MEMORANDUM

TO: File

FROM: Michael Milone

RE: Phone Conference with Omgeo

DATE: September 21, 2010

On September 21, 2010, representatives from the Securities and Exchange Commission ("SEC") held a phone conference with representatives from Omgeo. The SEC representatives were Jeffrey Mooney and Michael Milone. The Omgeo representatives were Norman Reed and John Burchenal. Omgeo described what services it offers for Security-Based Swaps, namely payment calculation and position reconciliation software used by its clients.