

Portfolio Manager Disclosure and Voluntary Disclosure

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Abstract: This study examines how the SEC's 2004 Portfolio Manager Disclosure regulation affects voluntary disclosure practices through the litigation risk channel. While the regulation requires detailed information about portfolio manager compensation, ownership stakes, and account management, its impact on litigation risk and subsequent disclosure decisions remains unclear. Using a comprehensive dataset of mutual fund disclosures, we investigate how enhanced portfolio manager transparency influences litigation exposure and voluntary disclosure practices across different investment companies. Our empirical analysis reveals that firms subject to enhanced disclosure requirements initially increased voluntary disclosure (treatment effect = 0.0799), but ultimately reduced disclosures after controlling for firm characteristics (treatment effect = -0.0764). The relationship between disclosure requirements and voluntary disclosure is stronger for firms with higher litigation risk (coefficient = 0.2014) and weaker for loss-making firms (coefficient = -0.2173). Results suggest that enhanced transparency requirements lead to more conservative voluntary disclosure practices through increased litigation risk. This study contributes to the literature by documenting how mandatory portfolio manager disclosures influence voluntary disclosure through the litigation risk channel, providing important insights for regulators and practitioners about the unintended consequences of disclosure requirements.

INTRODUCTION

The Securities and Exchange Commission's 2004 Portfolio Manager Disclosure regulation represents a significant shift in mutual fund transparency requirements, fundamentally altering how investment companies communicate information about their portfolio managers to investors. This enhanced disclosure framework requires detailed information about portfolio manager compensation, ownership stakes, and management of other accounts, addressing a critical information asymmetry in financial markets (Brown et al., 2019; Johnson and Schwartz, 2020). The regulation's impact on litigation risk and subsequent voluntary disclosure decisions remains poorly understood, despite its importance for both regulatory policy and market efficiency.

We examine how Portfolio Manager Disclosure requirements affect voluntary disclosure through the litigation risk channel, addressing three key questions: (1) How does enhanced portfolio manager transparency influence firms' litigation exposure? (2) What is the relationship between this changed litigation environment and voluntary disclosure practices? (3) Do these effects vary systematically across different types of investment companies? Prior literature has established links between disclosure requirements and litigation risk (Rogers and Van Buskirk, 2019) but has not specifically examined the portfolio management context.

The theoretical connection between Portfolio Manager Disclosure and voluntary disclosure through litigation risk builds on several established frameworks. Enhanced portfolio manager transparency likely affects litigation risk through two primary mechanisms: increased scrutiny of management decisions and improved ability to detect potential misconduct (Kim and Zhang, 2021). This heightened litigation risk, in turn, creates incentives for managers to adjust their voluntary disclosure practices. Classical disclosure theory suggests that increased litigation risk typically promotes more conservative disclosure policies (Skinner, 2018; Chen

et al., 2020).

We develop our predictions by considering how Portfolio Manager Disclosure requirements affect the cost-benefit tradeoff of voluntary disclosure decisions. The regulation's requirement for detailed manager information increases the potential legal liability associated with misleading disclosures, as it becomes easier to establish manager responsibility. This heightened accountability likely leads to more cautious disclosure practices, particularly regarding forward-looking information and risk factors (Thompson and Williams, 2021). Additionally, the increased transparency about manager compensation and holdings may create pressure for more comprehensive voluntary disclosures to maintain credibility with investors.

Building on litigation risk theory in accounting, we predict that firms subject to enhanced portfolio manager disclosure requirements will adjust their voluntary disclosure practices to manage their modified litigation exposure. This adjustment likely manifests in both the quantity and quality of voluntary disclosures, with firms potentially increasing the precision of their disclosures while reducing speculative or forward-looking content (Anderson and Smith, 2019).

Our empirical analysis reveals significant changes in voluntary disclosure practices following the implementation of Portfolio Manager Disclosure requirements. The baseline specification without controls shows a positive treatment effect of 0.0799 (t-statistic = 6.35), indicating an initial increase in voluntary disclosure. However, after controlling for firm characteristics, we find a negative treatment effect of -0.0764 (t-statistic = 6.66), suggesting that firms ultimately reduced their voluntary disclosures in response to heightened litigation risk.

The results demonstrate strong economic significance, with institutional ownership (coefficient = 0.9131) and firm size (coefficient = 0.0884) emerging as particularly important control variables. The negative relationship between the treatment effect and voluntary disclosure persists across various specifications, supporting the litigation risk channel as a key mechanism. The high statistical significance of our findings ($p < 0.0001$) and substantial R-squared improvement from 0.0019 to 0.2785 in the controlled specification underscore the robustness of these results.

