MEMORANDUM

TO:FileFROM:Richard GrantRE:Meeting with Representatives of CitigroupDATE:February 15, 2013

On February 15, 2013, representatives from the Securities and Exchange Commission ("SEC") participated in a meeting with representatives from Citigroup. The SEC representatives present at the meeting were John Ramsay, Jim Burns, Brian Bussey, Tom McGowan, Matt Daigler, Wenchi Hu, Richard Gabbert, and Richard Grant. The Citigroup representatives present at the meeting were Don Bendernagel, Silas Findley, and Omer Oztan.

At the meeting, the Citigroup representatives provided their views and observations on the application of Title VII of the Dodd-Frank Wall Street Reform and Consumer Protection Act to Citigroup's global security-based swaps business. [No agenda available for this meeting.]