

# STATE OF WISCONSIN Department of Employee Trust Funds

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# Correspondence Memorandum

**Date:** August 15, 2019

**To:** Deferred Compensation Investment Committee

**From:** Shelly Schueller, Director

Wisconsin Deferred Compensation Program

**Subject:** Changes at Galliard Capital Management

# This memo is for informational purposes only. No Investment Committee action is required.

The July 22, 2019, edition of *Pensions and Investments* contained an article about Galliard Capital Management (Galliard). The article discusses a report from investment consulting firm Callan, LLC to the North Carolina Supplemental Retirement Board. The Board suggested that a "close watch" of the firm was warranted, due to the departures of several key leadership personnel, and potential changes regarding Galliard's future interactions with Wells Fargo, the parent company of Galliard. North Carolina subsequently placed the firm "on watch" due to the planned organizational changes.

In light of the *Pensions and Investments* article, Mike Norman from Galliard will be attending the investment committee meeting to provide an update and answer any questions you may have on the planned changes at Galliard. Bill Thornton of Great-West investments also provided the attached communication and will be at the meeting as well to share his perspective on this situation.

Attachment A: Galliard Firm Update, August 29, 2019

Attachment B: Galliard departures put stable value firm on watch" Danielle Walker. Pensions and

Investments, July 22, 2019.

Attachment C: Galliard Firm Update, April 10, 2019

Attachment D: Great-West Financial Memo re: Galliard Capital Management, August 13, 2019

Reviewed and approved by Matt Stohr, Administrator, Division of Retirement Services

Matt Stol

Electronically Signed 8/19/19

Board	Mtg Date	Item #
DCIC	8.29.19	2



ARCHITECTS OF INVESTMENT SOLUTIONS





Wisconsin Deferred Compensation Program – Galliard Firm Update

# WISCONSIN DEFERRED COMPENSATION PROGRAM

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SECTION I: Galliard Capital Management Firm Overview

**SECTION II:** 2Q'19 Portfolio Review

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# SECTION I

# **GALLIARD CAPITAL MANAGEMENT**

WHO WE ARE

\$92.1 B

TOTAL AUM

\$77.7 B

TOTAL STABLE VALUE AUM

95+

STABLE VALUE SEPARATE ACCOUNTS

102

EMPLOYEES ON STAFF

SENIOR PROFESSIONALS AVERAGE YEARS OF EXPERIENCE:

Stable value portfolio management team -26

Fixed income team -21

Contract management & negotiation team - 28

Offer **separate account** and **collective fund** solutions for clients

230+

INSTITUTIONAL CLIENTS

CLIENT RELATIONSHIP TENURE



~80% of our clients have worked with Galliard for greater than **5 years** 

32 of those relationships exceed 15 years with Galliard

#### **CLIENT TYPES**

- Corporate
   Public Entities
- Taft-HartleyOperating Funds
- Healthcare
   Insurance Reserves
  - Foundations/ Endowments

FORTUNE 100 / 500

24 Fortune 100 clients; 62 Fortune 500 clients

GALLIARD

# HIGHLIGHTS

Galliard is the **largest** stable value separate account manager<sup>1</sup> and advises the **largest** stable value collective fund<sup>2</sup> in the nation

¹eVestment, Stable Value Fixed Income universe, as of December 31, 2018, Galliard ranked highest separate/segregated assets under management

<sup>2</sup>As ranked by the Hueler Analytics, Inc. © stable value universe; January 2018 monthly fund data

Galliard has been a signatory to the United Nations-supported **Principles for Responsible Investment** since 2017

2019 NEW BUSINESS

9 new clients; \$1.1 B new assets

Data as of 6/30/19



#### **GALLIARD CAPITAL MANAGEMENT**

#### ORGANIZATION CHART

CURRENT EXECUTIVE MANAGEMENT TEAM:

