SEC Historical Society
Interview with Drew Bowden:
Conducted on July 18, 2022, by Kenneth Durr

Ken Durr:

This is an interview with Drew Bowden for the SEC Historical Society's Virtual Museum and Archive of the History of Financial Regulation. Today is July 18th, 2022, and I'm Kenneth Durr. Drew, it's good to talk to you again.

Drew Bowden:

Same. Nice to speak with you again, too, Ken. Thanks for having me today.

Ken Durr:

You're welcome. I've been looking forward to the talk. I always start these things by going back a little bit, and I don't want to go all the way back, but let's go to your education. Talk a little bit about your undergrad, and how you got interested in law.

Drew Bowden:

Sure. Undergrad I was an English major at Loyola University in Maryland. I graduated college, and I was teaching high school English, and coaching lacrosse, and it became apparent to me that if I wanted to move out of my parent's house and make a living, I probably needed to figure out something else to do. So I actually had an older brother who was very interested in going to law school and studying for the LSATs. And so I thought I would tag along for that experience, and if I did well on the LSATs, I might apply to some law schools and see if I could get in.

Ken Durr:

So you did, and you ended up at Penn, right?

Drew Bowden:

I did, yes. So I had the opportunity to go to Penn and went up there. I did not know much about the law prior to going to law school and coming out of law school I think all I wanted to do was be a trial attorney. I thought that's what all lawyers did, and it certainly was what I was interested in doing.

Ken Durr:

Any interest in securities law, or did you study it?

Drew Bowden:

No, and funny thing, I was principally motivated by my desire to go work for a law firm who would promise me an opportunity to go to court and handle arbitrations and trials, and things. I went back to a law firm in Baltimore that completely unbeknownst to me handled all of the legal work for Legg Mason, which was located across the street in Baltimore, and at the time in the late '80s was really a regional brokerage firm. So I went to work at my law firm in September 1987. And as God is my witness, at that time I could not have told you the difference between a stock and a bond. I'd never had a business class, a finance class, an economics class, or anything else, but a month after I started in October 1987, the stock market crashed, and I was fresh meat at the law firm.

A lot of people made claims against what were then called stockbrokers. And they told me, "Hey, kid, this is what you're going to work on." And it really turned out for me to be love at first sight in many different ways. I really love the business. I love learning about investing and finance, but I also really learned more about, and came to appreciate and admire, Legg Mason as a business entity itself. When I speak to young people, I always tell them, "Keep your head on a swivel. You never know where opportunity is going to arise." I started as a young lawyer in September 1987, almost completely uninformed, and I've spent my entire career now in financial services in one way or another.

Ken Durr:

And you did work in litigation, though. Talk about the kinds of cases you were doing.

Drew Bowden:

Yes. I eventually made partner at my law firm and worked there for about seven years and handled litigations, arbitrations, and regulatory matters for financial services firms. Most of the work I did was for Legg Mason, who was a fantastic client. When Legg Mason hired us, they said, "Figure out what happened. If we made a mistake or messed it up, make the client whole. And if we didn't fight like crazy." So we took cases to trial, jury trials, appellate work, lots of arbitrations, handling contested regulatory matters, which, back then it probably would have been the NASD, and the New York Stock Exchange. So that's really what I spent probably the first seven years of my career doing.

Ken Durr:

And eventually you made the jump over to Legg Mason.

Drew Bowden:

Yes. I'd been doing a lot of work for them. And as I said, came to really admire the company and the people who ran it at that time. I think I moved over to Legg Mason in 1994, and it was still run by Chip Mason, and a group of executives who had really built that business. It was a first-generation business. I thought they were really smart, very successful, treated everybody the same with dignity and respect, ran a good business, and they offered me the opportunity to come and join their business, which I did. I walked across the street.

Ken Durr:

This was a legendary period for Legg Mason. They were doing very well. They had some very good investing going on for a while there.

Drew Bowden:

Oh, yes. At Legg Mason you had Ernie Kiehne, and Bill Miller running the Legg Mason Value Trust. Ernie Kiehne had his famous Thanksgiving list. The list of about a dozen stocks he would publish every year that people in Baltimore would follow very closely and invest in. Again, it wasn't a formal product. Honestly, if you look back on it, he probably didn't really have a formal, or compliant, investment track record. It was just a list they put out every Thanksgiving, but it was very popular and very successful.

Ken Durr:

So you start to get involved in compliance here. I want to broaden out a bit and talk about this whole idea of compliance as it's emerging going into the '90s. It hadn't been around forever. Talk about the concept, what you were doing, and what others were doing to build up this field.

Drew Bowden:

In the '90s, at that time broker-dealer compliance was principally coming out of the NASD—this is pre-FINRA—and the New York Stock Exchange. At that time, again, Legg Mason was principally a broker-dealer. Over time Chip felt the future of the business was in asset management. And so he went out and began to acquire asset management firms where Legg Mason would buy 100 percent of the equity in the companies, but otherwise leave them alone. That was part of Chip's deal proposition. And really over that time in the advisory world, the SEC as it still is today was the only regulatory entity examining and overseeing investment advisors. And the emphasis, I think, early on was on policies and procedures. "Do you have a policy manual? Do you have procedures?" During the time I was at Legg Mason, we were examined many times. We're just up the road from the SEC and that was typically where exams started. "Give me your policy manual."

Ken Durr:

And did you have to write one of those? Could you pull one out of the cupboard?

Drew Bowden:

We did. I think the SEC had actually adopted what's called the Compliance Rule, 206(4)-7, in 2004. Prior to that, at Legg Mason Chip had acquired, I don't know the exact number, but I'll call it between a dozen and fifteen asset management firms. I was working at the parent company, and we were responsible at the parent company level for overseeing the business of the subsidiaries that Legg Mason owned. And even before the SEC rule, we published our own little manual for our affiliate firms and said, "You have to identify an individual who's the compliance officer, and you have to have a policy manual, and you have to address the following." I forget what it was, probably a dozen or fifteen different topics that we made them have. And so by the time the Compliance Rule came into effect at the behest of the SEC in 2004, we were already there.

Ken Durr:

Gene Gohlke would have been the one doing the investment advisor and investment company examinations. Did you work with him?

