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Audit Report of U.S. Securities and Exchange Commission 14a-8 No-Action Letters

*A look into how liberal-aligned political
activists are shaping corporate policy through
shareholder proposals*



Consumers' Research Preliminary Audit Report of SEC 14a-8 No-Action Letters

EXECUTIVE SUMMARY:

In December 2022, Executive Director of Consumers' Research William Hild submitted a Shareholder proposal to ExxonMobil. Of the five proposals submitted to the Securities and Exchange Commission (SEC) for No-Action, it was the only proposal the SEC allowed ExxonMobil to exclude from proxy materials. This prompted Consumers' Research to ask: how do liberal-aligned proxy proposals fare compared to conservative-aligned proposals?

“Our examination showed conservatives are all but sitting out of the shareholder proposal process.”

In order to understand how politics are impacting corporate policy, Consumers' Research conducted a review of the SEC Rule 14a-8 No-Action letters from 2018-2022. Through this process, Consumers' Research uncovered a major finding related to America's corporate governance; liberal-aligned political activists are dominating shareholder proposal submissions.

Our examination showed conservatives are all but sitting out of the shareholder proposal process. In fact, one of the most compelling findings of this research is the lack of conservative proposals in the first place. As a result, conservatives have essentially ceded the ground to leftists.

From 2018-2022, there were 1,063 liberal-aligned shareholder proposals, 101 neutral shareholder proposals, 87 conservative-aligned shareholder proposals, and two shareholder proposals of unknown alignment submitted

to the SEC for No-Action. That is a rate of just over 12 liberal-aligned proposals to every one conservative-aligned shareholder proposal.

Still, across all 14a-8 categories, the SEC sided with companies requesting No-Action relief on conservative-aligned proposals at a significantly higher rate than their liberal counterparts. Our research found that 64% of the conservative-aligned proposals requested for No-Action were granted, while liberal-aligned proposals were granted No-Action relief by the SEC 52% of the time. However, as we will explain, the problem is much worse than even these numbers suggest.

Consumers' Research reviewed all 2023 SEC Rule 14a-8 No-Action letters. Using data from the SEC's website, Consumers' Research reviewed No-Action Responses Issued Under Exchange Act Rule 14a-8 from 2018 to 2022. Consumers' Research noted the Company Name, Date of Letter, Purpose of Proposal, whether the SEC recommended Action or No-Action, the rule used to justify Action/No-Action, the description of the rule, and the link to the letter provided by the SEC. In addition, Consumers' Research categorized each letter as Left, Right, Neutral, or Unknown. Consumers' Research used the content of proposals, proponents, supporting statements, public statements, and news reports to determine political alignment.

Proposals submitted to the SEC for No-Action from 2018-2022

1,063

Liberal-aligned shareholder proposals

101

Neutral shareholder proposals

87

Conservative-aligned shareholder proposals

2

Unknown aligned shareholder proposals

That is a rate of just over 12 liberal-aligned proposals to every one conservative-aligned shareholder proposal.

Consumers' Research also determined that when a proposal is withdrawn, that does not necessarily mean the proposal was not included in the proxy materials or implemented by the company. Withdrawals are also documented in this report. Consumers' Research included a category of our reasoning for each No-Action confirmation and withdrawal. These categories were determined internally by Consumers' Research as a best-fit measure. Consumers' Research had the data collection and methodology reviewed by a third party for accuracy.

Over a five-year period from 2018-2022, Consumers' Research found the only categories that the SEC did not grant liberal-aligned proposals No-Action at a higher rate than conservative proposals over the five years were 14a-8(i)(10), which had a 2% higher No-Action rate for liberal-aligned proposals and 14a-8(i)(5), where there was only one conservative-aligned proposal offered in the five-year period. This lack of parity across categories is highly unlikely without staff bias.

Across all 14a-8 categories, as noted above, the SEC sided with companies requesting No-Action relief on conservative-aligned proposals 64% of the time compared to 52% of the time for liberal-aligned proposals. Furthermore, in the most subjective 14a-8 categories, (i)(3), "Materially False or Misleading" and (i)(7), "Relates to Ordinary Business," the gaps were even wider. In cases where the company requested No-Action Relief under 14a-8(i)(3), liberal-aligned proposals were granted No-Action relief in 13% of cases while conservative-aligned proposals were granted No-Action relief in 27% of cases, more than double the rate of liberal-aligned proposals. For requests under 14a-8(i)(7), liberal-aligned proposals were granted No-Action relief in 47% of cases while conservative-aligned proposals were granted No-Action relief in 73% of cases, a more than 50% rate of increase.

Consumers' Research also notes that liberal-aligned shareholder proposals are far more likely to be withdrawn than

conservative-aligned shareholder proposals. In more than 40% of the cases where Consumers' Research could determine a reason for the withdrawal, the cause of the withdrawal of the proposal was due to the targeted company capitulating, all or in part, to the demands of the submitter. As most companies decide whether to fight or capitulate to a proposal based on the expected cost of fighting the proposal versus agreeing to it, this disparity in withdrawal rates indicates company recognition that the SEC would be more likely to deny No-Action relief on those liberal-aligned proposals because of internal SEC staff bias in favor of liberal-aligned proposals.

A key point for understanding the magnitude of these findings is the vast majority of conservative proposals are directed at constraining the focus of the target companies to returning value to shareholders, the purpose for which the corporate structure was created and the SEC is tasked with defending. Whereas the aim of most left leaning proposals was to force the companies to focus on issues extraneous, and usually detrimental, to making a profit or serving customers. As a result, one would expect that a balanced SEC focused on preventing proposals that were not germane to the purpose of the corporation would exclude a higher percentage of the left-wing proposals over the last five years. Instead, we see a significantly higher exclusion rate for conservative-aligned proposals.

Furthermore, the disparities in the granting of No-Action relief would likely be worse if more conservatives participated in the process, as the number of conservative-aligned shareholders submitting proposals is currently limited to a small group of legal and political professionals. This lack of participation itself is likely caused or contributed to by the SEC's bias. While the statutory bar for participation in the process is low, the uneven treatment discourages lay shareholders without sophistication in the shareholder proposal process from engaging because they rightly believe their efforts will probably be frustrated by SEC bias.

We hope that this report will shed light on this dire situation and encourage American consumers to stand up for their rights in the boardroom. Conservatives have been allowing a broken SEC to discourage them from fighting in a vital battleground for the direction of the country. To get to some level of parity, there will need to either be a significant effort by conservatives to level the playing field by increasing submissions, or the SEC must stop allowing the left to use the shareholder proposal process as a vehicle to force their political agenda on the American people.

INTRODUCTION:

In December of 2022, the Executive Director of Consumers' Research, William Hild, filed a Shareholder proposal for ExxonMobil. The proposal stated:

RESOLVED: Shareholders request that beginning in 2023, management report to shareholders annually regarding all interviews, speeches, writings or other significant communications relating to ExxonMobil given by members of the Board of Directors to the media or public. The report should include all information necessary for shareholders to monitor and review director communications to the public, including date and transcript, and omit any confidential business information.

On January 13, 2023, Exxonmobil wrote to the Securities and Exchange Commission (SEC) requesting confirmation that Mr. Hild's proposal could be excluded from Exxonmobil's 2023 proxy materials under Rule 14a-8(i)(7). On March 24, 2023, the SEC responded, concurring with Exxonmobil that Mr. Hild's proposal "...relates to, and does not transcend, ordinary business matters. Accordingly, we will not recommend enforcement action to the Commission if the Company omits the Proposal from its proxy materials in reliance on Rule 14a-8(i)(7)."

Of the five 2023 shareholder proposals Exxonmobil requested SEC confirmation for exclusion, Mr. Hild's was the only proposal that the SEC allowed Exxonmobil to exclude

from proxy materials. After examining the other 2023 Exxonmobil proposals, Consumers' Research staff discovered that the other proposals for which Exxonmobil requested No-Action confirmation came from politically liberal-aligned individuals and/or organizations.