**Karl Tourville** 

Founding Managing Partner

William Weber

Principal

Matt Kline

Principal

Director

Ryan Olsen

Senior Principal

Andrea Johnson, CFA

Pete Schmit, CFA

Associate Director

Elizabeth Smithlev

Associate Director

Robert Crandall, CFA

Senior Director

**Client Portfolio Team** 

Carrie Callahan Managing Partner

Richard Merriam, CFA Founding Managing Partner Ajay Mirza, CFA Managing Partner

Mike Norman

Partner

PENDING (POST 1/1/20) EXECUTIVE MANAGEMENT TEAM:

Ajay Mirza, CFA

Senior Managing Principal Senior Managing Principal **Andrew Owen** 

Senior Managing Principal

#### **Fixed Income Investment Team**

#### Credit

Richard Merriam, CFA Managing Partner

Brandon Kanz, CFA Senior Principal Sector Head

Matt Bentley Principal

Chad Callahan Principal

Rene Hoogmoed, CFA Principal

John Kenley, CFA Senior Director

Robert Barrett, CFA Director

Will Moeller, CFA Director

#### Structured Product

Ajay Mirza, CFA Managing Partner Sector Head

Matt Robertson, CFA Senior Principal

Mike Meerovich Director

Tyler Wadsworth, CFA Associate Director

#### **Quantitative Analytics** & Data Management

Vani Ramakrishnan Associate Director

Jimmie Wu, CFA Associate Director

David Que Senior Associate

#### Stable Value Strategy & Contract Team

Leela Scattum Partner

Nick Gage, CFA Principal

David Lui Principal

Paula Novick Principal

Laura Sell, CFA Principal

Tami Pearse-Byczek Senior Director

Nicole Berger Director

Jordan Bewley Director

Christina Burton Director

#### Compliance

Mike Norman

#### Investment

Mark Otto Senior Director

Matt Brown Associate Director

Andrew McKessock Associate Director

Sanhakorn Rattanacheeworn Associate

Jesse Ahlbrecht

Associate Director

Michael Amundsen

Associate Director

Associate Director

Associate Director

Stephanie Ripley

Stacie Sandager

Jason Skull

Associate Director

Associate Director

Associate Director

Michael Bouska

Rasaan Ellison

#### Firm

Jennifer Lammers Chief Compliance Officer

Brian Renelt Senior Director

Laurie Kern Associate Director

Sami Shingu Senior Associate

#### **Consultant Relations & Marketing**

Sarah Hilton Associate Director

Christopher Dahl Senior Associate

Jackie Plantenberg Senior Associate

Carlie Frost Associate

Katie Stuhlmueller Associate

#### Reporting

Jennifer Miller Senior Director

Matt Remington Senior Associate

Trevor Fletcher Associate

Natalia Kolakowska Associate

Breanna Richie Associate

# **Client & Contract Support**

Erica Bloudek Director

Linh Buoen Associate Director

Jeff Hay Associate Director

Jennifer Hopper, CFA Associate Director

Timothy Noel Associáte Director

Becky L'Allier Seniór Associate

Senior Associate

Chad Foote

Principal

Senior Director

Senior Director

Robert Malcomson

Pete Anderson Director

Luke Olson

