
MEMORANDUM

To: File No. 4-637

Date: January 28, 2014

From: Jenny Riegel
Division of Corporation Finance

Subject: Meeting on Rule Petition

On September 20, 2013, Keith Higgins, Director of the Division of Corporation Finance, and Jenny Riegel, Counsel to the Director of the Division of Corporation Finance, met with the following parties who expressed their support for the rule petition to require public companies to disclose to shareholders the use of corporate resources for political activities:

- Lisa Gilbert, Public Citizen
- John Keenan, AFSCME
- Don Marlais, Lussier, Gregor, Vienna & Associates, representing CalPERS
- Rob McGarrah, AFL-CIO
- Adam Kanzer, Domini Social Investments LLC (via teleconference)