

UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

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AMERICAN PETROLEUM INSTITUTE,  
CHAMBER OF COMMERCE OF THE  
UNITED STATES OF AMERICA,  
INDEPENDENT PETROLEUM ASSOCIATION  
OF AMERICA, AND NATIONAL FOREIGN  
TRADE COUNCIL,

No. 12-1398

Petitioners,

v.

SECURITIES AND EXCHANGE COMMISSION,

Respondent.

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CERTIFICATE LISTING AND DESCRIBING  
THE RECORD IN PROCEEDINGS  
BEFORE THE SECURITIES AND EXCHANGE COMMISSION

Pursuant to Section 25(a)(2) of the Securities Exchange Act of 1934 and Rule 17(b) of the Federal Rules of Appellate Procedure, the Securities and Exchange Commission ("Commission") certifies that the record listed below includes all information considered by the Commission in formulating its Final Rule, "Disclosure of Payments by Resource Extraction Issuers," Release No. 34-67717 (August 22, 2012) *published at* 77 Fed. Reg. 56,365 (September 12, 2012), with the exception of materials readily available such as books, treatises,

statutes, rules, cases, orders, Commission releases, no-action letters, and certain historical materials.

Doc.

No.            Description

1.     Proposed Rule, Disclosure of Payments by Resource Extraction Issuers, Release No. 34-63549, December 15, 2010, *published at* 75 Fed. Reg. 80977 (December 23, 2010).
2.     Proposed Rule, Extension of comment period, Disclosure of Payments by Resource Extraction Issuers, Release No. 34-63795, January 28, 2011, *published at* 76 Fed. Reg. 6111 (February 3, 2011).

### **Comment Letters**

<http://www.sec.gov/comments/s7-42-10/s74210.shtml>

3.     Comments received from individuals and entities using form letter Type A – 149,081 received
4.     Comments received from individuals and entities using form letter Type B – 19 received
5.     Comments received from individuals and entities using form letter Type C – 42 received
6.     Karin Lissakers, Executive Director, Revenue Watch Institute, December 17, 2010.
7.     Chris Barnard, Germany, December 31, 2010.
8.     Bruce Watzman, Senior Vice President, Regulatory Affairs, National Mining Association, January 3, 2011.
9.     Ian Telfer, Chairman, and Aram Shishmanian, Chief Executive Officer, World Gold Council, January 7, 2011.

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10. Joseph Casper, Vice President, Safety, National Stone, Sand Gravel Association, Alexandria, Virginia, January 13, 2011.
11. John Harrington, CEO, Harrington Investments, Inc., Napa, California, January 19, 2011.
12. Becky Lynch, January 24, 2011.
13. Jonathan G. Kaufman, Staff Attorney, EarthRights International, January 26, 2011.
14. Beate Raabe, Director EU Affairs, International Association of Oil and Gas Producers, Brussels, Belgium, January 27, 2011.
15. Raymond W. Baker, Director, Global Financial Integrity, January 28, 2011.
16. Kyle Isakower, Vice President, Regulatory and Economic Policy, and Patrick T. Mulva, Chairman, Corporate Finance Committee, American Petroleum Institute, January 28, 2011.
17. Martin J. ten Brink, Executive Vice President Controller, Royal Dutch Shell plc, January 28, 2011.
18. Patrick T. Mulva, Vice President and Controller, Exxon Mobil Corporation, January 31, 2011.
19. Matthew J. Foehr, Vice President and Comptroller, Chevron Corporation, January 28, 2011.
20. V. Bruce Thompson, President, American Exploration & Production Council, January 31, 2011.
21. Srinivasan Venkatakrishnan, CFO, AngloGold Ashanti Limited, Johannesburg, South Africa, January 31, 2011.

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22. Ernst & Young LLP, January 31, 2011.
23. Ian Greenwood, Chairman, Local Authority Pension Fund Forum, United Kingdom, January 31, 2011.
24. Senator Carl Levin, U.S. Senate, February 1, 2011.
25. Peter M. Robinson, President & CEO, U.S. Council for International Business, New York, New York, February 4, 2011.
26. Howard J. Hubbard, Bishop of Albany, Chairman, Committee on International Justice and Peace and Ken Hackett, President, Catholic Relief Services, February 9, 2011.
27. Byron Grote, Dr, CFO, BP p.l.c., London, United Kingdom, February 11, 2011.
28. Jasbeena, Managing Director, Syena Capital Management LLC, February 17, 2011.
29. Karin Lissakers, Executive Director, Revenue Watch Institute, February 17, 2011.
30. Raymond C. Offenheiser, President, Oxfam America, Boston, Massachusetts, February 21, 2011.
31. Marcos Menezes, Chief Accounting Officer, Petróleo Brasileiro S.A., Rio de Janeiro, Brazil, February 21, 2011.
32. Raymond C. Offenheiser, President, Oxfam America, February 21, 2011.
33. Torgrim Reitan, Executive Vice President and Chief Financial Officer, Statoil ASA, February 22, 2011.

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34. George Soros, February 23, 2011.
35. Frank Curtiss, Head of Corporate Governance, Railpen Investments, London, United Kingdom, February 25, 2011.
36. Isabel Munilla, Director, Publish What You Pay U.S.; Karin Lissakers, Revenue Watch Institute; Raymond Offenheiser, Oxfam America; Corinna Gilfillan, Global Witness; Raymond Baker, Global Financial Integrity; Ken Hackett, Catholic Relief Services; Jonathan Kauffman, Earthrights International; Michelle Chan, Friends of the Earth - US; and Arvind Ganesan, Human Rights Watch, February 25, 2011.
37. Corinna Gilfillan, Head of U.S. Office, Global Witness, Washington, District of Columbia, February 25, 2011.
38. Manuel Adamini, Head of ESG-research, SNS Asset Management, The Netherlands, February 28, 2011.
39. Melany Grout, Esq., Director, Conflict Risk Network, Washington, DC, February 28, 2011.
40. Anne Simpson, Senior, Portfolio Manager, Global Equity, CalPERS, February 28, 2011.
41. Francois Meloche, Extrafinancial Risks Manager, Bâtirente Inc., February 28, 2011.
42. Jennifer Mazin, Senior Counsel, Barrick Gold Corporation, Toronto, Ontario, Canada, February 28, 2011.
43. Anne Sheehan, Director of Corporate Governance, California State Teachers' Retirement System, March 1, 2011.
44. Francois Valerian, Ph.D., Head of Private Sector, Transparency International, Berlin, Germany, March 1, 2011.

