	1933 Act Regulation D Other (500 Series Rules)	57	1934 Act Sec. 3(a)(10)
25	Other 1933 Act Rules	58	1934 Act Sec. 3(a)(12)
26	1933 Act Sec. 2(1) Condominiums	59	1934 Act Sec. 3(other)
27	1933 Act Sec. 2(1) Other Real Estate	60	1934 Act Sec. 10(a)
28	1933 Act Sec. 2(1) Livestock	61	1934 Act Sec. 10(b) Rule 10b-6 Cash Tender Offers
29	1933 Act Sec. 2(1) Other	62	1934 Act Sec. 10(b) Rule 10b-6 Exchange Offers
30	1933 Act Sec. 2(3) Mergers/Acquisitions Reorganizations	63	1934 Act Sec. 10(b) Rule 10b-6 Other Purchases by Issuer
31	1933 Act Sec. 2(3) Other	64	1934 Act Sec. 10(b) Rule 10b-6 Purchases by Control Persons
32	1933 Act Sec. 2(other)	65	1934 Act Sec. 10(b) Rule 10b-6 Purchases by Underwriters, Brokers
33	1933 Act Sec. 3(a)(2) Govts: Industrial Dev. and Other Revenue Bonds		

SEC No-Action Letters [List of WSB Subject Categories](#)

Category	Act, Section, Rule	Category	Act, Section, Rule
66	1934 Act Sec. 10(b) Rule 10b-6 Amendments & Extensions	100	1934 Act Sec. 17 (other)
67	1934 Act Sec. 10(b) Rule 10b-6 Other	101	1934 Act Forms
68	1934 Act Sec. 10(b) Rule 10b-13	102	Other 1934 Act Sections and Rules
69	1934 Act Sec. 10(b) Other Rules	103	All PUHCA
70	1934 Act Sec. 12	104	1939 Act Sec. 304(a)(4) Other
71	1934 Act Sec. 13(e) Rule 13e-4	105	1939 Act Sections
72	1934 Act Sec. 13(other)	106	All Bankruptcy Act Sections
73	1934 Act Sec. 14(a) Rule 14a-8 Timely submissions	107	Investment Advisers Act Sec. 202(a)(11) Pubs./ Charts/Newsletters
74	1934 Act Sec. 14(a) Rule 14a-8 Other Procedural exclusions	108	Investment Advisers Act Sec. 202(a)(11) Incidental to Regular Business
75	1934 Act Sec. 14(a) Rule 14a-8 Substantive exclusions: exec. comp.	109	Investment Advisers Act Sec. 202(a)(11) Other
76	1934 Act Sec. 14(a) Rule 14a-8 Substantive exclusions: director elections	110	Investment Advisers Act Sec. 202 (other)
77	1934 Act Sec. 14(a) Rule 14a-8 Other Substantive exclusions	111	Investment Advisers Act Sec. 203 Form ADV
78	1934 Act Sec. 14(a) Other	112	Investment Advisers Act Sec. 203 Other
79	1934 Act Sec. 14(other)	113	Investment Advisers Act Sec. 204
80	1934 Act Sec. 15(a) Securities Sales by An Issuer's Employees	114	Investment Advisers Act Sec. 205
81	1934 Act Sec. 15(a) Other	115	Investment Advisers Act Sec. 206(4) Rule 206(4)-1
82	1934 Act Sec. 15(b)	116	Investment Advisers Act Sec. 206(4) Other
83	1934 Act Sec. 15B Municipal Securities Issues	117	Investment Advisers Act Sec. 206 (other)
84	1934 Act Sec. 15(c) Rule 15c3-1(a)	118	Other Investment Advisers Act Sections and Rules
85	1934 Act Sec. 15(c) Rule 15c3-1(c)	119	Investment Company Act Sec. 2(a)(32)
86	1934 Act Sec. 15(c) Rule 15c3-1 (other)	120	Investment Company Act Sec. 2(a)(36)
87	1934 Act Sec. 15(c) Rule 15c3-3(k)(2)(A)	121	Investment Company Act Sec. 2 (other)
88	1934 Act Sec. 15(c) Rule 15c3-3 Reserve Formula Computation	122	Investment Company Act Sec. 3(a)
89	1934 Act Sec. 15(c) Rule 15c3-3 Other	123	Investment Company Act Sec. 3(b)
90	1934 Act Sec. 15(c) Other	124	Investment Company Act Sec. 3(c)(1)
91	1934 Act Sec. 15C Government Securities Issues	125	Investment Company Act Sec. 3(c)(5)
92	1934 Act Sec. 15(d)	126	Investment Company Act Sec. 3(c)(other)
93	1934 Act Sec. 16(a)	127	Investment Company Act Sec. 6
94	1934 Act Sec. 16(b)	128	Investment Company Act Sec. 8
95	1934 Act Sec. 17(a) Rule 17a-5 Extensions	129	Investment Company Act Sec. 17(f)
96	1934 Act Sec. 17(a) Rule 17a-5 Audit Date Changes	130	Investment Company Act Sec. 17(other)
97	1934 Act Sec. 17(a) Rule 17a-5 Other Exemptions	131	Investment Company Act Sec. 18
98	1934 Act Sec. 17(a) Other	132	Investment Company Act Sec. 22 (d)
99	1934 Act Sec. 17A	133	Investment Company Act Sec. 22 (other)
		134	Other Investment Company Act Sections and Rules
		135	All Government Securities Act of 1986 Sections and Rules
		136	Other Statutes