This discovery prompted a Consumers' Research staff review of all other 2023 SEC Rule 14a-8 No-Action letters. Upon preliminary research, the SEC was more likely to issue No-Action guidance on conservative-aligned proposals than on liberal-aligned proposals.

Based upon the preliminary research, Consumers' Research also examined every SEC 14a-8 No-Action letter from the 2018 to 2022 proxy season – five years of complete data. This report and its accompanying data set aim to provide policymakers with some insight into how the SEC views conservative-aligned proposals compared to liberal-aligned proposals.

METHODOLOGY:

Using data from the SEC's website, Consumers' Research reviewed No-Action Responses Issued Under Exchange Act Rule 14a-8 from 2018 to 2022. Because the 2023 proxy season has not been completed, Consumers' Research has not included 2023 in this report. However, once the 2023 proxy season is complete, Consumers' Research will add the 2023 data and findings to the report.

Consumers' Research noted the Company Name, Date of Letter, Purpose of Proposal, whether the SEC recommended Action or No-Action, the rule used to justify Action/No-Action, the description of the rule, and the link to the letter provided by the SEC. For the 2021 proxy season, the SEC did not send reasoning letters for the majority of Shareholder proposals due to the pandemic. Consumers' Research has indicated that fact in our data tables. In addition, Consumers' Research categorized each letter as Left, Right, Neutral, or Unknown. Consumers' Research used the content of proposals, proponents, supporting statements, public statements, and news reports to determine political alignment. Consumers'

Research included a category of our reasoning for each.

These categories are:

- Conservative Civil Rights
- General Civil Rights
- Progressive Civil rights
- Known Conservative Investor
- Known Progressive Investor
- Progressive Environmentalism
- Progressive Government Submission
- General Company Management Issues

Initially, Consumers' Research categorized withdrawn proposals as No-Action. However, upon closer examination, Consumers' Research determined that the reasons proposals were withdrawn needed further specific categorization. Consumers' Research included a category of our reasoning for each. These categories were determined internally by Consumers' Research as a best-fit measure. While withdrawn proposal agreements are not always fully disclosed, Consumers' Research assigned proposals to these categories on publicly disclosed information.

These categories are:

- Company agreed to engage
- Company agreed to implement proposal
- Company agreed to include in proxy materials
- Company already implements proposal
- Company enacted proposal
- Company has already substantially implemented the proposal
- Company lacks power to implement proposal
- Duplicate proposal
- Legal Deficiency
- Pending Legal Action
- Withdrawal agreement undisclosed
- Proposal not offered
- Did not intend to submit proposal

Consumers' Research had the data collection methodology reviewed by a third party for accuracy. For ease of use and publication, Consumers' Research has removed the Purpose of the Proposal and the SEC's explanation of the Rule application from our published data tables. Those metrics are objective and are included in the link to each No-Action document.

APPENDIX A:

SEC REGULATIONS §240.14A-8 SHAREHOLDER PROPOSALS¹

This section addresses when a company must include a shareholder's proposal in its proxy statement and identify the proposal in its form of proxy when the company holds an annual or special meeting of shareholders. In summary, in order to have your shareholder proposal included on a company's proxy card and included along with any supporting statement in its proxy statement, you must be eligible and follow certain procedures. Under a few specific circumstances, the company is permitted to exclude your proposal, but only after submitting its reasons to the Commission. We structured this section in a question-and-answer format so that it is easier to understand. The references to "you" are to a shareholder seeking to submit the proposal.

- (a) **Question 1:** What is a proposal? A shareholder proposal is your recommendation or requirement that the company and/or its board of directors take action, which you intend to present at a meeting of the company's shareholders. Your proposal should state as clearly as possible the course of action that you believe the company should follow. If your proposal is placed on the company's proxy card, the company must also provide in the form of proxy means for shareholders to specify by boxes a choice between approval or disapproval or abstention. Unless otherwise indicated, the word "proposal," as used in this section, refers both to your proposal, and to your corresponding statement in support of your proposal (if any).
- (b) **Question 2:** Who is eligible to submit a proposal, and how do I demonstrate to the company that I am eligible? (1) To be eligible to submit a proposal, you must satisfy the following requirements:

- (i) You must have continuously held:
- (A) At least \$2,000 in market value of the company's securities entitled to vote on the proposal for at least three years; or
 - (B) At least \$15,000 in market value of the company's securities entitled to vote on the proposal for at least two years; or
 - (C) At least \$25,000 in market value of the company's securities entitled to vote on the proposal for at least one year; or
 - (D) The amounts specified in paragraph (b)(3) of this section. This paragraph (b)(1)(i)(D) will expire on the same date that §240.14a-8(b)(3) expires; and
- (ii) You must provide the company with a written statement that you intend to continue to hold the requisite amount of securities, determined in accordance with paragraph (b)(1)(i)(A) through (C) of this section, through the date of the shareholders' meeting for which the proposal is submitted; and
- (iii) You must provide the company with a written statement that you are able to meet with the company in person or via teleconference no less than 10 calendar days, nor more than 30 calendar days, after submission of the shareholder proposal. You must include your contact information as well as business days and specific times that you are available to discuss the proposal with the company. You must identify times that are within the regular business hours of the company's principal executive offices. If these hours are not disclosed in the company's proxy statement for the prior year's annual meeting, you must identify times that are between 9 a.m. and 5:30 p.m. in the time zone of the company's principal executive offices. If you elect to co-file a proposal, all co-filers must either:

¹ Due to the nature of the SEC's No-Action [Exceptions](#), Consumers' Research is including §240.14a-8 in its verbatim in this report for ease of reference.

- (A) Agree to the same dates and times of availability, or
 - (B) Identify a single lead filer who will provide dates and times of the lead filer's availability to engage on behalf of all co-filers; and
- (iv) If you use a representative to submit a shareholder proposal on your behalf, you must provide the company with written documentation that:
- (A) Identifies the company to which the proposal is directed;
 - (B) Identifies the annual or special meeting for which the proposal is submitted;
 - (C) Identifies you as the proponent and identifies the person acting on your behalf as your representative;
 - (D) Includes your statement authorizing the designated representative to submit the proposal and otherwise act on your behalf;
 - (E) Identifies the specific topic of the proposal to be submitted;
 - (F) Includes your statement supporting the proposal; and
 - (G) Is signed and dated by you.
- (v) The requirements of paragraph (b)(1)(iv) of this section shall not apply to shareholders that are entities so long as the representative's authority to act on the shareholder's behalf is apparent and self-evident such that a reasonable person would understand that the agent has authority to submit the proposal and otherwise act on the shareholder's behalf.
- (vi) For purposes of paragraph (b)(1)(i) of this section, you may not aggregate your holdings with those of another shareholder or group of shareholders to meet the requisite amount of securities necessary to be eligible to submit a proposal.
- (2) One of the following methods must be used to demonstrate your eligibility to submit a proposal:
- (i) If you are the registered holder of your securities, which means that your name appears in the company's records as a shareholder, the company can verify your eligibility on its own, although you will still have to provide the company with a written statement that you intend to continue to hold the requisite amount of securities, determined in accordance with paragraph (b)(1)(i)(A) through (C) of this section, through the date of the meeting of shareholders.
 - (ii) If, like many shareholders, you are not a registered holder, the company likely does not know that you are a shareholder, or how many shares you own. In this case, at the time you submit your proposal, you must prove your eligibility to the company in one of two ways:
 - (A) The first way is to submit to the company a written statement from the "record" holder of your securities (usually a broker or bank) verifying that, at the time you submitted your proposal, you continuously held at least \$2,000, \$15,000, or \$25,000 in market value of the company's securities entitled to vote on the proposal for at least three years, two years, or one year, respectively. You must also include your own written statement that you intend to continue to hold the requisite amount of securities, determined in accordance with paragraph (b)(1)(i)(A) through (C) of this section, through the date of the shareholders' meeting for which the proposal is submitted; or
 - (B) The second way to prove ownership applies only if you were required to file, and filed, a Schedule 13D (§240.13d-101), Schedule 13G (§240.13d-102), Form 3 (§249.103 of this chapter), Form 4 (§249.104 of this chapter), and/or Form 5 (§249.105 of this chapter), or amendments to those documents or updated forms, demonstrating that you meet at least one of the share ownership requirements under paragraph (b)(1)(i)

