

To: File No. 33-8861
Release No. S7-28-07

From: Matthew Reed

Date: January 15, 2008

Re: Meeting with representatives of Janus Capital Group

On January 14, 2008, Commissioner Casey, Matthew Reed, and Justin Daly, counsels to the Commissioner, met with Kelley Howes, Executive Vice President, General Counsel and Secretary, and Blair Johnson, Senior Vice President, Corporate Communications, both with Janus Capital Group, and David Franasiak and Joel Oswald of Williams & Jensen. During this meeting, Ms. Howes discussed the above-referenced proposal, particularly with respect to cost issues and the top-ten holdings disclosure requirement.