

## MEMORANDUM

**To:** File

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

**Date:** October 27, 2011

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

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On October 27, 2011, Paula Dubberly, Felicia Kung, Hughes Bates, and John Fieldsend of the Division of Corporation Finance met in person with Jim Neill and Kelly Cybulski of the Retail Industry Leaders Association, Arthur D. Jackson, Jr. of Costco Wholesale Corporation, Sarah Thorn of Wal-Mart Stores, Inc., and Robert S. Schwartz of Constantine Cannon, which represents the Consumer Electronic Retail Coalition, and by telephone with Leona Lewis of Best Buy Co., Inc., Toni Dembski-Brandl and Scott Lercel of Target Corporation, Joe Bussell, Don Wiseman, and Peggy Fowler of Wal-Mart Stores, Inc., Cary Mergle and Nate Issacson of Sears Holdings, Inc., Mary Tortorice of Dick's Sporting Goods Inc., Sharon Schwabel of Staples, Inc., and Candace Rodriguez of The Home Depot, Inc. 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.