

# MEMORANDUM

TO:  
FROM: Max Polonsky  
DATE: February 24, 2014  
SUBJECT: Meeting with Representatives of Ice Clear Credit

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On February 21, 2014, representatives from the Securities and Exchange Commission (“SEC”) participated on a call with representatives from Ice Clear Credit (“ICC”). The SEC representatives on the call were Thomas Eady, Heather Seidel, Gregg Berman, Michael Gaw, Marta Chaffee, Wenchi Hu, Jeffrey Mooney, Gena Lai, Stephanie Park, George Gilbert, Justin Byrne, Marc Leibert and Max Polonsky. The ICC representatives on the call were Eric Nield, Michelle Weiler, Helen Fermor, Don Sternard, Marc Teichman, Peter Kellner, Kara Dutta, Tara Williams, Bruce Tupper and Tara Collier. On the call, the ICC representatives discussed reporting swap transactions and submitting swap transactions for clearing.