

MEMORANDUM

To: File

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

Date: March 8, 2017

Re: Reconsideration of Conflict Minerals Rule Implementation Pursuant to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act

On March 8, 2017, Elizabeth Murphy, Felicia Kung, and John Fieldsend of the Division of Corporation Finance met with Lawrence M. Heim of Elm Sustainability Partners LLC. The participants discussed Acting Chairman Michael S. Piwowar's request for feedback from the public on all aspects of the conflict minerals rule, which was promulgated under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the 2014 staff guidance.