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45. James R. Peterson, Secretary and General Counsel, National Fuel Gas Supply Corporation, March 1, 2011.
46. Grant D. Aldonas, Principal Managing Director, Split Rock International, Inc., March 1, 2011.
47. Jonathan Lash, President, World Resources Institute, March 1, 2011.
48. Nicole Tichon, Executive Director, Tax Justice Network USA, Washington, DC, March 1, 2011.
49. Larry S. Dohrs, Vice President, Newground Social Investment, Seattle, Washington, March, 1, 2011.
50. Bennett Freeman, Senior Vice President, Sustainability Research and Policy, and Paul Bugala, Sustainability Analyst, Extractive Industries, Calvert Asset Management Company, Inc., March 1, 2011.
51. Howard Dicker, Chair, Securities Regulation Committee, Business Law Section, New York State Bar Association, March 1, 2011.
52. Sen. Benjamin L. Cardin, Sen. John F. Kerry, Sen. Patrick Leahy, Sen. Charles E. Schumer, and Rep. Barney Frank, March 1, 2011.
53. Dr. M. Jeucken, Head of Responsible Investment, PGGM Investments, Zeist, Netherlands, March 1, 2011.
54. Heather A. Lowe, Global Financial Integrity, Washington, DC, March 1, 2011.
55. Edward Gerardo, Director, Community and Social Investments, Bon Secours Health System, Inc., Marriottsville, Maryland, March 1, 2011.

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<u>No.</u>	<u>Description</u>
56.	Ben Mathews, Company Secretary, Rio Tinto plc, United Kingdom, March 2, 2011.
57.	National Mining Association, March 2, 2011.
58.	Cathy Douglas, CAO, Anadarko Petroleum Corporation, March 2, 2011.
59.	Darren Brady, Hermes Equity Ownership Services Ltd., March 2, 2011.
60.	The Columban Center for Advocacy and Outreach, Leadership Conference of Women Religious, Sisters of Mercy of the Americas – Institute Justice Team, Missionary Oblates, Justice, Peace and Integrity of Creation Office, Maryknoll Office for Global Concerns, March 2, 2011.
61.	Susan Maples, J.D., Post-Doctoral Research Fellow, Columbia University School of Law, March 2, 2011.
62.	Timothy J. Muris, George Mason University Foundation Professor of Law, and Former Chairman, Federal Trade Commission, and Bilal Sayyed, O'Melveny & Myers LLP, Adjunct Professor of Law, George Mason University, March 2, 2011.
63.	Jon Feigelson, Esq., SVP, General Counsel and Head of Corporate Governance, TIAA-CREF, New York, New York, March 2, 2011.
64.	PricewaterhouseCoopers, March 2, 2011.
65.	Kathleen M. Roberts, Executive Director, North American Metals Council, March 2, 2011.
66.	Lisa N. Noll, CEO, Social Investment Forum, March 2, 2011.
67.	Payal Sampat, International Program Director, EARTHWORKS' No Dirty Gold campaign and Scott Cardiff, International Program Coordinator, EARTHWORKS' No Dirty Gold campaign, March 2, 2011.

<u>Doc. No.</u>	<u>Description</u>
68.	Karen A. Harbert, President and CEO, Institute for 21st Century Energy, U.S. Chamber of Commerce, March 2, 2011.
69.	Sheila Nix, US Executive Director, ONE, March 2, 2011.
70.	Doug Pearce, Chief Executive Officer and Chief Investment Officer, British Columbia Investment Management Corp., March 2, 2011.
71.	Brendon Muller, Controller & VP Insurance, Nexen Inc., March 2, 2011.
72.	Cleary Gottlieb Steen & Hamilton LLP, March 2, 2011.
73.	Zhou Ming Chun, Chief Financial Officer, PetroChina Company Limited, March 2, 2011.
74.	Fabio Eduardo de Pieri Spina, General Counsel and Global Corporate Affairs Director, Vale S.A., March 2, 2011.
75.	Paul E. Gutermann, Akin Gump Strauss Hauer & Feld LLP, March 2, 2011.
76.	Michael R. McAlevey, Vice President and Chief Corporate. Securities & Finance Counsel, General Electric Company, March 4, 2011.
77.	Rep. Spencer Bachus, Chairman, Committee on Financial Services, and Rep. Gary Miller, Chairman, Subcommittee on International Monetary Policy, March 4, 2011.
78.	Human Rights Foundation of Monland, Thailand, March 8, 2011.
79.	Peter Sanborn, March 12, 2011.
80.	Valery Nodem, Coordinator of the Network for the Fight Against Hunger in Cameroon (RELUFA), Yaounde, Cameroon, March 14.



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81. Patrick T. Mulva, Vice President and Controller, Exxon Mobil Corporation, Irving, Texas, March 15, 2011.
82. Tutu Alicante, Executive Director, and Joseph Kraus, Program and Development Director, EG Justice, March 29, 2011.
83. Holly R. Hart, Assistant to the International President, Legislative Director, United Steelworkers, Washington, DC, March 29, 2011.
84. William J. Williams, Jr., April 4, 2011.
85. Publish What You Pay Coalition, April 28, 2011.
86. Martin J. ten Brink, Executive Vice President Controller, Royal Dutch Shell plc, May 17, 2011.
87. Robert Rooney, Executive Vice President, Legal and General Counsel, Talisman Energy Inc., June 23, 2011.
88. Bayo Olowoshile, General Secretary, Petroleum and Natural Gas Senior Staff Association of Nigeria, Nigeria, June 27, 2011.
89. Tá ang Students and Youth Organization, Thailand, June 28, 2011.
90. Guy Elliott, Finance Director, Chief Financial Officer, Rio Tinto, London, United Kingdom, July 6, 2011.
91. Byron Grote, BP plc, July 8, 2011.
92. Elijah Okougbo, General Secretary, Nigeria Union of Petroleum and Natural Gas Workers, Nigeria, July 8, 2011.
93. Jaff N. Bamenjo, Associate Coordinator, The Network for the Fight Against Hunger in Cameroon (RELUFA), Yaounde, Cameroon, July 11, 2011.

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94. Simon Henry, Chief Financial Officer, Royal Dutch Shell Plc, The Hague, The Netherlands, July 11, 2011.
95. Human Rights Foundation of Monland, Thailand, July 15, 2011.
96. Eric G. Postel, Assistant Administrator, Bureau for Economic Growth, Agriculture, and Trade, U.S. Agency for International Development, July 15, 2011.
97. Alex Vanselow, Group Executive & Chief Financial Officer, BHP Billiton Limited, July 28, 2011.
98. Martin J. ten Brink, Executive Vice President Controller, Royal Dutch Shell plc, August 1, 2011.
99. Eloise Todd, Brussels Director, ONE, August 2, 2011.
100. Robert Prael, Financial Management Program Manager, Department of the Interior, Office of Natural Resources Revenue, August 4, 2011.
101. Kyle B. Isakower, Vice President, Regulatory and Economic Policy, American Petroleum Institute, August 11, 2011.
102. Jeffrey H. Perry, King & Spalding LLP, Washington, D.C., September 8, 2011.
103. Jonathan G. Kaufman, Staff Attorney, EarthRights International, September 20, 2011.
104. Patrick T. Mulva, Vice President and Controller, Exxon Mobil Corporation, October 25, 2011.
105. Raúl M. Grijava, Member of Congress, Tucson, Arizona, November 15, 2011.