Drew Bowden:

Yes. Gene was there for a long time. As I mentioned, we were right up the road in Baltimore and growing, and Gene was a wonderful person who I always admired and who seemed most interested to me in understanding things and getting it right. So from time to time, when I was at Legg Mason, Gene would pick up the phone and call informally and ask questions about a particular market development, or practice, or something that he was seeing in the industry that he or his team wanted to get more information about. Sometimes those were phone calls. Sometimes he'd say, "Can we come up the road and spend a couple hours with your team? It's not an exam. You're not in trouble. We just want you to walk us through it and help us understand it." So I would say we had a regular working relationship when I was at Legg Mason.

Ken Durr:

Okay. Well, let's get you to the SEC. Was that something that you had your eye on? Had you thought about making the jump to become a regulator, or how did that happen?

Drew Bowden:

I would say only amorphously. Up to that point in my time at Legg Mason, I always observed. I never met anybody who worked at the SEC who didn't have a great experience, who didn't describe it as a rewarding part of their career. I was always attracted by the opportunity to do public service, but what practically happened was the global financial crisis. So coming out of that in 2011, there was a lot of change going on in the industry. The Legg Mason affiliate which I was working for, had lost a lot of assets. We had gone through a couple rounds of layoffs, and it looked like it was about time to start exploring what other options might be available out there if the worst came to pass and I needed to find something else to do.

Ken Durr:

So you inquired about the SEC?

Drew Bowden:

Sure, among other things. I did the proverbial network, talked to people you know, see what was out there. The SEC happened relatively quickly. I called a gentleman named David Tittsworth, who was then the executive director of the Investment Advisor Association, both a professional acquaintance and a friend, and explained to him, “Hey, David. I’m thinking I might need something to do here. Do you have any ideas?” And he said, “Well, just yesterday I met with Carlo di Florio and Norm Champ. Gene Gohlke is leaving as the head of the investment advisor program at the SEC, and they’re looking for somebody to succeed Gene. Do you think you’d want to talk to them?” To which I said, “Yeah, sure. I’d love to talk to them.” So I hung up the phone with David and I don’t think it was more than a half hour later, Carlo was calling me saying, “This is Carlo di Florio. I understand you might be interested. Can you come down to the SEC tomorrow and meet with Norm and me and talk about the position.” Which I did.

Ken Durr:

What did they want to talk about? Carlo was reinventing the examinations program. What was he talking to you about?

Drew Bowden:

He was in the midst of a pretty significant change program in OCIE. I think they were looking for someone with some investment advisor background, which I had. Somebody who it seemed like they would be able to work with. I remember them asking me extensively about my disciplinary history. They wanted to make sure I didn’t have any problems there.

Ken Durr:

Right.

Drew Bowden:

So those are the type of questions that we had. It was an introductory meeting, so we didn’t really get into deep philosophical questions about the role of the SEC, or the role of the exam program, or those things at that time.

Ken Durr:

What was your impression of Carlo and what he was doing then, and as it developed in your first few weeks and months at the SEC?

Drew Bowden:

I had joined the Commission and I very, very, very quickly came to realize that Carlo, very competent, had a plan, had done a tremendous amount of work, really, I thought a highly effective job with the OCIE leadership in terms of change management, and getting OCIE in particular back on its feet. It didn’t take me long to realize that Carlo was highly, highly capable, great integrity, very good communicator, nice person, and really was a pleasure to have the opportunity to work with and learn from Carlo.

Ken Durr:

So, you came during this period of transformation. Was it fall of 2011, something like that?

Drew Bowden:

Yes, November of 2011.

Ken Durr:

Where was OCIE at that point by your estimation? Were things still moving pretty quickly? Were you still looking for changes to make, or was the new system in place, and getting tuned up at that point?

Drew Bowden:

Yes, it was interesting. My observation—which is just mine, other people could have a different observation—but when I came in it seemed to me that, again, Carlo and the leadership of OCIE had restructured and come up with a very good framework for OCIE including a specialized investment team, a new leadership structure, an understanding of what the pillars of the program were, what they were trying to do, what they were trying to accomplish. And my observation was, boy, they have a really good framework here, but they keep talking about it.

They keep talking about what they can change and what they can do, and my take on it all was you need to stop talking about what else you can change and what else you can do and execute on the framework that you've put in place. Stop contemplating how you might fine-tune a particular governance process, or this or that, or the other thing. So it seemed to me as I look back on it, my perception was a lot of the reorganization really had been thoughtfully done, and what OCIE needed to do was now get out and refocus on exams and putting the new framework to work.

Ken Durr:

And so your job would have been to do that for investment advisor exams.

Drew Bowden:

Yes, initially. I came in and succeeded Gene and was leading the investment advisor program.

Ken Durr:

So tell me about how that felt? You're on the other side of the desk at this point. What did you see that you did that Gene used to do? What did you start doing differently?

Drew Bowden:

Well, the team was great, very dedicated, very knowledgeable, actually. And so it was a function of, I think, both trying to come up with plans for tasks that had been given to us that we didn't necessarily select for ourselves, but then also thinking about, "Okay, where is it that, left to our own devices, we would choose to allocate the limited capital and resources that we had for the benefit of investors and the markets?" Probably the principal issue on assignments that had been given to us was coming out of Dodd-Frank, and the requirement that hedge funds and private equity firms register with the SEC for the first time.

I remember pretty quickly coming into a situation where at the start of it, I'll forget the exact number, but in 2012, I guess, you had well more than 10,000 registered investment advisors managing somewhere around $40 trillion. I think a third of them had never been examined. A larger percentage hadn't been examined for 10 years, and you had a couple hundred investment advisor examiners to oversee that business. The business was growing rapidly, and the SEC had very limited resources to cover that cohort.

And so then on top of that, Congress passed legislation that said, "About 2,000 new registrants, hedge funds, private equity firms needed to register with the Commission." And thus began a lively debate of what to do with those new registrants, from put them at the back of the queue and do nothing, to, I think, where we eventually settled, which was devising a presence exam strategy that we began to execute on.

Ken Durr:

What was behind this spectacular growth of the investment advisor industry generally speaking?

Drew Bowden:

Boy, it's tough to put it on any one thing. It coincided somewhat with, this is off the top of my head, the growth in the mutual fund business. I think back then there was a lot of progress made on portfolio theory, and how advisors could use different asset classes with different risk and return profiles to build more diversified portfolios for clients with better returns so that generally the state of the business of advising consumers was moving from transactional buying and selling a security to more holistic and advisory and building a portfolio. And so as those capabilities came online, I think many of the firms chose to allocate more of their money just like Legg Mason did on emphasizing the growth of the advisory business sometimes at the expense of the brokerage business.

