

MEMORANDUM

To: File

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

Date: October 24, 2011

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

On October 24, 2011, Paula Dubberly, Felicia Kung, and John Fieldsend of the Division of Corporation Finance met with Jana Morgan of Global Witness, Amol Mehra of the International Corporate Accountability Roundtable, and Delly Mawazo Sesete who is an expert from the North Kivu province of the Democratic Republic of the Congo on the trade in conflict minerals. 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.