

MEMORANDUM

To: File

From: Lesli Sheppard
Counsel to Commissioner Elisse B. Walter
U.S. Securities and Exchange Commission

Date: December 2, 2010

Re: Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act Regarding Congolese Conflict Minerals

On December 2, 2010, Commissioner Elisse B. Walter and I met with Rick Goss of the Information Technology Industry Council (“ITI”), Catherine A. Novelli of Apple Inc., Michael E. Loch of Motorola, Inc., and David B.H. Martin and David H. Engvall of Covington & Burling LLP. The participants discussed the Commission’s required rulemaking in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which relates to reporting requirements regarding conflict minerals originating in the Democratic Republic of the Congo and adjoining countries. The participants also discussed the ITI’s comment letter dated November 18, 2010, which is posted to the SEC’s website at: <http://www.sec.gov/comments/df-title-xv/specialized-disclosures/specializeddisclosures-68.pdf>. In addition, Mr. Goss provided a copy of the attached document entitled ITI’s 2010 Member Companies.