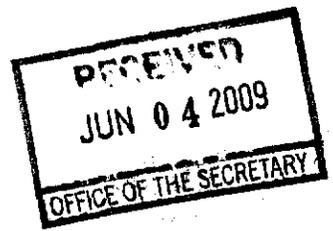




May 26, 2009

SEC File 4-583

Elizabeth M. Murphy, Secretary  
Securities and Exchange Commission  
100 F Street N.W. Room 10900  
Washington, D.C. 20549



Dear Ms. Murphy,

This letter is to support SEC File 4-583, a petition to request the SEC to amend Rule 14a-4(b)(1) to prohibit conferring discretionary authority to issuers regarding non-votes on the shareholder proxy.

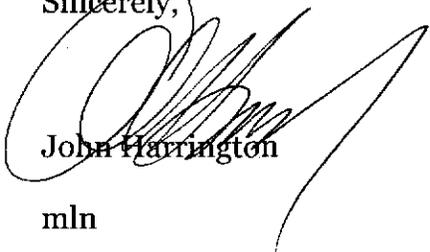
This petition is requesting that:

“When votes are cast and fields are left blank, the beneficial owner or security holder shall be deemed to have abstained on those matters. Furthermore, when votes are cast using an electronic platform a subsequent screen before final submission must warn the security holder in large font boldface red type that each field left blank will be treated as an abstention, and that no vote will be cast on their behalf regarding such matters.”

Harrington Investments, Inc. (HII) believes that when shareholders cast “blank votes” or do not vote, they should be counted as cast; “abstain.” Those voting electronically should be warned of each skipped vote, but non-votes should not be voted based upon preferences of brokers, management or the soliciting committee, since these parties are either self-interested, are parties in interest, have a clear conflict of interest, or at the very least, have interests not aligned with those of shareholders.

Clearly, without this change, the current corporate voting system is similar to a one-party Stalinist state. The deck is inevitably stacked against the owners in favor of corporate management, whose interests are to continue to control, without legal ownership responsibilities.

Sincerely,

  
John Harrington

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