

MEMORANDUM

November 8, 2010

To: File on Section 619 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”)

From: David A. Vaughan
Division of Investment Management

Re: Meeting with Silicon Valley Bank Financial Group

On October 22, 2010, representatives of Silicon Valley Bank Financial Group and its outside counsel participated in a meeting with the Securities and Exchange Commission (“SEC”) staff from the Division of Investment Management.

The representatives of Silicon Valley Bank Financial Group who participated were: Mary Dent, General Counsel of SVB Financial Group, and Sven Weber, President, SVB Capital.

The outside counsel attending were: Greg Lyons, David Luigs and Satish Kini of Debevoise & Plimpton LLP.

The SEC staff members who participated in the meeting were David Vaughan and Lily Reid. Bruce Kraus from Division of Risk, Strategy, and Financial Innovation also participated.

The topic of discussion was the definition of "hedge fund and private equity fund" in the Volcker Rule (section 619 of the Dodd-Frank Act).