

SECTION D

Several things about mutual funds have been discussed. However, everything has not been covered, and you may have some comments to make. Do you wish to make any observations about your mutual fund shares or about mutual funds in general? If so, please do so in this space. (Continue on the other side if necessary).

Instructions for Completing the Redemption Questionnaire

Subject of Questionnaire: The questionnaire is concerned with your redemption of shares described at the top of page 2 of the questionnaire. The questions relate to this particular transaction unless otherwise specified. The date mentioned may differ by a few days from the actual date of the redemption because of the normal delay in recording information in the company's books.

Who Should Answer the Questions? The questionnaire has been sent to the shareholder in whose name the account is recorded, and in general the shareholder's responses are requested. However, as a guide to determine exactly who should answer the questions, the following outline is presented:

1. If the shares were owned by an adult individual, that individual should reply.
2. If the shares were owned jointly by the husband and wife, the husband should reply.
3. If the shares were owned by a dependent minor, the parent, custodian, guardian, relative, etc., should reply on behalf of the shareholder.
4. If the shares were owned by a person in another category, the person who made the decision to redeem the shares should reply.

In all cases, if the decision to redeem the shares was made by the administrator or executor of an estate or any person in a similar capacity, this fact should be explained and the blank questionnaire should be returned.

Since the study is designed to obtain a picture of the mutual funds industry from the investor's point of view, the respondent as determined above should complete the questionnaire to the best of his recollection and without seeking the aid of mutual fund salesmen, broker-dealers, or other persons who specialize in financial affairs.

How Should the Questions be Answered?

1. Specific instructions for answering each question have been given in the questionnaire where necessary for clarity. These instructions are indicated in CAPITAL LETTERS--usually on the left side of the page.
2. Most questions can be answered by simply circling a number or inserting a number in the space provided.
3. In a few cases, a brief comment explaining the reply is requested.
4. An opportunity is given the shareholder (in SECTION D) to make any observations he may have about his own mutual fund shares or about mutual funds in general. Any further comment on specific questions asked in the body of the questionnaire may also be included in SECTION D.

Return of Questionnaire: The completed questionnaire should be returned in the enclosed, postage-paid envelope to:

Securities Research Unit  
Wharton School of Finance and Commerce  
University of Pennsylvania  
Philadelphia 4, Pennsylvania

FORM 1C-6

Budget Bureau Approval

No. 71-6221

Expiration Date: March 31, 1963

MUTUAL FUND INVESTOR STUDY

Being Conducted For

Securities and Exchange Commission

by the

Securities Research Unit

Wharton School of Finance and Commerce

University of Pennsylvania

REDEMPTION QUESTIONNAIRE

Code:

THIS QUESTIONNAIRE IS CONCERNED WITH YOUR REDEMPTION OF SHARES OF \_\_\_\_\_ ON \_\_\_\_\_, 1962. THE QUESTIONS RELATE TO THIS PARTICULAR REDEMPTION UNLESS OTHERWISE SPECIFIED.

SECTION A

A-1. On the above date did you redeem all or only part of your shares in this fund?

(CIRCLE ONE NUMBER)

|      |   |
|------|---|
| All  | 1 |
| Part | 2 |

A-2. (IF "PART") Approximately what proportion of your holdings in this fund did you redeem?

A-3. When you redeemed your shares, did you use the money for a specific purpose?

(CIRCLE ONE NUMBER)

|     |   |                       |
|-----|---|-----------------------|
| Yes | 1 | SKIP TO QUESTION A-6. |
| No  | 2 |                       |

A-4. (IF "YES") What specific purpose? Was it:

(CIRCLE ONE OR MORE NUMBER(S))

|   |   |
|---|---|
| To purchase durable consumer goods(e.g., automobiles, furniture, etc.)? | 1 |
| To pay medical or hospital bills?                                       | 2 |
| To pay other types of debt?   | 3 |
| To pay for a vacation?  | 4 |
| To pay educational expenses?  | 5 |
| To make other household or personal expenditures?                       | 6 |
| To purchase a home?   | 7 |
| To invest in a business?  | 8 |

(Question A-4 continued on next page)

|                              |   |    |
|------------------------------|---|----|
| (CIRCLE ONE OR MORE NUMBERS) | To buy life insurance?                      | 9  |
|                              | To buy shares in another mutual fund?       | 10 |
|                              | To buy common stock other than fund shares? | 11 |
|                              | To buy other types of securities?           | 12 |
|                              | To open or increase savings accounts?       | 13 |
|                              | For some other purpose(s)?                  | 14 |

A-5. (IF "FOR SOME OTHER PURPOSE") What was the purpose?

A-6. Did you redeem your shares on the advice of someone else?

(CIRCLE ONE NUMBER)

|     |   |                               |
|-----|---|-------------------------------|
| Yes | 1 | SKIP TO QUESTION<br>A-8 BELOW |
| No  | 2 |                               |

A-7. (IF "YES") How would you describe this person? (As a friend, relative, broker, salesman, sales representative of a mutual fund, business advisor, or other person.)

A-8. When you redeemed your shares, did you expect the price of the shares was likely to change significantly in the next year?

(CIRCLE ONE NUMBER)

|     |   |                          |
|-----|---|--------------------------|
| Yes | 1 | SKIP TO<br>QUESTION A-11 |
| No  | 2 |                          |

A-9. (IF "YES") Did you expect the prices of these shares was likely to

(CIRCLE ONE NUMBER)

|      |   |
|------|---|
| Rise | 1 |
| Fall | 2 |

A-10. Did your expectation of future price movement influence your decision to redeem your shares?

(CIRCLE ONE NUMBER)

|     |   |
|-----|---|
| Yes | 1 |
| No  | 2 |

A-11. Did you own any of the following assets (a) at the time you acquired, and (b) at the time you redeemed your shares?