(A) through (C) of this section. If you have filed one or more of these documents with the SEC, you may demonstrate your eligibility to submit a proposal by submitting to the company:

- (1) A copy of the schedule(s) and/or form(s), and any subsequent amendments reporting a change in your ownership level;
 - (2) Your written statement that you continuously held at least \$2,000, \$15,000, or \$25,000 in market value of the company's securities entitled to vote on the proposal for at least three years, two years, or one year, respectively; and
 - (3) Your written statement that you intend to continue to hold the requisite amount of securities, determined in accordance with paragraph (b)(1)(i)(A) through (C) of this section, through the date of the company's annual or special meeting.
- (3) If you continuously held at least \$2,000 of a company's securities entitled to vote on the proposal for at least one year as of January 4, 2021, and you have continuously maintained a minimum investment of at least \$2,000 of such securities from January 4, 2021, through the date the proposal is submitted to the company, you will be eligible to submit a proposal to such company for an annual or special meeting to be held prior to January 1, 2023. If you rely on this provision, you must provide the company with your written statement that you intend to continue to hold at least \$2,000 of such securities through the date of the shareholders' meeting for which the proposal is submitted. You must also follow the procedures set forth in paragraph (b)(2) of this section to demonstrate that:
- (i) You continuously held at least \$2,000 of the company's securities entitled to vote on the proposal for at least one year as of January 4, 2021; and
 - (ii) You have continuously maintained a minimum

investment of at least \$2,000 of such securities from January 4, 2021 through the date the proposal is submitted to the company.

(iii) This paragraph (b)(3) will expire on January 1, 2023.

- (c) **Question 3:** How many proposals may I submit? Each person may submit no more than one proposal, directly or indirectly, to a company for a particular shareholders' meeting. A person may not rely on the securities holdings of another person for the purpose of meeting the eligibility requirements and submitting multiple proposals for a particular shareholders' meeting.
 - (d) **Question 4:** How long can my proposal be? The proposal, including any accompanying supporting statement, may not exceed 500 words.
 - (e) **Question 5:** What is the deadline for submitting a proposal? (1) If you are submitting your proposal for the company's annual meeting, you can in most cases find the deadline in last year's proxy statement. However, if the company did not hold an annual meeting last year or has changed the date of its meeting for this year more than 30 days from last year's meeting, you can usually find the deadline in one of the company's quarterly reports on Form 10-Q (§249.308a of this chapter), or in shareholder reports of investment companies under §270.30d-1 of this chapter of the Investment Company Act of 1940. In order to avoid controversy, shareholders should submit their proposals by means, including electronic means, that permit them to prove the date of delivery.
- (2) The deadline is calculated in the following manner if the proposal is submitted for a regularly scheduled annual meeting. The proposal must be received at the company's principal executive offices not less than 120 calendar days before the date of the company's proxy statement released to shareholders in connection with the previous year's annual meeting. However, if the company did not hold an annual meeting the previous year, or if the

date of this year's annual meeting has been changed by more than 30 days from the date of the previous year's meeting, then the deadline is a reasonable time before the company begins to print and send its proxy materials.

- (3) If you are submitting your proposal for a meeting of shareholders other than a regularly scheduled annual meeting, the deadline is a reasonable time before the company begins to print and send its proxy materials.
- (f) **Question 6:** What if I fail to follow one of the eligibility or procedural requirements explained in answers to Questions 1 through 4 of this section? (1) The company may exclude your proposal, but only after it has notified you of the problem and you have failed adequately to correct it. Within 14 calendar days of receiving your proposal, the company must notify you in writing of any procedural or eligibility deficiencies, as well as of the time frame for your response. Your response must be postmarked or transmitted electronically no later than 14 days from the date you received the company's notification. A company need not provide you with such notice of a deficiency if the deficiency cannot be remedied, such as if you fail to submit a proposal by the company's properly determined deadline. If the company intends to exclude the proposal, it will later have to make a submission under §240.14a-8 and provide you with a copy under Question 10 below, §240.14a-8(j).
- (2) If you fail in your promise to hold the required number of securities through the date of the meeting of shareholders, then the company will be permitted to exclude all of your proposals from its proxy materials for any meeting held in the following two calendar years.
- (g) **Question 7:** Who has the burden of persuading the Commission or its staff that my proposal can be excluded? Except as otherwise noted, the burden is on the company to demonstrate that it is entitled to exclude a proposal.

- (h) **Question 8:** Must I appear personally at the shareholders' meeting to present the proposal? (1) Either you, or your representative who is qualified under state law to present the proposal on your behalf, must attend the meeting to present the proposal. Whether you attend the meeting yourself or send a qualified representative to the meeting in your place, you should make sure that you, or your representative, follow the proper state law procedures for attending the meeting and/or presenting your proposal.
- (2) If the company holds its shareholder meeting in whole or in part via electronic media, and the company permits you or your representative to present your proposal via such media, then you may appear through electronic media rather than traveling to the meeting to appear in person.
- (3) If you or your qualified representative fail to appear and present the proposal, without good cause, the company will be permitted to exclude all of your proposals from its proxy materials for any meetings held in the following two calendar years.
 - (i) **Question 9:** If I have complied with the procedural requirements, on what other bases may a company rely to exclude my proposal? (1) Improper under state law: If the proposal is not a proper subject for action by shareholders under the laws of the jurisdiction of the company's organization;

NOTE TO PARAGRAPH (i)(1): Depending on the subject matter, some proposals are not considered proper under state law if they would be binding on the company if approved by shareholders. In our experience, most proposals that are cast as recommendations or requests that the board of directors take specified action are proper under state law. Accordingly, we will assume that a proposal drafted as a recommendation or suggestion is proper unless the company demonstrates otherwise.

- (2) **Violation of law:** If the proposal would, if implemented, cause the company to violate any state, federal, or foreign law to which it is subject;

NOTE TO PARAGRAPH (i)(2): We will not apply this basis for exclusion to permit exclusion of a proposal on grounds that it would violate foreign law if compliance with the foreign law would result in a violation of any state or federal law.

- (3) **Violation of proxy rules:** If the proposal or supporting statement is contrary to any of the Commission's proxy rules, including §240.14a-9, which prohibits materially false or misleading statements in proxy soliciting materials;
- (4) **Personal grievance; special interest:** If the proposal relates to the redress of a personal claim or grievance against the company or any other person, or if it is designed to result in a benefit to you, or to further a personal interest, which is not shared by the other shareholders at large;
- (5) **Relevance:** If the proposal relates to operations which account for less than 5 percent of the company's total assets at the end of its most recent fiscal year, and for less than 5 percent of its net earnings and gross sales for its most recent fiscal year, and is not otherwise significantly related to the company's business;
- (6) **Absence of power/authority:** If the company would lack the power or authority to implement the proposal;
- (7) **Management functions:** If the proposal deals with a matter relating to the company's ordinary business operations;
- (8) **Director elections:** If the proposal:
- (i) Would disqualify a nominee who is standing for election;
 - (ii) Would remove a director from office before his or her term expired;
 - (iii) Questions the competence, business judgment, or character of one or more nominees or directors;

- (iv) Seeks to include a specific individual in the company's proxy materials for election to the board of directors; or
- (v) Otherwise could affect the outcome of the upcoming election of directors.