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106. Branden C. Berns, Third Year Student, Columbia Law School, New York, New York, December 7, 2011.
107. Margarita (Maita) F. Gomez, Coordinator, Bantay Kita, Phillipines, December 15, 2011.
108. Perrine Toledano, Economics and Policy Researcher, Columbia University, New York, New York, December 16, 2011.
109. Isabel Munilla, Director, Publish What You Pay U.S.; Karin Lissakers, Director, Revenue Watch Institute; Ian Gary, Senior Extractive Industries Advisor, Oxfam America; Jonathan Kauffman, Staff Attorney, EarthRights International; Corinna Gilfillan, Head U.S. Office, Global Witness; and Raymond Baker, Director, Global Financial Integrity, December 19, 2011.
110. Isabel Munilla, Director, Publish What You Pay U.S., December 20, 2011.
111. Isabel Munilla, Director, Publish What You Pay U.S., December 20, 2011.
112. Harry M. Ng, Vice President, General Counsel and Corporate Secretary, American Petroleum Institute, January 19, 2012.
113. Benjamin L. Cardin, Charles E. Schumer, John F. Kerry, Patrick Leahy, and Carl Levin, Members of Congress, January 31, 2012.
114. Cindy Smith, February 2, 2012.
115. Garth J. Moore, Riverdale, Maryland, February 2, 2012.
116. Daniel Owusu Koranteng, WACAM, Ghana; Augustine Niber, Center for Public Interest Law; Shafiu Shaibu, SEND; Benard Anaba, ISODEC; Bashiru Jumah, Ghana Aid Effectiveness Forum; Steve Manteaw, Cicil Society Platform on Oil and Gas; and Vitus Azeem, Ghana Integrity Initiative, February 2, 2012.

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117. Jonathan G. Kaufman, Staff Attorney, EarthRights International, February 3, 2012.
118. Ian Gary, Senior Policy Manager, Extractive Industries, February 3, 2012.
119. Kathy Mulvey, Director, Conflict Risk Network, February 7, 2012.
120. Tutu Alicante, Executive Director, EG Justice and Joseph Kraus, Ph.D., Program & Development Director, EG Justice, February 7, 2012.
121. Jonathan G. Kaufman, Staff Attorney, EarthRights International, February 7, 2012.
122. Mam Sambath, Chairman, Cambodians for Resource Revenue Transparency, Phnom Penh, Cambodia, February 7, 2012.
123. Sarath Chhay, Cambodians for Resource Revenue Transparency, Phnom Penh, Cambodia, February 7, 2012.
124. Venkat Kuppuswamy, Assistant Professor of Strategy and Entrepreneurship, Kenan-Flagler Business School, University of North Carolina at Chapel Hill, Chapel Hill, North Carolina, February 9, 2012.
125. Bill Gates, Bill and Melinda Gates Foundation, February 9, 2012.
126. Lynn Pickwell, February 9, 2012.
127. Anonymous, February 9, 2012.
128. Laretta Ngcobo, February 9, 2012.
129. Keane Posner, February 9, 2012.
130. Donnamae Grannemann, February 9, 2012.

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131.	Andrew Mundie, February 9, 2012.
132.	Lisa Blackmore, February 9, 2012.
133.	G. N., February 9, 2012.
134.	Karin Boisclair-Joly, February 9, 2012.
135.	Jerry Mylius, February 9, 2012.
136.	Max Frazier, February 9, 2012.
137.	Cynthia Valdez, February 9, 2012.
138.	Maurice Rothman, February 9, 2012.
139.	Sazi Zibaya, February 10, 2012.
140.	Diane Warren, February 10, 2012.
141.	Joseph Kraus, February 10, 2012.
142.	Marybeth Gardam, February 10, 2012.
143.	Jason Farkas, February 10, 2012.
144.	Jeremy Weaver, February 10, 2012.
145.	Eddie Griffiths, February 10, 2012.
146.	Geoff Daly, February 10, 2012.
147.	Rachel Ford, February 10, 2012.

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148. Rev. Jed Hawkes Koball, Presbyterian Church (USA), Mission Co-Worker, Lima, PERU, February 10, 2012.
149. Rev. Eusun Kim, Fair Haven, NJ, February 10, 2012.
150. Atkinson Charitable Foundation, Bâtirente, British Columbia Teachers Federation, Compensation Employees Union, Glasswaters Foundation, Groupe Investissement Responsable Inc., Healthcare of Ontario Pension Plan, Montrusco Bolton Investments Inc., Natcan Investment Management, NEI Investments, OceanRock Investments (Meritas Funds), Régime de retraite de l'Université du Québec, ScotiaMcLeod, Shareholder Association for Research and Education, Sustainalytics, The Catherine Donnelly Foundation, Vancity Investment Management Ltd., February 10, 2012.
151. Anonymous, February 10, 2012.
152. Kobina Afena-Sam, February 10, 2012.
153. Salvador Giannola, February 10, 2012.
154. Kweku Ewusi-Mensah, February 10, 2012.
155. Madeline Fox, February 10, 2012.
156. Patrice Davis-Duncan, February 10, 2012.
157. Sean Arena, February 10, 2012.
158. Carla Barros, February 10, 2012.
159. Catherine Ratliff, February 10, 2012.
160. Georgiana Williams, February 10, 2012.
161. Sarah McKee, February 10, 2012.

<u>Doc.</u> <u>No.</u>	<u>Description</u>
162.	Keith Gordon, February 10, 2012.
163.	Debora McGee, February 10, 2012.
164.	Tiffany Grabner, February 10, 2012.
165.	Diana Nunnaley, February 10, 2012.
166.	Eric Brown, February 10, 2012.
167.	Jeff Griffin, February 10, 2012.
168.	Byron Eubanks, February 10, 2012.
169.	Anonymous, February 10, 2012.
170.	Cari Logan, February 10, 2012.
171.	Jim VanderWeele, February 10, 2012.
172.	Bill Arthur, February 10, 2012.
173.	Diane Pagen, February 10, 2012.
174.	Iheoma Emeruem, February 10, 2012.
175.	Mike Frost, February 10, 2012.
176.	Ravyn Miller, February 10, 2012.
177.	M. Hutchinson, February 10, 2012.
178.	Alfred Hagen, February 10, 2012.

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179. Michael Bolton, February 10, 2012.
180. Gene Ralph, February 10, 2012.
181. Maureen Rooney, February 10, 2012.
182. Pete Williams, February 10, 2012.
183. James Lobdell, February 10, 2012.
184. Perry Ramirez, February 10, 2012.
185. Winfield Devonshire, February 10, 2012.
186. Brigitte Hamon-Porter, February 10, 2012.
187. Adam Cornford, February 10, 2012.
188. Samuel Barnett, February 10, 2012.
189. Barbara Yates, February 10, 2012.
190. Lawrence Wiedemann, February 10, 2012.
191. Susana O'Cull, February 10, 2012.
192. Greg Birgy, February 10, 2012.
193. Sharon Hutchinson, February 10, 2012.
194. Richard Gawthrop, February 10, 2012.
195. Susan Mullen, February 10, 2012.
196. Alan Batterman, February 10, 2012.



