



OCCIDENTAL
ENTERTAINMENT GROUP HOLDINGS

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CRAIG C. DARIAN
Co-Chairman
Chief Executive Officer

November 15, 2011

Ms. Elizabeth M. Murphy, Secretary
Securities and Exchange Commission
100 F Street, Northeast
Washington, D.C. 20549

Re: COMMITTEE ON DISCLOSURE OF CORPORATE POLITICAL SPENDING
PETITION FOR RULEMAKING (August 3, 2011), File No. 4-637

Dear Ms. Murphy:

Transparency and honesty are the foundation of any free market. Without those principles, investors cannot have trust in the marketplace. That is why we, as business leaders, are writing to support the petition for rulemaking that would require greater transparency of corporate political spending.

We are troubled by the way that some of our business colleagues have chosen to exploit recent court rulings expanding the right of companies to participate in politics. Rather than donate openly and deal honestly with shareholders and citizens, these firms fail to adequately disclose campaign expenditures from their corporate treasury.

We agree with the eight Supreme Court justices who, in last year's *Citizens United* decision, said that disclosure allows shareholders to "determine whether their corporation's political speech advances the corporation's interest in making profits." Shareholders can only make that determination if the corporation where they have an equity interest fully discloses their political expenditures. That is why it is critical for the Securities and Exchange Commission to enact a rule to require corporations to disclose political spending to shareholders, not only to protect shareholders but to strengthen the corporations themselves.

It is exactly this type of disclosure that facilitates good corporate governance by encouraging corporations to create a process in which these types of donations are thoroughly evaluated. We strongly believe that requiring disclosure of corporate political spending will strengthen the way that corporations operate and will protect the investment of shareholders.

Sincerely,

OCCIDENTAL ENTERTAINMENT
GROUP HOLDINGS, INC.

CRAIG C. DARIAN
Co-Chairman & CEO

Albert Sweet Development ♦ Occidental Studios ♦ Occidental Technologies
Occidental Lighting & Grip ♦ Prop Services West

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