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September 18, 2020

***VIA E-MAIL***
Office of Chief Counsel
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: *Walgreens Boots Alliance, Inc.*
*Stockholder Proposal of Domini Impact Equity Fund*
*Securities Exchange Act of 1934—Rule 14a-8*

Ladies and Gentlemen:

This letter is to inform you that our client, Walgreens Boots Alliance, Inc. (the "Company"), intends to omit from its proxy statement and form of proxy for its 2021 Annual Meeting of Stockholders (collectively, the "2021 Proxy Materials") a stockholder proposal (the "Proposal") and statements in support thereof (the "Supporting Statement") received from Domini Impact Equity Fund (the "Proponent").

Pursuant to Rule 14a-8(j), we have:

- filed this letter with the Securities and Exchange Commission (the "Commission") no later than eighty (80) calendar days before the Company intends to file its definitive 2020 Proxy Materials with the Commission; and
- concurrently sent a copy of this correspondence to the Proponent.

Rule 14a-8(k) and Staff Legal Bulletin No. 14D (Nov. 7, 2008) ("SLB 14D") provide that stockholder proponents are required to send companies a copy of any correspondence that the proponents elect to submit to the Commission or the staff of the Division of Corporation Finance (the "Staff"). Accordingly, we are taking this opportunity to inform the Proponent that if it elects to submit additional correspondence to the Commission or the Staff with respect to this Proposal, a copy of that correspondence should be furnished concurrently to the undersigned on behalf of the Company pursuant to Rule 14a-8(k) and SLB 14D.

## THE PROPOSAL

The Proposal states:

RESOLVED that shareholders of Walgreens Boots Alliance Inc. ("WBA") urge the Compensation and Leadership Performance Committee (the "Committee") of the board to adopt a policy authorizing the Committee to decline to pay in full an award (a "Bonus") to a senior executive or group of senior executives under any annual cash incentive program ("Bonus Program") that is based on one or more financial measurements (a "Financial Metric") whose performance measurement period ("PMP") is one year or shorter for a period (the "Deferral Period") following the award. The policy should include a methodology for determining the length of the Deferral Period, should the Committee decide to defer, and adjusting the unpaid portion of the Bonus over the Deferral Period, in each case that allows accurate assessment of risks taken during the PMP that could have affected performance on the Financial Metric(s) and facilitates recoupment pursuant to WBA's recoupment policy.

The changes should be implemented in a way that does not violate any existing contractual obligation or the terms of any compensation or benefit plan currently in effect.

A copy of the Proposal, as well as related correspondence with the Proponent, is attached to this letter as Exhibit A.

## BASIS FOR EXCLUSION

We hereby respectfully request that the Staff concur in our view that the Proposal properly may be excluded from the 2021 Proxy Materials pursuant to Rule 14a-8(i)(10) because the administration of the Company's existing Management Incentive Plan (the "MIP") and Compensation Recoupment (Clawback) Policy (the "Clawback Policy"), together with the anticipated Committee Action (as defined below) by the Compensation and Leadership Performance Committee (the "Committee") of the Company's Board of Directors substantially implement the Proposal.

## ANALYSIS

**The Proposal May Be Excluded Under Rule 14a-8(i)(10) As Substantially Implemented.**

*A. Background.*

Rule 14a-8(i)(10) permits the exclusion of a stockholder proposal "[i]f the company has already substantially implemented the proposal." The Commission stated in 1976 that the predecessor to Rule 14a-8(i)(10) was "designed to avoid the possibility of shareholders having to consider matters which already have been favorably acted upon by the management." *See* Exchange Act Release No. 12598 (July 7, 1976). Originally, the Staff narrowly interpreted this predecessor rule and granted no-action relief only when stockholder proposals were "'fully' effected" by the company. *See* Exchange Act Release No. 19135 (Oct. 14, 1982). By 1983, the Commission recognized that the "previous formalistic application of [the Rule] defeated its purpose" because proponents were successfully convincing the Staff to deny no-action relief by submitting stockholder proposals that differed from existing company policy by only a few words. Exchange Act Release No. 20091, § II.E.6. (Aug. 16, 1983) (the "1983 Release"). Therefore, in 1983, the Commission adopted a revised interpretation to the rule to permit the omission of stockholder proposals that had been "substantially implemented." 1983 Release. The 1998 amendments to the proxy rules codified this position. 1998 Release at n.30 and accompanying text.

