

MEMORANDUM

TO: File on S7-33-10, Proposed Rules for Implementing the Whistleblower Provisions of Section 21F of the Securities Exchange Act of 1934

FROM: Christian L. Broadbent
Counsel to Commissioner Elisse B. Walter

DATE: March 16, 2011

RE: Meeting with Apache Corporation and Assurant

On January 6, 2011, Christian Broadbent of Commissioner Walter's office met with Sarah Ball Teslik of Apache Corporation and Jay Cohen of Assurant to discuss the above-referenced proposal. Provided at the meeting was a comment letter on the proposal: <http://www.sec.gov/comments/s7-33-10/s73310-150.pdf>.