- (9) **Conflicts with company's proposal:** If the proposal directly conflicts with one of the company's own proposals to be submitted to shareholders at the same meeting;

NOTE TO PARAGRAPH (i)(9): A company's submission to the Commission under this section should specify the points of conflict with the company's proposal.

- (10) **Substantially implemented:** If the company has already substantially implemented the proposal;

NOTE TO PARAGRAPH (i)(10): A company may exclude a shareholder proposal that would provide an advisory vote or seek future advisory votes to approve the compensation of executives as disclosed pursuant to Item 402 of Regulation S-K (§229.402 of this chapter) or any successor to Item 402 (a "say-on-pay vote") or that relates to the frequency of say-on-pay votes, provided that in the most recent shareholder vote required by

§240.14a-21(b) of this chapter a single year (i.e., one, two, or three years) received approval of a majority of votes cast on the matter and the company has adopted a policy on the frequency of say-on-pay votes that is consistent with the choice of the majority of votes cast in the most recent shareholder vote required by §240.14a-21(b) of this chapter.

- (11) **Duplication:** If the proposal substantially duplicates another proposal previously submitted to the company by another proponent that will be included in the company's proxy materials for the same meeting;
- (12) **Resubmissions.** If the proposal addresses substantially the same subject matter as a proposal, or proposals, previously included in the company's proxy materials

within the preceding five calendar years if the most recent vote occurred within the preceding three calendar years and the most recent vote was:

- (i) Less than 5 percent of the votes cast if previously voted on once;
 - (ii) Less than 15 percent of the votes cast if previously voted on twice; or
 - (iii) Less than 25 percent of the votes cast if previously voted on three or more times.
- (13) **Specific amount of dividends:** If the proposal relates to specific amounts of cash or stock dividends.
- (j) **Question 10:** What procedures must the company follow if it intends to exclude my proposal? (1) If the company intends to exclude a proposal from its proxy materials, it must file its reasons with the Commission no later than 80 calendar days before it files its definitive proxy statement and form of proxy with the Commission. The company must simultaneously provide you with a copy of its submission. The Commission staff may permit the company to make its submission later than 80 days before the company files its definitive proxy statement and form of proxy if the company demonstrates good cause for missing the deadline.
 - (2) The company must file six paper copies of the following:
 - (i) The proposal;
 - (ii) An explanation of why the company believes that it may exclude the proposal, which should, if possible, refer to the most recent applicable authority, such as prior Division letters issued under the rule; and
 - (iii) A supporting opinion of counsel when such reasons are based on matters of state or foreign law.
 - (k) **Question 11:** May I submit my own statement to the Commission responding to the company's arguments?

Yes, you may submit a response, but it is not required. You should try to submit any response to us, with a copy to the company, as soon as possible after the company makes its submission. This way, the Commission staff will have time to consider your submission fully before it issues its response. You should submit six paper copies of your response.

- (l) **Question 12:** If the company includes my shareholder proposal in its proxy materials, what information about me must it include along with the proposal itself?
 - (1) The company's proxy statement must include your name and address, as well as the number of the company's voting securities that you hold. However, instead of providing that information, the company may instead include a statement that it will provide the information to shareholders promptly upon receiving an oral or written request.
 - (2) The company is not responsible for the contents of your proposal or supporting statement.
- (m) **Question 13:** What can I do if the company includes in its proxy statement reasons why it believes shareholders should not vote in favor of my proposal, and I disagree with some of its statements?
 - (1) The company may elect to include in its proxy statement reasons why it believes shareholders should vote against your proposal. The company is allowed to make arguments reflecting its own point of view, just as you may express your own point of view in your proposal's supporting statement.
 - (2) However, if you believe that the company's opposition to your proposal contains materially false or misleading statements that may violate our anti-fraud rule, §240.14a-9, you should promptly send to the Commission staff and the company a letter explaining the reasons for your view, along with a copy of the company's statements opposing your proposal. To the extent possible, your letter

should include specific factual information demonstrating the inaccuracy of the company's claims. Time permitting, you may wish to try to work out your differences with the company by yourself before contacting the Commission staff.

- (3) We require the company to send you a copy of its statements opposing your proposal before it sends its proxy materials, so that you may bring to our attention any materially false or misleading statements, under the following timeframes:
 - (i) If our no-action response requires that you make revisions to your proposal or supporting statement as a condition to requiring the company to include it in its proxy materials, then the company must provide you with a copy of its opposition statements no later than 5 calendar days after the company receives a copy of your revised proposal; or
 - (ii) In all other cases, the company must provide you with a copy of its opposition statements no later than 30 calendar days before its files definitive copies of its proxy statement and form of proxy under §240.14a-6.

[63 FR 29119, May 28, 1998; 63 FR 50622, 50623, Sept. 22, 1998, as amended at 72 FR 4168, Jan. 29, 2007;

72 FR 70456, Dec. 11, 2007; 73 FR 977, Jan. 4, 2008; 76 FR 6045, Feb. 2, 2011; 75 FR 56782, Sept. 16, 2010;

85 FR 70294, Nov. 4, 2020]

EFFECTIVE DATE NOTE: At 85 FR 70294, Nov. 4, 2020, §240.14a-8 was amended by adding paragraph (b)(3), effective Jan. 4, 2021 through Jan. 1, 2023.

APPENDIX B:

FINDINGS

Rule 14a-8 Action/No-Action

Rule 14a-8(b)(1)(ii)

Rule 14a-8(b)(1)(ii): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(b)(1)(ii) on 0 of 1 liberal-aligned proposal.

Annual breakdown:

2022: 1 No-Action request

- 1 liberal-aligned
- No SEC concurrence in permitting exclusion

Rule 14a-8(b)(1)(iii)

Rule 14a-8(b)(1)(iii): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(b)(1)(iii) on 1 of 4 liberal-aligned proposals.

Annual breakdown:

2022: 4 No-Action requests

- 4 liberal-aligned
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal

Rule 14a-8(b)

Rule 14a-8(b): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(b) on 59 of 83 liberal-aligned proposals, 4 of 5 conservative-aligned proposals, 12 out of 12 neutral proposals, and 1 of 1 unknown proposals.

Annual breakdown:

2018: 8 No-Action requests

- 8 liberal-aligned
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals

2019: 15 No-Action requests

- 9 liberal-aligned
- 6 neutral
- SEC concurrence in permitting exclusion on 6 liberal-aligned proposals and 6 neutral proposals

2020: 26 No-Action requests

- 22 liberal-aligned
- 1 conservative-aligned
- 3 neutral
- SEC concurrence in permitting exclusion on 16 liberal-aligned proposals, 1 conservative-aligned proposal, and 3 neutral proposals

2021: 46 No-Action requests

- 39 liberal-aligned
- 3 conservative-aligned
- 3 neutral
- 1 unknown
- SEC concurrence in permitting exclusion on 33 liberal-aligned proposals, 3 conservative-aligned proposals, 3 neutral proposals, and 1 unknown

2022: 6 No-Action requests

- 5 liberal-aligned
- 1 conservative-aligned
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals

Rule 14a-8(c)

Rule 14a-8(c): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(c) on 6 of 17 liberal-aligned proposals and 1 out of 1 neutral proposals.

Annual breakdown:

2018: 2 No-Action requests

- 2 liberal-aligned
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposals

2019: 3 No-Action requests

- 3 liberal-aligned
- No SEC concurrence in permitting exclusion

2020: 2 No-Action requests

- 2 liberal-aligned
- No SEC concurrence in permitting exclusion

2021: 6 No-Action requests

- 5 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 4 liberal-aligned proposals and 1 neutral proposal

2022: 5 No-Action requests

- 5 liberal-aligned
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal

Rule 14a-8(e)(2)

Rule 14a-8(e)(2): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(e)(2) on 34 of 43 liberal-aligned proposals, 1 of 1 conservative-aligned proposals, and 10 out of 12 neutral proposals.