Ken Durr:

We were talking about the transformation that was going on in OCIE, and the spark that touched the whole thing off was Bernie Madoff. What was the situation when you came in? Were there lingering effects of the Bernie Madoff trauma on OCIE?

Drew Bowden:

Very much so, and my observation coming in 2011 was that there were still a lot of conversations being had about that, talking about it inside of OCIE and talking about it externally, which struck me as somewhat counterproductive. So one of my requests to my colleagues in the Commission was, "Let's not talk about Bernie Madoff anymore. We have work to do, and it doesn't do us any good to bring that one up." So we had the proverbial jar. We had to stick a dollar bill in it every time you mentioned Bernie Madoff because I felt like it had occurred, the SEC and OCIE had addressed it reasonably, and it was time to get back to business and stop the self-flagellation on that one.

It really played a big part too, Ken, in the discussions—to make the point—the discussions we had about the presence exam strategy, which was we eventually settled, first by proposing that instead of having those new registrants come online and never hear from us, never get examined, which seemed to me to be a really bad outcome for investors in the markets was we needed to figure out some way to get in front of them, thus presence. Part of our mantra was if you're going to be effective and influence people, you have to have a presence and you have to be credible. So we proposed to the OCIE examiners in the regions a process where we would get out to see these new registrants, but not to do a complete exam, that we would pick a handful of what I would call plain vanilla right down the middle of the road topics, and ask examiners to go in and just look at one of them, just show up and do a thorough exam on one subject. So that from a registrant's perspective, they had an encounter with the SEC, they saw it was rigorous. They would be motivated to enhance their compliance programs and that it was good.

But because of Madoff, there was a lot of hesitancy on behalf of the examination teams. And I would say justified hesitancy, who said, "Wait a minute. If you send me in to look at a registrant, to look at one thing and then pull out and move on, what happens if I miss something? What happens if I go in a place and there's something rotten in a back room that I don't detect? I will be vilified. I'll be vilified by the media, by Congress, by my peers at the Commission. I don't want to be that person who missed it."

And so we had a lot of conversations about how to get people comfortable with the notion that we could effectively go into a registrant and do something other than a top to bottom multi-week or month exam, which is contrary to what we want to do, which is get in, be known, be credible, and get in front of as many people as you can and learn as much as you can over a short period of time.

Ken Durr:

That's interesting. It makes a lot of sense given what had happened a few years earlier. Another big event, before we roll into the things that you started accomplishing. Hurricane Sandy came along. Did you have some involvement in that?

Drew Bowden:

Yes, we did. Not just me. I was working with many other people, many of whom have dedicated their entire professional careers to working with the Commission, but I would say we are all at that point focused on what are things that we can do to drive and emphasize, we call them the four pillars of our mission. And they were to promote compliance, prevent fraud, monitor risk, and importantly, in the case of Sandy, to inform policy. And so when Hurricane Sandy came, you may remember, I think Lower Manhattan was closed for the better part of a couple days. There were many lessons learned sometimes in the school of hard knocks from Hurricane Sandy.

And so as a team at OCIE and the leadership team, we thought, "Well, wait a minute, We're the eyes and ears of the Commission. There's probably a lot for the industry and registrants, and the Commission to learn about how people had prepared for a disaster, what had happened, what practices turned out to be really helpful and exhibited foresight, and what practices that you might have thought were reasonable in theory ended up being in retrospect something that people might want to go and rethink."

So we sent teams up there to do a series of exams with firms, really for the purpose of learning. You're never going to walk away from a fraud, but what we were mostly interested in doing was collecting information from people about their experiences. And we took that, and I remember distinctly, we made a presentation to the entire Commission, the whole panel of all five commissioners, that said, "Here's what we saw. Here's what we learned." Which they appreciated. And we eventually, I think, turned it into a full-on risk alert to share the highlights of what we observed with the entire industry.

Ken Durr:

Did this lead directly into Reg SCI?

Drew Bowden:

Again, the SEC is a big place. There's a lot going on. I'm loath to describe credit for anything to any one person or even any one division at the SEC. There's a lot of moving parts, but I would like to think that we…

Ken Durr:

We were talking about OCIE helping to inform policy. So was there some sense that at that point you were helping to inform that policy?

Drew Bowden:

Yes, I think so. And there were instances where, A, we thought you could make better policy at the SEC to the extent you actually had facts and data on which to deal as opposed to academic theories. That's my own personal belief anyway. And we would look for opportunities in OCIE where if we thought that a policy issue might come up, or a policy issue ought to be considered, then we would do our work and gather our information and share it with our colleagues and the Commission. My favorite formulation of OCIE was always the eyes and ears of the Commission. And so we did that work really for the purpose of having a discussion with our colleagues to say, "In essence this is what's happening over here. This is what's occurring in this corner of the market, and you might want to take a look at it."

Ken Durr:

About this time, this is about a year in or so, you were promoted to deputy, right?

Drew Bowden:

Yes.

Ken Durr:

I believe you kept hold of the investment advisor portfolio for a while.

Drew Bowden:

I think, yes, for a bit. Norm Champ who had been the deputy went to run the Division of Investment Management. And so Carlo was deputy-less there for a while. So it was a battlefield promotion where I kept my old responsibilities as well. That's usually the way it worked at Legg Mason, too, you just get more things to do.

Ken Durr:

So one of the things you had to do, I think there was some concern about 40 Act funds.

Drew Bowden:

That really had been percolating from when I first got to OCIE. To your point about stepping into Gene's shoes, taking over the program. I mentioned there were certain things we had to deal with that were assigned to us. There were other things where I thought, "Okay, what do we want to go look at?" And I was fresh out of the global financial crisis on the industry side. So when I got in and was working with the team in the investment advisor program, one of the first questions I asked was, "Can I get a list of the 40 Act mutual funds that have the highest concentrations of illiquid securities in their portfolios?" And I was told, "We don't have that information. We don't know."

And I remember discussing with Norm Champ who then was the deputy director and saying, "Wow, I would have expected the SEC to have that information, at least with some reasonable time lag." Because it's certainly an area, if you're doing risk-based exams, that struck me as one of the first places where you might want to start. So that's an area, Ken, where from a request to a discussion, I think, again, I would not attribute it wholly to that, but you've seen over the years much more focus on the SEC on how people are classifying illiquid securities, how they're valuing them, how they're reporting them to the SEC, and those sorts of things.

Ken Durr:

This is all bundled up with the idea that OCIE is really targeting risk in a more systematic way during this period.