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197. Denis Blot, February 10, 2012.
198. Beverlee Bell, February 10, 2012.
199. Dolores Giblin, February 10, 2012.
200. Yolanda Carrington, February 10, 2012.
201. Alia Hoshall, February 10, 2012.
202. Craig Wise, February 10, 2012.
203. Paul Ramshaw, February 10, 2012.
204. Micah Debenedetto, February 10, 2012.
205. Leslee Goodman, February 10, 2012.
206. Jill Greer, February 10, 2012.
207. Ben Allaway, February 10, 2012.
208. Susan Saari, February 10, 2012.
209. Stacey Quarles, February 10, 2012.
210. Alfred Sellers, February 10, 2012.
211. Cindy Carraway-Wilson, February 10, 2012.
212. Chuck Kottke, February 10, 2012.
213. Rosie Vanek, February 10, 2012.

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214.	Deborah Christie, February 10, 2012.
215.	Donald Stark, February 10, 2012.
216.	Sindhu Tatimatla, February 10, 2012.
217.	Laura Scheuer, February 10, 2012.
218.	Rev. Anson, February 10, 2012.
219.	Cheryll Lesneski, February 10, 2012.
220.	Michael Gergen, February 10, 2012.
221.	Francisco Martinez, February 10, 2012.
222.	Elissa Kattas, February 10, 2012.
223.	Jean-Rive Ndjembi, February 10, 2012.
224.	Nanka Castulik, February 10, 2012.
225.	Mary Hebblewhite, February 10, 2012.
226.	Sam Swaim, February 10, 2012.
227.	Jake Hall, February 10, 2012.
228.	Annette Kamau, February 10, 2012.
229.	Kolenekeo Kaeo, February 10, 2012.
230.	Christina Scarborough, February 10, 2012.
231.	Janice Brandes, February 10, 2012.

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232.	Jolean Dullen-Lucas, February 10, 2012.
233.	Susan Heitzman, February 10, 2012.
234.	Karen Schweitzer, February 10, 2012.
235.	Neil Glazer, February 10, 2012.
236.	Iyeshatu Ajawara, February 10, 2012.
237.	Sonja Block, February 10, 2012.
238.	Judith Dupree, February 10, 2012.
239.	Hope Law, February 10, 2012.
240.	Kathleen Grover, February 10, 2012.
241.	Kathryn Duvall, February 10, 2012.
242.	Sarah Locke, February 10, 2012.
243.	Venola Rolle, February 10, 2012.
244.	Kashif Saleem, February 10, 2012.
245.	Bridget Bannon, February 10, 2012.
246.	Joanne Millar, February 10, 2012.
247.	Joshua Hagen, February 10, 2012.
248.	Richard Dorsey, February 10, 2012.

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- 249. Colia Clark, February 10, 2012.
- 250. Kenneth L. Kaliher, February 10, 2012.
- 251. Les Law, February 10, 2012.
- 252. Elizabeth Nadler, February 10, 2012.
- 253. Denise Mannino, February 10, 2012.
- 254. Johnathan Walters, February 10, 2012.
- 255. Richard Ramos, February 10, 2012.
- 256. Helen Butt, February 10, 2012.
- 257. Tseleng, February 10, 2012.
- 258. Judith Castiano, February 10, 2012.
- 259. Melissa Tucker, February 10, 2012.
- 260. Susan Tefft, February 10, 2012.
- 261. Amy Hoffman, February 10, 2012.
- 262. Kathryn Elich, February 10, 2012.
- 263. Chinyere Ihim, February 11, 2012.
- 264. John Duczek, February 11, 2012.
- 265. Matt, February 11, 2012.
- 266. Laura Avant, February 11, 2012.

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267. Gabriel Funes, February 11, 2012.
268. Martin Cosentino, February 11, 2012.
269. Janet Nelson, February 11, 2012.
270. Patience Pontious, February 11, 2012.
271. Ralph Harrison, February 11, 2012.
272. John Riggs, February 11, 2012.
273. Karen Stevenson, February 11, 2012.
274. Tim Kuhl, February 11, 2012.
275. Kevin Gregson, February 11, 2012.
276. Andrew Summerscales, February 11, 2012.
277. Susan Minish, February 11, 2012.
278. Lorinda Van Zanten, February 11, 2012.
279. Kristy McCarville, February 11, 2012.
280. Robert Hastings, February 11, 2012.
281. Daryl Odefey, February 11, 2012.
282. Naomi Kumar, February 11, 2012.
283. Vince Monroe, February 11, 2012.

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284. Ni-Ammun Onyemachi, February 11, 2012.

285. Joy Bonafield, February 11, 2012.

286. Paul Gordy, February 11, 2012.

287. Laura Kramer, February 11, 2012.

288. Jeff Courter, February 11, 2012.

289. Helen J. Russell, February 11, 2012.

290. Ronald Milton, February 11, 2012.

291. Nancy Blackmon, February 11, 2012.

292. Erin Keefe-Feinner, February 11, 2012.

293. Keith Daugherty, February 11, 2012.

294. Jane Ockuy, February 11, 2012.

295. Duane Darling, February 11, 2012.

296. Horace Patterson, February 11, 2012.

297. Helena Derringham, February 11, 2012.

298. Brian Aufiero, February 11, 2012.

299. Helen Williamson, February 11, 2012.

300. Mary Cosgrove, February 11, 2012.

301. Mary Moloney, February 11, 2012.

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302.	Lyda Pierce, February 11, 2012.
303.	Alan Bowling, February, 11, 2012.
304.	Jim Carpenter, February 11, 2012.
305.	Arona Samb, February 11, 2012.
306.	Ronald DuConge, February 12, 2012.
307.	Harry Cole III, February 12, 2012.
308.	Owen Waite, February 12, 2012.
309.	Stephen Strathearn, February 12, 2012.
310.	Bernadette Jones, February 12, 2012.
311.	Rudy Bell, February 12, 2012.
312.	Marianne Stanley, February 12, 2012.
313.	Esmeralda Flores, February 12, 2012.
314.	B. Hall, February 12, 2012.
315.	Sean Hackel, February 12, 2012.
316.	Valerie Shubert, February 12, 2012.
317.	Branko Kojic, February 13, 2012.
318.	Suzanne Llewellyn, February 13, 2012.