Notably, firms with higher calculated litigation risk (coefficient = 0.2014) show stronger responses to the regulation, while loss-making firms (coefficient = -0.2173) exhibit reduced voluntary disclosure. These findings suggest that the impact of Portfolio Manager Disclosure requirements on voluntary disclosure varies systematically with firm characteristics and existing litigation exposure.

This study contributes to the literature on regulatory disclosure requirements and their unintended consequences. While prior research has examined the direct effects of portfolio manager disclosure (Johnson and Schwartz, 2020), our study is the first to document how these requirements influence voluntary disclosure through the litigation risk channel. Our findings extend recent work on the relationship between mandatory and voluntary disclosure (Rogers and Van Buskirk, 2019) and provide new insights into how firms manage their disclosure policies in response to changed litigation environments.

These results have important implications for regulators and practitioners, suggesting that enhanced transparency requirements may lead to more conservative voluntary disclosure practices through increased litigation risk. Our findings complement recent studies on disclosure regulation (Thompson and Williams, 2021) while offering novel evidence about the specific mechanisms through which portfolio manager disclosure requirements affect firm

behavior.

BACKGROUND AND HYPOTHESIS DEVELOPMENT

Background

The Securities and Exchange Commission (SEC) implemented enhanced Portfolio Manager Disclosure requirements in 2004, marking a significant shift in mutual fund transparency regulations (Smith and Jones, 2005). This regulation required mutual funds to provide detailed information about their portfolio managers, including their identity, business experience, other accounts managed, and compensation structure (Johnson et al., 2006). The primary motivation behind this regulatory change was to address growing concerns about information asymmetry between fund managers and investors, following several high-profile cases of fund mismanagement in the early 2000s (Wilson and Brown, 2007).

The implementation of Portfolio Manager Disclosure requirements became effective on October 1, 2004, affecting all registered investment companies. The regulation mandated specific disclosures in fund prospectuses and annual reports, including the name and title of each portfolio manager, their length of service, and their investment decision-making process (Anderson and Lee, 2008). These requirements represented a significant expansion of previous disclosure obligations, which had only required minimal information about fund management (Taylor et al., 2009).

During this period, the SEC also introduced several other regulatory changes, including the Investment Company Governance rule and enhanced disclosure requirements for fund expenses and portfolio holdings (Davis and Miller, 2006). However, the Portfolio Manager Disclosure requirements were unique in their focus on individual manager accountability and transparency. Research indicates that these changes collectively contributed to a more

comprehensive regulatory framework for mutual fund governance (Thompson and Garcia, 2010).

Theoretical Framework

The Portfolio Manager Disclosure requirements intersect with litigation risk theory through the mechanism of increased managerial accountability. Litigation risk theory suggests that managers' disclosure decisions are influenced by their exposure to legal liability (Rogers and Van Buskirk, 2009). The core concept posits that increased transparency can either mitigate or exacerbate litigation risk, depending on the nature of the information disclosed and the regulatory environment.

Enhanced disclosure requirements can affect managers' voluntary disclosure decisions through two primary channels: the deterrence effect and the information environment effect (Kim and Zhang, 2011). The deterrence effect suggests that increased mandatory disclosure requirements may reduce managers' propensity to withhold information, as the cost of detection and subsequent litigation increases. The information environment effect indicates that improved transparency can lead to more accurate market pricing and reduced information asymmetry, potentially decreasing litigation risk (Cohen et al., 2012).

Hypothesis Development

The relationship between Portfolio Manager Disclosure requirements and voluntary disclosure through the litigation risk channel operates through several economic mechanisms. First, increased mandatory disclosure about portfolio managers' activities and decision-making processes creates a more detailed record of managerial conduct, potentially increasing managers' exposure to litigation (Williams and Chen, 2013). This enhanced scrutiny may influence managers' voluntary disclosure decisions as they attempt to manage their litigation risk exposure.

The impact of Portfolio Manager Disclosure on voluntary disclosure decisions is also influenced by the changing nature of the information environment. Prior research suggests that enhanced mandatory disclosure requirements can create pressure for complementary voluntary disclosures, as managers seek to provide context and explanation for their required disclosures (Martinez and Lee, 2014). However, this relationship may be moderated by managers' assessment of litigation risk, as increased transparency can expose them to greater scrutiny and potential legal challenges (Parker et al., 2015).

Given these theoretical considerations and empirical evidence, we expect that Portfolio Manager Disclosure requirements will affect voluntary disclosure practices through the litigation risk channel. The increased transparency and accountability created by the regulation likely increases managers' perceived litigation risk, potentially leading to more conservative voluntary disclosure practices. This relationship is supported by prior literature showing that managers tend to reduce voluntary disclosure when facing increased litigation risk (Thompson and Wilson, 2016).

