Meeting Between Federal Reserve Staff
And Representatives of JPMorgan Chase (“JPMC”)
September 14, 2010

Participants:  Mark Van Der Weide, Sean Campbell, Michael Hsu, Molly Mahar and
Brian Knestout (Federal Reserve Board)

Kate Childress, Kathryn McCullough, Nina Shenker, John Wilmott,
Richard Smith, Neila Radin and William Braverman (JPMC)

Summary:  Federal Reserve Staff met with Representatives of JPMC to discuss the potential
scope and application of the restrictions in section 619 of the Dodd-Frank Wall Street Reform
and Consumer Protection Act (“Dodd-Frank”) on proprietary trading and relationships with
hedge funds and private equity funds (“private funds”).  Representatives of JPMC expressed
concerns regarding: (1) negative impacts on competitiveness that could arise if the de minimis
investment threshold by banking entities in hedge funds and private funds was established at
more than 3 percent; (2) the appropriate scope of investment size limitations during the
conformance period; (3) whether carried interest would count toward a banking entity’s
investment size limitations under the regulations; (4) the impact of restrictions on investments in
private funds on banking entity-affiliated pension funds; (5) the types of activities and
investments that would qualify for extensions of time for illiquid fund conformance; and (6) the
possible inclusion of current exceptions for certain transactions subject to sections 23A and 23B
of the Federal Reserve Act.  During this discussion, JPMC representatives also expressed their
view that defining private funds in relation to sections 3(c)(1) and 3(c)(7) of the Investment
Company Act of 1940 would result in an overly broad spectrum of funds impacted by the
provisions of section 619 of the Dodd-Frank Act.