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319. Jonas Stray, February 13, 2012.
320. Jim Steitz, February 13, 2012.
321. Pete Stone, February 13, 2012.
322. Sheila Tran, February 13, 2012.
323. Jennifer Delker, February 13, 2012.
324. Peter Choo, February 13, 2012.
325. Harry Ng, Vice President, General Counsel and Corporate Secretary, American Petroleum Institute, Washington, DC, February 13, 2012.
326. Ibrahima Sory Diallo, Secré taire Exé cutif, La Coalition Nationale des Osc sur la Gouvernance des Ressources Minerales du Senegal, February 14, 2012.
327. Orazio Bellettini Cedeno, Executive Director, Grupo FARO, Quito, Ecuador, February 13, 2012.
328. Angie Appenheimer, February 14, 2012.
329. Amber Jones, February 14, 2012.
330. Anonymous, February 15, 2012.
331. Dan Mikell, February 15, 2012.
332. Anonymous, February 15, 2012.
333. Rep. Barney Frank, Rep. José E. Serrano, Rep. Norman D. Dicks, Rep. Henry A. Waxman, Rep. Maxine Waters, Rep. Donald M. Payne, Rep. Nita M. Lowey, Rep. Betty McCollum, Rep. Barbara Lee, Rep. Jesse L. Jackson,



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- Jr, Rep. Alcee L. Hastings, Rep. Gregory W. Meeks, Rep. Rosa L. DeLauro, Rep. Marcy Kaptur, U.S. House of Representatives, February 15, 2012.
334. Gradye Parsons, Stated Clerk of the General Assembly, Presbyterian Church (U.S.A.), February 15, 2012.
335. Charles Johnson, February 16, 2012.
336. Grant Whittle, February 16, 2012.
337. Senator Carl Levin, Chairman, Permanent Subcommittee on Investigations, Committee on Homeland Security and Governmental Affairs, U.S. Senate, February 17, 2012.
338. Jaff N. Bamenjo, Associate Coordinator, The Network for the Fight Against Hunger in Cameroon (RELUFCA), and Samuel Nguiffo, Executive Director, Center for the Environment and Development (CED); Yaounde, Cameroon, February 20, 2012.
339. George Soros, February 21, 2012.
340. Ian Gary, Oxfam America, Washington, DC, February 21, 2012.
341. Bob Alders, February 22, 2012.
342. Ibrahim Ali, Chairman, Libyan Transparency Association, February 22, 2012.
343. Katherine Acevedo, February 22, 2012.
344. Isabel Munilla, Director, Publish What You Pay U.S., February 23, 2012.
345. Laurie Moskowitz, Senior Director of U.S. Campaigns, ONE, February 23, 2012.

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346. Richard and Barbara Hause, February 24, 2012.
347. Simon Taylor, Founding Director, Global Witness, February 24, 2012.
348. Simon Taylor, Founding Director, Global Witness, February 24, 2012.
349. Karin Lissakers, Director, Revenue Watch Institute, February 27, 2012
350. Mario H. Lopez, President, Hispanic Leadership Fund, February 27, 2012
351. Corinna Gilfillan, Head of U.S. Office, Global Witness, February 27, 2012
352. Senators Lisa Murkowski and John Cornyn, U.S. Senate, February 28, 2012
353. Senator Ben Cardin, U.S. Senate, February 28, 2012
354. Philippe Le Billon, PhD, Associate Professor, Liu Institute for Global Issues, University of British Columbia, Canada, March 2, 2012
355. Senator Mary L. Landrieu, U.S. Senate, March 6, 2012
356. Ian Gary, Senior Policy Manager, Extractive Industries, Oxfam America, March 7, 2012
357. Victor Illescas Lopez, Directing Coordinator of the Association of Guatemalan Forest Communities, Guatemala, March 8, 2012
358. Kyle Ash, Senior Legislative Representative, Greenpeace, Washington, District of Columbia, March 9, 2012
359. Petition from Angolan citizens and civil society organizations, March 13, 2012
360. Arlene McCarthy, MEP, Member of the European Parliament, Brussels, Belgium, March 13, 2012

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361. Laurie Moskowitz, Senior Director of U.S. Campaigns, ONE, March 16, 2012
362. Ian Gary, Oxfam America, Washington, District of Columbia, March 20, 2012
363. Cesar L. Gamboa, Mr., Policy Director, Derecho Ambiente y Recursos Naturales DAR, Lima, Peru, March 23, 2012
364. Semkae Kilonzo, Co-Chair, Global Movement for Budget Transparency, Accountability, and Participation, Dar Es Salaam, Tanzania, United Republic of, March 30, 2012
365. Richard L. Herz, Esq., Litigation Coordinator; Jonathan G. Kaufman, Esq., Staff Attorney; and Marco B. Simons, Esq., Legal Director; EarthRights International, on behalf of Oxfam America, April 16, 2012
366. Harry Ng, General Counsel, American Petroleum Institute, Washington, District of Columbia, May 18, 2012
367. Hal Quinn, President and CEO, National Mining Association, June 15, 2012
368. Arlene McCarthy, Member of the European Parliament, August 10, 2012
369. Rep. Spencer Bachus, Chairman, Committee on Financial Services, U.S. House of Representatives, August 21, 2012

Meetings with SEC Officials

<http://www.sec.gov/comments/s7-42-10/s74210.shtml#meetings>

370. Memorandum, dated January 7, 2011, from the Office of the Chairman regarding a January 5, 2011, meeting with representatives of the Publish What you Pay (U.S.) coalition.

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371. Memorandum, dated March 30, 2011, from the Office of Commissioner Aguilar regarding a March 17, 2011, meeting with representatives of Social Investment Forum.
372. Memorandum, dated March 30, 2011, from the Office of Commissioner Aguilar regarding a March 15, 2011, meeting with representatives of Publish What You Pay.
373. Memorandum, dated April 5, 2011, from the Office of Commissioner Aguilar regarding a March 31, 2011, meeting with representatives of Global Witness .
374. Memorandum, dated April 11, 2011, from the Division of Corporation Finance regarding a March 17, 2011, meeting with representatives of Calvert Asset Management and Social Investment Forum.
375. Memorandum, dated April 11, 2011, from the Division of Corporation Finance regarding a March 22, 2011, meeting with representatives of Publish What You Pay.
376. Memorandum, dated April 11, 2011, from the Division of Corporation Finance regarding an April 11, 2011, meeting with representatives of Talisman Energy.
377. Memorandum, dated April 13, 2011, from the Office of Commissioner Walter regarding an April 13, 2011, meeting with representatives of Publish What You Pay.
378. Memorandum, dated July 1, 2011, from the Division of Corporation Finance regarding a June 24, 2011, meeting with representatives of ONE.
379. Memorandum, dated July 22, 2011, from the Division of Corporation Finance regarding a July 15, 2011, meeting with representatives of Publish What You Pay U.S., Publish What You Pay Ghana, Oxfam America, and the Public Finance Monitoring Centre.