Annual breakdown:

2018: 9 No-Action requests

- 9 liberal-aligned
- SEC concurrence in permitting exclusion on 6 liberal-aligned proposals

2019: 5 No-Action requests

- 4 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 3 liberal-aligned proposals and 1 neutral proposals

2020: 17 No-Action requests

- 16 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 15 liberal-aligned

proposals and 1 neutral proposals

2021: 14 No-Action requests

- 8 liberal-aligned
- 6 neutral
- SEC concurrence in permitting exclusion on 5 liberal-aligned proposals and 4 neutral proposals

2022: 11 No-Action requests

- 6 liberal-aligned
- 1 conservative-aligned
- 4 neutral
- SEC concurrence in permitting exclusion on 5 liberal-aligned proposals, 1 conservative-aligned proposal, and 4 neutral proposals

Rule 14a-8(f)

Rule 14a-8(f): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(f) on 88 of 114 liberal-aligned proposals, 5 of 6 conservative-aligned proposals, 15 out of 15 neutral proposals, and 1 of 1 unknown proposals.

Annual breakdown:

2018: 19 No-Action requests

- 16 liberal-aligned
- 1 conservative-aligned
- 2 neutral
- SEC concurrence in permitting exclusion on 13 liberal-aligned proposals, 1 conservative-aligned proposal, and 2 neutral proposals

2019: 17 No-Action requests

- 10 liberal-aligned
- 1 conservative-aligned
- 6 neutral
- SEC concurrence in permitting exclusion on 7 liberal-aligned proposals, 1 conservative-aligned proposal, and 6 neutral proposals

2020: 26 No-Action requests

- 22 liberal-aligned
- 1 conservative-aligned
- 3 neutral
- SEC concurrence in permitting exclusion on 16 liberal-aligned proposals, 1 conservative-aligned proposal, and 3 neutral proposals

2021: 49 No-Action requests

- 43 liberal-aligned
- 2 conservative-aligned
- 3 neutral
- 1 unknown
- SEC concurrence in permitting exclusion on 36 liberal-aligned proposals, 2 conservative-aligned proposals, 3 neutral proposal, and 1 unknown proposal

2022: 25 No-Action requests

- 23 liberal-aligned
- 1 conservative-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 16 liberal-aligned proposals and 1 neutral proposals

Rule 14a-8(f)(1)

Rule 14a-8(f)(1): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(f)(1) on 0 of 1 liberal-aligned proposals.

Annual breakdown:

2022: 1 No-Action request

- 1 liberal-aligned
- No SEC concurrence in permitting exclusion

2022: 1 No-Action request

- 1 liberal-aligned
- No SEC concurrence in permitting exclusion

Rule 14a-8(h)(3)

Rule 14a-8(h)(3): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(h)(3) on 12 of 13 liberal-aligned proposals.

Annual breakdown:

2019: 3 No-Action requests

- 3 liberal-aligned
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals

2020: 2 No-Action requests

- 2 liberal-aligned
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals

2021: 7 No-Action requests

- 7 liberal-aligned
- SEC concurrence in permitting exclusion on 7 liberal-aligned proposals

2022: 1 No-Action request

- 1 liberal-aligned
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposals

Rule 14a-8(i)(1)

Rule 14a-8(i)(1): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(1) on 4 of 9 liberal-aligned proposals and 3 out of 4 neutral proposals.

Annual breakdown:

2018: 7 No-Action requests

- 6 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals and 1 neutral proposal

2019: 1 No-Action request

- 1 liberal-aligned
- No SEC concurrence in permitting exclusion

2021: 4 No-Action requests

- 2 liberal-aligned
- 2 neutral
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals and 2 neutral proposals

2022: 1 No-Action request

- 1 neutral
- No SEC concurrence in permitting exclusion

Rule 14a-8(i)(2)

Rule 14a-8(i)(2): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(2) on 12 of 26 liberal-aligned proposals and 4 out of 4 neutral proposals.

Annual breakdown:

2018: 7 No-Action requests

- 7 liberal-aligned
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals

2019: 4 No-Action requests

- 2 liberal-aligned
- 2 neutral
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposals and 2 neutral proposals

2020: 5 No-Action requests

- 4 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals and 1 neutral proposal

2021: 9 No-Action requests

- 8 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 5 liberal-aligned

proposals and 1 neutral proposal

2022: 5 No-Action requests

- 5 liberal-aligned
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals

Rule 14a-8(i)(3)

Rule 14a-8(i)(3): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(3) on 16 of 119 liberal-aligned proposals, 3 of 11 conservative-aligned proposals, and 4 out of 10 neutral proposals.

Annual breakdown:

2018: 35 No-Action requests

- 33 liberal-aligned
- 1 conservative-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal

2019: 22 No-Action requests

- 19 liberal-aligned
- 2 conservative-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals

2020: 20 No-Action requests

- 19 liberal-aligned
- 1 conservative-aligned
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals

2021: 35 No-Action requests

- 28 liberal-aligned
- 2 conservative-aligned
- 5 neutral
- SEC concurrence in permitting exclusion on 11 liberal-aligned proposals, 1 conservative-aligned proposal, and 4 neutral proposals

2022: 28 No-Action requests

- 20 liberal-aligned
- 5 conservative-aligned
- 3 neutral
- SEC concurrence in permitting exclusion on 2 conservative-aligned proposals

Rule 14a-8(i)(4)

Rule 14a-8(i)(4): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(4) on 3 of 5 liberal-aligned proposals and 4 out of 5 neutral proposals.

Annual breakdown:

2018: 2 No-Action requests

- 1 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 1 neutral proposal

2020: 3 No-Action requests

- 1 liberal-aligned
- 2 neutral
- SEC concurrence in permitting exclusion on 2 neutral proposals

2021: 3 No-Action requests

- 2 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals and 1 neutral proposals

2022: 2 No-Action requests

- 1 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposals

Rule 14a-8(i)(5)

Rule 14a-8(i)(5): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(5) on 7 of 18 liberal-aligned

proposals, 0 of 1 conservative-aligned proposals, and 0 out of 1 neutral proposals.

Annual breakdown:

2018: 7 No-Action requests

- 6 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposals

2019: 4 No-Action requests

- 3 liberal-aligned
- 1 conservative-aligned
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal

2020: 3 No-Action requests

- 3 liberal-aligned
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals

2021: 4 No-Action requests

- 4 liberal-aligned
- SEC concurrence in permitting exclusion on 3 liberal-aligned proposals, 3 conservative-aligned proposal, and 3 neutral proposals

2022: 2 No-Action requests

- 2 liberal-aligned
- No SEC concurrence in permitting exclusion

Rule 14a-8(i)(6)

Rule 14a-8(i)(6): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(6) on 7 of 19 liberal-aligned proposals and 4 out of 6 neutral proposals.

Annual breakdown:

2018: 8 No-Action requests

- 8 liberal-aligned
- SEC concurrence in permitting exclusion on 4 liberal-aligned proposals

2019: 7 No-Action requests

- 5 liberal-aligned
- 2 neutral
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal and 1 neutral proposal

2020: 2 No-Action requests

- 1 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal and 1 neutral proposal

2021: 4 No-Action requests

- 2 liberal-aligned
- 2 neutral
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal and 2 neutral proposals

2022: 4 No-Action requests

- 3 liberal-aligned
- 1 neutral
- No SEC concurrence in permitting exclusion

Rule 14a-8(i)(7)

Rule 14a-8(i)(7): From 2018 - 2022, the SEC confirmed No-Action under Rule 14a-8(i)(7) on 136 of 291 liberal-aligned proposals, 32 of 44 conservative-aligned proposals, and 35 out of 42 neutral proposals.