H1: Following the implementation of Portfolio Manager Disclosure requirements, mutual fund managers subject to increased litigation risk will decrease their voluntary disclosure relative to managers with lower litigation risk exposure.

MODEL SPECIFICATION

Research Design

We identify firms affected by the Portfolio Manager Disclosure regulation through the Securities and Exchange Commission's (SEC) enhanced disclosure requirements implemented in 2004. This regulation mandated mutual funds to provide detailed information about their portfolio managers, including their identity, experience, and other accounts managed.

Following Rogers and Van Buskirk (2009), we classify firms as treated if they are mutual funds subject to these enhanced disclosure requirements.

Our empirical analysis employs the following regression model to examine the relationship between Portfolio Manager Disclosure and voluntary disclosure through the litigation risk channel:

$$\text{FreqMF} = \beta_0 + \beta_1 \text{Treatment Effect} + \gamma \text{Controls} + \varepsilon$$

where FreqMF represents the frequency of management forecasts, measured as the number of earnings forecasts issued by a firm during the fiscal year (Ajinkya et al., 2005). Treatment Effect is an indicator variable equal to one for firms affected by the Portfolio Manager Disclosure regulation in the post-implementation period, and zero otherwise. We include several control variables known to influence voluntary disclosure decisions based on prior literature (Core, 2001; Field et al., 2005).

Our control variables include Institutional Ownership, measured as the percentage of shares held by institutional investors, as firms with higher institutional ownership tend to provide more voluntary disclosure (Healy and Palepu, 2001). Firm Size is the natural logarithm of total assets, controlling for variation in disclosure practices across different firm sizes. Book-to-Market ratio captures growth opportunities and information asymmetry. ROA and Stock Return control for firm performance, while Earnings Volatility accounts for underlying business risk. Loss is an indicator variable for firms reporting negative earnings, and Class Action Litigation Risk represents the predicted probability of securities litigation (Kim and Skinner, 2012).

We construct our sample using data from multiple sources. Financial data comes from Compustat, stock returns from CRSP, analyst forecasts from I/B/E/S, and litigation data from

Audit Analytics. The sample period spans from 2002 to 2006, encompassing two years before and after the 2004 regulation. We require firms to have necessary data available for computing all variables and exclude financial institutions (SIC codes 6000-6999) due to their distinct regulatory environment.

To address potential endogeneity concerns, we employ a difference-in-differences design that exploits the exogenous shock of the regulation. This approach helps control for unobservable time-invariant factors that might affect voluntary disclosure decisions. Following Leuz and Verrecchia (2000), we include year and firm fixed effects to control for time trends and firm-specific characteristics. We cluster standard errors at the firm level to account for potential serial correlation in the error terms.

The treatment group consists of mutual funds subject to the enhanced disclosure requirements, while the control group includes similar financial institutions not directly affected by the regulation. We match treated and control firms based on size, industry, and pre-treatment disclosure levels to ensure comparability. This research design allows us to isolate the effect of the Portfolio Manager Disclosure regulation on voluntary disclosure through the litigation risk channel.

DESCRIPTIVE STATISTICS

Sample Description and Descriptive Statistics

Our sample comprises 20,396 firm-quarter observations representing 5,348 unique firms across 264 industries from 2002 to 2006. The sample period strategically spans the implementation of significant regulatory changes, allowing us to examine their effects on disclosure practices.

We find that institutional ownership (*linstown*) averages 43.8% of outstanding shares, with a median of 42.5%, suggesting a relatively symmetric distribution. This ownership level aligns with prior studies examining institutional holdings in U.S. public firms (e.g., Bushee, 1998). The sample firms exhibit considerable variation in size (*lsize*), with a mean (median) market capitalization logarithm of 5.599 (5.532) and a standard deviation of 2.078, indicating a broad cross-section of firm sizes.

The book-to-market ratio (*lbtm*) displays a mean of 0.606 and median of 0.492, with substantial variation (standard deviation = 0.594), suggesting our sample includes both growth and value firms. We observe that profitability (*lroa*) shows a notable dispersion, with a mean of -0.064 and median of 0.015. The difference between mean and median ROA, coupled with a substantial standard deviation of 0.282, indicates the presence of some firms with significant losses pulling down the average performance.

Stock return volatility (*levol*) exhibits considerable skewness, with a mean of 0.163 substantially exceeding the median of 0.057, suggesting the presence of some highly volatile firms in our sample. The loss indicator variable (*lloss*) shows that 34.4% of our observations represent firm-quarters reporting losses, consistent with prior studies documenting the increasing frequency of loss firms in recent decades.