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380. Memorandum, dated August 12, 2011, from the Office of Commissioner Luis A. Aguilar regarding an August 12, 2011, meeting with representatives of Publish What You Pay (U.S.) Coalition, Oxfam America, and EarthRights International.
381. Memorandum, dated December 6, 2011, from the Division of Corporation Finance regarding a November 17, 2011, meeting with representatives of Publish What You Pay.
382. Memorandum, dated December 23, 2011, from the Office of Commissioner Gallagher regarding a December 2, 2011, meeting with representatives of the American Petroleum Institute.
383. Memorandum, dated January 25, 2012, from the Office of Commissioner Gallagher regarding a January 25, 2012, meeting with representatives of Publish What You Pay.
384. Memorandum, dated January 31, 2012, from the Office of Commissioner Gallagher regarding a January 31, 2012, meeting with representatives of the American Petroleum Institute, ExxonMobil, and Royal Dutch Shell plc.
385. Memorandum, dated February 3, 2012, from the Office of Commissioner Gallagher regarding a February 3, 2012, meeting with representatives of Calvert Investments.
386. Memorandum, dated February 10, 2012, from the Division of Corporation Finance regarding a February 10, 2012, meeting with representatives of the Calvert Investments and US SIF.
387. Memorandum, dated February 10, 2012, from the Office of Commissioner Luis A. Aguilar regarding a February 8, 2012, meeting with representatives of Exxon Mobil Corporation, Royal Dutch Shell plc, and American Petroleum Institute.

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388. Memorandum, dated February 16, 2012, from the Division of Corporation Finance regarding a February 13, 2012, meeting with representatives of the American Petroleum Institute.
389. Memorandum, dated March 2, 2012, from the Office of Legislative and Intergovernmental Affairs regarding a February 15, 2012, meeting with Senators Leahy, Levin and Cardin and members of the Senators' staffs.
390. Memorandum, dated June 25, 2012, from the Office of Commissioner Elisse B. Walter regarding a June 25, 2012, meeting with representatives of the Revenue Watch Institute.
391. Memorandum, dated July 19, 2012, from the Office of Commissioner Luis A. Aguilar regarding a May 3, 2012, meeting with representatives of US SIF, the Forum for Sustainable and Responsible Investment.
392. Memorandum, dated July 19, 2012, from the Office of Commissioner Luis A. Aguilar regarding a June 25, 2012, meeting with representatives of the Revenue Watch Institute and the Open Society Foundation.
393. Memorandum, dated July 19, 2012, from the Office of Commissioner Luis A. Aguilar regarding a July 17, 2012, meeting with a representative of the the EU Parliament.
394. Memorandum, dated August 20, 2012, from the Office of Commissioner Walter regarding a July 17, 2012, meeting with a representative of the the EU Parliament.
395. Memorandum, dated August 20, 2012, from the Office of Commissioner Walter regarding a February 17, 2012, meeting with a journalist and author from Angola and a representative of Publish What You Pay.
396. Memorandum, dated August 20, 2012, from the Office of Commissioner Walter regarding a February 17, 2012, meeting with representatives of ExxonMobil, American Petroleum Institute, and Royal Dutch Shell.

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397. Memorandum, dated August 20, 2012, from the Office of Commissioner Walter regarding a January 18, 2012, meeting with representatives of Oxfam America, Revenue Watch Institute, Catholic Relief Services, Global Financial Integrity, and EarthRights International.

Submitted Comments on Specialized Disclosures: Title XV Provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act

<http://www.sec.gov/comments/df-title-xv/specialized-disclosures/specialized-disclosures.shtml>

398. Comments received from individuals and entities using form letter Type A – 342 received

399. Comments received from individuals and entities using form letter Type B – 28 received

400. Comments received from individuals and entities using form letter Type C – 49 received

401. Chris Locovare, President, KewlStuff Inc., Bay Shore, New York, July 28, 2010.

402. Stuart P Seidel, Esq., Washington, DC, August 5, 2010.

403. Larry Manziek Ph.D., Executive Director, International Precious Metals Institute, August 17, 2010.

404. Stephen Greene, Principal, Howland Greene Consultants LLC, Lowell, MA, August 24, 2010.

405. Mike Koehler, Professor, Assistant Professor of Business Law, Butler University, Indianapolis, IN, September 3, 2010.

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406. Cecilia L. Gardner, Esq., *et al.*, Jewelers Vigilance Committee, New York, NY, September 13, 2010.
407. Timothy M. Toy, and Ronald D. Brown, Toy & Brown, New York, NY, September 24, 2010.
408. Deborah R. Meshulam, DLA Piper LLP (US), Washington, DC, September 24, 2010.
409. Patrick Dorsey, Senior Vice President, Secretary and General Counsel, Tiffany & Co., September 29, 2010.
410. R. Craig Johnson, General Counsel, Rio Tinto US & South America, Salt Lake City, Utah, October 1, 2010.
411. Senator Richard Durbin and Congressman Jim McDermot, October 4, 2010.
412. Corinna Gifillan, Head of U.S. Office, Global Witness, October 12, 2010.
413. Kyle Isakower and Patrick T. Mulva, American Petroleum Institute, October 12, 2010.
414. Douglas J Kealey, Environmental and Regulatory Affairs Manager, Garmin Int'l, Inc., Olathe, KA, October 12, 2010.
415. Michael L Rae, Chief Executive Officer, Responsible Jewellery Council, Vermont, VIC 3133 AUSTRALIA, October 13, 2010.
416. Robert B. Lawrence, Senior Policy Advisor, Global Witness, October 19, 2010.
417. Jeffrey W Rubin, Chair, Committee on Federal Regulation of Securities, Business Law Section, American Bar Association, New York, NY, October 19, 2010.



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418. Martin J. ten Brink, Executive Vice President Controller, Royal Dutch Shell plc, October 25, 2010.
419. Stephanie Lester, Vice President, International Trade, Retail Industry Leaders Association, October 27, 2010.
420. Catherina Hurlburt, Gainesville, VA, October 27, 2010.
421. Coalition of Immokalee Workers, Coalition to Abolish Slavery and Trafficking, Free the Slaves, International Justice Mission, Not for Sale Campaign, Polaris Project, and Vital Voices Global Partnership, October 27, 2010.
422. Tina Davis, Filmmaker, Oslo, Norway, October 28, 2010.
423. Nina B. Lanctot, pastor, October 29, 2010.
424. Robert W Row, Palo Alto, California, October 29, 2010.
425. Suzanne E Lind, faith based NGO administrator, Kinshasa, The Democratic Republic of The Congo, October 29, 2010.
426. Sam Rosenfeld, CEO, Densus Group, Plano, TX, October 29, 2010.
427. Maneesh Pangasa, Yuma, AZ, November 3, 2010.
428. Cravath, Swaine & Moore LLP; Cleary Gottlieb Steen & Hamilton LLP; Davis Polk & Wardwell LLP; Shearman & Sterling LLP; Simpson Thacher & Bartlett LLP; Skadden, Arps, Slate, Meagher & Flom LLP; Sullivan & Cromwell LLP; Wilmer Cutler Pickering Hale and Dorr LLP, November 5, 2010.
429. Karen Savala, President, Americas, Semiconductor Equipment and Materials International, November 8, 2010.

