

## MEMORANDUM

**To:** File

**From:** John Fieldsend  
Special Counsel  
Office of Rulemaking  
Division of Corporation Finance  
U.S. Securities and Exchange Commission

**Date:** March 10, 2011

**Re:** Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act Regarding Congolese Conflict Minerals

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On March 10, 2011, Felicia Kung, Steven Hearne, and John Fieldsend of the Division of Corporation Finance met with John Crawley of Niotan, Inc., Barney Rush of Denham Capital Management LP, and Gare A. Smith and Amy K. Lehr of Foley Hoag LLP. The participants discussed the Commission's required rulemaking in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which relates to reporting requirements regarding conflict minerals originating in the Democratic Republic of the Congo and adjoining countries.