Under this standard, when a company can demonstrate that it already has taken actions to address the underlying concerns and essential objectives of a stockholder proposal, the Staff has concurred that the stockholder proposal has been "substantially implemented" and may be excluded as moot. The Staff has noted that "a determination that the company 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. (Recon.)* (avail. Mar. 28, 1991).

In applying this standard, a company need not implement a stockholder proposal in the manner that a stockholder may prefer. *See* 1998 Release at n.30 and accompanying text. Differences between a company's actions and a stockholder proposal are permitted as long as the company's actions satisfactorily address the stockholder proposal's essential objectives. For example, the Staff has concurred that companies, when substantially implementing a stockholder proposal that touches upon executive compensation matters, can address aspects of implementation that may differ from the manner in which the stockholder proponent would implement the proposal. For example, in *Rite Aid Corp.* (avail. Apr. 14, 2020), the Staff concurred that the company had substantially implemented a stockholder proposal requesting amendments to the Company's clawback policy, even though the company had not addressed one aspect of the proposal (relating to the location and timing of public disclosure regarding

application of the policy) in the manner specifically requested in the proposal. Similarly, in *Visa Inc.* (avail. Oct. 11, 2019), the Staff concurred that the company had substantially implemented a proposal recommending that the compensation committee reform the company's executive compensation philosophy to include social factors to enhance the company's social responsibility, even though the factors considered by the company did not include the one specifically recommended in the proposal. Likewise, in *Nike, Inc.* (*Recon.*) (avail. July 16, 2019), the Staff ultimately concurred that the company had substantially implemented a proposal seeking a director skills matrix that discloses "[e]ach nominee's skills, ideological perspectives, and experience presented in a chart or matrix form" where the company committed to providing such a matrix in its proxy materials, even though it stated it would not be disclosing the "ideological perspectives" of the nominees. *See also*, *Wal-Mart Stores, Inc.* (avail. Mar. 25, 2015) (concurring with the exclusion of a proposal that requested the company to include at least one metric related to the company's employee engagement as a metric in determining senior executives' incentive compensation, noting "that [the company's] policies, practices and procedures compare favorably with the guidelines of the proposal and that [the company] has, therefore, substantially implemented the proposal"). Therefore, if a company has satisfactorily addressed a proposal's "essential objective," the proposal will be deemed "substantially implemented" and, therefore, may be excluded as moot. *See, e.g.*, *Exelon Corp.* (avail. Feb. 26, 2010); *Anheuser-Busch Companies, Inc.* (avail. Jan. 17, 2007); *ConAgra Foods, Inc.* (avail. July 3, 2006); *Johnson & Johnson* (avail. Feb. 17, 2006); *The Talbots Inc.* (avail. Apr. 5, 2002); *Masco Corp.* (avail. Mar. 29, 1999); and *The Gap, Inc.* (avail. Mar. 8, 1996).

Additionally, the Staff has previously concurred that a company substantially implemented a stockholder proposal seeking adoption by the board of a policy relating to senior executive compensation where the requested policy was evidenced through resolutions of a committee of the board or action amending a compensatory plan. For example, in *Citigroup Inc.* (avail. Jan. 15, 2015), the proposal asked the board to adopt a policy that in the event of a change of control, there shall be no acceleration of vesting of any equity award granted to any senior executive (other than vesting on a partial, pro rata basis). Thus, the proposal contained two essential elements: (i) the adoption of a policy and (ii) that the policy shall provide for no acceleration of vesting of any equity award granted to any executive in the event of a change in control. In evidencing the company's substantial implementation of the proposal, the company provided the text of a resolution of the company's compensation committee affirming that it was the policy of the committee that no equity or other deferred incentive award held by any executive will vest as a result of a change in control of the company. The staff concurred that the resolution adopted by the company's compensation committee documented its policy with respect to the subject of the proposal and therefore had substantially implemented the proposal, such that exclusion was warranted. *See also AT&T Inc.* (avail. Jan 22, 2014) (concurring with the exclusion of a stockholder proposal requesting the adoption of a policy limiting accelerated vesting of equity awards in connection with a change in control, where the company amended its

equity incentive plan (rather than adopting a separate policy) to remove certain provisions relating to the accelerated vesting of equity awards in connection with a change in control).