(CIRCLE NUMBER IN EACH COLUMN FOR ANY ASSETS OWNED)

|   | OWNED WHEN SHARES WERE ACQUIRED | OWNED WHEN SHARES WERE REDEEMED |
|---|---------------------------------|---------------------------------|
| Corporate stock other than mutual funds?                  | 1                               | 7                               |
| Other shares in mutual funds?                             | 2                               | 8                               |
| U. S. Government bonds?                                   | 3                               | 9                               |
| Other bonds?  | 4                               | 10                              |
| Savings accounts?   | 5                               | 11                              |
| Real Estate (buildings, land, etc.) other than your home? | 6                               | 12                              |

A-12. Did you dispose of any of these assets at about the time you redeemed your shares?

(CIRCLE ONE NUMBER)

|     |   |                       |
|-----|---|-----------------------|
| Yes | 1 | SKIP TO QUESTION A-14 |
| No  | 2 |                       |

A-13. (IF "YES") Please indicate which assets you disposed of by circling one or more numbers below.

|   |   |   |    |    |    |
|---|---|---|----|----|----|
| 7 | 8 | 9 | 10 | 11 | 12 |
|---|---|---|----|----|----|

A-14. Did you originally acquire the fund shares you redeemed by:

(CIRCLE ONE NUMBER)

|             |   |         |
|-------------|---|---------|
| Purchase    | 1 |         |
| Gift        | 2 | SKIP TO |
| Inheritance | 3 | PART C  |

A-15. (IF "PURCHASE") When did you purchase them? (If you purchased shares in the same fund at different times, give the date of the first purchase.)

A-16. In your opinion do you think you realized a net gain or a loss when you redeemed your shares?

(CIRCLE ONE NUMBER)

|                |   |
|----------------|---|
| Net gain       | 1 |
| Loss           | 2 |
| Don't remember | 3 |

A-17. When you purchased your shares, did you have any expectations about the investment performance (investment results) of your fund in the years ahead?

(CIRCLE ONE NUMBER)

|                |   |               |
|----------------|---|---------------|
| Yes            | 1 |               |
| No             | 2 | SKIP TO       |
| Don't remember | 3 | QUESTION A-19 |

A-18. (IF "YES") How did the actual investment performance of the shares compare with what you expected?

(CIRCLE ONE NUMBER)

|                        |   |
|------------------------|---|
| About same as expected | 1 |
| Better than expected   | 2 |
| Worse than expected    | 3 |

A-19. Did you purchase the shares you redeemed as part of a periodic investment plan involving monthly or other regular payments?

(CIRCLE ONE NUMBER)

|     |   |                   |
|-----|---|-------------------|
| Yes | 1 | SKIP TO SECTION B |
| No  | 2 |                   |

A-20. When did you make your last periodic payment?

A-21. Did you complete your plan before redemption?

(CIRCLE ONE NUMBER)

|     |   |                       |
|-----|---|-----------------------|
| Yes | 1 | SKIP TO QUESTION A-25 |
| No  | 2 |                       |

A-22. (IF "NO" to A-21) Was the sales charge that was deducted from your investment a greater percentage of your investment than if you had completed your plan?

(CIRCLE ONE NUMBER)

|            |   |                       |
|------------|---|-----------------------|
| Yes        | 1 | SKIP TO QUESTION A-25 |
| No         | 2 |                       |
| Don't know | 3 |                       |

A-23. (IF "YES" to A-22) When you began your plan did you anticipate that this would happen if you did not complete your plan?

|                |   |                       |
|----------------|---|-----------------------|
| Yes            | 1 | SKIP TO QUESTION A-25 |
| No             | 2 |                       |
| Don't Remember | 3 |                       |



A-24. (IF "YES" to A-23) At that time, did you regard it as an advantage, a disadvantage, or neither that this would happen?

(CIRCLE ONE NUMBER)

|              |   |
|--------------|---|
| Advantage    | 1 |
| Disadvantage | 2 |
| Neither      | 3 |

A-25. Listed below are several features typically associated with periodic investment plans. Indicate, for each feature, whether you now regard it as an advantage, a disadvantage, or neither.

(CIRCLE ONE NUMBER ON EACH LINE)

|  | Advantage | Disadvantage | Neither |
|--|-----------|--------------|---------|
| Periodic payments  | 1         | 2            | 3       |
| Professional management of fund securities   | 1         | 2            | 3       |
| Automatic reinvestment of dividends without sales charge                             | 1         | 2            | 3       |
| Diversification of fund securities   | 1         | 2            | 3       |
| "Front-end load", or large proportion of sales charge deducted in first year of plan | 1         | 2            | 3       |

S E C T I O N B

(FILL IN ONLY IF YOU PURCHASED THE SHARES YOU REDEEMED)

B-1. We turn now to your objectives in buying mutual fund shares. Please read the statements below and indicate the general objective or objectives for which these shares were purchased.

(CIRCLE ONE OR MORE NUMBERS)

|   |   |
|---|---|
| To provide a means for general saving             | 1 |
| To provide for retirement                         | 2 |
| To provide for children's college education       | 3 |
| To provide for the purchase of a business or home | 4 |
| To accumulate an estate                           | 5 |
| To provide current income                         | 6 |
| Some other objective                              | 7 |

B-2. (IF "SOME OTHER OBJECTIVE") What was the objective?

B-3. In your opinion did your investment in these shares accomplish the objective(s) for which they were purchased?

(CIRCLE ONE NUMBER)

|            |   |
|------------|---|
| Yes        | 1 |
| No         | 2 |
| Don't know | 3 |

B-4. Why did you choose to invest in mutual funds to accomplish (this) (these) objectives?