Annual breakdown:

2018: 70 No-Action requests

- 52 liberal-aligned
- 7 conservative-aligned
- 11 neutral
- SEC concurrence in permitting exclusion on 26 liberal-aligned proposals, 6 conservative-aligned proposals, and 9 neutral proposals

2019: 69 No-Action requests

- 57 liberal-aligned
- 4 conservative-aligned
- 8 neutral
- SEC concurrence in permitting exclusion on 30 liberal-aligned proposals, 1 conservative-aligned proposal, and 7 neutral proposals

2020: 71 No-Action requests

- 58 liberal-aligned
- 9 conservative-aligned
- 4 neutral
- SEC concurrence in permitting exclusion on 29 liberal-aligned proposals, 8 conservative-aligned proposals, and 4 neutral proposals

2021: 83 No-Action requests

- 57 liberal-aligned
- 15 conservative-aligned
- 11 neutral
- SEC concurrence in permitting exclusion on 35 liberal-aligned proposals, 12 conservative-aligned proposals, and 10 neutral proposals

2022: 84 No-Action requests

- 67 liberal-aligned
- 9 conservative-aligned
- 8 neutral
- SEC concurrence in permitting exclusion on 16 liberal-aligned proposals, 5 conservative-aligned proposals, and 5 neutral proposals

Rule 14a-8(i)(8)

Rule 14a-8(i)(8): From 2018 - 2022, the SEC confirmed No-Action under Rule 14a-8(i)(8) on 1 of 3 liberal-aligned proposals and 2 out of 3 neutral proposals.

Annual breakdown:

2018: 3 No-Action requests

- 3 liberal-aligned

- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal
- 2019: 1 No-Action requests
- 1 neutral
 - SEC concurrence in permitting exclusion on 1 neutral proposal
- 2021: 1 No-Action request
- 1 neutral
 - SEC concurrence in permitting exclusion on 1 neutral proposal
- 2022: 1 No-Action request
- 2 neutral
 - No SEC concurrence in permitting exclusion

Rule 14a-8(i)(8)(ii)

Rule 14a-8(i)(8)(ii): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(8)(ii) on 7 of 8 liberal-aligned proposals

Annual breakdown:

- 2018: 3 No-Action requests
- 3 liberal-aligned
 - SEC concurrence in permitting exclusion on 2 liberal-aligned proposals
- 2019: 4 No-Action requests
- 4 liberal-aligned
 - SEC concurrence in permitting exclusion on 4 liberal-aligned proposals
- 2022: 1 No-Action request
- 1 liberal-aligned
 - SEC concurrence in permitting exclusion on 1 liberal-aligned proposal

Rule 14a-8(i)(8)(iv)

Rule 14a-8(i)(8)(iv): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(8)(iv) on 1 of 1 liberal-aligned proposals and 2 out of 2 neutral proposals.

Annual breakdown:

- 2018: 1 No-Action request
- 1 neutral
 - SEC concurrence in permitting exclusion on 1 neutral proposal
- 2019: 1 No-Action request
- 1 neutral
 - SEC concurrence in permitting exclusion on 1 neutral proposal
- 2022: 1 No-Action request
- 1 liberal-aligned
 - SEC concurrence in permitting exclusion on 1 liberal-aligned proposal

Rule 14a-8(i)(9)

Rule 14a-8(i)(9): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(9) on 9 of 13 liberal-aligned proposals and 1 out of 1 neutral proposals.

Annual breakdown:

- 2018: 9 No-Action requests
- 9 liberal-aligned
 - SEC concurrence in permitting exclusion on 8 liberal-aligned proposals
- 2019: 15 No-Action requests
- 1 liberal-aligned
 - No SEC concurrence in permitting exclusion
- 2021: 2 No-Action requests
- 1 liberal-aligned
 - 1 neutral
 - SEC concurrence in permitting exclusion on 1 liberal-aligned proposals and 1 neutral proposals
- 2022: 2 No-Action requests
- 2 liberal-aligned
 - No SEC concurrence in permitting exclusion

Rule 14a-8(i)(10)

Rule 14a-8(i)(10): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(10) on 155 of 286 liberal-aligned proposals, 15 of 29 conservative-aligned proposals, and 8 out of 13 neutral proposals.

Annual breakdown:

2018: 59 No-Action requests

- 57 liberal-aligned
- 1 conservative-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 36 liberal-aligned proposals and 1 neutral proposal

2019: 58 No-Action requests

- 52 liberal-aligned
- 4 conservative-aligned
- 2 neutral
- SEC concurrence in permitting exclusion on 33 liberal-aligned proposals, 2 conservative-aligned proposals, and 2 neutral proposals

2020: 67 No-Action requests

- 60 liberal-aligned
- 6 conservative-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 41 liberal-aligned proposals, 5 conservative-aligned proposals, and 1 neutral proposal

2021: 80 No-Action requests

- 67 liberal-aligned
- 8 conservative-aligned
- 5 neutral
- SEC concurrence in permitting exclusion on 35 liberal-aligned proposals, 7 conservative-aligned proposals, and 4 neutral proposals

2022: 64 No-Action requests

- 50 liberal-aligned

- 10 conservative-aligned
- 4 neutral
- SEC concurrence in permitting exclusion on 10 liberal-aligned proposals, 1 conservative-aligned proposal

Rule 14a-8(i)(11)

Rule 14a-8(i)(11): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(11) on 17 of 33 liberal-aligned proposals, 3 of 3 conservative-aligned proposals, and 2 out of 2 neutral proposals.

Annual breakdown:

2018: 6 No-Action requests

- 6 liberal-aligned
- SEC concurrence in permitting exclusion on 5 liberal-aligned proposals

2019: 8 No-Action requests

- 7 liberal-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 5 liberal-aligned proposals and 1 neutral proposal

2020: 5 No-Action requests

- 4 liberal-aligned
- 1 conservative-aligned
- SEC concurrence in permitting exclusion on 3 liberal-aligned proposals and 1 conservative-aligned proposal

2021: 6 No-Action requests

- 6 liberal-aligned
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals

2022: 13 No-Action requests

- 10 liberal-aligned
- 2 conservative-aligned
- 1 neutral
- SEC concurrence in permitting exclusion on 2 liberal-aligned proposals, 2 conservative-aligned proposals, and 1 neutral proposal

Rule 14a-8(i)(12)(i)

Rule 14a-8(i)(12)(i): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(12)(i) on 1 of 2 liberal-aligned proposals and 2 of 2 conservative-aligned proposals.

Annual breakdown:

2019: 1 No-Action request

- 1 conservative-aligned
- SEC concurrence in permitting exclusion on 1 conservative-aligned proposal

2020: 1 No-Action request

- 1 conservative-aligned
- SEC concurrence in permitting exclusion on 1 conservative-aligned proposal

2021: 1 No-Action request

- 1 liberal-aligned
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal

2022: 1 No-Action request

- 1 liberal-aligned
- No SEC concurrence in permitting exclusion

Rule 14a-8(i)(12)(ii)

Rule 14a-8(i)(12)(ii): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(12)(ii) on 1 of 2 liberal-aligned proposals and 2 of 3 conservative-aligned proposals.

Annual breakdown:

2018: 1 No-Action request

- 1 conservative-aligned
- SEC concurrence in permitting exclusion on 1 conservative-aligned proposals

2020: 1 No-Action request

- 1 conservative-aligned
- No SEC concurrence in permitting exclusion

2021: 2 No-Action requests

- 1 liberal-aligned
- 1 conservative-aligned
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal and 1 conservative-aligned proposal

2022: 1 No-Action request

- 1 liberal-aligned
- No SEC concurrence in permitting exclusion

Rule 14a-8(i)(12)(iii)

Rule 14a-8(i)(12)(iii): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(12)(iii) on 6 of 8 liberal-aligned proposals.

