

Dear Secretary Murphy,

I am writing to support the Shareholder Communications Coalition's (SCC) cause to streamline and improve the proxy process in the United States.

My name is Christopher J. Ryan and I am the CEO of Lakeland Industries, Inc (LAKE), a leading manufacturer of safety apparel and accessories for the industrial protective clothing market.

The existing system fails in a number of areas. All companies under the current system lack the ability to have direct access to a large portion of their shareholder base. The current distribution process is aimless and is not cost effective. However, the most disconcerting failure is the inability of the current single-provider system to provide true transparency and accountability. Proxy process accuracy cannot be guaranteed due to the lack of auditability and the absence of a confirmation process. Competition will undoubtedly improve the quality of both the proxy process and the tabulation results.

The SCC's proposed system remedies the failures of the current system. The new system would be cost-effective, utilizing electronic communication to decrease costs. Transparency would significantly increase with a multi-service-provider model instead of the current single-provider. There would be more accurate disclosure of shareholder positions, which would allow companies to have greater access to their shareholder base. And most importantly, there would be competitive bidding, which would ultimately result in a cost-effective system of distribution and tabulation. Finally, companies, including Lakeland, would have the assurance of full confirmation and auditability, both of which the current system lacks.

Thus, will public companies have to form a class and file complaints before the FTC and the Justice Department to force some competition here?

Secondly, your new voting rules for directors do not take into account the ability of hedge funds to work together secretly to take over boards and then loot the company using extreme leverage, consulting fees and fabulous board compensation. Boards set their own fees! The SEC has not been able to regulate hedge funds, frequency traders, ponzi schemes and insider trading (only occasionally); what makes the SEC think it can adequately follow and regulate hedge funds and crack pots making some 4,000-8,000 board voting proposals annually?

Thirdly, Sarbanes Oxley (although incredibly expensive) has not stopped fraud, nor did it stop the banking crisis. Further, the vast majority of erudite commentation believes the Dodd Frankel bill would not have stopped the Bear Stearns or Lehmann debacles.

Thank you for your consideration.

Best Regards,

Christopher J. Ryan, CEO/ General Counsel/Secretary  
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