(CIRCLE ONE OR MORE NUMBERS)

|  |   |
|--|---|
| To benefit from a rise in stock prices             | 1 |
| To hedge against inflation                         | 2 |
| To benefit from professional investment management | 3 |
| To benefit from diversification                    | 4 |
| To protect capital                                 | 5 |
| To acquire discipline in saving                    | 6 |
| To benefit from economic growth                    | 7 |
| Some other reason                                  | 8 |

B-5. (IF "SOME OTHER REASON") What was the reason?

B-6. In your opinion did your investment in fund shares provide the benefits indicated in B-4 and/or B-5?

(CIRCLE ONE NUMBER)

|            |   |
|------------|---|
| Yes        | 1 |
| No         | 2 |
| Don't know | 3 |

B-7. (IF "YES" OR "NO") Please explain the basis for your opinion.

B-8. After you purchased your shares, did you acquire any additional information about your fund or plan which would have affected your original decision to buy?

(CIRCLE ONE NUMBER)

|     |   |
|-----|---|
| Yes | 1 |
| No  | 2 |

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B-9. (IF "YES") Please explain the nature of the information.

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Empty space for providing an explanation for a "Yes" response to question B-8.

| <u>SECTION C</u>   |   |         |     |         |                                |        |   |                  |   |   |               |   |   |
|--|---|---------|-----|---------|--------------------------------|--------|---|------------------|---|---|---------------|---|---|
| Classification Data  |   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| In this section, information about you (and in some cases your family) is requested.       |   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| (Questions C-1 through C-11 refer to you, the respondent, as an individual).               |   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| C-1. Sex   | <table border="1" style="margin-left: auto; margin-right: 0;"> <tr> <td style="width: 80%;">Male</td> <td style="width: 20%; text-align: center;">1</td> </tr> <tr> <td>Female</td> <td style="text-align: center;">2</td> </tr> </table>   | Male    | 1   | Female  | 2                              |        |   |                  |   |   |               |   |   |
| Male   | 1   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| Female   | 2   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| C-2. Are you married, widowed, or single?  | <table border="1" style="margin-left: auto; margin-right: 0;"> <tr> <td style="width: 80%;">Married</td> <td style="width: 20%; text-align: center;">1</td> </tr> <tr> <td>Widowed</td> <td style="text-align: center;">2</td> </tr> <tr> <td>Single</td> <td style="text-align: center;">3</td> </tr> </table>   | Married | 1   | Widowed | 2                              | Single | 3 |                  |   |   |               |   |   |
| Married  | 1   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| Widowed  | 2   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| Single   | 3   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| C-3. (IF "MARRIED") Were you and your wife (husband) employed when the shares were bought? | <table border="1" style="margin-left: auto; margin-right: 0;"> <tr> <td style="width: 70%;"></td> <td style="width: 15%; text-align: center;">Yes</td> <td style="width: 15%; text-align: center;">No</td> </tr> <tr> <td style="text-align: center;">(CIRCLE A NUMBER ON EACH LINE)</td> <td></td> <td></td> </tr> <tr> <td>Husband employed</td> <td style="text-align: center;">1</td> <td style="text-align: center;">2</td> </tr> <tr> <td>Wife employed</td> <td style="text-align: center;">1</td> <td style="text-align: center;">2</td> </tr> </table> |         | Yes | No      | (CIRCLE A NUMBER ON EACH LINE) |        |   | Husband employed | 1 | 2 | Wife employed | 1 | 2 |
|  | Yes   | No      |     |         |                                |        |   |                  |   |   |               |   |   |
| (CIRCLE A NUMBER ON EACH LINE)   |   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| Husband employed   | 1   | 2       |     |         |                                |        |   |                  |   |   |               |   |   |
| Wife employed  | 1   | 2       |     |         |                                |        |   |                  |   |   |               |   |   |
| C-4. How many people are in your family at this address?                                   | <table border="1" style="margin-left: auto; margin-right: 0;"> <tr> <td style="width: 80%;">Number:</td> <td style="width: 20%;"></td> </tr> </table>   | Number: |     |         |                                |        |   |                  |   |   |               |   |   |
| Number:  |   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| C-5. How many dependents do you have?  | <table border="1" style="margin-left: auto; margin-right: 0;"> <tr> <td style="width: 80%;">Number:</td> <td style="width: 20%;"></td> </tr> </table>   | Number: |     |         |                                |        |   |                  |   |   |               |   |   |
| Number:  |   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| C-6. How old are you?  | <table border="1" style="margin-left: auto; margin-right: 0;"> <tr> <td style="width: 80%;">Age:</td> <td style="width: 20%;"></td> </tr> </table>  | Age:    |     |         |                                |        |   |                  |   |   |               |   |   |
| Age:   |   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| C-7. In what kind of business or industry are you employed?                                |   |         |     |         |                                |        |   |                  |   |   |               |   |   |
| C-8. What is your occupation?  |   |         |     |         |                                |        |   |                  |   |   |               |   |   |

C-9. What was the highest grade you completed in school or college?  
(CIRCLE ONLY ONE NUMBER)

|               |     |    |    |    |
|---------------|-----|----|----|----|
| Elementary    | 0-5 | 6  | 7  | 8  |
| High School   | 9   | 10 | 11 | 12 |
| College       | 1   | 2  | 3  | 4  |
| Post Graduate | 1   | 2  | 3  | 4  |

C-10. (IF "POST GRADUATE") What was your major field of study?

