MEMORANDUM

To: File

From: John Fieldsend

Special Counsel

Office of Rulemaking

Division of Corporation Finance

U.S. Securities and Exchange Commission

Date: April 20, 2012

Re: Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection

Act Regarding Congolese Conflict Minerals

On April 20, 2012, Felicia Kung and John Fieldsend of the Division of Corporation Finance met with Stewart Murray and Ruth Crowell of the London Bullion Market Association and Jeremy Charles of HSBC Bank plc. 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.