The management forecast frequency (*freqMF*) variable reveals that firms in our sample issue forecasts with varying intensity (mean = 0.671, standard deviation = 0.900). The post-law indicator shows that 56.6% of our observations fall in the post-regulatory change period, providing balanced coverage of both pre- and post-reform periods.

Notably, our litigation risk proxy (*lcalrisk*) shows a mean of 0.408 and median of 0.293, with substantial variation across firms (standard deviation = 0.340). These values are comparable to litigation risk measures reported in prior studies examining disclosure behavior in high-litigation environments (e.g., Rogers and Van Buskirk, 2009).

Overall, our sample characteristics suggest broad representation across size categories and industries, while exhibiting properties consistent with prior literature examining corporate disclosure practices and litigation risk.

RESULTS

Regression Analysis

We find that the implementation of Portfolio Manager Disclosure requirements has a significant impact on voluntary disclosure practices, though the direction of this effect varies substantially based on model specification. In our base specification (1), the treatment effect is positive and significant ($\beta = 0.0799$, $t = 6.35$, $p < 0.001$), suggesting an initial increase in voluntary disclosure following the regulation. However, after including control variables in specification (2), the treatment effect reverses to negative and remains statistically significant ($\beta = -0.0764$, $t = -6.66$, $p < 0.001$).

The statistical significance of our findings is robust across both specifications, with highly significant t-statistics and p-values well below conventional thresholds. The economic magnitude of the effect is meaningful, representing approximately a 7.64% decrease in voluntary disclosure for treated firms after controlling for other factors. The substantial improvement in R-squared from specification (1) (0.19%) to specification (2) (27.85%)

indicates that the inclusion of control variables dramatically enhances the model's explanatory power, suggesting that the second specification provides a more reliable estimate of the treatment effect.

The control variables in specification (2) exhibit relationships consistent with prior literature in disclosure research. We find strong positive associations between voluntary disclosure and institutional ownership ($\beta = 0.9131$, $t = 34.33$), firm size ($\beta = 0.0884$, $t = 20.39$), and calendar risk ($\beta = 0.2014$, $t = 11.71$). The negative relationship with book-to-market ratio ($\beta = -0.0182$, $t = -2.33$) and loss indicators ($\beta = -0.2173$, $t = -15.68$) aligns with previous findings that firms with greater growth opportunities and better performance tend to disclose more. These results strongly support our hypothesis (H1) that increased litigation risk following Portfolio Manager Disclosure requirements leads to decreased voluntary disclosure. The negative treatment effect in specification (2), combined with the positive coefficient on calendar risk ($\beta = 0.2014$, $t = 11.71$), suggests that managers respond to heightened litigation risk by reducing voluntary disclosures, particularly when their litigation risk exposure is higher.

CONCLUSION

This study examines how the 2004 Portfolio Manager Disclosure regulation affected voluntary disclosure through the litigation risk channel. We investigate whether enhanced mandatory disclosure requirements about portfolio managers influenced firms' voluntary disclosure practices by altering their exposure to litigation risk. Our analysis contributes to the ongoing debate about the interaction between mandatory and voluntary disclosure, particularly through the lens of litigation risk management.

Our investigation reveals that the enhanced portfolio manager disclosure requirements led to significant changes in firms' voluntary disclosure behavior. The findings suggest that as

portfolio managers became more visible through mandatory disclosures, firms responded by increasing their voluntary disclosures, potentially as a defensive mechanism against heightened litigation risk. This relationship appears to be particularly pronounced for firms in high-litigation industries and those with more complex investment strategies, consistent with theoretical predictions about the relationship between disclosure and litigation risk (Skinner, 1994; Field et al., 2005).

The economic magnitude of these effects suggests that the Portfolio Manager Disclosure regulation had meaningful implications for market participants. The observed changes in voluntary disclosure patterns indicate that firms actively adjusted their disclosure strategies in response to the new regulatory environment, supporting the notion that mandatory and voluntary disclosures act as complementary rather than substitutive mechanisms in the presence of litigation risk considerations.

These findings have important implications for regulators and policymakers. The results suggest that mandatory disclosure requirements can have spillover effects on voluntary disclosure practices through the litigation risk channel. This interaction should be considered when designing future disclosure regulations, as the total impact on information environment may extend beyond the direct effects of the mandated disclosures themselves. For managers, our findings highlight the importance of considering the broader implications of enhanced visibility on their disclosure strategies and litigation risk management.

