

# Inadequate Perk Disclosure Remains in SEC's Sights

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**A \$900,000 fine is a reminder for companies to use care in tracking and disclosing all elements of executive compensation.**

Executive perks may not be material to a company's financial condition. But the latest in a series of SEC cases shows that the expense, distraction, and potential reputational impact of an enforcement investigation can be significant.

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

**Ning Chiu**

+1 212 450 4908  
ning.chiu@davispolk.com

**Robert A. Cohen**

+1 202 962 7047  
robert.cohen@davispolk.com

**Edmond T. FitzGerald**

+1 212 450 4644  
edmond.fitzgerald@davispolk.com

**Joseph A. Hall**

+1 212 450 4565  
joseph.hall@davispolk.com

**Michael Kaplan**

+1 212 450 4111  
michael.kaplan@davispolk.com

**Kyoko Takahashi Lin**

+1 212 450 4706  
kyoko.lin@davispolk.com

**Stefani Johnson Myrick**

+1 202 962 7165  
stefani.myrick@davispolk.com

**Linda Chatman Thomsen**

+1 202 962 7125  
linda.thomsen@davispolk.com

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