

From: Mari Schwartzner
Sent: Friday, March 07, 2014 1:50 PM
To: OFM Performance and Planning
Subject: comment on the Strategic Plan

Attached, please find our firm's comment on the SEC's 2014-2018 Strategic Plan.

Thank you for your consideration.

U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549
via email: performanceplanning@sec.gov
RE: Strategic Plan 2014-2018

Dear Strategic Planning Committee:

I congratulate the SEC for making the quality and usefulness of disclosure a top priority in its strategic plan. However, I believe that the SEC needs to look to the investor community to determine what disclosure is most useful. The unprecedented volume and range of support that the petition for disclosure of political expenditure has received demonstrates that investors, academics, and the general public recognize the importance of disclosure of political activity in evaluating a company.

Disclosure of political expenditures exposes whether or not a company's actions are consistent with its business plan and public values. Disclosure of this sort can expose legal, regulatory and business risks not otherwise apparent to investors in its other public disclosures. Disclosure also enables shareholders to make investments that are consistent with the shareholder's public and private values.

It is imperative that the SEC not assume that the only interest of shareholders is the return on their investment, **nor should it be assumed that either disclosure of political contributions and/or consistency with corporate values in political giving would reduce shareholder value.** In implementing its Strategic Plan, I hope that SEC takes into account the value of disclosure. It's not simply the size of an expenditure that's important – the *use* of an expenditure is often more revelatory about a company's values, plans, and objectives than the amount expended.

There is no better test of the SEC's commitment to enhancing the quality and usefulness of disclosure than how it responds to this petition. If the SEC believes, as the Strategic Plan suggests, that disclosure of executive compensation is important, the SEC should have a reasoned and publicly articulated basis for rejecting a rule requiring disclosure of political spending as less

important, or the SEC should adopt a rule on political spending disclosure as at least equally important. If the SEC's Strategic Plan is implemented based only on the private assessment of the Commissioners or the Staff, without input of the value of disclosure to investors, the SEC will fail to fulfill the mission of "protecting investors, maintaining fair, orderly and efficient markets and facilitating capital formation."

I appreciate that the SEC is seeking public comment on its strategic plan, but I also ask that you not overlook the three-quarters of a million public comments that have already been received regarding how the SEC can enhance disclosure to the benefits of shareholders and the public alike. Thank you for your consideration. I welcome response or comment at the address listed on this letterhead.

Sincerely,

Julie N.W. Goodridge
President and CEO
NorthStar Asset Management, Inc.