

February 24, 2010

«salutation» «Chairman_first» «middle_» «last»
«Title»
«Constituent_Name»
«MA_line_1»
«MA_Line_2»
«MA_Line_3»

Dear «salutation» «last»:

We are writing to urge your company to commit to disclosure and board oversight of all its political spending with corporate funds. As you know, the U.S. Supreme Court's recent decision in *Citizens United v. the Federal Election Commission*, removes all but a handful of restraints on corporate political spending. The ruling poses a major challenge to companies and their shareowners. It is likely to put companies under immense pressure to use shareholder funds to support candidates, groups and causes whose positions and activities could threaten a company's reputation, bottom line and shareholder value.

We hope you will join the 73 major companies that have already agreed to adopt political disclosure and accountability policies. The list includes nearly half of S&P 100 firms, such as Hewlett-Packard, Merck and United Technologies.

Best practices in corporate political disclosure and accountability include:

- policies and procedures for board approval and review of corporate political spending, and
- annual public disclosure of all corporate political expenditures, including contributions made with corporate funds and payments to trade associations and other tax-exempt organizations that are used for political purposes.

Over the past decade, support for political disclosure has increased steadily among companies, shareholders, corporate directors and proxy advisory services. A 2008 Mason-Dixon Polling & Research survey of directors, commissioned by the Center for Political Accountability (CPA), found that two-thirds said corporate scandals involving political activities have “damaged the public’s confidence and trust in corporate America.” A similar majority (60 percent) agreed that reforms were necessary to “protect companies from risk.” A 2006 Mason-Dixon poll of shareholders found that more than 90 percent backed more disclosure and 84 percent wanted board oversight and approval of political giving.

Shareowners in growing numbers support proxy resolutions calling for disclosure of corporate political contributions. Proxy voting advisory firms RiskMetrics, Proxy Governance and Glass Lewis recognize the importance of political giving disclosure and accountability, and in most cases support proxy proposals that promote those goals. The Council of Institutional Investors calls on boards to monitor, assess and approve all

company political contributions, and to develop and disclose publicly, on an annual basis, the amounts and recipients of all monetary and non-monetary contributions.

Please look to the Center of Political Accountability as a resource when developing your policies on political spending, and contact Bruce Freed, CPA President, with any questions, at bffreed@politicalaccountability.net or (202) 464-1570 x 102.

Sincerely,



Bruce F. Freed
President
Center for Political Accountability



Ann Yerger
Executive Director
Council of Institutional Investors



Thomas P. DiNapoli
New York State Comptroller
New York State Common Retirement Fund



Anne Simpson
Senior Portfolio Manager
**California Public Employees'
Retirement System**



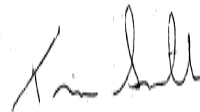
Orin S. Kramer
Chair
New Jersey State Investment Council



Denise L. Nappier
Connecticut State Treasurer



Shelley Alpern
Social Research and Advocacy Director
Trillium Asset Management Corporation



Timothy Smith
Senior Vice President
Walden Asset Management



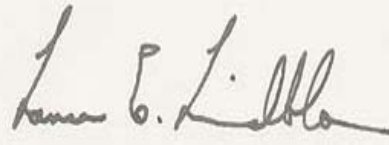
Bruce Herbert
Chief Executive
Newground Social Investment



Adam Kanzer
Managing Director & General Counsel
Domini Social Investments



Kristina Curtis
Vice President
Green Century Capital Management, Inc




Lance E. Lindblom
President & CEO
The Nathan Cummings Foundation



Bennett Freeman
Senior Vice President
Sustainability Research and Policy
Calvert Asset Management Company, Inc.



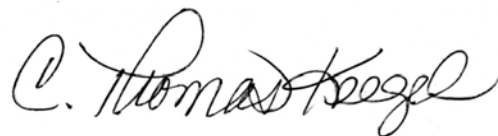
Robert Zevin
President
Robert Brooke Zevin Associates, Inc.