C-11. What was your employment status at the time the fund shares were bought?

|                    |   |
|--------------------|---|
| Employed by others | 1 |
| Self-employed      | 2 |
| Unemployed         | 3 |
| Retired            | 4 |
| Housewife          | 5 |

C-12. Are you head of the family, or just what is your status in the family?

|  |   |  |
|--|---|--|
| Head   | 1 | (ANSWER QUESTIONS<br>C-13 thru C-19<br>ABOUT THE FAMILY)     |
| Spouse                                       | 2 |  |
| Dependent son or daughter                    | 3 |  |
| A dependent adult                            | 4 |  |
| An individual who is financially independent | 5 | (ANSWER QUESTIONS<br>C-13-thru C-19<br>ABOUT THE INDIVIDUAL) |

C-13. At the time the mutual fund shares were bought, did you (your family) own your home?

|     |   |              |
|-----|---|--------------|
| Yes | 1 |              |
| No  | 2 | SKIP TO C-15 |

C-14. (IF "YES") Was it mortgaged?

|     |   |
|-----|---|
| Yes | 1 |
| No  | 2 |

C-15. Are you (is the head of the family) covered by life insurance?

|     |   |
|-----|---|
| Yes | 1 |
| No  | 2 |

C-16. (IF "YES") What is the total face amount?

|                     |   |
|---------------------|---|
| Less than \$5,000   | 1 |
| \$5,000 - \$9,999   | 2 |
| \$10,000 - \$14,999 | 3 |
| \$15,000 - \$24,999 | 4 |
| \$25,000 - \$50,000 | 5 |
| Over \$50,000       | 6 |

C-17. In which group below does your annual (family) income fall?

|                     |   |
|---------------------|---|
| Less than \$5,000   | 1 |
| \$5,000 - \$9,999   | 2 |
| \$10,000 - \$14,999 | 3 |
| \$15,000 - \$24,999 | 4 |
| \$25,000 - \$50,000 | 5 |
| Over \$50,000       | 6 |

SECTION D

Several things about mutual funds have been discussed. However, everything has not been covered, and you may have some comments to make. Do you wish to make any observations about your mutual fund shares or about mutual funds in general? If so, please do so in this space. (Continue on the other side if necessary).



APPENDIX XI-B

QUESTIONNAIRE IC-1 AND RELATED FORMS

INSIDERS' PORTFOLIO TRANSACTIONS AND FUNDS'

POLICIES RELATING THERETO



SPECIAL STUDY OF  
SECURITIES MARKETS

SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON 25, D.C.

May 17, 1962

Gentlemen:

Under the provisions of Public Law 87-196 (1961) the Commission is authorized to make a study of the securities markets and rules and practices relating thereto.

Your cooperation is requested in completing the attached questionnaire and form which are being sent to a selected group of companies. The fact that you have received this questionnaire is not to be construed as a reflection upon your company or anyone connected with it. Nor should any question about a particular action or course of conduct on your part be construed to mean that it either is or is not deemed by the Commission to have been a lawful, proper or otherwise desirable one.

Wherever possible, the Special Study of Securities Markets is making use of material available from other sources, such as the Wharton School Study, rather than duplicating any such data. The information requested through this questionnaire is not available through the Wharton School Study and we will appreciate your continued cooperation in supplying the required information.

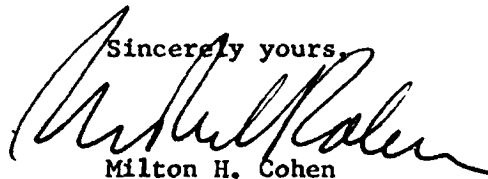
Your attention is directed to the instructions and definitions at the beginning of the questionnaire and the instructions set forth at the head of Part III and on the back of Form A. Please note that Part III is to be completed separately by the investment company, the investment adviser and the principal underwriter.

All of the requested information should be assembled by the investment company and returned on or before June 15, 1962, to the Securities and Exchange Commission, Special Study of Securities Markets, Washington 25, D. C.

Extra copies of the questionnaire and Form A are enclosed for your files. Additional copies may be obtained from the Securities and Exchange Commission, at the above address. All inquiries should be directed to Mr. Harry Krueger at this address, telephone Worth 2-2425 (Area Code 202).

For your information, it is our intention to inquire on a sample basis of individuals named in your response to Part II, with respect to transactions in some or all of the securities listed on Form A.

Sincerely yours,



Milton H. Cohen  
Director

Attachments:

Questionnaire IC-1 (2)  
Part III (6)  
Form A (8)

Budget Bureau Approval  
No. 71-6201

SPECIAL STUDY OF SECURITIES MARKETS

Securities and Exchange Commission

Washington 25, D. C.

QUESTIONNAIRE - IC-1

Name of Investment Company \_\_\_\_\_

INSTRUCTIONS

Every question should be completed in full. If there is no information to report or if the question is not applicable, you should answer "None" or "Not Applicable". If the space provided for any answer is insufficient, the complete answer should be prepared on a separate sheet to be attached to the questionnaire and identified as "Answer to Question \_\_\_\_\_."

The investment company should complete Parts I, II and III (with respect to itself) and Form A, and should obtain separately a completed Part III both from its investment adviser and principal underwriter. In addition, the investment company should attach, for the use of the Special Study of Securities Markets, a copy of its latest prospectus as effective under the Securities Act of 1933 and a copy of its semi-annual report furnished stockholders pursuant to Section 30(d) of the Investment Company Act of 1940.

Attention is directed to the provisions of Title 18, U. S. C., Section 1001, which makes it a criminal offense to submit false information to a federal government agency.

DEFINITIONS

Principal Underwriter:  
Investment Adviser:  
Affiliated Company:  
Affiliated Person:  
Company:  
Person:  
Advisory Board:



As defined under Section 2  
of the Investment Company  
Act of 1940.

Affiliated Broker-Dealer: The term "affiliated broker-dealer" means any broker-dealer which is an affiliated company or person of the investment company, its investment adviser or its principal underwriter, or of which any affiliated person of the investment company, its investment adviser or its principal underwriter is an affiliated person.

