

July 13, 2020

Ms. Vanessa A. Countryman  
Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090  
rule-comments@sec.gov

File No. S7-23-19

Dear Ms. Countryman:

This is an example of how investors with small holdings have a significant impact through their resolutions.

The McRitchie, Steiner and Chevedden proposals received 25 votes higher than 50% in 2020 so far.

Global Payments Inc. (GPN)  
Simple majority vote standard  
51%

The Boeing Company (BA)  
Independent chair  
52%

Marathon Petroleum Corporation (MPC)  
Simple majority vote standard  
98%

Netflix, Inc. (NFLX)  
Simple majority vote standard  
73%

Raytheon Technologies Corporation (RTX)  
Simple majority vote standard  
97%

Bloomin' Brands, Inc. (BLMN)  
Annual election of each director  
84%

Berry Plastics Group, Inc. (BERY)  
Written consent  
84%

Centene Corporation (CNC)  
Simple majority vote standard  
93%

FleetCor Technologies, Inc. (FLT)  
Special meeting  
78%

Duke Energy Corporation (DUK)  
Simple majority vote standard  
94%

International Business Machines Corporation (IBM)  
Shareholder right to remove directors without cause  
54%

Sonoco Products Company (SON)  
Special meeting  
54%

Cadence Design Systems, Inc. (CDNS)  
Special meeting  
54%

Baxter International Inc. (BAX)  
Independent chair  
54%

OGE Energy Corp. (OGE)  
Written consent  
79%

Stanley Black & Decker, Inc. (SWK)  
Written consent  
51%

Abbott Laboratories (ABT)  
Simple majority vote standard  
84%

E\*TRADE Financial Corporation (ETFC)  
Simple majority vote standard  
99%

Laboratory Corporation of America Holdings (LH)  
Special meeting  
53%

Verizon Communications Inc. (VZ)  
Special meeting  
52%

The Western Union Company (WU)  
Political spending disclosure  
53%

Alarm.com <<http://alarm.com/>> Holdings, Inc. (ALRM)  
Annual election of each director  
62%

New York Community Bancorp, Inc. (NYCB)  
Annual election of each director  
85%

Axon Enterprise, Inc. (AAXN)  
Annual election of each director  
84%

Activision Blizzard, Inc. (ATVI)  
Political spending disclosure  
58%

Sincerely,

  
John Chevedden