Drew Bowden:

Yes, more systematic. Again, I had been examined in the industry. And as I mentioned before, at the time the exams at least started, I wouldn't say they were totally, but they started on policies and procedures, and coming from the industry, I said to myself, "If I'm going to do an exam and I want to know what's going on, I'm going to start with the trade blotter. Show me what you're buying and selling for your clients and what you own, and how much you're paying for it, how much you're charging your clients for it." And that's probably a better place to start.

In mutual fund land, I remember there was a period in Italy, in Greece, and they were being devalued, and there were defaults, and that's another one where we said, "Okay, well, let's go out and find out who owns those securities and how are they overseeing them? And what information are they providing to the boards? What are they valuing those securities at?" So I would say it was risk-based, but arguably a shift away from policies and procedures, not exclusively, but towards what is actually happening which to me seemed to be a speedier way to get to insight as to whether there was activity going on that was potentially harmful to investors, or to the markets.

Ken Durr:

Right. That's very interesting. Looking at this historically, I know that the policies and procedures emphasis was part of an attempt to get the exchanges, the broker-dealers, the investment advisors to regulate themselves to have the systems in place where they could do the right thing, but what I'm hearing is that your sense was that the SEC needed to do a little bit of helping itself taking a look into what they were doing.

Drew Bowden:

I think, fairly, I think we gave a lot of help, and it made a big difference in terms of what really was expected out of a compliance program. And how do you bring tools that had been in use in the industry for a long time, usually on the investment side. I'm speaking now about advanced data analytics, quantitative capabilities. My hypothesis is firms had been using those very effective skills on the money-making side of the business to help you decide what to buy and sell and when, and how to route it, and those sorts of things. And they had not really applied that skillset, that technology to monitoring their own business and understanding.

I've been around long enough. You can have all the policies and procedures that you want in the world. That does not mean that's what people are actually doing out in your branch offices, or on your trading desk, or anywhere else. So it seemed to me, like I said, if you're really interested in promoting compliance and doing a good job and overseeing your business, then you want to employ advanced data analytics and quantitative skills to your business in a compliance function so that you can really understand what's happening, again, and not through sampling 20 trades, but look at what's been going on in a particular part of your business over a period of months, or quarters, or years.

And so I think the emphasis of the program when I was there was on "let's get into the trade blotter, let's get into the trade room, let's use advanced data analytics to understand what's going on in these businesses. " I would like to think helped to awaken the industry both to the importance and utility of those tools in the compliance realm, but also part of our hypothesis was if you're a registrant, the absolute last thing in the world you want is the SEC to come in and look at your data and tell you things about your business that you don't know. That would be very uncomfortable. And so if you go back and look at risk alerts, and priorities, and speeches, and other things, we were pretty out there and pretty vocal about we're coming in to look at your data, and we're not sampling. We're going to ask for a bunch of data, and we're going to go away and analyze it.

Ken Durr:

Where were these tools coming from, the new data analytics tools that the SEC was employing at this point?

Drew Bowden:

Again, it was a function of, I think OCIE had always had data analysis, so it was working on being risk focused, and risk measured. I think what happened was allocating more resources to it, and going and getting people who were real quants, people with PhDs in mathematics and computational science who had worked at NASA, or in medical fields, and what we could offer them. If you're a data wonk and you like working with data and gaining insights out of data, the SEC is really an ideal place to work because we might have been undermanned, or understaffed from a personnel standpoint, but we had mountains of data and we could get any data we wanted.

This is one of the coolest things about working at the SEC. You could pretty much ask for anything and people were obliged to give it to you. So we built a quantitative analytics unit, and we had a very competitive hiring process, testing people, and we tried to build a mighty and highly evolved team who weren't really good at Excel and macros, but people who were data scientists who could sink their teeth into that resource of the Commission's.

Ken Durr:

Being able to pay good help, or not just help, but real significant expertise like that was usually a challenge for the Commission before. Were you able to provide competitive pay to these people with PhDs at this point?

Drew Bowden:

Yes, we were. Again, this was way before my time. And then those before me made those strides on behalf of the Commission, and OCIE in particular, but the pay scales and the amounts that we were paying, Carlo had really started an initiative to try to bring in people with specialized expertise, whether it was quantitative analytics, or whether it was trading, or whether it was derivatives, there was a whole laundry list of skill sets that the examination program was looking for at the time, but I would say we were not hampered from a compensation standpoint, and we could sell, especially on the quants.

Most of the people and really one of the pleasures about working with the Commission, I mean, the mission is to protect investors and promote the integrity and vibrancy of our capital markets. Most people can get behind that. That's a pretty compelling mission to come to work every day. And as I mentioned before, for the quants it was, "we can give you an opportunity to do work and make advances and make tremendous strides because it's really a nascent initiative, or an initiative that's starting to roll downhill and gain steam." We were able to recruit great people.

Ken Durr:

Well, maybe we should go into your period as director at this point. Is there anything else we should talk about that you worked on as deputy, or in the investment advisory area?

Drew Bowden:

We talked about resources. That was always an interesting issue, really from the moment I walked in the door. Obviously, OCIE is organized by registrant type. So there was an investment advisor program. There was a separate broker-dealer oversight program. And as we've talked about, as the investment advisory industry continued to grow and grow and grow, and the SEC really could not keep up from a resource perspective one of the big questions was, should you allocate resources from a different program? And usually it was from the broker-dealer program to the investment advisory program to get more coverage and get more exams done, and those sorts of things.

And that was on that one to me, it starts an interesting discussion of, I felt it was always unfair that the investment advisor program, and really OCIE as a whole tended to be evaluated exclusively by the number of exams it did. Certainly, that's what you're supposed to do, so I get it, but it didn't seem to me to be the best, or the fairest measuring stick of the effectiveness of the program given the other things we were trying to do, inform policy, promote compliance, monitor risk, and those sorts of things. My belief and what I preach is, look, what we're trying to do is influence people. That's all we're trying to do. We're trying to influence people to behave in ways that work better for investors and for the markets.

And there's a lot of ways to do that. Exams are just one. If you look at some of the annual reports and other things we put out at that time, we did start to keep better track and promote, or self-promote if you will, what we were doing in terms of our engagement with the industry, in terms of work we were doing with the policy divisions, and those sorts of things. And we really, at least I did, started to think about the job as what's the most cost-effective way to influence people and move the needle, and to move away from saying, "Hey, measure how good OCIE is doing by the number of exams."

