May 27, 2013

Ms. Mary Jo White Chairman U.S. Securities and Exchange Commission 101 F Street NE Washington, DC 20549

Dear Ms. White:

Re: Disclosure Violations by Chevron Regarding Impact of its \$19 Billion Ecuador Judgment

We write to you as investors to ask that you investigate evidence that Chevron Corporation is violating securities laws by repeatedly making misrepresentations and material omissions regarding the impact on the company of its adverse judgment in Ecuador of \$19 billion for pollution of the land and water of rainforest communities.

We attach to this letter a report by Graham Erion, a securities lawyer licensed in Ontario and New York, which contains detailed information and analysis strongly suggesting that Chevron has breached its disclosure obligations as relates to this liability. The report essentially implicates Chevron management and board of directors in what appears to be an extensive failure to disclose the risks faced by the company regarding this litigation. Chevron's continued failure to adequately disclose these risks is potentially harmful to investors and the integrity of the financial markets.

As background, last May investors with over half a trillion of assets under management sent a letter to the company urging it to "fully disclose to shareholders the risks to its operations and business" from the Ecuador litigation. That same month, investors wrote the SEC, citing an earlier version of Graham Erion's report and asking that the agency investigate the adequacy of Chevron's reports to the SEC. Since then, the Ecuadorian plaintiffs have filed enforcement actions against significant Chevron assets in Canada and Brazil. In Argentina, a court has frozen \$2 billion of Chevron's assets in that country.

Chevron still has not fully disclosed the implications of having an enforceable \$19 billion judgment in Ecuador lodged against the company. Furthermore, Chevron has not only declined to address the issues raised by shareholders, the company has retaliated against a number of its investors by filing subpoenas demanding, amongst other things, communications between shareholders regarding approaching the SEC in this matter.

There appears to be numerous material misrepresentations by the company that warrant investigation. We urge you to focus attention on this important matter and make a determination as to whether Chevron has violated any disclosure obligations.

Sincerely,

Lauren Compere

Managing Director Boston Common Asset Management 84 State Street, Suite 1000 Boston, MA 02109

Sonia Kowal Director of Socially Responsible Investing Zevin Asset Management 11 Beacon Street, Suite 1125 Boston, MA 02108

Tim Brennan Treasurer and CFO Unitarian Universalist Association 25 Beacon Street Boston, MA 02108

Bruce Herbert Chief Executive Newground Social Investment 2206 Queen Anne Avenue N, Suite 402 Seattle, WA 98109

Hans Aasnæs CEO Storebrand Kapitalforvaltning (Asset Management) Professor Kohts vei 9 P.O. box 484 NO-1327 Lysaker Norway

Fr. Michael Hoolahan CP Treasurer Congregation of the Passion 1420 Renaissance Drive, Suite 312 Park Ridge, Illinois 60068

Jeffrey Scales, CFP[®], AIF[®] Managing Principal JSA FINANCIAL GROUP 7 Livingston St. Rhinebeck, NY 12572

Frank I. Sanchez Executive Director The Needmor Fund 42 South St. Clair Street Toledo, Ohio 43604 Shelley Moskowitz Manager of Public Policy and Mobilization Unitarian Universalist Service Committee 1100 G Street NW, Suite 800 Washington, DC 20005

Lars M. Lewander CEO Spring Water Asset Management 11431 N Port Washington Road, Suite 105-8 Mequon, WI 53092

Rev. Séamus P. Finn OMI Justice and Peace/Integrity of Creation Office Missionary Oblates of Mary Immaculate 391 Michigan Avenue NE Washington, DC 20017

Lincoln Pain, CFP[®], AIF[®] Effective Assets 1510 Walnut Street, Suite E Berkeley, CA 94709

Ruth Kuhn, SC Coordinator Region VI Coalition for Responsible Investment 5900 Delhi Road Mount St. Joseph, OH 45051

Ruth Kuhn, SC Chair Sisters of Charity of Cincinnati – Corporate Responsibility Committee 5900 Delhi Road Mount St. Joseph, OH 45051

cc:

Keith F. Higgins Director, Division of Corporate Finance U.S. Securities and Exchange Commission

H. Roger Schwall Assistant Director of Natural Resources, Division of Corporate Finance U.S. Securities and Exchange Commission

Elisse B. Walter Luis A. Aguilar Troy A. Paredes Daniel M. Gallagher Commissioners U.S. Securities and Exchange Commission