

MEMORANDUM

To: File

From: Steven Hearne
Special Counsel
Office of Rulemaking
Division of Corporation Finance
U.S. Securities and Exchange Commission

Date: January 19, 2011

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

On January 19, 2011, Felicia Kung, Lillian Brown, Steven Hearne, and John Fieldsend of the Division of Corporation Finance met with Gareth Llewellyn of the World Gold Council, Scott A. Lewis of Newmont Mining Corporation, Holly H. Smith of Sutherland Asbill & Brennan, and Paul W. Bateman of The Klein & Saks Group. The participants discussed the Commission's proposed rulemaking under 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.