

MEMORANDUM

TO: File No. S7-33-10

FROM: James A. Cappoli
Office of Commissioner Luis A. Aguilar

DATE: December 14, 2010

SUBJECT: Meeting with Representatives of Various Companies

On December 13, 2010, Commissioner Aguilar, along with Smeeta Ramarathnam, Chief of Staff for the Commissioner, and James A. Cappoli, Counsel to the Commissioner, met with representatives of the following companies:

Sarah Teslik- Apache Corporation, Sr. Vice President, Policy & Governance
Dominic Ricotta- Apache Corporation, Vice President & Associate General Counsel
Sherry D. Williams- Halliburton Company, Sr. Vice President & Corporate Secretary
Brian Morris- Prudential Financial, Inc., Chief Corporate Finance & Disclosure Counsel
Betsy Moran- UnitedHealth Group, Chief Compliance Officer
Todd Hartman- Best Buy, Vice President, Associate GC and Chief Compliance Officer
Stacey K. Geer- Primerica, Inc., Sr. Vice President and Associate General Counsel
Kevin J. Avery- Marathon Oil Corporation, Director Federal Government Affairs
Stephen W. Gauster- Assurant, Sr. Vice President, Chief Corporate Counsel & Assistant Secretary
David L. Siddall- Anadarko Petroleum Corporation, Vice President, DGC & Corporate Secretary
Jay Cohen- Assurant, Inc., Sr. Vice President & Chief Compliance Officer
Thomas R. Moore- Ameriprise Financial, Vice President, Corporate Secretary and Chief Governance Officer
Marc Rome- Chesapeake Energy Corporation, Assistant Corporate Secretary
Dan Dorsky- Tyco International, Sr. Compliance Counsel FCPA
Edward Nowicki, Pfizer, Inc., Assistant General Counsel, Corporate Compliance

The discussion included, among other things, the Commission's Proposed Rules for Implementing the Whistleblower Provisions of Section 21F of the Securities Exchange Act of 1934.