

**PUBLICATIONS**

# SEC's Proxy Voting Proposal Could Shake Up Private Funds

**Law360**

**November 30, 2021**

On Sept. 29, the U.S. Securities and Exchange Commission proposed Rule 14Ad-1, which would require institutional investment managers subject to Section 13(f) reporting requirements to annually disclose their proxy votes on executive compensation matters. Currently, only registered funds are required to disclose their say-on-pay votes. If the rule is adopted, the universe of managers required to disclose their compensation votes would significantly broaden and would include many private fund managers for the first time.

**In this *Law360* article, partners Marc Elovitz and Kelly Koscuizka and special counsel Adriana Schwartz discuss the potential implications of the proposed rule.**

---

## Related People



**Marc  
Elovitz**

Partner  
New York



**Kelly  
Koscuiszka**

Partner  
New York



**Adriana  
Schwartz**

Partner  
New York

---

## Practices

**REGULATORY AND COMPLIANCE**

**INVESTMENT MANAGEMENT**

**SHAREHOLDER ACTIVISM**

---

## Attachments

↓ Download Article