#### Operations

Chief Operating Officer

Sue Stachel

Carmen Rangel, CPA

Marylynn Shapiro

Brian Brooks Director

Director

#### **Technology**

George Jones Senior Director

Lisa Anderson Director

John Hammar Director

Christopher Smith Director

Charlie Head Associate Director

Will Ingle Associate Director

Ben Modica Associate Director

Sankaranaravanan Associate

Suresh

Baber Khan

Senior Associate

Mark Perzichilli

Ahmed Taher

Senior Associate

Senior Associate

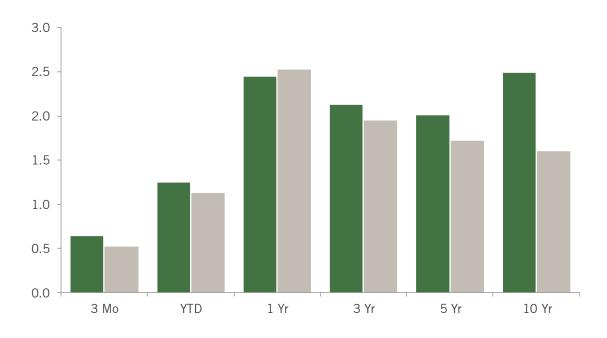
+18 additional professionals



# SECTION II

### ANNUALIZED INVESTMENT PERFORMANCE

#### ANNUALIZED INVESTMENT PERFORMANCE AS OF 6/30/191



	3 Mo	YTD	1 Yr	3 Yr	5 Yr	10 Yr
Portfolio (net of all fees - NAV level) <sup>2</sup>	0.64	1.25	2.45	2.13	2.01	2.49
Linked Benchmark <sup>3</sup>	0.52	1.13	2.53	1.95	1.72	1.60
Value Added (net of all fees - NAV level) <sup>4</sup>	0.12	0.12	(80.0)	0.18	0.29	0.89

<sup>4:</sup> May not add due to rounding.



<sup>1:</sup> Returns for periods of less than one year are not annualized.

<sup>2:</sup> Returns are net of all fees, including book value contract fees, Galliard investment management fees, and, if applicable, external managers fees, Wells Fargo collective fund administrative fees, and plan administrative reimbursement

<sup>3:</sup> Linked benchmark: 3 Year Constant Maturity Treasury; Prior to 11/1/15 was the 5 Year Constant Maturity Treasury.

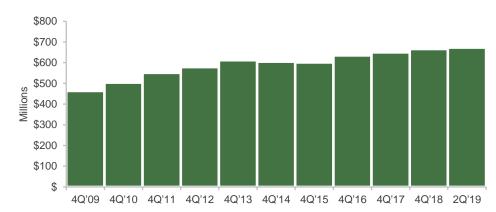
#### PORTFOLIO CHARACTERISTICS

#### WISCONSIN DEFERRED COMPENSATION PROGRAM - STABLE VALUE FUND

#### ACCOUNT SUMMARY

Benchmark	3 Year Constant Maturity Treasury	
Galliard Inception Date	July 1, 1998	
Net Asset Value	\$672,635,442	

#### HISTORICAL FUND ASSETS



#### PORTFOLIO CHARACTERISTICS

	<b>Portfolio</b> 3/31/19	<b>Portfolio</b> 6/30/19
Average Quality - Book Value <sup>1</sup>	A+	A+
Average Quality - Market Value <sup>2</sup>	AA	AA
Number of Contract Issuers	5	5
Blended Yield (after all fees) <sup>3</sup>	2.54%	2.59%
Yield to Maturity	2.81%	2.30%
Effective Duration	2.98 years	2.96 years
Market/Book Value Ratio	100.14%	101.58%

#### PORTFOLIO DISTRIBUTION

	<b>% Portfolio</b> 3/31/19	<b>% Portfolio</b> 6/30/19
Liquidity Buffer: Cash & Equivalents <sup>4</sup>	1.4	1.3
Short Portfolio	40.3	40.0
Intermediate Portfolio	58.4	58.6
Total	100.0%5	100.0%5

<sup>5:</sup> Total % of portfolio may not add to 100% due to rounding.



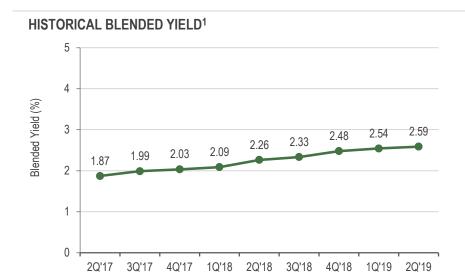
<sup>1:</sup> Average holdings quality of the contracts and other book value assets in the portfolio. The Weighted Average Quality of the portfolio has NOT been assessed by a nationally recognized statistical rating organization. The Weighted Average Quality shown represents an average quality of the individual holdings' Composite Ratings, as rated by S&P, Moody's and Fitch.