*B. Anticipated Committee Action Will Substantially Implement The Proposal.*

The Proposal requests that the Committee:

> adopt a policy authorizing the Committee to decline to pay in full an award (a "Bonus") to a senior executive or group of senior executives under any annual cash incentive program ("Bonus Program") that is based on one or more financial measurements (a "Financial Metric") whose performance measurement period ("PMP") is one year or shorter for a period (the "Deferral Period") following the award.

The Proposal further states that:

> [t]he policy should include a methodology for determining the length of the Deferral Period, should the Committee decide to defer, and adjusting the unpaid portion of the Bonus over the Deferral Period, in each case that allows accurate assessment of risks taken during the PMP that could have affected performance on the Financial Metric(s) and facilitates recoupment pursuant to WBA's recoupment policy.

Here, the Company's existing annual incentive program and Clawback Policy[1], together with the anticipated Committee Action (as defined below), will substantially implement the Proposal because, collectively, they address the Proposal's underlying concerns and essential objectives consistent with Rule 14a-8(i)(10).

Specifically, the only Company compensatory plan or program pursuant to which annual cash incentives are awarded to senior executives is the Management Incentive Plan (the "MIP"), which designates the Committee as the administrator of the MIP and specifically permits the

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[1] The Company's Clawback Policy applies to all forms of incentive compensation and authorizes the Committee to seek reimbursement of incentive awards from an executive officer if there is a restatement of financial results or other misconduct (including fraud). The Committee may look back for a three-year period prior to the restatement or other misconduct for the recoupment, and may look to both current and former executive officers. Additionally, the policy provides the Committee with discretion to recoup amounts of excess incentive compensation paid to an officer in conjunction with any materially incorrect results (even if not resulting in a restatement), or misconduct on the part of the executive officer, including fraud or other conduct that would lead to a "for cause" termination (as defined in the Clawback Policy). *See* the Company 2020 Proxy Statement and Notice of Annual Meeting of Stockholders at 68, available at https://s1.q4cdn.com/343380161/files/doc_financials/2019/annual/2020-Annual-Meeting-of-Stockholders-and-Proxy-Statement.pdf.

deferral of bonuses.[2] Moreover, the Committee already has a process for reviewing and approving incentive compensation awarded and paid pursuant to the MIP in a manner that satisfies the essential objectives of the Proposal. In order to substantially implement the Proposal, the Committee is scheduled to take action (the "Committee Action") confirming its policy with respect to administering the deferral of bonuses for senior executives that are based on one or more financial metrics whose performance measurement period is one year or shorter, including its methodology for determining the length of deferrals and adjusting any such bonuses in a manner that substantially implements the Proposal. Accordingly, the anticipated Committee Action, in the context of the design and flexibility of the MIP and the Committee's recoupment authority pursuant to the Clawback Policy, will substantially implement the Proposal's request.

*C. Supplemental Notification.*

We submit this no-action request now to address the timing requirements of Rule 14a-8(j). Following the Committee Action, the Company expects to promptly supplement this letter to report on the Committee's Action, which we expect to file on or about October 30, 2020. The Staff consistently has granted no-action relief under Rule 14a-8(i)(10) where a company has notified the Staff of the actions expected to be taken that will substantially implement the proposal and then supplements its request for no-action relief by notifying the Staff after those actions have been taken. *See, e.g., United Continental Holdings, Inc.* (avail. Apr. 13, 2018); *United Technologies Corp.* (avail. Feb. 14, 2018); *The Southern Co.* (avail. Feb. 24, 2017); *Mattel, Inc.* (avail. Feb. 3, 2017); *The Wendy's Co.* (avail. Mar. 2, 2016); *The Southern Co.* (avail. Feb. 26, 2016); *The Southern Co.* (avail. Mar. 6, 2015); *Visa Inc.* (avail. Nov. 14, 2014); *Hewlett-Packard Co.* (avail. Dec. 19, 2013); *Starbucks Corp.* (avail. Nov. 27, 2012); *DIRECTV* (avail. Feb. 22, 2011); *NiSource Inc.* (avail. Mar. 10, 2008); and *Johnson & Johnson* (avail. Feb. 19, 2008) (each granting no-action relief where the company notified the Staff of its intention to omit a stockholder proposal under Rule 14a-8(i)(10) because the board of directors was expected to take action that would substantially implement the proposal, and the company supplementally notified the Staff of the board action).

