

**MEMORANDUM**

July 13, 2011

To: File No. 4-617

From: Scott H. Kimpel  
Office of Commissioner Troy A. Paredes

Re: Study on Extraterritorial Private Rights of Action

On July 13, 2011, Commissioner Troy A. Paredes and Scott H. Kimpel, Counsel to the Commissioner, met with the following individuals:

1. Femke van 't Groenewout-Hendriks, Senior Advisor Responsible Investment – PGGM (Netherlands)
2. Richard Grottheim, Chief Executive Officer - AP7 (Sweden)
3. Phil Spathis, Manager of Strategy & Engagement – Australian Council of Super Investors
4. Daniel Summerfield, Head of Corporate Governance - Universities Superannuation Scheme (UK)
5. Anders Månsson, Partner, Setterwalls (Sweden)
6. Michael Hensman, Financial Controller - Coal Pension Trustees Limited (UK)

The participants discussed the above-referenced study.