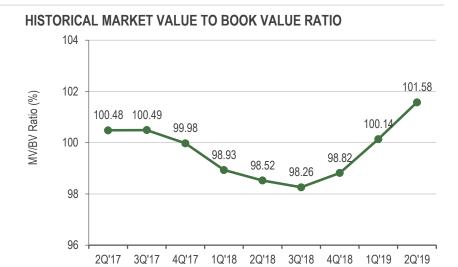
<sup>2:</sup> Average holdings quality of the underlying assets of the portfolio. The Weighted Average Quality shown represents an average quality of the individual holdings' Composite Ratings, as rated by S&P, Moody's and Fitch.

<sup>3:</sup> Blended Yield is net of all fees, including book value contract fees, Galliard investment management fees, and, if applicable, external manager fees, Wells Fargo collective fund administrative fees, and plan administrative reimbursement.

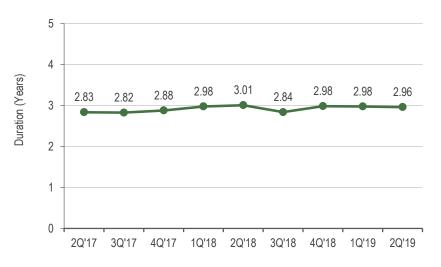
<sup>4:</sup> Includes Receivables and Payables.

HISTORICAL STATS

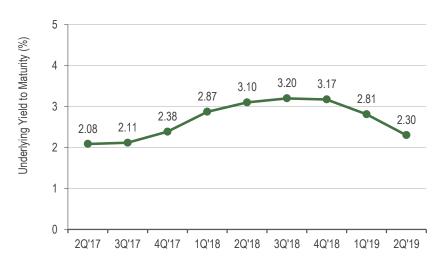




#### HISTORICAL DURATION



#### HISTORICAL UNDERLYING YIELD TO MATURITY



1: Blended Yield is net of all fees, including book value contract fees, Galliard investment management fees, and, if applicable, external manager fees, Wells Fargo collective fund administrative fees, and plan administrative reimbursement.



#### MANAGER DISTRIBUTION

#### MANAGER DISTRIBUTION % of Portfolio % of Portfolio Strategy Benchmark 3/31/19 6/30/19 Liquidity Buffer: Cash & Equivalents STIF/Money Market 1.4 1.3 Galliard Short Bloomberg Barclays U.S. 1-3 Year Government/Credit Bond Index 40.3 40.0 Galliard Intermediate Bloomberg Barclays U.S. Intermediate Government/Credit Bond Index 27.7 27.8 Dodge & Cox Intermediate Bloomberg Barclays U.S. Intermediate Aggregate Bond Index 10.2 10.2 Intermediate Bloomberg Barclays U.S. Intermediate Government/Credit Bond Index Jennison Assoc. 10.3 10.3 Intermediate Bloomberg Barclays U.S. Intermediate Government/Credit Bond Index 10.2 10.3 **TCW** 100%1 100%1 Total

<sup>1:</sup> Total % of portfolio may not add to 100% due to rounding.



# APPENDIX

#### **GALLIARD CAPITAL MANAGEMENT**

**PROFESSIONALS** 



Michael D. Norman
Chief Administrative Officer
Partner
612.667.3219
michael.d.norman@galliard.com

#### Responsibilities

As Chief Administrative Officer, Mike oversees firm operations. In this role, he helps to assure consistency of service delivery across all investment products at Galliard. Mike oversees the coordination and execution of all middle- and back-office functions. He also oversees major initiatives within the client facing teams, including new product development. Mike also coordinates service for certain key clients.

#### **Oversight Committees**

Executive Operating Committee, Compliance Committee, New Business & Fees Committee (Chair), Stable Value Strategy Committee, Investment Contract Review Sub-Committee, Client Contract Working Group, External Manager Oversight Working Group, System Governance Working Group

#### Experience

- · Joined Galliard in 1996
- Previously a Securities Lending Trader and Trust Officer with Norwest Bank

#### Education

B.A., Economics, University of Notre Dame MBA, Carlson School of Management at the University of Minnesota

#### Memberships

Formerly on the Board of Directors of the Stable Value Investment Association (SVIA) American Society of Pension Professionals & Actuaries (ASPPA) Association of Governmental Risk Pools (AGRIP) National Association of Government Defined Contribution Administrators (NAGDCA) National Association of Plan Advisors (NAPA)

The Society of Professional Asset-Managers and Record Keepers (SPARK)



# Pensions&Investments

July 22, 2019 12:00 AM

# Galliard departures put stable value firm on watch

DANIELLE WALKER







Karl Tourville, left, and Richard Merriam, both founding managing partners, are set to retire within a year.