At any rate, in IA/IC we were way behind. People wanted to do the broker-dealer. The fact of the matter is at the time, I think, even with FINRA examining broker-dealers, I believe the stats were, between FINRA and the SEC they had examined less than 1 percent, or some small percentage, of the branch offices of broker-dealers. And we continued to see, even with FINRA's oversight, the business was still significant enough that we continued to see issues. I know eventually, I think, Marc Wyatt did move resources from broker-dealer to advisory, which, again, we had talked about, and is a reasonable thing to do. I could never quite get myself comfortable with that because I felt like it was, I don't know how you'd put it, but robbing Peter to pay Paul.

Ken Durr:

Well, one of the things I wanted to do was ask you what your priorities were, or what was driving your policy initiative when you took over as director? It's sounding like you already answered that in talking about influencing people.

Drew Bowden:

Yes. It seemed to me that was the mission for myself. And, again, working with the leadership, it was interesting to me and informed actually by the time at Legg Mason where Legg Mason was a parent company with a dozen, 15 subsidiary businesses. The SEC was a headquarters, or a home office with a dozen regional firms. And in the time that I was at Legg Mason it dawned on me that at Legg Mason all the revenue of the business was generated by the subsidiaries who actually had clients they had to serve and do things. And it struck me at Legg Mason that the extent that the parent company is asking them to do things, or requesting information, or changing how things are done, it sometimes could be a distraction, and a tax, and a cost on actually doing the primary business, which is serving your clients, and growing a successful business.

So when I got to the SEC it struck me that the notion of Washington as headquarters and particularly at OCIE, where there were always requests emanating from Washington to the regional offices about particular information that people wanted for a memo, or for a conversation with a commissioner, or whatever else it was. And we tried to emphasize at the time to the team that, look, we're in the business of doing exams. Exams are principally done in the regions. Every time you ask the regions for something they're not doing exams. They're turning their back to their region and shoveling information to Washington, D.C. So another one of the initiatives, which is subtle, I guess, but was like, let's stop calling ourselves headquarters. Let's stop calling ourselves a home office. We're just D.C. And let's stop pinging and banging on the regions with the frequency that we historically have to give us information that we want.

My rule to the people I worked with in D.C. was, you cannot pick up the phone, or send an email, or ask for information from a region until you've exhausted all attempts to get it for yourself. And if you have to ask them for it then you have to devise a method where you can get it for yourself the next time. And so for me when I was there, it was really trying to work with the team. As I said, it was executing on, I think, a framework that Carlo had put in place that people were committed to, which was let's get back to doing exams, engaging with people, and being in the field, so that was one. The quantitative analytics was another one. We've talked about that for sure.

Ken Durr:

Talk a little bit about the annual exam document and how that was evolving over this period?

Drew Bowden:

I think Carlo had actually started a publication, early in the year, to the industry about what OCIE wanted to focus on during the year. When I became the director, you look at that document, I think it was fourteen and a half pages long. No offense to any of the scriveners at the SEC, but if you believe my hypothesis that what we were trying to do was influence people, it struck me that one of the things we ought to try to do is not publish a laundry list of everything that we might look at in the coming year, but try to produce a document that was a little tighter and a little shorter, and that really emphasized the things that we thought were most important for the industry to know that we were going to come and look at.

My goal was ideally, I don't know if it was ever realized or not, but my goal was, I'd like the priorities memo, one, to come out at the very beginning of the year. So you start a new year, you get your priorities memo. But two, it ought to be a document that the CEO of an investment advisory firm might actually pick up and read. And so we eventually, it had been fourteen, fifteen pages long, I think, at its low-water mark maybe. We got it to about four and a half pages, which is pretty good, I thought, and trying to focus on that. So it was always looking at everything and trying to think about what are ways to do this that people will engage with? And, again, that will have an impact, that will have influence.

Ken Durr:

Another way to have influence is speaking. And it looks like you stepped up the frequency with which the OCIE director was going out and talking in public. Was that deliberate, or was that something you happened to do?

Drew Bowden:

Deliberate. I take no responsibility for it. That's a perfect example of one where I would say Carlo and the OCIE leadership put the baton in our hands and we took it and went with it. Because I think Carlo had started what we called large firm engagement where we would go meet with senior executives and boards of directors of some of the largest firms. In the regional offices they were talking about more outreach type of events. So I would put that, Ken, in the category more of execution.

We felt like we could more effectively do our jobs, again, if we were present and we were credible. So if you don't have enough resources to do exams, instead of somebody never hearing or seeing from you, my saying was, "Let's not be a specter in people's lives." Then by hosting an event or going to speak at events, you at least were there. You were a voice in the room, and you were going to engage with people. From the publications to the large firm engagement to—again, many of the regional offices did a great job and put a lot of effort into getting out in their community, picking up the phone and calling people, hosting events. There was probably a lot of activity in that area. It seemed to me, again, based historically, maybe a little more emphasis than there had been in the past.

Ken Durr:

So you were actually targeting resources toward creating a public presence, to getting the message out somehow.

Drew Bowden:

Yes. Again, I said it at the time and speeches and everything else, people can argue with me if they want, but having come from the industry, my experience was most people want to get it right. They understand the importance to their clients, the importance to their business, the importance to their reputation to get it right. And so most people, if you can actually have a reasonable dialogue with them and give them some guidance, they'll self-correct on their own. That's not everybody, obviously. And we allocated a lot of time and energy in defining the people who were not so motivated, but it seemed to me, if most of the people were self-motivated, and it didn't require a lot of resources and effort to give them what they needed to be even more effective, then that was a reasonable allocation of our time and effort and capital to do that.

Ken Durr:

Well, we've talked about speeches. One of the most notable of yours was the Sunshine Speech. We talked a little bit about Dodd-Frank and private equities. Let's dig into that subject a bit. Dodd-Frank gave you hedge funds and private equity, and it sounds like private equity was maybe the bigger concern. Is that the case?

Drew Bowden:

I don't know if it's fair to say it was a bigger concern out of the box. It was, I think I characterized it a year before as sort of an assignment. I'd go to the Hill for budget things, and there's certain constituents of the world who like, "Why are you doing that? Why are you going to actually spend time examining private equity funds and hedge funds? They're big boys." I'd say, "Well, because Congress passed a law and they told us we had to do it." It really wasn't any more tortured than that in my mind.