**CONCLUSION**

Based upon the foregoing analysis, the Company intends to exclude the Proposal from its 2020 Proxy Materials, and we respectfully request that the Staff concur that the Proposal may be excluded under Rule 14a-8.

We would be happy to provide you with any additional information and answer any questions that you may have regarding this subject. Correspondence regarding this letter should

[2] The MIP is attached to the Company's Form 10-K for the year ended August 31, 2016 as Exhibit 10.2 and is available at https://www.sec.gov/Archives/edgar/data/1618921/000114036116083198/form10k.htm#Item15.

be sent to shareholderproposals@gibsondunn.com. If we can be of any further assistance in this matter, please do not hesitate to call me at (202) 955-8287.

Sincerely,

Elizabeth A. Ising

Enclosures

cc: Joseph B. Amsbary, Jr., Vice President, Corporate Secretary, Walgreens Boots Alliance, Inc.
Mark L. Dosier, Senior Director, Securities Law, Walgreens Boots Alliance, Inc.
Kelsey Chin, Assistant Corporate Secretary, Walgreens Boots Alliance, Inc.
Corey Klemmer, Esq., Domini Impact Equity Fund

**EXHIBIT A**

August 11, 2020

Mr. Joseph B Amsbary, Jr.
Vice President and Corporate Secretary
Walgreens Boots Alliance, Inc.
108 Wilmot Road, MS #1858
Deerfield, IL 60015

*Via email to jake.amsbary@wba.com.*

Re: Submission of Shareholder Proposal

Dear Mr. Amsbary:

I am writing to you on behalf of the Domini Impact Equity Fund, a long-term Walgreens Boots Alliance shareholder to submit the enclosed shareholder proposal urging the company to empower the compensation committee to exercise greater discretion over certain components of executive incentive pay.

The attached shareholder proposal is submitted for inclusion in the next proxy statement in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities Act of 1934. The Fund has held more than $2,000 worth of Walgreens Boots Alliance shares for greater than one year and will maintain ownership of the required number of shares through the date of the next stockholders' annual meeting. A letter verifying our ownership of Walgreens shares from our portfolio's custodian is forthcoming under separate cover. A representative of the filers will participate in the stockholders' meeting to move the resolution as required by SEC Rules.

We may be joined by other investors submitting the identical proposal. Please consider us to be the lead filer of the proposal. Should you have any questions or concerns, I can be reached at (212) 217-1027, or at cklemmer@domini.com.

Sincerely,

Corey Klemmer, CFA, Esq.
Director of Corporate Engagement

cc: Kelsey Chin <Kelsey.chin@wba.com>

RESOLVED that shareholders of Walgreens Boots Alliance Inc. ("WBA") urge the Compensation and Leadership Performance Committee (the "Committee") of the board to adopt a policy authorizing the Committee to decline to pay in full an award (a "Bonus") to a senior executive or group of senior executives under any annual cash incentive program ("Bonus Program") that is based on one or more financial measurements (a "Financial Metric") whose performance measurement period ("PMP") is one year or shorter for a period (the "Deferral Period") following the award. The policy should include a methodology for determining the length of the Deferral Period, should the Committee decide to defer, and adjusting the unpaid portion of the Bonus over the Deferral Period, in each case that allows accurate assessment of risks taken during the PMP that could have affected performance on the Financial Metric(s) and facilitates recoupment pursuant to WBA's recoupment policy.

The changes should be implemented in a way that does not violate any existing contractual obligation or the terms of any compensation or benefit plan currently in effect.

## SUPPORTING STATEMENT

As long-term shareholders, we support compensation policies that align senior executives' incentives with the company's long-term success. We are concerned that short-term incentive plans can encourage senior executives to take on excessive risk.

