

MEMORANDUM

To: File No. S7-45-10

From: Jennifer B. McHugh

Re: Section 975 of the Dodd-Frank Wall Street Reform Act of 2010 (the "Act")

On April 7, 2011, Senior Advisor to the Chairman Jennifer McHugh met with John Dotson and John Bergwell of Chevron; Anthony Kuznik and Edward Wojtowicz of Honeywell; and Amy Kroll and Hardy Calcott of Bingham to discuss the Commission's proposal retarding the registration of municipal advisors. During the meeting, the representatives of Chevron, Honeywell and Bingham reiterated the points made in their respective February 22, 2011 comment letters on the proposal. In addition, the representatives of Chevron and Honeywell discussed the nature of the engineering and other services that they perform on behalf of municipal entities.

ABA Meeting with Chairman Schapiro

March 16, 2011

SEC Offices, 2:30 p.m.

Attendees

Dan Blanton
President and CEO
Georgia Bank and Trust Company of Augusta
Augusta, GA

David Bochnowski
Chairman and CEO
Peoples Bank
Munster, IN

Richard Brueckner
Chairman of Pershing and Senior Executive Vice President
BNY Mellon

Barrie Christman
Chairman
Principal Bank
Des Moines, IA

Bill Grant
Chairman of the Board and CEO
First United Bank and Trust
Oakland, MD

Mark Johnson
President and CEO
First Citizens National Bank
Upper Sandusky, OH

Linda Manfredonia
Chief Fiduciary Officer
Executive Vice President
PNC Asset Management Group

Mike Middleton
Chairman and CEO
Community Bank of Tri-County
Waldorf, MD

Carlos Mello
President and CEO
Prudential Bank and Trust, FSB
Prudential Retirement
Hartford, CT

Leon Moore
Chairman, President and CEO
Bank of Floyd
Floyd, VA

Bill Pasenelli
President
Community Bank of Tri-County
Waldorf, MD

Kelley Sanders
Senior Deposits Officer
SpiritBank
Tulsa, OK

Ignacio Urrabazo
President
Commerce Bank
Laredo, TX

Frank Keating
President and CEO
American Bankers Association

Wayne Abernathy
Executive Vice President
Financial Institutions Policy
and Regulatory Affairs
American Bankers Association

Cecelia Calaby
Executive Director and General Counsel
ABA Securities Association

Senior Vice President
Center for Securities, Trust and Investments
American Bankers Association