

**Meeting between Federal Reserve Board Staff
and Representatives of JPMorgan Chase & Co.
February 25, 2011**

Participants: Sean Campbell, Brian Knestout, Jeremy Newell, and Chris Paridon
(Federal Reserve Board)

Greg Baer, Alexander Hunt, and Jeremy Barnum (JPMorgan Chase & Co.)

Summary: Staff of the Federal Reserve Board met with representatives of JPMorgan Chase & Co. (“JPMorgan”) to discuss the restrictions on proprietary trading activities under section 619 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. JPMorgan provided Federal Reserve Board staff with a presentation on their views on the proprietary trading restrictions and, in particular, the use of quantitative metrics in the implementation of those restrictions.

Among other matters discussed in the meeting were: the potential levels at which quantitative metrics could be applied (e.g., trading desk, trade-by-trade, etc.); and the potential advantages and disadvantages of particular metrics, including the Sharpe ratio, inventory turnover ratios, customer-initiated trade ratios, profitability measurements, and bid/offer spread measurements.