

MEMORANDUM

To: File

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

Date: June 6, 2012

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

On June 6, 2012, Paula Dubberly, Felicia Kung, Steven Hearne, and John Fieldsend of the Division of Corporation Finance met with Amol Mehra of the International Corporate Accountability Roundtable and Corinna Gilfillan and Jana Morgan of Global Witness. 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. At the meeting, the outside participants provided the staff with the following documents that are publicly available at the below Internet website addresses:

1. Global Witness, "Renewed fighting in eastern Congo highlights urgent need to end conflict minerals trade" (May 31, 2012), available at <http://www.globalwitness.org/library/renewed-fighting-eastern-congo-highlights-urgent-need-end-conflict-minerals-trade>.
2. Global Witness, "Congo government enforces law to curb conflict mineral trade" (May 21, 2012), available at <http://www.globalwitness.org/library/congo-government-enforces-law-curb-conflict-mineral-trade>.
3. Global Witness, COMING CLEAN: HOW SUPPLY CHAIN CONTROLS CAN STOP CONGO'S MINERALS TRADE FUELLING CONFLICT (May 2012), available at http://www.globalwitness.org/sites/default/files/library/120531_Coming%20Clean_GW.pdf.