Officer and Director: For the purposes of all subsections of Part II of the questionnaire, the term "officer" and the term "director" shall also include any other person who performs similar executive, supervisory or policy-making functions.

PART I

Identify and give the business addresses of each of the following:

|                             | <u>Name</u> | <u>Business Address</u> |
|-----------------------------|-------------|-------------------------|
| Investment Adviser          | : _____     | _____                   |
| Principal Underwriter       | : _____     | _____                   |
| Affiliated Broker-Dealer(s) | : _____     | _____                   |
|                             | _____       | _____                   |
|                             | _____       | _____                   |

PART II

For each person in the following categories, at any time during the period December 1, 1960 to July 31, 1961, inclusive, give the name, business address and position:

- (a) For the investment company:  
each officer; each director; and each member of the advisory board (where there is a board of trustees or a corporate trustee with a board of directors, each member of such board should be named),

| <u>Name</u> | <u>Business<br/>Address</u> | <u>Position</u> |
|-------------|-----------------------------|-----------------|
|-------------|-----------------------------|-----------------|

- (b) For the investment adviser:  
each officer; each director; each person having one of the ten largest general partnership interests or the ten largest holdings of outstanding voting securities; and each other person or entity (including any employee acting in an executive or research capacity or any affiliated company of the investment adviser, but excluding any broker-dealer) whose position or relationship with the investment adviser is such as to afford access to information as to recommended, proposed or pending portfolio transactions of the investment company prior to public disclosure thereof,

| <u>Name of Person<br/>or Company</u> | <u>Business<br/>Address</u> | <u>Position</u> |
|--------------------------------------|-----------------------------|-----------------|
|--------------------------------------|-----------------------------|-----------------|

- (c) For the principal underwriter:  
each individual or entity (including any officer, director, partner, stockholder, employee acting in an executive or research capacity, or affiliated company of the principal underwriter, but excluding any other broker-dealer) whose position or relationship with the principal underwriter was such as to afford access to information as to recommended, proposed or pending portfolio transactions of the investment company prior to public disclosure thereof,

| <u>Name of Person<br/>or Company</u> | <u>Business<br/>Address</u> | <u>Position</u> |
|--------------------------------------|-----------------------------|-----------------|
|--------------------------------------|-----------------------------|-----------------|

- (d) For each affiliated broker-dealer:  
each individual or entity (including any officer, director, partner, stockholder, employee acting in an executive or research capacity, or affiliated company of the affiliated broker-dealer, but excluding any other broker-dealer) whose position or relationship with the affiliated broker-dealer was such as to afford access to information as to recommended, proposed or pending portfolio transactions of the investment company prior to public disclosure thereof,

| <u>Name of Person<br/>or Company</u> | <u>Business<br/>Address</u> | <u>Position</u> |
|--------------------------------------|-----------------------------|-----------------|
|--------------------------------------|-----------------------------|-----------------|

Certified true and correct  
(on information and belief,  
with respect to II(b), (c)  
and (d)).

\_\_\_\_\_  
Name of Investment Company

By: \_\_\_\_\_  
Name of Officer

Title: \_\_\_\_\_

Date: \_\_\_\_\_



Budget Bureau Approval  
No. 71-6201

\_\_\_\_\_  
Name of Respondent

\_\_\_\_\_  
Name of Investment Company

QUESTIONNAIRE IC-1

PART III

INSTRUCTIONS

The following items are to be answered separately by:  
(1) the investment company, (2) the investment adviser, and (3) the principal underwriter. Additional copies of this Part III are enclosed for that purpose. Each respondent should separately sign this attachment.

Every question should be completed in full. If there is no information to report or if the question is not applicable, you should answer "None" or "Not Applicable." If the space provided for any answer is insufficient, the complete answer should be prepared on a separate sheet to be attached and identified as "Answer to Question \_\_\_\_\_ of Part III."

Attention is directed to the provisions of Title 18, U.S.C., Section 1001, which makes it a criminal offense to submit false information to a federal government agency.

1. (a) Do you have a written policy respecting the use of investment advisory or research information supplied to the investment company, or the use of information concerning prospective or actual portfolio transactions of the investment company, by persons in your firm having access to such information?

Yes [ ]                      No [ ]

(b) Do you have an unwritten policy respecting the use of investment advisory or research information supplied to the investment company, or the use of information concerning prospective or actual portfolio transactions of the investment company, by persons in your firm having access to such information?

Yes [ ]                      No [ ]

2. (a) If the answer to Item 1(a) is in the affirmative, state when your written policy was adopted in its present form.

Date: \_\_\_\_\_

(b) If the answer to Item 1(b) is in the affirmative, state approximately when your unwritten policy, as presently understood, became operative.

Date: \_\_\_\_\_

**NOTE:** If your present written or unwritten policy evolved into its present form over a period of time, you may at your option attach an appropriate summary of its history.

3. (a) If your answer to Item 1(a) is in the affirmative, attach to this form a copy of your written policy.

(b) If your answer to Item 1(b) is in the affirmative, attach to this form a statement giving the substance of your unwritten policy.

4. (a) If you have an unwritten policy, state precisely what means are used to communicate such policy to your personnel.

(b) If you have established any procedures for implementing or enforcing your written or unwritten policy, briefly describe such procedures.

5. (a) If you had a written or unwritten policy at any time during the period from January 1, 1960, to the present, do you have knowledge of any violations of that policy?

Yes [ ] No [ ]

(b) If your answer to 5(a) is in the affirmative, furnish details sufficient to provide a clear understanding of the particular transactions involved and of the action taken with respect thereto.

Certified true and correct.

