

## MEMORANDUM

To: File No. 4-637

Date: March 27, 2012

From: Jennifer B. McHugh  
Senior Advisor to the Chairman

Re: Meeting on Rule Petition

---

On March 16, 2012, Meredith Cross, Director of the Division of Corporation Finance; Paula Dubberly, Deputy Director of the Division of Corporation Finance; Tamara Brightwell, Senior Special Counsel to the Director of the Division of Corporation Finance; James Burns, Deputy Chief of Staff; and Jennifer McHugh, Senior Advisor to the Chairman, met with the following, 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, Deputy Director of Congress Watch
- Craig Holman-Public Citizen, Government Affairs
- John Keenan-AFSCME, Corporate Governance Analyst
- Don Marlais-Lussier, Gregor, Vienna & Associates, Representation for Calpers
- Rob McGarrah-AFLCIO, Counsel

The rule petition is available at <http://www.sec.gov/rules/petitions/2011/petn4-637.pdf>.