I don't know that we had any particular concerns at the outset beyond how the heck are we going to bring on board 2,000 new advisors, and, again, have a presence and do our job and do the job that Congress had given to the SEC? That was really it at the beginning, and that's what we were trying to solve for. And it seemed to me, to the point Ken, the whole presence exam was premised upon and acknowledgement that although the SEC had done exams of private equity and hedge funds in the past, that was not really their wheelhouse, and that the presence exam strategy was purposely designed for the SEC to go in and learn and to collect information and find out more about these industries and their incentive structures and their business models.

Ken Durr:

And the presence exam was used in the private equity industry first. Is that right?

Drew Bowden:

Yes, and then hedge funds. I think we did what we call private fund advisors.

Ken Durr:

Well, talk about how the presence exam process worked. Did it work well? Who did the footwork and what did they find?

Drew Bowden:

I'll answer those, though, not in order. The team did all the footwork. You've referred it to as my Sunshine Speech. Sometimes my former colleagues call it that, and I always try to tell them it was not my speech. It was our speech. The exam program did it together. And so the presence strategy, we said, I think, very plainly in preparation for this—I went back and read it. We sent a letter to all the new registrants, and we said, "We're going to engage with you first of all. We're going to tell you who we are, what your responsibilities are, and we're going to tell you what we're going to come out and examine." And then we published a letter and said, again, I call them plain vanilla right down the middle of the road. "Here's the handful of things we're going to come in and look at: your firm, your marketing, your fees and expenses." Custody may have been in there, I forget.

Our thought was if we want to be credible let's not get over our skis. Let's stick with things that we understand and can really put them to the test on. We know what we're doing. And then we told them we're going to go out and try to do, I think we wanted to get to twenty-five percent of the new registrants over a period of a couple years. And the belief was if we do a couple hundred exams, even though each exam might only be looking at one or two issues at a particular advisor, after a couple years you'd add it up, and you would have a significant amount of data and observations that you had collected. And then we said, "And then we're going to report back. We'll come back to you and tell you what we found." So that was really the plan.

And that speech, again, really happened because that group invited me to come talk. It had been a couple years and they said, "Hey, you've been at it. You've been collecting information. Do you mind coming and telling us what you're seeing?" And so I turned around to the team and the regions and said, "Okay. You all have been doing the work. I'm the one they're going to shove behind a podium, but what do you want to tell them? What have you seen? What is the report that we would give at this time?"

Ken Durr:

And that was the private equity trade association, more or less. I don't remember the name.

Drew Bowden:

I don't actually remember the name of the group that had invited me to do it, but, again, it was timely, and we had said we were going to do it. And so we used it as an excuse to get everybody together and say, "Okay. What do we want to say?"

Ken Durr:

Did you anticipate the response that you got?

Drew Bowden:

No. I mean, yes and no. I think even in the speech I had to acknowledge this is not flattering. Part of putting that presentation together I thought it was important when we were engaging with the industry was to provide them with some context, and some basis to understand what we were telling them. Again, I didn't want to get into just giving them a litany of, we've been doing exams and here's the 25 things that we've seen that are problematic in private equity. I didn't think that would have as big an impact as trying to say, "Look, you're relatively new registrants, but we have a long history of examining people in the industry. We've seen a lot of things over time and here's what we're seeing about your business, how it compares historically with other advisors, and what we're seeing." It's not flattering. There's work to do in the industry. So in one sense, surprised it got people's attention. Maybe the degree and the nature of some of the reactions to it were a surprise to me and my colleagues in the Commission at the time.

Ken Durr:

Why?

Drew Bowden:

Well, there's a couple. One, and I think one of the things at the time that we were, I'll say, most proud about is, I said from the private equity industry itself, that they had some responses, most of which I think were constructive. But I said, "What they didn't say was that we didn't know what we were talking about." Nobody said, "SEC has no business examining private equity fund advisors. You don't understand our business. You don't understand our model. You're all wet. Basically, leave us alone and go back to looking at broker-dealers." To my knowledge, I don't know that anybody took that angle of attack with us, which is not uncommon at all for the SEC or OCIE in particular, for an industry, or a trade group to say, "You don't get it. You don't understand." I'll call that a pleasant surprise.

I think there was a little bit of surprise from the limited partnership segment of the ecology who I think we acknowledged at the beginning that a typical limited partner does not have the same ability, and level of transparency that the SEC has when it goes into a private equity fund. I always felt like our teams were able to go in and get information and ask questions that limited partners couldn't. But be that as it may, as a limited partner, the reaction ranged from, on one hand, "Great stuff, really interesting, appreciated it, tell us more. How do we protect ourselves? What do we do?" To on the other end of the spectrum, there was a little bit of pushback on like, "Knock it off. You're embarrassing us a bit. We're under scrutiny for why we hadn't dug into these issues, or ask these questions, or done this work." Which, again, was a little bit of a surprise because it seemed to me at the outset that a limited partner and the SEC are not identically—heck, they're not even arguably similarly situated when it comes to doing those types of inquiries.

Ken Durr:

Right, but they're supposed to be the educated investors, the more sophisticated investors.

Drew Bowden:

Yes, well.

Ken Durr:

Anything else we should talk about on the private equity, which did appear to consume a good bit of your time as director?

Drew Bowden:

We created, as I mentioned under Carlo, and the team's reorganization of OCIE, we had devised, or they had devised a plan for specialized investment units, where you bring people in from the industry with special expertise who focus on a particular type of exam, as opposed to being a generalist, or a utility player. And so although I think it may have existed before then, I do think that the work we had done was really important in allocating resources and formalizing the private funds unit at the SEC. And I think to our earlier conversation about quants, I think that that gave the SEC, again, credibility in that area where you started to see highly competent people with extensive experience and backgrounds in that part of the market interested in coming to work at the SEC and working in that group. So I think that that would be another one of the outcomes, I guess, if you will, of that particular initiative.

Ken Durr:

You've mentioned the large firm outreach program a couple of times, but we haven't really talked much about it. Give me some of the basics of what that was about.

Drew Bowden:

Again, that was Carlo, Norm, and the leadership team. Again, Carlo would probably be more authoritative in terms of the rationale for the origin of it, but same thing. I know when I got to the Commission in 2011, when it came to some of the larger firms in the industry that the SEC regulates, there wasn't a proverbial binder on the shelf that said, "Hey, here's the Acme Investment Management book that contains a history of the firm, who are the executives, what's going on in the Commission with that firm in terms of do they have requests for policy relief? Is anybody in enforcement looking at them? What's happening from a business perspective?"

