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Cross-Trading at a Crossroads: WilmerHale

Once upon a time, in 1994, when I was a young lawyer in the SEC's Division of Investment Management (Division), Office of Chief Counsel, we received a request to modify a previously granted but totally impractical no-action position addressing Rule 17a-7 under the Investment Company Act of 1940 (the 1940 Act), which allowed funds to cross-trade municipal securities. The Division granted that request in January 1995, and for a number of years, funds relied on the new position to efficiently cross-trade various fixed income securities resulting in significant cost savings to the funds and their shareholders.

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Please see [full publication](#) for more information.

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by Amy Doberman

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