

MEMORANDUM

January 6, 2011

To: File No. S7-33-10

From: Scott H. Kimpel
Office of Commissioner Troy A. Paredes

Re: Proposed Rules for Implementing the Whistleblower Provisions of Section
21F of the Securities Exchange Act of 1934

On January 6, 2011, Scott H. Kimpel and Saurabh K. Shah, Counsel to Commissioner Troy A. Paredes, met with Sarah Teslik, Apache Corp. and Jay Cohen, Assurant. The participants discussed the Commission's proposed rules implementing the whistleblower provisions of Section 21F of the Securities Exchange Act of 1934.