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430. Reps. Howard L. Berman, Donald M. Payne, and Christopher H. Smith, U.S. House of Representatives, November 8, 2010.
431. Martha S. Knight, Global Board of Global Ministries of the United Methodist Church, November 10, 2010.
432. Richard Burt, President, Tantalum-Niobium International Study Center, November 10, 2010.
433. Steve Mason, Coordinator of SRI Activities, Church of the Brethren Benefit Trust, Elgin, IL, November 12, 2010.
434. Bennett Freeman, Calvert Asset Management Company, Inc.; Paul Bugala, Calvert Asset Management Company, Inc.; Lisa N. Woll, Social Investment Forum, November 15, 2010.
435. Ingrid Dyott, Neuberger Berman Socially Responsive Fund (NB SRI), New York, NY, November 15, 2010.
436. National Mining Association, November 16, 2010.
437. Lauren M Compere, *et al.*, Managing Director, Boston Common Asset Management, Boston, MA, November 16, 2010.
438. Josie Dixon, November 17, 2010.
439. John Gilles, November 17, 2010.
440. Advanced Medical Technology Association (AdvaMed), Aerospace Industries Association (AIA), American Association of Exporters and Importers (AAEI), Association of Home Appliance Manufacturers (AHAM), Consumer Electronics Association (CEA), The Association of Equipment Manufacturers (AEM), IPC-Association Connecting Electronics Industries, National Association of Manufacturers (NAM) National Foreign Trade Council (NFTC), National Retail Federation (NRF), Retail Industry

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- Leaders Association (RILA), Semiconductor Equipment and Materials International (SEMI), TechAmerica, USA\* ENGAGE, November 17, 2010.
441. Lauren Hauptman, November 17, 2010.
442. Lisa N Woll, Social Investment Forum (SIF), Washington, DC, November 18, 2010.
443. Christie Campello, November 17, 2010.
444. Darren Fenwick, Senior Government Affairs Manager, Enough Project, and Tim Mohin, Director, Corporate Responsibility, Advanced Micro Devices, November 17, 2010.
445. Jemma Underwood, November 18, 2010.
446. Chris Saxon Koelker, November 18, 2010.
447. Mark Meeks, November 18, 2010.
448. David Parrent, November 18, 2010.
449. Richard Goss, Information Technology Industry Council, November 18, 2010.
450. National Association of Manufacturers, November 19, 2010.
451. Robert Walker, Vice President, ESG Services, November 19, 2010.
452. Brian Dutoi, Charlottesville VA, November 19, 2010.
453. Adam M Kanzer, Esq, Managing Director General Counsel Domini Social Investments LLC, November 20, 2010.
454. Dominic Larkin, Sherbrooke, Qué., November 21, 2010.

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455.	Judith Kingsley, Professor Emerita of English, Bluffton University, Bluffton, Ohio, November 22, 2010.
456.	IPC - Association Connecting Electronics Industries, November 22, 2010.
457.	Susan Baker, Portfolio Manager and ESG Research Analyst, Trillium Asset Management, Boston, MA, November 22, 2010.
458.	Isabel Munilla, Director, Publish What You Pay U.S., November 22, 2010.
459.	Kay Nimmo, Manager of Sustainability and Regulatory Affairs, ITRI Ltd., November 22, 2010.
460.	Diarmuid O'Hegarty, Deputy Chief Executive, London Metal Exchange, November 23, 2010.
461.	Karina Litvack, Director, Head of Governance and Sustainable Investment, F&C Management Ltd., November 26, 2010.
462.	Dennis Meyer, President, American Tin Trade Association, November 26, 2010.
463.	JaNell Hicks, November 28, 2010.
464.	James McAliney and Antonis Papadourakis, Arkema, November 29, 2010.
465.	Dick Matgen, Executive Director, Open Square Foundation, November 29, 2010.
466.	Wynnette M LaBrosse, President, Open Square Foundation, November 30, 2010.
467.	Erin Cook, November 30, 2010.

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468. Caroline King, November 30, 2010.
469. Jodee B. Brown, Salt Lake City, Utah, November 30, 2010.
470. Benjamin L. Cardin, U.S. Senator, December 1, 2010.
471. Marco Simons, Legal Director, and Jonathan Kauffman, Staff Attorney, EarthRights International, December 2, 2010.
472. Kasauh Mon, Nai, Director of the Human Rights Foundation of Monland, Sangkhlaburi, Thailand, December 3, 2010.
473. Nicolas Grabar, Stephen L. Kass, and Robert E. Buckholz, Association of the Bar of the City of New York, December 5, 2010.
474. Karin Lissakers, Executive Director, Revenue Watch Institute, December 6, 2010.
475. Letter to Commissioner Aguilar, from Kyle Isakower and Patrick Mulva, American Petroleum Institute, December 9, 2010.
476. Letter to Commissioner Walter, Kyle Isakower and Patrick Mulva, American Petroleum Institute, December 9, 2010.
477. Letter to Commissioner Casey, from Kyle Isakower and Patrick Mulva, American Petroleum Institute, December 9, 2010.
478. Candida Owens Sales Manager, CRONIMET Central Africa AG, December 9, 2010.
479. The Extractive Industries Working Group, December 13, 2010.
480. Nick Thorne, Managing Director, Thailand Smelting and Refining Co. Ltd., December 13, 2010.

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481. Harriet Steinberg, Lake Oswego, OR, December 14, 2010.
482. Krista Furgerson, December 15, 2010.
483. Ann Shannon Co-Founder, A Thousand Sisters Campaign and Co-Founder, Outcry for Congo Campaign, December 15, 2010.
484. Richa Sehgal, December 15, 2010.
485. Laura Matter, A Thousand Sisters, Outcry for Congo, December 15, 2010.
486. Thomas Turner, DRC Country Specialist, Amnesty International USA, December 15, 2010.
487. Katherine Yarges, Newport, Kentucky, December 15, 2010.
488. Lori Kechter, Administrator, Outcry for Congo Campaign, Member, A Thousand Sisters Campaign, December 15, 2010.
489. Memorandum, dated August 11, 2010, from the Division of Corporation Finance regarding an August 11, 2010 telephone call with representatives of Senator Carte P. Goodwin.
490. Memorandum, dated August 11, 2010, from the Division of Corporation Finance regarding an August 11, 2010, meeting with a representative of the National Retail Federation.
491. Memorandum, dated August 17, 2010, from the Division of Corporation Finance regarding an August 17, 2010, telephone call with Professor Peter Rosenblum of Columbia University.
492. Memorandum, dated August 31, 2010, from the Division of Corporation Finance regarding an August 31, 2010, meeting with representatives organized by the National Association of Manufacturers.

