

TO: File

FROM: Division of Trading and Markets

RE: Follow-up meeting with representatives from WilmerHale

DATE: August 31, 2011

On August 31, 2011, Robert Cook, James Brigagliano, and Josephine Tao of the Securities and Exchange Commission met with Andrew Vollmer and Jeannette Boot of Wilmer Hale to discuss The Managed Fund Association's December 23, 2010 and March 29, 2011 comment letters on the Commission's proposed Rule 9j-1 (prohibition against fraud, manipulation, and deception in connection with security-based swaps) (File no. S7-32-10).