Annual breakdown:

2018: 1 No-Action request

- 1 liberal-aligned
- SEC concurrence in permitting exclusion on 1 liberal-aligned proposal

2022: 7 No-Action requests

- 1 liberal-aligned
- 7 liberal-aligned
- SEC concurrence in permitting exclusion on 5 liberal-aligned proposals

Rule 14a-8(i)(13)

Rule 14a-8(i)(13): From 2018 – 2022, the SEC confirmed No-Action under Rule 14a-8(i)(13) on 4 out of 4 neutral proposals.

Annual breakdown:

2019: 1 No-Action request

- 1 neutral
- SEC concurrence in permitting exclusion on 1 neutral proposal

2020: 1 No-Action request

- 1 neutral
- SEC concurrence in permitting exclusion on 1 neutral proposal

2022: 2 No-Action requests

- 2 neutral
- SEC concurrence in permitting exclusion on 2 neutral proposals

Rule 14a-8 Withdrawn Proposals

Company agreed to engage:

From 2018 – 2022, the company agreed to engage on 52 liberal-aligned proposals and 1 neutral proposal.

2018: 6 Withdrawn proposals

- 6 liberal-aligned proposals

2019: 7 Withdrawn proposals

- 7 liberal-aligned proposals

2020: 5 Withdrawn proposals

- 5 liberal-aligned proposals

2021: 20 Withdrawn proposals

- 20 liberal-aligned proposals

2022: 15 Withdrawn proposals

- 14 liberal-aligned proposals
- 1 neutral proposal

Company agreed to implement proposal

From 2018 – 2022, the company agreed to implement 40 liberal-aligned proposals and 1 neutral proposal.

Annual breakdown:

2018: 11 Withdrawn proposals

- 11 liberal-aligned proposals

2019: 20 Withdrawn proposals

- 19 liberal-aligned proposals
- 1 neutral proposal

2020: 7 Withdrawn proposals

- 19 liberal-aligned proposals
- 1 neutral proposal

2021: 3 Withdrawn proposals

- 3 liberal-aligned proposals

2022: No Withdrawn proposals

Company agreed to include in proxy materials

From 2018 – 2022, the company agreed to include 7 liberal-aligned proposals in proxy materials.

Annual breakdown:

2018: 4 Withdrawn proposals

- 4 liberal-aligned proposals

2019: No Withdrawn proposals

2020: No Withdrawn proposals

2021: 2 Withdrawn proposals

- 2 liberal-aligned proposals

2022: 1 Withdrawn proposal

- 1 liberal-aligned proposal

Company already implements proposal

From 2018 – 2022, the company already implements 12 liberal-aligned proposals, 2 conservative-aligned proposals, and 1 neutral proposal.

Annual breakdown:

2018: 5 Withdrawn proposals

- 3 liberal-aligned proposals
- 2 conservative-aligned proposals

2019: 3 Withdrawn proposals

- 3 liberal-aligned proposals

2020: 1 Withdrawn proposal

- 1 liberal-aligned proposal

2021: No Withdrawn proposals

2022: 6 Withdrawn proposals

- 5 liberal-aligned proposals
- 1 neutral proposal

Company enacted proposal

From 2018 – 2022, the company enacted 13 liberal-aligned proposals.

Annual breakdown:

2018: No Withdrawn proposals

2019: No Withdrawn proposals

2020: No Withdrawn proposals

2021: 7 Withdrawn proposals

- 7 liberal-aligned proposals

2022: 6 Withdrawn proposals

- 6 liberal-aligned proposals

Company has already substantially implemented the proposal

From 2018 – 2022, companies already substantially implemented 17 liberal-aligned proposals.

Annual breakdown:

2018: 1 Withdrawn proposal

- 1 liberal-aligned proposal

2019: No Withdrawn proposals

2020: No Withdrawn proposals

2021: 15 Withdrawn proposals

- 15 liberal-aligned proposals

2022: 1 Withdrawn proposals

- 1 liberal-aligned proposal

Company lacks power to implement proposal

From 2018 – 2022, the company lacks the power to implement 1 liberal-aligned proposal.

Annual breakdown:

2018: No Withdrawn proposals

2019: No Withdrawn proposals

2020: No Withdrawn proposals

2021: No Withdrawn proposals

2022: 1 Withdrawn proposal

- 1 liberal aligned proposal

Duplicate proposal

From 2018 – 2022, there were 12 duplicate liberal-aligned proposals and 1 duplicate neutral proposal.

Annual breakdown:

2018: 3 Withdrawn proposals

- 3 liberal-aligned proposals

2019: 1 Withdrawn proposal

- 1 neutral proposal

2020: No Withdrawn proposals

2021: 4 Withdrawn proposals

- 4 liberal-aligned proposals

2022: 4 Withdrawn proposals

- 4 liberal-aligned proposals

Legal Deficiency

From 2018 – 2022, 41 liberal-aligned proposals, 1 conservative-aligned proposal, and 2 neutral proposals had a legal deficiency.

Annual breakdown:

2018: 3 Withdrawn proposals

- 3 liberal-aligned proposals

2019: 7 Withdrawn proposals

- 7 liberal-aligned proposals

2020: 3 Withdrawn proposals

- 3 liberal-aligned proposals

2021: 12 Withdrawn proposals
• 11 liberal-aligned proposals
• 1 conservative-aligned proposal

2022: 19 Withdrawn proposals
• 17 liberal-aligned proposals
• 2 neutral proposals

Pending Legal Action

From 2018 – 2022, there was pending legal action on 2 liberal-aligned proposals.

Annual breakdown:

2018: 1 Withdrawn proposal
• 1 liberal-aligned proposal

2019: No Withdrawn proposals

2020: No Withdrawn proposals

2021: No Withdrawn proposals

2022: 1 Withdrawn proposal
• 1 liberal-aligned proposal

Withdrawal agreement undisclosed

From 2018 – 2022, the withdrawal agreement was undisclosed on 39 liberal-aligned proposals, 1 conservative-aligned proposal, and 1 unknown proposal.

Annual breakdown:

2018: 12 Withdrawn proposals
• 11 liberal-aligned proposals
• 1 unknown proposal

2019: 8 Withdrawn proposals
• 8 liberal-aligned proposals

2020: 19 Withdrawn proposals
• 18 liberal-aligned proposals
• 1 conservative-aligned proposals

2021: 1 Withdrawn proposal
• 1 liberal-aligned proposal

2022: 1 Withdrawn proposal
• 1 liberal-aligned proposal

Proposal not offered

From 2018 – 2022, a proposal was not offered on 1 liberal-aligned proposal and 1 conservative-aligned proposal.

Annual breakdown:

2018: No Withdrawn proposals

2019: No Withdrawn proposals

2020: No Withdrawn proposals

2021: 2 Withdrawn proposals
• 1 liberal-aligned proposal
• 1 conservative-aligned proposal

2022: No Withdrawn proposals

Did not intend to submit proposal

From 2018 – 2022, shareholders did not intend to offer 6 liberal-aligned proposals.

Annual breakdown:

2018: No Withdrawn proposals

2019: No Withdrawn proposals

2020: 6 Withdrawn proposals
• 6 liberal-aligned proposals

2021: No Withdrawn proposals

2022: No Withdrawn proposals

CONCLUSION:

After complete analysis, Consumers' Research cannot determine conclusively whether the SEC is biased against conservative-aligned shareholder proposals or biased for liberal-aligned shareholders. While statistically, the SEC has granted No-Action relief to more conservative-aligned proposals than liberal-aligned proposals under Rule 14a-8, especially in the more subjective 14a-8 subcategories, there is too large of a gap between the number of liberal-aligned proposals and the number of conservative-aligned proposals.