In our view, the opioid crisis reflects overly risky behavior by companies in the supply chain, including retailers such as Walgreens. That behavior has led to costly litigation, as well as civil and criminal enforcement actions, with potential financial and reputational consequences. Walgreens is a defendant in the multi-district opioid litigation in Ohio.

To foster a longer-term orientation, this proposal asks that the Committee develop a policy on bonus deferral; the Committee would have discretion to set the terms and mechanics of this process. Bonus deferral is widely used in the banking industry, where overly risky behavior was widely viewed as contributing to the financial crisis. The Financial Stability Board's *Principles for Sound Compensation Practices* state that bonus deferral is "particularly important" because it allows "late-arriving information about risk-taking and outcomes" to alter payouts and reduces the need to claw back compensation already paid out, which may "fac[e] legal barriers," in the event of misconduct. Banking supervisors in 16 jurisdictions, including the US, have requirements or expectations regarding bonus deferral.

(https://www.fsb.org/wp-content/uploads/P170619-1.pdf) Pharmaceutical manufacturers GlaxoSmithKline and Novartis defer a portion of annual bonuses into equity that does not immediately vest.

We urge shareholders to vote FOR this proposal.

**From:** Corey Klemmer
**Sent:** Tuesday, August 11, 2020 9:02 AM
**To:** Amsbary Jr, Joseph ; Chin, Kelsey
**Cc:** Nolan Ritcey
**Subject:** Shareholder Proposal Submission

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**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jake,
Please find a shareholder proposal attached, submitted for inclusion in the 2021 proxy. We appreciate the work WBA has put into engagement and would welcome the opportunity to withdraw if the issue can be addressed through those channels. Given the timing, however, we have elected to file the attached proposal as well. A letter verifying ownership of the required shares will be sent separately. Please don’t hesitate to reach out with any questions or concerns.
Thank you,
Corey
------------------------------

**Corey Klemmer, CFA, Esq.**
Director of Engagement
212-217-1027
Domini Impact Investments LLC
180 Maiden Ln, Suite 1302 New York, NY, 10038-4925
Main: 212-217-1100 Shareholder Information: 800-582-6757
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Eising@gibsondunn.com

August 13, 2020

***VIA OVERNIGHT MAIL AND EMAIL***
Corey Klemmer, CFA, Esq.
Director of Corporate Engagement
Domini Impact Equity Fund
180 Maiden Lane, Suite 1302
New York, NY 10038-4925

Dear Ms. Klemmer:

I am writing on behalf of Walgreens Boots Alliance, Inc. (the "Company"), which received on August 11, 2020, the stockholder proposal submitted on behalf of the Domini Impact Equity Fund pursuant to Securities and Exchange Commission ("SEC") Rule 14a-8 for inclusion in the proxy statement for the Company's 2021 Annual Meeting of Stockholders (the "Proposal").

The Proposal contains certain procedural deficiencies, which SEC regulations require us to bring to your attention. Rule 14a-8(b) under the Securities Exchange Act of 1934, as amended, provides that stockholder proponents 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 as of the date the stockholder proposal was submitted. The Company's stock records do not indicate that you are the record owner of sufficient shares to satisfy this requirement. In addition, to date we have not received proof that you have satisfied Rule 14a-8's ownership requirements as of the date that the Proposal was submitted to the Company.

To remedy this defect, you must submit sufficient proof of your continuous ownership of the required number or amount of Company shares for the one-year period preceding and including August 11, 2020, the date the Proposal was submitted to the Company. As explained in Rule 14a-8(b) and in SEC staff guidance, sufficient proof must be in the form of:

(1) a written statement from the "record" holder of your shares (usually a broker or a bank) verifying that you continuously held the required number or amount of Company shares for the one-year period preceding and including August 11, 2020; or

(2) if you have 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 your ownership of the required number or amount 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 you continuously held the required number or amount of Company shares for the one-year period.