\_\_\_\_\_  
Name of Respondent

By: \_\_\_\_\_  
Name of Partner or Officer

Date: \_\_\_\_\_

Title: \_\_\_\_\_



## Form A

## INSTRUCTIONS

General Instructions

The definitions of the terms "principal underwriter", "investment adviser", "affiliated company", "affiliated person", "company", "person", "advisory board", and "affiliated broker-dealer", are set forth in Questionnaire IC-1.

Column 1

List alphabetically each security issue of each issuer in which the investment company made purchases (excluding exercise of rights or receipt of stock dividends) or sales during the period December 1, 1960 to June 30, 1961, inclusive.

All purchases of a single issue are to be combined on one line except that each purchase representing an allotment of a new issue is to be listed on a separate line in accordance with the instructions for column 8. All sales of a single issue are to be combined on one line.

Column 7

In each instance where an affiliated person of the investment company served as an officer or director of an issuer, so indicate in this column by the designation "AP".

Column 8

Indicate by the symbol "NI" in this column each purchase representing an allotment of a new issue being offered to the public for the first time. Indicate by the symbol "NIP" each such instance where the principal underwriter or any affiliated broker-dealer of the investment company, or any broker-dealer named in column 9 with respect to such purchase, acted either as an underwriter or as a selected dealer in the distribution of such new issue.

Column 9

For every issue listed, name the broker-dealer acting as agent for the investment company in the purchase or sale, or, if purchased from or sold to a broker-dealer acting as principal, name the broker-dealer from or to whom the securities were purchased or sold. If more than one broker-dealer is involved in the purchase or sale of any one issue listed, the name of all such broker-dealers should be given in a footnote or by any other convenient means.

621501



SPECIAL STUDY OF  
SECURITIES MARKETS

SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON 25, D.C.

Re: \_\_\_\_\_  
(Investment Company)

Gentlemen:

Under the provisions of Public Law 87-196 (1961) the Commission is authorized to make a study of the securities markets and rules and practices relating thereto.

As you may know, the Commission's Special Study of Securities Markets, in May 1962, sent a questionnaire, designated IC-1, to a group of open-end investment companies for the purpose of obtaining facts relating to the policies and practices of investment companies and affiliated persons respecting the use of investment advisory or research information supplied to such companies. At that time, it was announced that the Special Study intended to inquire on a sample basis as to transactions of certain related persons named in the investment companies' responses in securities which were involved in the investment companies' portfolio transactions.

Your firm appears as investment adviser in the response of the investment company named above. Accordingly your cooperation is requested in completing the enclosed Form C for your firm and for each closed-end investment company (if any) whose investments are managed by your firm as well as each of the three largest private advisory accounts (if any) managed by your firm for a fee. Your attention is directed to the instructions for completion of the form which requires you to furnish the specified information with respect to transactions in any of the securities named on the enclosed list.

It is emphasized that the fact that this form is being sent to your firm is not to be construed as a reflection upon your firm or the named investment company or anyone connected with them. Neither is it intended to indicate that your firm or the investment company or its management have in any way violated any law or any rule or regulation of the Commission.

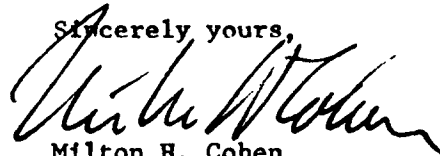
The requested information should be returned within two weeks of the date of this letter to the Securities and Exchange Commission, Special Study of Securities Markets, Washington 25, D. C. Extra copies of the form are enclosed for your files. Additional copies may be obtained from the Securities and Exchange Commission, at the above address.

Any questions regarding this form may be addressed to the following persons:

Harry Krueger  
Securities and Exchange Commission  
Special Study of Securities Markets  
Washington 25, D. C.  
Worth 2-2425 (Area Code 202)

Sheldon Rappaport  
Securities and Exchange Commission  
Special Study of Securities Markets  
Washington 25, D. C.  
Worth 3-3379 (Area Code 202)

Sincerely yours,



Milton H. Cohen  
Director

Enclosure  
Form C (10)  
List



SPECIAL STUDY OF  
SECURITIES MARKETS

SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON 25, D.C.

Re: \_\_\_\_\_  
(Investment Company)

Dear Sir or Madam:

Under the provisions of Public Law 87-196 (1961) the Commission is authorized to make a study of the securities markets and rules and practices relating thereto.

As you may know, the Commission's Special Study of Securities Markets, in May 1962, sent a questionnaire, designated IC-1, to a group of open-end investment companies for the purpose of obtaining facts relating to the policies and practices of investment companies and affiliated persons respecting the use of investment advisory or research information supplied to such companies. At that time, it was announced that the Special Study intended to inquire on a sample basis as to transactions of certain related persons named in the investment companies' responses in securities which were involved in the investment companies' portfolio transactions.

Your name appears as a related person in the response of the investment company named above. Accordingly, your cooperation is requested in completing enclosed Form B. Your attention is directed to the instructions for completion of the form which require you to furnish the specified information with respect to transactions in any of the securities named on the enclosed list.

It is emphasized that the fact that this form is being sent to you is not to be construed as a reflection upon the named investment company or anyone connected with it. Neither is it intended to indicate that you or the investment company or its management have in any way violated any law or any rule or regulation of the Commission.




The requested information should be returned within two weeks of the date of this letter to the Securities and Exchange Commission, Special Study of Securities Markets, Washington 25, D. C. Extra copies of the form are enclosed for your files. Additional copies may be obtained from the Securities and Exchange Commission, at the above address.

