

## MEMORANDUM

**To:** File

**From:** John Fieldsend  
Special Counsel  
Office of Rulemaking  
Division of Corporation Finance  
U.S. Securities and Exchange Commission

**Date:** November 18, 2010

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

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On November 18, 2010, Felicia Kung, Steven Hearne, and John Fieldsend of the Division of Corporation Finance met with Stephanie Lester of the Retail Industry Leaders Association, Arthur D. Jackson, Jr. of Costco Wholesale Corporation, Toni Dembski-Brandl of Target Corporation, Parker Brugge and Todd G. Hartman of Best Buy Co., Inc., Kathleen McGuigan of J.C. Penney Company, Inc., Sarah Thorn of Wal-Mart Stores, Inc., and Scott D. Mason of Lowe's Companies, Inc. 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.