

MEMORANDUM

TO: File No. S7-09-14

FROM: Andrew Schoeffler

RE: Meeting with Representatives of SIFMA and Davis Polk & Wardwell

DATE: October 30, 2014

On October 30, 2014, Keith Higgins, David Fredrickson, Amy Starr and Andrew Schoeffler met with Aseel Rabie of SIFMA and Joe Hall and Annette Nazareth of Davis Polk & Wardell regarding *Treatment of Certain Communications Involving Security-Based Swaps That May Be Purchased Only By Eligible Contract Participant*, Release No. 33-9643 (Sep. 8, 2014), 79 FR 54224 (Sep. 11, 2014).