

United States Senate
WASHINGTON, DC 20510

December 18, 2018

The Honorable Robert Jackson, Commissioner
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

Dear Commissioner Jackson,

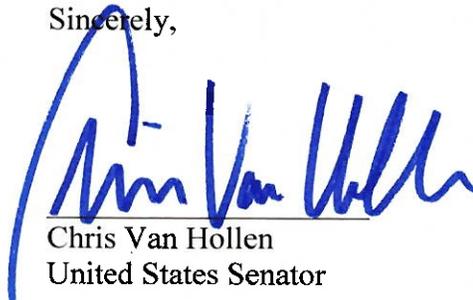
During the December 11, 2018, Senate Banking Committee's hearing on the oversight of the U.S. Securities and Exchange Commission (SEC), I had a dialogue with SEC Chairman Jay Clayton on stock buybacks and your recent findings regarding stock buybacks and when executives sell their shares.^[1]

During our exchange, I asked Chairman Clayton if he was concerned that your study found twice as many companies have insiders selling in the eight days after a buyback announcement as sell on an ordinary day. Chairman Clayton responded that the findings could be coincidental because the window might coincide with the period when executives are permitted to sell their stocks.

Since this is your research, I would like to give you the opportunity to respond to Chairman Clayton's comment. Therefore would you please confirm your findings and also discuss any tests for coincidence you conducted and other methods you used to account for statistical significance?

Thank you for your attention to this issue.

Sincerely,



Chris Van Hollen
United States Senator

^[1] Jackson, Robert. "Stock Buybacks and Corporate Cashouts." Washington, DC 2018. <https://www.sec.gov/news/speech/speech-jackson-061118>