If you intend to demonstrate ownership by submitting a written statement from the "record" holder of your shares as set forth in (1) above, please note that most large U.S. brokers and banks deposit their customers' securities with, and hold those securities through, the Depository Trust Company ("DTC"), a registered clearing agency that acts as a securities depository (DTC is also known through the account name of Cede & Co.). Under SEC Staff Legal Bulletin No. 14F, only DTC participants are viewed as record holders of securities that are deposited at DTC. You can confirm whether your broker or bank is a DTC participant by asking your broker or bank or by checking DTC's participant list, which is available at http://www.dtcc.com/~/media/Files/Downloads/client-center/DTC/alpha.ashx. In these situations, stockholders need to obtain proof of ownership from the DTC participant through which the securities are held, as follows:

(1) If your broker or bank is a DTC participant, then you need to submit a written statement from your broker or bank verifying that you continuously held the required number or amount of Company shares for the one-year period preceding and including August 11, 2020.

(2) If your broker or bank is not a DTC participant, then you need to submit proof of ownership from the DTC participant through which the shares are held verifying that you continuously held the required number or amount of Company shares for the one-year period preceding and including August 11, 2020. You should be able to find out the identity of the DTC participant by asking your broker or bank. If your broker is an introducing broker, you may also be able to learn the identity and telephone number of the DTC participant through your account statements, because the clearing broker identified on your account statements will generally be a DTC participant. If the DTC participant that holds your shares is not able to confirm your individual holdings but is able to confirm the holdings of your broker or bank, then you need to satisfy the proof of ownership requirements by obtaining and submitting two proof of ownership statements verifying that, for the one-year period preceding and including August 11, 2020, the required number or amount of Company shares were continuously held: (i) one from your broker or bank confirming your ownership, and (ii) the other from the DTC participant confirming the broker or bank's ownership.

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 transmit any response by email to Kelsey Chin at kelsey.chin@wba.com. Alternatively, you may transmit any response by mail to Kelsey Chin, Assistant Corporate Secretary, Walgreens Boots Alliance, Inc., 108 Wilmot Road, MS #1858, Deerfield, IL 60015.

If you have any questions with respect to the foregoing, please contact me at (202) 955-8287. For your reference, I enclose a copy of Rule 14a-8 and Staff Legal Bulletin No. 14F.

Sincerely,

Elizabeth A. Ising

cc: Joseph B. Amsbary, Jr., Vice President, Corporate Secretary, Walgreens Boots Alliance, Inc.
Mark L. Dosier, Senior Director, Securities Law, Walgreens Boots Alliance, Inc.
Kelsey Chin, Assistant Corporate Secretary, Walgreens Boots Alliance, Inc.

Enclosures

August 14, 2020

Mr. Joseph B Amsbary, Jr.
Vice President and Corporate Secretary
Walgreens Boots Alliance, Inc.
108 Wilmot Road, MS #1858
Deerfield, IL 60015

*Via email to [jake.amsbary@wba.com](mailto:jake.amsbary@wba.com).*

Re: Submission of Shareholder Proposal

Dear Mr. Amsbary:

Attached, please find a letter from our custodian, attesting to our ownership of the required number of shares to submit the shareholder proposal relating to bonus deferral that we filed on August 11th.

Please let us know if you need anything further.

Sincerely,

Corey Klemmer
Director of Corporate Engagement
Domini Impact Investments LLC

cc: Kelsey Chin <Kelsey.chin@wba.com
Mark Dosier <Mark.Dosier@Wba.com>
Geoffrey E. Walter <GWalter@gibsondunn.com>

8/14/20

Corey Klemmer
Managing Director of Corporate Engagement
Domini Impact Investments LLC
180 Maiden Ln, Suite 1302
New York, NY 10038-4925

Re: Custodial Letter

Ms. Corey Klemmer,

As custodian, we confirm that as of August 11th, 2020 the Domini Impact Equity Fund held at least $2,000 worth of shares continuously for one year of Walgreens Boots Alliance Inc (WBA/931427108).

| Security | Shares as of August 11th, 2020 |
|---|---|
| Walgreens Boots Alliance Inc | 30,448 |

If you have any questions, please feel free to call me at (617) 662-3546.

Thanks and kind regards,

Eric Baxter

Eric Baxter
Vice President
State Street Global Services
1 Iron St.
Boston, MA 02210