MEMORANDUM

TO: File

FROM: Elliot Staffin

Division of Corporation Finance

U.S. Securities and Exchange Commission

RE: Meeting with representatives from Oxfam, Global Witness, One Campaign,

Earthrights International, and PWYP U.S.

DATE: November 26, 2019

On November 26, 2019, Commission staff met with Isabella Munilla, Oxfam; Zorka Milin, Global Witness; Joe Kraus, One Campaign; Michelle Harrison and Patrick Boyle, Earthrights International, and Kathleen Brophy, PWYP U.S. Among the topics discussed were Exchange Act Section 13(q), Congressional disapproval of the related 2016 rules, and the Commission's statutory mandate to promulgate new rules.

The following Commission staff participated: Barry Summer and Elliot Staffin, Division of Corporation Finance; and Brooks Shirey and Connor Raso, Office of General Counsel.