

## MEMORANDUM

TO: File  
FROM: Cindy S. Oh  
RE: Consultation with American Benefits Council and CIEBA  
DATE: August 30, 2011

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On August 30, 2011, Joanne Rutkowski and Cindy Oh of the SEC and Phyllis Cela, Ted Kneller, and Barry McCarty of the CFTC consulted with James Harshaw (GM Pensions & CIEBA), Diann Howland (VP, Legislative Affairs for ABC), Ken Mason (Davis & Harman), Bella Sanevich (NISA Investment Advisors, LLC), and Mark Young (Skadden).

The participants discussed the SEC's proposed business conduct standards rule and the application of the special entity provisions to employee benefit plans subject to ERISA.

[No agenda available for this meeting.]