Lisa Woll
Chief Financial Officer
Social Investment Forum



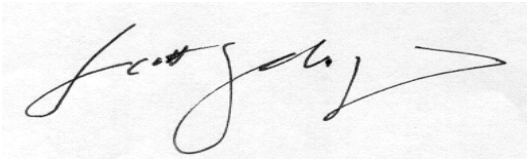
Leslie Christian
President & CEO
Portfolio 21 Investments



C. Thomas Keegel
General Secretary-Treasurer
International Brotherhood of Teamsters



Mary Ellen Gondeck
Congregation of St. Joseph
Office of Peace and Justice



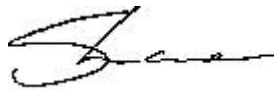
Scott Zdrazil
Director of Social Responsibility
Amalgamated Bank



Stephen Viederman
Finance Committee
Christopher Reynolds Foundation



Ruth Kuhn, SC
Sisters of Charity of Cincinnati
Corporate Responsibility Committee,
Coordinator, Region VI
Coalition for Responsible Investment



Shane G. Johnston, AIF®
Accredited Investment Fiduciary
Blue Summit Financial Group, Inc.



Reverend Séamus P. Finn
Missionary Oblates of Mary Immaculate



James McRitchie, Publisher
CorpGov.net (Corporate Governance)



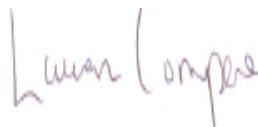
Peter W. Krull
President
Krull & Company



Conrad MacKerron
Director, CSR Program
As You Sow Foundation



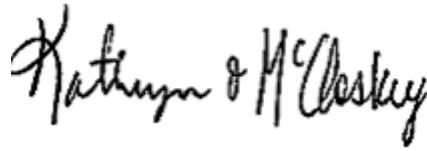
Susan Vickers
Vice President Community Health
Catholic Healthcare West



Lauren Compere
Director of Shareholder Advocacy
Boston Common Asset Management



Valerie Heinonen, o.s.u
Consultant, Corporate Social Responsibility
Dominican Sisters of Hope
Mercy Investment Program
Sisters of Mercy-Detroit Charitable Trust
Ursuline Sisters of Tildonk, U.S. Province



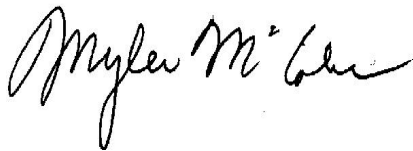
Kathryn McCloskey
Director, Corporate Social Responsibility
United Church Funds
Director, Corporate Social Responsibility
Pension Boards,
United Church of Christ, Inc.



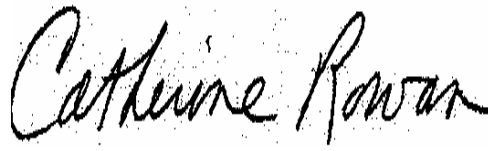
Elizabeth E. McGeveran
Senior Vice President, Governance
& Sustainable Investment
F&C Management Ltd.



George Gay
Chief Executive Officer
First Affirmative Financial Network



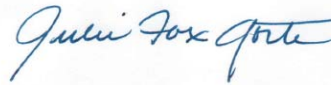
Myles McCabe
Director of Peace and Justice
Marianist Province of the U.S.



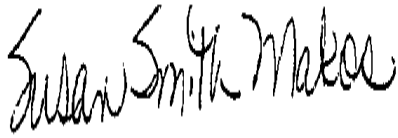
Catherine Rowan
Corporate Responsibility
Coordinator
Maryknoll Sisters



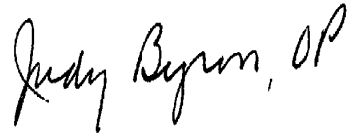
Joanne Dowdell
SVP, Director of Corporate Responsibility
Sentinel Financial Services Company



Julie Fox Gorte, Ph.D
Senior Vice President
for Sustainable Investing
PaxWorld LLC



Susan Makos
First Vice President
Mercy Investment Services, Inc.



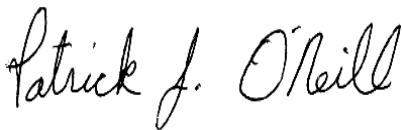
Judy Byron, OP
Director
**Northwest Coalition for
Responsible Investment**



Colin Melvin
Chief Executive
**Hermes Equity Ownership Services
L.P.**



Bob Walker
VP Sustainability
Northwest & Ethical Investments



Patrick J. O'Neill
Executive Vice President
Director, Organizing Department
UFCW International Union



Kenneth Colombo
Fund Coordinator
**Sheet Metal Workers' National
Pension Fund**



Abigail Herron
Corporate Governance Manager
Responsible Investment Team
The Co-operative Asset Management



Andrew Shapiro
President
**Lawndale Capital Management,
LLC**



Rian Fried
President
Clean Yield Asset Management



Constance Brookes
Executive Director
Friends Fiduciary Corporation