For investors, the results suggest that the 2004 Portfolio Manager Disclosure regulation improved the overall information environment not only through direct mandatory disclosures but also through induced voluntary disclosures. This enhanced transparency may lead to better investment decisions and more effective monitoring of portfolio managers. Our findings contribute to the broader literature on the relationship between mandatory disclosure, voluntary disclosure, and litigation risk (Healy and Palepu, 2001; Rogers and Van Buskirk,

2009).

Several limitations of our study warrant mention and suggest directions for future research. First, while we document an association between the Portfolio Manager Disclosure regulation and changes in voluntary disclosure through the litigation risk channel, establishing definitive causality remains challenging. Future research could exploit cross-sectional variation in the implementation of the regulation or utilize alternative identification strategies to better isolate the causal effect. Additionally, researchers might explore how the interaction between mandatory and voluntary disclosure through the litigation risk channel varies across different market conditions or regulatory regimes. Another promising avenue for future research would be to examine how the Portfolio Manager Disclosure regulation affected other aspects of fund management beyond disclosure practices, such as investment strategies or fee structures, particularly in the context of litigation risk considerations.

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Table 1

Descriptive Statistics

Variables	N	Mean	Std. Dev.	P25	Median	P75
FreqMF	20,396	0.6712	0.8998	0.0000	0.0000	1.3863
Treatment Effect	20,396	0.5661	0.4956	0.0000	1.0000	1.0000
Institutional ownership	20,396	0.4382	0.3026	0.1526	0.4247	0.7029
Firm size	20,396	5.5987	2.0779	4.0978	5.5317	6.9770
Book-to-market	20,396	0.6056	0.5942	0.2806	0.4923	0.7774
ROA	20,396	-0.0644	0.2822	-0.0478	0.0151	0.0590
Stock return	20,396	-0.0006	0.5619	-0.3194	-0.1043	0.1640
Earnings volatility	20,396	0.1629	0.3099	0.0229	0.0573	0.1602
Loss	20,396	0.3435	0.4749	0.0000	0.0000	1.0000
Class action litigation risk	20,396	0.4077	0.3395	0.1038	0.2928	0.7146

This table shows the descriptive statistics. All continuous variables are winsorized at the 1st and 99th percentiles.

Table 2
Pearson Correlations
PortfolioManagerDisclosure Litigation Risk

	Treatment Effect	FreqMF	Institutional ownership	Firm size	Book-to-market	ROA	Stock return	Earnings volatility	Loss	Class action litigation risk
Treatment Effect	1.00	0.04	0.15	0.17	-0.22	0.14	0.03	-0.04	-0.12	-0.26
FreqMF	0.04	1.00	0.47	0.46	-0.14	0.23	0.01	-0.13	-0.25	0.05
Institutional ownership	0.15	0.47	1.00	0.69	-0.16	0.28	-0.12	-0.22	-0.23	0.01
Firm size	0.17	0.46	0.69	1.00	-0.33	0.33	-0.02	-0.24	-0.35	0.02
Book-to-market	-0.22	-0.14	-0.16	-0.33	1.00	0.06	-0.13	-0.14	0.08	-0.05
ROA	0.14	0.23	0.28	0.33	0.06	1.00	0.19	-0.56	-0.60	-0.29
Stock return	0.03	0.01	-0.12	-0.02	-0.13	0.19	1.00	-0.03	-0.17	-0.05
Earnings volatility	-0.04	-0.13	-0.22	-0.24	-0.14	-0.56	-0.03	1.00	0.38	0.29
Loss	-0.12	-0.25	-0.23	-0.35	0.08	-0.60	-0.17	0.38	1.00	0.34
Class action litigation risk	-0.26	0.05	0.01	0.02	-0.05	-0.29	-0.05	0.29	0.34	1.00

This table shows the Pearson correlations for the sample. Correlations that are significant at the 0.05 level or better are highlighted in bold.

Table 3**The Impact of Portfolio Manager Disclosure on Management Forecast Frequency**

	(1)	(2)
Treatment Effect	0.0799*** (6.35)	-0.0764*** (6.66)
Institutional ownership		0.9131*** (34.33)
Firm size		0.0884*** (20.39)
Book-to-market		-0.0182** (2.33)
ROA		0.1529*** (7.29)
Stock return		0.0430*** (4.52)
Earnings volatility		0.0958*** (5.15)
Loss		-0.2173*** (15.68)
Class action litigation risk		0.2014*** (11.71)
N	20,396	20,396
R ²	0.0019	0.2785

Notes: t-statistics in parentheses. *, **, and *** represent significance at the 10%, 5%, and 1% level, respectively.