Any questions regarding this form may be addressed to the following persons:

Harry Krueger  
Securities and Exchange Commission  
Special Study of Securities Markets  
Washington 25, D. C.  
Worth 2-2425 (Area Code 202)

Sheldon Rappaport  
Securities and Exchange Commission  
Special Study of Securities Markets  
Washington 25, D. C.  
Worth 3-3379 (Area Code 202)

Sincerely yours,

  
Milton H. Cohen  
Director

Enclosure:  
Form B (4)  
List



SPECIAL STUDY OF  
SECURITIES MARKETS

SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON 25, D.C.

Re: \_\_\_\_\_  
(Investment Company)

Gentlemen:

Under the provisions of Public Law 87-196 (1961) the Commission is authorized to make a study of the securities markets and rules and practices relating thereto.

As you may know, the Commission's Special Study of Securities Markets, in May 1962, sent a questionnaire, designated IC-1, to a group of open-end investment companies for the purpose of obtaining facts relating to the policies and practices of investment companies and affiliated persons respecting the use of investment advisory or research information supplied to such companies. At that time, it was announced that the Special Study intended to inquire on a sample basis as to transactions of certain related persons named in the investment companies' responses in securities which were involved in the investment companies' portfolio transactions.

Your firm has been named as principal underwriter, affiliated broker-dealer or affiliated person in the response of the investment company named above. Accordingly, your cooperation is requested in completing enclosed Form B. Your attention is directed to the instructions for completion of the form which require you to furnish the specified information with respect to transactions in any of the securities named on the enclosed list.

It is emphasized that the fact that this form is being sent to your firm is not to be construed as a reflection upon your firm or the named investment company or anyone connected with them. Neither is it intended to indicate that you or the investment company or its management have in any way violated any law or any rule or regulation of the Commission.

The requested information should be returned within two weeks of the date of this letter to the Securities and Exchange Commission, Special Study of Securities Markets, Washington 25, D. C. Extra copies of the form are enclosed for your files. Additional copies may be obtained from the Securities and Exchange Commission, at the above address.

Any questions regarding this form may be addressed to the following persons:

Harry Krueger  
Securities and Exchange Commission  
Special Study of Securities Markets  
Washington 25, D. C.  
Worth 2-2425 (Area Code 202)

Sheldon Rappaport  
Securities and Exchange Commission  
Special Study of Securities Markets  
Washington 25, D. C.  
Worth 3-3379 (Area Code 202)

Sincerely yours,



Milton H. Cohen  
Director

Enclosure:  
Form B (4)  
List



**Form B**  
**INSTRUCTIONS**

General Instructions

An individual respondent should set forth each transaction made directly or indirectly by himself, his spouse and/or his minor children in any security on the attached list for the period from December 1, 1960 to July 31, 1961, inclusive. Transactions in any such security during such period by any corporation, partnership, association, fund, or account in which the individual respondent, his spouse and/or his minor children had a direct or indirect beneficial interest of 10% or more, and any transactions in any trust in which he is trustee, shall be included.

A respondent which is a corporation, partnership or other entity should set forth each transaction in any security on the attached list during the period from December 1, 1960 to July 31, 1961, inclusive, by itself or by any affiliated business entity. An affiliated business entity shall mean any corporation, partnership, association, fund, or account in which the respondent entity had a direct or indirect beneficial interest of 10% or more.

If any such transactions of an underwriter or broker-dealer occurred in a specialist trading account, or in a broker-dealer trading account maintained for the purpose of "making a market" (over-the-counter) in a security, such transactions need not be reported on this form except for a general statement that transactions in such securities occurred in such account during a specified period.

Column 1

Omit all securities on the attached list in which there were no transactions during the period.

List each security alphabetically.

List each transaction in any security on the attached list separately (i.e., every transaction should be on a different line whether a purchase or a sale).

Column 3

Add an asterisk to this column if the transaction was a short sale or the covering of a short sale.

Column 7

Show the total cost or proceeds for the transaction of purchase or sale exclusive of brokerage commissions and transfer taxes.

Column 8

Name the broker-dealer acting as agent or name the broker-dealer from or to whom the securities were purchased or sold.

*Attention is directed to the provisions of Title 18, U.S.C., Section 1001, which makes it a criminal offense to submit false information to a federal government agency.*



**Form C**  
**INSTRUCTIONS**

General Instructions

This form should be completed by the investment adviser for itself as respondent. A separate form should be completed by the investment adviser for each closed-end investment company (if any) whose accounts are managed for a fee and for each of the three largest private advisory accounts (if any) of the investment adviser which are managed for a fee. The private accounts need only to be identified as accounts "A", "B", and "C".

If the investment adviser does not manage other accounts for a fee, please so state on the line "For Account of: \_\_\_\_\_"

There should be set forth for each respondent, closed-end investment company and private advisory account, each transaction in any security on the attached list during the period from December 1, 1960 to July 31, 1961. A respondent which is a corporation, partnership or other entity should set forth each transaction in any security by itself or by any affiliated business entity. An affiliated business entity shall mean any corporation, partnership, association, fund, or account in which the respondent entity had a direct or indirect beneficial interest of 10% or more.

If any such transactions of an investment adviser who is also a broker-dealer occurred in a specialist trading account, or in a broker-dealer trading account maintained for the purpose of "making a market" (over-the-counter) in a security, such transactions need not be reported on this form except for a general statement that transactions in such securities occurred in such account during a specified period.

Column 1

Omit all securities on the attached list in which there were no transactions during the period.

List each security alphabetically.

List each transaction in any security on the attached list separately (i.e., every transaction should be on a different line whether a purchase or a sale).

Column 3

Add an asterisk to this column if the transaction was a short sale or the covering of a short sale.

Column 7

Show the total cost or proceeds for the transaction of purchase or sale exclusive of brokerage commissions and transfer taxes.

Column 8

Name the broker-dealer acting as agent for the investment adviser or name the broker-dealer from or to whom the securities were purchased or sold, or, where known, the broker-dealer executing the transaction on behalf of the account.