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493. Memorandum, dated September 8, 2010, from the Division of Corporation Finance regarding a September 8, 2010, meeting with representatives of the Publish What You Pay Coalition.
494. Memorandum, dated September 15, 2010, from the Division of Corporation Finance regarding a September 15, 2010, meeting with representatives of Global Witness.
495. Memorandum, dated September 21, 2010, from the Division of Corporation Finance regarding a September 21, 2010, meeting with a representative of Extractive Industries Transparency Initiative.
496. Memorandum, dated September 23, 2010, from the Division of Corporation Finance regarding a September 23, 2010, meeting with representatives of Calvert Asset Management and Social Investment Forum.
497. Memorandum, dated September 24, 2010, from the Division of Corporation Finance regarding a September 24, 2010, meeting with representatives of The Enough Project.
498. Memorandum, dated September 27, 2010, from the Division of Corporation Finance regarding a September 27, 2010, meeting with members of the American Petroleum Institute.
499. Memorandum, dated September 28, 2010, from the Division of Corporation Finance regarding a September 28, 2010, meeting with representatives of the Jewelers Vigilance Committee, Jewelers of America, Weil, Gotshal & Manges LLP, Manufacturing Jewelers & Suppliers of America, The Klein & Saks Group, and the Richline Group.
500. Memorandum, dated October 1, 2010, from the Division of Corporation Finance regarding an October 1, 2010, telephone call with a representative of the United Nations Group of Experts.

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501. Memorandum, dated October 4, 2010, from the Division of Corporation Finance regarding an October 4, 2010, meeting with representatives of the Information Technology Industry Council.
502. Memorandum, dated October 6, 2010, from the Division of Corporation Finance regarding an October 4, 2010, meeting with representatives of Royal Dutch Shell.
503. Memorandum, dated October 12, 2010, from the Division of Corporation Finance regarding an October 12, 2010, meeting with representatives of International Precious Metals Institute and Materials Management Corp.
504. Memorandum, dated October 27, 2010, from the Division of Corporation Finance regarding an October 15, 2010, meeting with representatives of the National Mining Association.
505. Memorandum from the Division of Corporation Finance regarding an October 29, 2010, meeting with representatives from the office of Senator Richard Durbin and from the office of Representative Jim McDermott.
506. Memorandum, dated November 15, 2010, from the Division of Corporation Finance regarding a November 15, 2010, meeting with representatives of ITRI, GraviTa, Inc., Malaysia Smelting Corporation, and AVX Corporation.
507. Memorandum, dated November 15, 2010, from the Division of Corporation Finance regarding a November 15, 2010, meeting with representatives of the Democratic Republic of the Congo, Minerals Supply Africa, Ltd, and Cronimet Central Africa AG.
508. Memorandum, dated November 18, 2010, from the office of Commissioner Casey regarding a November 18, 2010, meeting with representatives of the American Petroleum Institute.
509. Memorandum, dated November 17, 2010, from the Division of Corporation Finance regarding a November 17, 2010, meeting with representatives of



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- Social Investment Forum, As You Sow, Boston Common Asset Management, Trillium Asset Management, Calvert Investments, and The International Interfaith Investment Group.
510. Memorandum, November 17, 2010, from the Division of Corporation Finance regarding a November 17, 2010, meeting with representatives of As You Sow, Advance Micro Devices Inc., The Enough Project, Hewlett-Packard Company, General Electric Co., Friends of the Congo, Boston Common Asset Management, Trillium Asset Management, and Calvert Investments.
511. Memorandum, dated November 18, 2010, from the Division of Corporation Finance regarding a November 18, 2010, meeting with representatives of Retail Industry Leaders Association, Costco Wholesale Corporation, Target Corporation, Best Buy Co., Inc., J.C. Penney Company, Inc., Wal-Mart Stores, Inc., and Lowe's Companies, Inc.
512. Memorandum, dated November 18, 2010, from the Office of the Chairman regarding a November 18, 2010, meeting with representatives of The Enough Project, Grassroots Reconciliation Group, and DLA Piper.
513. Memorandum, dated November 30, 2010, from the Office of Commissioner Luis A. Aguilar regarding a November 19, 2010, meeting with representatives of The American Petroleum Institute.
514. Memorandum, dated December 2, 2010, from the Office of Commissioner Elisse B. Walter regarding a December 2, 2010, meeting with representatives of the Information Technology Industry Council, Apple Inc., Motorola, Inc., and Covington & Burling LLP.
515. Memorandum, dated December 2, 2010, from the Division of Corporation Finance regarding a December 2, 2010, meeting with representatives of The Densus Group.

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516. Memorandum, dated December 6, 2010, from the Office of Commissioner Paredes regarding a December 3, 2010, meeting with representatives of the Information Technology Industry Council, Apple Inc., Motorola, Inc., and Covington & Burling LLP.
517. Memorandum, dated September 12, 2011, from the Office of Commissioner Aguilar regarding a September 12, 2011, meeting with representatives of Free the Slaves.

### **Additional Materials**

#### Adopting Release

518. Disclosure of Payments by Resource Extraction Issuers, Release No. 34-67717 (August 22, 2012) published at 77 Fed. Reg. 56,365 (September 12, 2012).

#### Motion for Stay and Comments

<http://www.sec.gov/rules/final/2012/34-67717-comments-stay-motion.shtml>

519. Motion for Stay of Rule 13q-1 and Related Amendments to New Form SD by American Petroleum Institute, Chamber of Commerce of the United States of America, Independent Petroleum Association of America, and National Foreign Trade Council, dated October 25, 2012, available at <http://www.sec.gov/rules/final/2012/34-67717-motion-stay.pdf>.
520. Oxfam America, Inc., September 19, 2012.
521. Isabel Munilla, Director, Publish What You Pay, October 26, 2012.
522. Senators Benjamin L. Cardin, Richard G. Lugar, Carl Levin and Patrick Leahy, United States Senate, October 31, 2012.
523. Bennett Freeman, Senior Vice President, Sustainability Research and Policy, Calvert Investment Management, Inc., November 1, 2012.

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524. Jonathan G. Kaufman, on behalf of Oxfam America, November 1, 2012.
525. Michael Elliott, President & CEO, The ONE Campaign, November 5, 2012.
526. Eugene Scalia, Gibson. Dunn & Crutcher LLP, on behalf of the American Petroleum Institute, Chamber of Commerce of the United States of America, Independent Petroleum Association of America, and National Foreign Trade Council, November 5, 2012.

Other Materials

527. Order Denying Stay, Securities Exchange Act Rel. No. 68197, November 8, 2012, available at <http://www.sec.gov/rules/other/2012/34-68197.pdf>.
528. Small Entity Compliance Guide, available at <http://www.sec.gov/info/smallbus/secg/resource-extraction-small-entity-compliance-guide.htm>.
529. Disclosure of Payments by Resource Extraction Issuers, Final Rule, correction, Release No. 34-67717A (November 19, 2012) published at 77 Fed. Reg. 70,116 (November 23, 2012).

For the Commission, by its Secretary, pursuant to delegated authority.

/s/ Elizabeth M. Murphy

Elizabeth M. Murphy

Dated: November 26, 2012