Organizational changes at Galliard Capital Management are raising concerns from one large client and an investment consultant.

Organizational changes at Galliard Capital Management Inc., a Wells Fargo Asset Management subsidiary with \$78.2 billion in stable value assets under management, are raising concerns from one large client and an investment consultant.

Now that the remaining founding partners of Minneapolis-based Galliard are retiring from the firm, investors await clarity on whether a revenuesharing agreement between the firm and its parent Wells Fargo will change, making key talent and client assets a potential flight risk, public investor documents reveal.

Last month, the North Carolina Supplemental Retirement Board of Trustees, Raleigh, placed a \$2 billion stable value strategy overseen by Galliard on watch due to organizational changes.

North Carolina's 401(k) and 457 retirement plans had \$11.8 billion in combined assets as of March 31, meaning Galliard's mandate represented around 17% of total assets in the plans.

The action was primarily prompted by a "lack of clarity" around Galliard's "ability to retain and incentivize their investment team," and concerns that Wells Fargo is "taking a more active role in the management of the firm," according to a June 3

memo by Loren de Mey, an assistant investment director for the supplemental retirement plans.

At Galliard, Karl Tourville, founding managing partner and president, will retire from the firm in June 2020. Richard Merriam, founding managing partner, and Carrie Callahan, managing partner and head of client service, will retire at the end of this year. And Leela Scattum, partner and chief stable value strategist, will retire by the end of 2020, according to company Form ADV filings with the Securities and Exchange Commission.

Additionally, according to North Carolina's memo, while Wells Fargo and Galliard have a revenue-sharing agreement, it will expire at the end of this year.

"With the revenue share going away, Wells Fargo has started to work on structuring a bonus pool for key investment professionals," the memo said, noting also that Galliard's compliance, risk and technology teams would begin reporting directly to Wells Fargo starting next year.

"Although there had always been a dotted line reporting to Wells, Galliard was the only remaining subsidiary that did not have these groups fully reporting up through Wells (Fargo)," the memo said.

Galliard, a major player in the stable value market, has 85% of its \$92 billion in total assets in stable value accounts, according to the firm's website.

# 'Under review'

North Carolina is also a client of investment consultant Callan LLC, San Francisco, which placed the Galliard stable value strategy "under review" over the organizational concerns in its first-quarter manager review for the public DC plans.

A Callan report, posted on North Carolina's website, said the firm is "awaiting more clarity on (the) future relationship with parent Wells Fargo and potential renegotiation of the revenue-sharing agreement between the two entities, which may impact Galliard's ability to retain talent and assets."

A spokeswoman at Callan declined to comment in an email, citing the firm's policy "to not address any client matters in the media."

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John Caswell, who retired from the firm in 2017, co-founded Galliard with Messrs. Tourville and Merriam in 1995. Galliard then was a wholly owned subsidiary of Norwest Bank, which merged with Wells Fargo in 1998.

On July 15, a spokesman for Wells Fargo Asset Management disputed in an email that the firm was increasing its involvement in the management of Galliard.

"(WFAM) is not taking a more active role in the management of Galliard's investment process, client services, sales or operations," the spokesman said. "The recent client communication provided details on Galliard's leadership succession plan, which is being implemented over several years. It did not represent a change in the operating model between Galliard and WFAM. Galliard has always been and remains a wholly owned subsidiary of Wells Fargo."

The spokesman declined to comment on whether compensation structures for Galliard staff were changing in light of upcoming retirements.

North Carolina officials declined to comment further July 10 through a spokesman for the office of the state treasurer; the spokesman would only confirm in an email that the supplemental retirement board approved placing Galliard's stable value strategy on watch "not because of performance, but because of organizational changes."

