MEMORANDUM

| TO: | File No. S7-40-10 |
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| FROM: | Marc A. Leaf Office of Commissioner Luis A. Aguilar |
| DATE: | February 24, 2012 |
| SUBJECT: | Meeting with Representatives of Multi-Stakeholder Group |

On February 13, 2012, Commissioner Luis Aguilar and Marc Leaf, Counsel to Commissioner Aguilar, met with the following individuals:

- Patricia Jurewicz, Director, Responsible Sourcing Network, a project of As You Sow
- Bennett Freeman, Senior Vice President Social Research and Policy, Calvert Asset Management Co.
- Sandy Merber, Counsel, International Trade Regulation and Sourcing, General Electric Company

The following individuals participated in the meeting by conference telephone:

- Jay A. Celorie, Global Program Manager, Hewlett Packard
- Bahati Jacques, Policy Analyst, Africa Faith and Justice Network
- Pat Zerega, Director of Shareholder Advocacy, Mercy Investment Services
- Alya Kayal, Director of Policy and Programs, US SIF
- John Kleiderer, Policy Director, Social and International Ministries, Jesuit Conference

The discussion related principally to the Commission's proposed rule to implement Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, *Conflict Minerals*, Release No. 34-63547, including the topics discussed in the comment letters dated November 17, 2010, March 2, 2011, August 22, 2011, and November 10, 2011, submitted on behalf of the multi-stakeholder group, and the February 1, 2012 comment letter submitted by Calvert Asset Management Co., Inc., Responsible Sourcing Network, a project of As You Sow, and other entities.