And so, on one hand, Carlo allocated resources and set up a group to say, "Okay, there's a certain number of firms of a significant enough size that we ought to have a binder on that we can go to, so if something happens, we're not starting at square one." Which is, again, a great idea, but part of that, also, was this idea of if it's presence and credibility and influence was, we should get out and meet with the heads of these businesses and the boards of directors and have direct conversations with them. We should spend a day with them. And in the time that Carlo and Norm were there, we talked a lot about how to do that most effectively.

I think the bias of any government agency, including the SEC was, well, round up a dozen people and go see them. Which didn't seem to us to set up the meeting to have the type of discussion that we wanted to have, which is tell us candidly what's going on in your business. Tell us what you're seeing in markets. Tell us where you see risk. Give us a candid assessment of us. Tell us where you feel like we're not doing things that are working for investors or for the markets. And so in the last couple years I was there we would try to go out to these meetings. Usually, it was two or three of us, Carlo, Norm, and me. Norm, when he was doing IM, he'd bring colleagues from Trading and Markets, but our goal was always keep it to a couple people so that it wasn't so overwhelming for the registrants, which is funny because the registrants often adopted the exact same tactic to greet us when we walked through the door, which was lining up 18 people on the other side of the table.

Ken Durr:

Is that what SEC had previously done?

Drew Bowden:

Had they previously done?

Ken Durr:

Like go to meetings and have a phalanx of folks there to present?

Drew Bowden:

I don't know, specifically, in the context of large firm meetings. It was an observation from being there and observing. There always seemed to be a lot of people in the room for somebody who came from a business background where it was usually like, get the people in the room who absolutely have to be here, and we'll tell everybody else what went on. It was interesting, I guess, an observation I would have at the Commission in particular, and I'm sure in a lot of large businesses. Information is currency so people tended to want to be in the room and in the meeting because having that information was a form of currency within the organization, which I understand.

Ken Durr:

Any other things we should talk about from your time as director?

Drew Bowden:

We've talked some about the data analytics. We didn't talk, specifically, there were a couple highlights of that. One was the development of what we called NEAT, or the National Exam Analytics Tool. I mentioned that we started the quantitative analytics unit. We hired really competent people, and there were a couple things interesting about that, Ken. One was we told them, "Look, if I'm right, that insight will be gleaned from a trade blotter." We wanted to build a tool that would enable an examiner to go in and review years' worth of trading data in connection with an exam.

Previously, and this is not a knock on the examiners at all, but previously the tools that they had been given were pretty much Excel, and it was word of mouth. And somebody may have been able to do a macro, or a pivot table, but, again, having been examined most of the time when the SEC came in a standard request would be show me two weeks' worth of your trading blotter, and you'd give it to them. And the examiners really didn't have many tools at their disposal, as I said, other than putting it in Excel, and doing as much with it as they could have, given their particular capabilities, which sometimes were sophisticated. But other times we're squinting at it and trying to see if anything jumped out.

So, the goal was to create a tool that would allow the SEC to go in, and, again, not sample, don't give me two weeks, give me everything. Give me two years of every single trade that you've done. It took a year, but by the end it was running 50 different tests against that data for front-running, for cherry-picking, for marking the close, for allocating trades favorably to certain accounts as opposed to other accounts. It became, I think, for the Commission, a useful tool when doing exams. But to me, that was always the perfect example of how we were able to influence the industry to pick up its game because that was really my experience, one of the rare instances where the Commission had a tool, and a capability that the people we're examining didn't. They weren't doing that work. The compliance people were not looking at two years' worth of trading data to see if they could discern any patterns of potentially problematic behavior. So that one, I think, was pretty cool.

And then you started to see this emphasis on large scale data analytics manifest itself in other initiatives. I think there was a risk alert. It was published after I left, but the examiners went into ten branch offices that were selling structured products to their clients. I want to say the team was able to collect information about every sale of a structured product to every person over a period of years, looked at more than a billion dollars' worth of transactions. It was tens of thousands of different transactions that they looked at, but were able to come out with observations, which to me go into credibility. If you're the Commission and coming in and saying, "I've looked at every single trade in this area that you've done for a period of years. I've cross-referenced it against the client information. I've followed downstream to see what happened with the investment after you bought it. And here's what we've observed about your use of these products and how you're overseeing them."

Particularly, it was interesting where the results in some branches were far different than the results in other branches, but I always looked at that and shared with people that that to me was a really good example of OCIE's newfound ability to use those tools to gain insights, and to really, I think, be credible and impactful in terms of making changes. It was so interesting, Ken, because we had, as we were doing that, there were so many instances. I remember one in anti-money laundering where the teams along the Southern border wanted to go into firms and look to see if they were filing their suspicious activity reports. And so the quants devised a list of all the data that they wanted to look at to help them do that analysis and the firms, again, not unexpectedly, but the firms said, "What are you going to do with all this data? You're not even going to be able to open the files. It's so much data. This is pointless."

And we said, "Well, just give it to us. That's our problem, not your problem." And the team was really able to go do the work, cross-reference the data related to one another, and come back to those firms and say, "Here's some of the patterns that we've identified in your system that are going on in terms of money movements." Which, again, to my earlier point, we were telling those firms things that I don't think they knew about their business, which was very powerful, I think, and a credit to the team.

Ken Durr:

I'm glad you raised those points because the SEC, and you, were clearly making that message. You're getting that message across, because in my research I saw over and over, "we're looking at lots of data, we're using large quantities of data," as if you wanted to let people know that you were really taking a look at things rather than just sampling.

Drew Bowden:

Well, again, cut away everything, to me—and this goes back to coming back into the industry—it is, I believe, if not the, then certainly one of the most highly effective ways to understand what the hell is going on in a particular part of your business. If you have that ability to say, "Go look over there. Get a bunch of data and come back and tell me what is actually happening, not what they're telling me when I speak to them, not what my manual says, but what happens in the real world out there." It is to me, today, the most effective tool for gaining those types of insights. And, again, to me, importantly gaining them with credibility.

Ken Durr:

Great. Well, let's talk about the circumstances leading up to your leaving the Commission. I know it gets to the fact that, again, you're in front of an audience, you're talking to people.

Drew Bowden:

That actually didn't have anything to do with my leaving the Commission. That would be contemporaneous in time, but I think you're probably talking about the outreach event at Stanford?

Ken Durr:

Yes.