The \$6.5 billion Metropolitan Transportation Authority Deferred Compensation Program, New York, which includes the Galliard Stable Value Fund as an investment option, was notified of personnel changes at the firm in April, but Mercer, its investment consultant, did not recommend any immediate action, a spokesman said.

As part of Galliard's succession planning, Andrew Owen — Wells Fargo Asset Management executive vice president and president of Wells Fargo Funds Management who has been board chairman of Galliard since 2014 — will join Galliard as president and senior managing principal on Jan. 1, Galliard disclosed in SEC filings.

Additionally, Michael Norman, a Galliard partner and chief administrative officer, will replace Ms. Callahan as head of client service and consultant relations after her

retirement. Nick Gage, a principal at Galliard, will replace Ms. Scattum as chief stable value strategist when she retires in late 2020.

Executives at Galliard did not respond to requests for comment.

# 'Immediate red flag'

For investors, the exit of executive-level staff or those in investment roles creates "an immediate red flag," said Lee Beck, a managing partner at Kudu Investment Management LLC, a New York firm that provides capital to asset and wealth management boutiques. "Will the culture remain the same, will the incentive to perform be there, (and) will they produce the same investment results?" Mr. Beck said of typical client concerns.

North Carolina's memo also noted that only one investment staff member at Galliard, Ajay Mirza, a managing partner and chairman of the investment committee, was under an employment contract.

"We will look for additional steps by Galliard over the next several months to ensure that the remaining senior investment professionals are incentivized to stay," the memo said.

Luba Nikulina, managing director and global head of research at investment consultant Willis Towers Watson PLC, London, said that "this particular situation, where it's a subsidiary and then you have the senior members in quick succession leaving," is "somewhat unusual."

"Usually there would be some retention provisions. They would think about how to retain senior talent," she said.

Alan Johnson, managing director and president of Johnson Associates Inc., New York, a money manager compensation consultant, said: "When founders leave, often you do that reset. It's a natural time for employees, clients and the owner to take another look at the organization."

Additionally, money managers are getting more attention from financial services parent companies, as "many (of these companies') core businesses use a lot of capital and are more competitive," such as investment and retail banking, he said.

"Asset management doesn't use a lot of capital and is scalable," Mr. Johnson said.

Regarding the changes at Galliard, Mr. Johnson said that the first impression among clients would likely be: "are we going to be subsumed within the bank further?"

"If you're a client, your initial reaction will be either neutral or negative," he said. "As (firms) push further into asset management, these are things they have to be very careful about," Mr. Johnson added.

#### RELATED ARTICLES



North Carolina fund puts Wells Fargo subsidiary on watch



Wells Fargo Asset Management names interim co-CEO as new chief



Wells Fargo exec: Sale of asset management unit not in the cards

# Inline Play

Source URL: https://www.pionline.com/money-management/galliard-departures-put-stable-value-firm-watch

#### Attachment C



#### Confidential

Wednesday, April 10, 2019

#### Good afternoon:

We would like to take a moment to share with you news on pending retirements and succession planning within Galliard.

Richard Merriam, Founding Managing Partner, will be officially retiring at the end of 2019. Galliard has been preparing for Richard's retirement since early 2018, when Brandon Kanz, Senior Principal, Head of Credit became the Vice Chair of the Investment Committee alongside Ajay Mirza. Ajay Mirza, Managing Partner and Head of Structured Product, will continue as Chair of the Investment Committee and Brandon will continue as Vice Chair post Richard's retirement. Ajay will remain as a member on the Executive Operating Committee. Richard will be stepping down from the Executive Operating Committee at retirement. He will remain as an Advisor to Galliard until December 2022.

Carrie Callahan, Managing Partner, Head of Client Service, Sales and Consultant Relations will also be retiring as of yearend. Carrie's roles will be assumed by Mike Norman, Partner. Mike has been at Galliard since 1996 and currently serves as Chief Administrative Officer and a member of the Executive Operating Committee. Carrie will be stepping down from the Executive Operating Committee upon retirement.