*Attention is directed to the provisions of Title 18, U.S.C., Section 1001, which makes it a criminal offense to submit false information to a federal government agency.*





## FORM D

## INSTRUCTIONS

General Instructions

This form should be completed by the investment company for each security listed in the covering letter. A separate form is required for each security.

The "date of written recommendation" means the date of any written recommendation for the purchase or sale of the security, pursuant to which the purchases or sales shown for the period were made, to the investment company's Advisory Board (or equivalent), or to its Board of Directors, or any others to whom investment decision authority is delegated.

The "date of investment decision" means the date of the decision to purchase or sell, pursuant to which the purchases or sales shown for the period were made (i.e., the first date the person or persons empowered to make an investment decision on behalf of the fund determined to take, add to, reduce, or eliminate a position in the security).

Each purchase or sale of the security during the period December 1, 1960 through June 30, 1961 is to be shown. List each purchase or sale on a separate line.

Columns 2 and 3

Add an asterisk to the appropriate column if the transaction was a short sale or the covering of a short sale.

Column 6

Show the total cost or proceeds for the transaction exclusive of brokerage commissions and transfer taxes.

APPENDIX XI-C

QUESTIONNAIRE IC-8

CONTRACTUAL PLANS SOLD IN FEBRUARY 1959; PAYMENTS

AND REDEMPTIONS IN THE FOLLOWING 3 1/2 YEARS



**INSTRUCTIONS**

1. Using as many sheets as may be necessary, fill in one line for every tenth contractual plan account opened by your company during the month of February, 1959. By "contractual plan account" is meant each separate account kept for a purchaser of what is known as a periodic payment plan or a "front-end load" plan; it does not include an account kept for a purchaser of a "voluntary" plan. A contractual plan account shall be deemed to have been opened by your company during the month of February, 1959, if the date of the first payment recorded on the account card (or other original record) is in February, 1959.

2. List below:

- (a) The total number of contractual plan accounts opened in February, 1959: \_\_\_\_\_
- (b) The account number of first account opened in February, 1959: \_\_\_\_\_
- (c) The account number of last account opened in February, 1959: \_\_\_\_\_
- (d) Any numbers in between the first and last account numbers which were not assigned to contractual plan accounts: \_\_\_\_\_ to \_\_\_\_\_  
 \_\_\_\_\_ to \_\_\_\_\_  
 \_\_\_\_\_ to \_\_\_\_\_  
 \_\_\_\_\_ to \_\_\_\_\_  
 \_\_\_\_\_ to \_\_\_\_\_

(If more than one sheet is used, provide this information only on the back of Sheet Number 1.)

3. On Line 1 of Sheet Number 1, list the File Number, or Account Number of the third account opened in February, 1959. Every 10th account number thereafter should be listed consecutively on Line 2, Line 3, et seq.

4. In the column headed "Monthly payment unit (\$ per month)" list the dollar amount to be paid monthly under the plan. Omit cents. If the plan calls for payments on any basis other than a monthly one (such as a quarterly payment plan) indicate with an asterisk (\*) in this column and specify in the "Notes" section on this side of the sheet the account number, the period and the payment called for, e.g. "Acct. No. 4172, 300 quarterly" or "Acct. No. 5971, 300 semi-annually".

5. Next, indicate whether the plan was sold with completion insurance, by marking an "X" in either the "Yes" or "No" column under the heading, "Sold With Completion Insurance".

6. If the plan was fully redeemed and the sales charge was returned in full to the customer on redemption, mark an "X" in the "Yes" column under the heading "Sales Charge Returned on Redemption". If the plan was not fully redeemed, or if the sales charge was not returned in full to the customer mark an "X" in the "No" column under this heading.

# 492 REPORT OF SPECIAL STUDY OF SECURITIES MARKETS

7. In the following columns, representing February, 1959 and each subsequent month through August, 1962, plan payments should be listed under the months in which payment was recorded on the account card (or other original record). Payments should be listed in terms of the number of monthly payment units, of the monthly payment called for, which were made.

For example:

- (a) Where the initial payment on a \$10 or \$15 per month plan consists of the two required monthly payment units, enter the number "2" in the column for February, 1959.
- (b) Where the initial payment on a \$50 per month plan is \$300, enter the number "6" in the column for February, 1959.
- (c) If a payment of \$50 is received on a \$50 per month plan in March, 1959, enter the number "1" in the column for March, 1959.
- (d) If a payment of \$100 is received on a \$50 per month plan in May, 1959, enter a number "2" in the column for May, 1959.

For any month in which no payment is made, enter a zero ("0") in the appropriate column. Zeros should not be entered, however, for any months after full redemption of a plan.

Where amounts received do not constitute even multiples of the monthly payment units, they should be rounded to the closest whole number of monthly payment units and that number recorded in the column for the appropriate month. For example: A \$70 payment on a \$50 a month plan should be recorded as 1. An \$80 payment on a \$50 a month plan should be recorded as 2.

8. If a plan is fully redeemed (with or without reimbursement of sales charge) enter an "R" in the column for the month in which payment of the proceeds of redemption occurs. Do not enter an "R" for partial redemptions.
9. If a plan is completed with the proceeds of completion insurance, enter "C" in the column for the month in which such proceeds were paid into the account.
10. If in the same month a plan is both completed with the proceeds of completion insurance and fully redeemed, enter a "W" for that month.

\* \* \* \* \*

Use as many sheets as necessary. Number each sheet in sequence and write the name of the plan or fund on each sheet used. Be sure that each sheet is certified by a responsible officer of the sponsor at the place provided below.

Certified true and correct.

Date: \_\_\_\_\_, 1962.

Notes:

\_\_\_\_\_  
Name and title of officer.