Drew Bowden:

The SEC was hosting an event. I believe it was for Silicon Valley, but consistent of what we were talking about, this was part of the outreach. We were the host of the event. We were inviting the industry in to share information with them and other things. We had a full day of presentations. I think I'd given formal remarks, and we went the whole day. And it actually was the last session of the day, the very last question of the day, a young man from private equity asked, "Gosh, don't you think with all this oversight you're doing you're going to run people out of the private equity business?" Which, again, the answer to that is like, "Are you kidding? Get out of here." We were the hosts of the event, and so in attempt to be congenial, I guess, for lack of a better thing. I think I gave the right answer, but I did it in a very stupid way, which is I told him like, "Get out of here. You have it pretty good. Your industry is pretty good."

Where I was stupid is, I said, "I have a teenage son. I talked to him and said, I think private equity is pretty interesting. I think it's an interesting business model when you look at it." To which he quickly retorted, "I would love to hire your son. Ha-ha." Everybody laughed, and they stopped the conference at that time, but that was really dumb of me, really stupid because I think it enabled people to look and say like, "Aha, look at this guy from the SEC he's cozying up to private equity and flattering them by saying it's an interesting business. And two, he's shilling for his son. He's trying to get his son a job. That's horrible and horrific."

So, on both of them at that point, I don't know that anybody who'd fairly read the record would say that we had been currying favor with the private equity industry on the team when we were there. And, two, my son was a teenager in high school, so that's preposterous, but be that as it may, it was stupid of me to do because it opened the door, and it allowed people to, I think, criticize the work of OCIE and the work of the Commission, and a lot of other things, which was frankly mortifying. I apologized to my team, apologized to the chair. That was a really stupid thing to say. I wish I could have that one back that's for sure.

Ken Durr:

Yes, but on the other side, you'd had the previous speech which had been considered to have come down too hard on the private equity industry, so all of a sudden, it's flipped 180 degrees.

Drew Bowden:

It was a great job. It was very interesting, but in the couple years there, there was a lot to learn about navigating public perceptions, and media in particular, because that was a particular issue on which it seemed no matter what you did, there were vocal critics on the other side of it from, "You're squeezing too hard. You're wasting your resources. Why the hell are you doing this?" To, on the other side, people saying, "You're not doing nearly enough. You're winking and walking away from it and you're in cahoots with the industry." That was just part of the dynamic.

Ken Durr:

Talk about the decision to go back into private industry.

Drew Bowden:

Again, I'd been at the Commission, I think probably for four years. I was not actively looking for a job. I knew I wasn't going to spend the rest of my career at the Commission. We could talk about that if you want. I knew I wasn't going to spend the rest of my career there, but I wasn't actively looking, and I got a call from a friend, he was a lawyer, and he said, "I'm doing work for this company. It's a great company, great people. Their general counsel is retiring after 30 years. This is a fantastic job." He told me like, "I would take this job." He said, "Except it's in the middle of Michigan." And I said, "Well, okay, well, I'll talk to him." So that was fortuitous, I think, the way that happened, as many things are in one's professional career.

Ken Durr:

So that was Jackson?

Drew Bowden:

Yep.

Ken Durr:

What kind of work did you do? What was your title there?

Drew Bowden:

I started there as general counsel. The gentleman who had been there before me had been there for 30 years, I think. To me, I say try to join a company that's doing well, which they were at the time. Get yourself an interesting role. And insurance, I didn't honestly have a huge amount of experience with insurance. I told them at the time I interviewed, something like, "You could fit what I know about insurance in a thimble." And they said, "Well, that's all right. You know other things. And we have a lot of people here who know insurance." I liked the people. And so I started there as general counsel, additionally assumed some additional responsibilities for HR, and government relations, and some other things.

Ken Durr:

Well, I want to wrap up by getting your perspective. You've remained in the industry more or less, and you've seen OCIE continue the transformative process that you were part of for a while. What's your perspective? Have things gone in the direction that you'd expected? What have you seen happen at the SEC that you didn't expect and that you think is particularly interesting?

Drew Bowden:

Well, that is a lot of open-ended questions, Ken.

Ken Durr:

Yes, so pick one.

Drew Bowden:

Well, maybe I'll come out of our own playbook a little bit. I do think that the team and the initiatives that we did at the time around the analytics was successful. I do think you've seen the industry start to equip compliance managers and professionals—be they risk, or compliance, or whoever—with some of the tools. I know there's vendors. I know that there's now compliance services, which built their own trade analytic tool in the nature of what I just said. They go to people and say, "Hey, you don't want the SEC to find out stuff you don't know about your own business. We built the tool you can use to go find out." So I think that would be one happy consequence of it.

I think that if you go back, we talked some. I can't say it, or I'll have to put a dollar in the jar. We did talk about Madoff. I would say, I think, the team that really looked at the program put steps in place to evolve the program and react to that did a great job, because my sense is… Back to my word credibility. I do really think that the Commission, and OCIE in particular, have remained credible to the industry in terms of their capabilities, their focus. I think that the engagement has continued. I think they've done a really good job of continuing to be transparent with the industry, share information. I think they could do more. It was one of my observations even when I was there.

I remember one particular instance where there was a market event, and it was problematic. My pitch at the time to the chair was my team had been in right after it. We had a report for internal use at the Commission that explained the whole thing and what had happened and what had gone wrong. And my pitch was like, "We should just publish that report. Everyone will read it. It's current. It's timely. Boards will read it. CEOs will read it and they're going to call people into their office and say, how the heck do I make sure this doesn't ever happen in my business?" But at that time, again, that was an isolated incident. But the idea for the SEC and the Commission was this is an enforcement matter. We need to pursue it through enforcement, and we need to conduct an enforcement investigation and make sure we have our facts correct, which, again, I understand, but those things take time in terms of influence.

The enforcement case came out two and a half years later. It was long in the rear-view mirror. I still think that the SEC could do more using its privileged ability to get any information that it wants pretty much in real time, and some of the analytical tools that it has. I think it could do more simply in doing analysis and sharing information with the industry that would be helpful.

People were great. I have many, many friends from the Commission, lifetime friends, hardworking people, dedicated people. For anybody who's thinking about doing a stint there, it really was a privilege and fascinating and exhilarating to go work for investors. And work for our capital markets is a wonderful opportunity.

Ken Durr:

Is there anything else that we haven't talked about that we should?

Drew Bowden:

I don't think so, Ken. I'm happy to answer any other questions you have today, or in the future if it's helpful.

Ken Durr:

Well, great. Well, I will be looking into this subject for quite some time to come.

Drew Bowden:

I know. You have quite the run going. You are the foremost authority, I think, on SEC, and certainly OCIE history for sure.

Ken Durr:

That's right. Well, it's been great. It's been a good talk. I really appreciate your time.