Karl Tourville, Founding Managing Partner, President and Chairman of the Executive Operating Committee, will be retiring in June 2020. Karl will step down from the Board of Directors and as the Chair of the Executive Operating Committee at the end of 2019. He will remain as an Advisor to Galliard through the end of 2022.

Leela Scattum, Partner, Chief Stable Value Strategist, has announced her intended retirement by year end 2020. Nick Gage, Principal, will be assuming this role. Nick has been with Galliard since 2008 and has been working closely with Leela on strategy and contract issuer management during his tenure at Galliard. Nick is currently a member of the Executive Committee and Chairman Elect of the Stable Value Investment Association (SVIA).

Andrew Owen, currently an Executive Vice President of Wells Fargo Asset Management, will be joining Galliard as President and a member of the Executive Operating Committee. Andrew has served as Chairman of Galliard's Board of Directors since 2014. He will work closely with Mike Norman and Ajay Mirza in managing the firms operations. Andrew Owen, Mike Norman, and Ajay Mirza will assume the titles of Senior Managing Principal. Under their guidance, Galliard will continue to operate as an independently operated investment subsidiary for the foreseeable future.

On January 1st of 2020, Galliard's Operational Risk Management, Compliance, and Technology teams will be reporting directly to Wells Fargo's centralized risk management and technology groups. We do not anticipate changes to current work flow or processes as it relates to these groups. Also, the investment and client servicing teams will continue to operate as they historically have.

We are excited for the future not only for our retiring Partners, but also for Galliard as a firm. Over the past 25 years you, our clients, have come to know Galliard as a firm with consistency in process and service, as provided by our strong, deep bench of staff. We look forward to continuing to work with you to provide the optimal investment solutions to all of our clients.

Sincerely,

Galliard Capital Management



Date: August 13, 2019

To: Shelly Schueller, Director, Wisconsin Deferred Compensation Program

Fr: Bill Thornton, Investment Director Govt. Markets

Re: Galliard Capital Management

Recently, Galliard Capital Management notified clients that a number of their founding members announced that they would be retiring from the company in the near future. This included:

Karl Tourville – Founding Managing Partner, President and Chair of Executive Operating Committee

Richard Merriam – Founding Managing Partner

Carrie Callahan – Managing Partner, Head of Client Service, Sales, and Consultant Relations

Leela Scattum - Partner, Chief Stable Value Strategist

Per the notification from Galliard, Richard Merriam and Carrie Callahan are retiring at the end of 2019, Karl Tourville will retire in June of 2020, and Leela Scattum will retire by the end of 2020.

In addition to these announced personnel moves, one of Galliard's senior portfolio managers, Erol Sonderegger, left the firm to take a position with the State of Minnesota's Retirement Board. Together, this represents changes to senior leadership in all major aspects of Galliard's business, including investment management, wrap contract procurement and strategy, client services, and overall business leadership. While turnover at any level of an organization is to be expected, the announced retirements of multiple executives, including three-quarters of the firm's Managing Partners, is unusual.

Additionally, Galliard is also seeing a change in their relationship with Wells Fargo. Galliard has been a subsidiary of Wells Fargo since 1998. There has been a revenue sharing agreement between the two entities for many years, and that agreement is ending at the close of this year. It was announced that on January 1, 2020, Andrew Owen, Executive Vice President at Wells Fargo Asset Management, will take over as President and senior managing principal of Galliard. Owen has been the Board chairman of Galliard since 2014. Also on January 1<sup>st</sup>, Galliard's Operational Risk Management, Compliance, and Technology teams will begin reporting directly to Wells Fargo.

While substantial senior level turnover is a concern for any investment firm, Galliard has many other associates very capable of assuming responsibility for their day to day operations. The larger concern may be the role that Wells Fargo will play in the operations of the firm going forward. Their involvement in the future direction of Galliard is still unknown to a great extent, and that ambiguity has caused some plan sponsors and consultants to put Galliard under review.

Per the Wisconsin Deferred Compensation Program Investment Policy Statement, the Board can conduct a formal review if an investment option "...has had a substantial change in ownership or control." While there is every reason to believe that Galliard will weather this transition well, reviewing their status is certainly an option.