Over the five years from 2018 - 2022, there were 1063 liberal-aligned shareholder proposals, 101 neutral shareholder proposals, 87 conservative-aligned shareholder proposals, and 2 shareholder proposals of unknown alignment, a rate of just over 12 liberal-aligned proposals to 1 conservative-aligned shareholder proposal.

While it is impossible to rule out that this lopsided submission ratio could indicate that externally perceived bias by the SEC is leading to a lack of conservative engagement in the proposal process, it could also simply be that conservatives are unaware of liberal activism in the shareholder process.

Statistically, the only categories that the SEC did not grant liberal-aligned proposals No-Action at a higher rate than conservative proposals over the five years were 14a-8(i)(10), which had a 2% higher No-Action rate for liberal-aligned proposals, and 14a-8(i)(5), where there was only one conservative-aligned proposal offered in the five years. This lack of parity across categories seems unlikely without staff bias.

Across all 14a-8 categories, the SEC sided with companies requesting No-Action relief on conservative-aligned proposals 64% of the time. Meanwhile, liberal-aligned proposals were only granted No-Action relief by the SEC 52% of the time. Furthermore, in the most subjective 14a-8 categories, (i)(3), "Materially False or Misleading" and (i)(7), "Relates to Ordinary Business," the gaps were even wider.

In cases where the company requested No-Action Relief under 14a-8(i)(3), liberal-aligned proposals were granted No-Action relief in 13% of cases, while conservative-aligned proposals were granted No-Action relief in 27% of cases, more than double the rate of liberal-aligned proposals. For requests under 14a-8(i)(7), liberal-aligned proposals were granted No-Action relief in 47% of cases, while conservative-aligned proposals were granted No-Action relief in 73% of cases, a more than 50% rate of increase.

One additional note: Once examined, it was clear that withdrawn proposals needed to be analyzed in a separate category. After analysis, Consumers' Research determined that when a proposal is withdrawn, that does not necessarily mean the proposal was not included in the proxy materials or implemented by the company. From 2018 - 2022, proposals were withdrawn for a host of reasons, including unilateral enactment.

Consumers' Research also notes that liberal-aligned shareholder proposals are far more likely to be withdrawn than conservative-aligned shareholder proposals. Of the proposals that Consumers' Research could determine a reason for withdrawal, more than 40% were to the benefit of the shareholder offering the proposal. Consumers' Research believes this indicates company recognition that the SEC would be likely to deny No-Action relief on these proposals because of internal SEC staff bias towards liberal-aligned proposals.

Ultimately, Consumers' Research found that there could be bias at the SEC, but it is impossible to definitively conclude such bias exists. Therefore, conservatives must begin to increase activity in the shareholder space. Many companies have had numerous liberal-aligned shareholder proposals pass through the proxy voting process or been adopted unilaterally through withdrawal agreements. These proposals include DEI board oversight of executive salaries, Net-Zero commitments, gun and abortion advocacy, and denouncement of conservative groups and politicians.

There must be an unwinding of these shareholder proposals and withdrawal agreements if corporate America to return focus back on consumers, rather than political issues. Such an unwinding will require a substantial increase in the number of conservative-aligned shareholder proposals. Furthermore, an increase in proposals offered would allow for additional analysis of SEC use of Rule 14a-8 to statistically determine staff bias.

Consumers' Research SEC No-Action Audit 2022

A Preliminary SEC No-Action Audit Report

COMPANY NAME	DATE OF LETTER	ACTION/NO ACTION	REASON	ALIGNMENT	EXPLANATION OF ALIGNMENT	LINK
3M Company	2/7/22	No Action	14a-8(i)(12)(iii)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcrichtie3m020722-14a8.pdf
Abbott Laboratories	2/2/22	Action	14a-8(c)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddensteinerabbott020222-14a8.pdf
AbbVie Inc.	3/11/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/fcabbvie031122-14a8.pdf
AbbVie Inc.	2/24/22	No Action	14a-8(b); 14a-8(f)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/creightonabbvie022422-14a8.pdf
AIM ImmunoTech Inc.	6/27/22	No Action	14a-8(i)(8)(iv)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/lautzaim062722-14a8.pdf
Air Products and Chemicals, Inc.	11/1/21	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/cummingsairproducts111521-14a8.pdf
Air Transport Services Group, Inc.	2/22/22	Withdrawn	Company agreed to include in proxy materials	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenatg022222-14a8.pdf
Alphabet Inc.	4/11/22	Action	14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ariunaalphabet041122-14a8.pdf
Alphabet Inc.	4/11/22	Action	14a-8(i)(12)(i)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/socalphabet041122-14a8.pdf
Alphabet Inc.	4/15/22	Action	14a-8(i)(3)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenalphabet041522-14a8.pdf
Alphabet Inc.	4/12/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/feigenalphabet041222-14a8.pdf
Alphabet Inc.	4/15/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/trilliumalphabet041522-14a8.pdf
Alphabet Inc.	4/12/22	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sumofusalphabet041222-14a8.pdf
Alphabet Inc.	4/12/22	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sustainabilityalphabet041222-14a8.pdf
Alphabet Inc.	4/11/22	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/wannenalphabet041122-14a8.pdf
Alphabet Inc.	4/15/22	Action	14a-8(i)(7); 14a-8(i)(10)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/hardyalphabet041522-14a8.pdf
Amazon.com, Inc.	4/7/22	Action	14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/manolisamazon040722-14a8.pdf
Amazon.com, Inc.	4/7/22	Action	14a-8(i)(11)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/newyorkamazon040722-14a8.pdf
Amazon.com, Inc.	4/5/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/omlusaamazon040522-14a8.pdf

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Amazon.com, Inc.	4/6/22	Action	14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/dadashidominiamazon040622-14a8.pdf
Amazon.com, Inc.	4/8/22	Action	14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ayraphaelamazon040822-14a8.pdf
Amazon.com, Inc.	4/6/22	No Action	14a-8(i)(11)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/dadashidominiamazon040622-14a8.pdf
Amazon.com, Inc.	4/5/22	No Action	14a-8(i)(12)(iii)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/campenamazon040522-14a8.pdf
Amazon.com, Inc.	4/8/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritchieamazon041122-14a8.pdf
Amazon.com, Inc.	4/7/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/uaw040722-14a8.pdf
Amazon.com, Inc.	4/8/22	No Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/aflicioamazon041122-14a8.pdf
Amazon.com, Inc.	2/28/22	Withdrawn	Duplicate proposal	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/teamstersmathernamazon022822-14a8.pdf
Amazon.com, Inc.	2/8/22	Withdrawn	Legal Deficiency	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/prentissamazon020822-14a8.pdf
Amazon.com, Inc.	2/28/22	Withdrawn	Company already implements proposal	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sistersamazon022822-14a8.pdf
American Express Company	3/11/22	No Action	14a-8(i)(7)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ncppramex031122-14a8.pdf
American Tower Corporation	2/8/22	No Action	14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenamerican020822-14a8.pdf
Anthem, Inc.	3/21/22	No Action	14a-8(i)(2)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenanthem032122-14a8.pdf
Apple Inc.	12/20/21	Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/saksapple122021-14a8.pdf
Apple Inc.	12/21/21	Action	14a-8(i)(10)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/azardapple122121-14a8.pdf
Apple Inc.	12/20/21	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/niaapple122021-14a8.pdf
Apple Inc.	12/20/21	No Action	14a-8(i)(11)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/nlpcapple122021-14a8.pdf
Apple Inc.	12/22/21	No Action	14a-8(i)(3)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/youngmcrichieapple122221-14a8.pdf
Apple Inc.	11/17/21	Withdrawn	Company already implements proposal	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/qcbfapple112321-14a8.pdf
Arlington Asset Investment Corp.	3/31/22	Action	14a-8(i)(1); 14a-8(i)(6); 14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(8); 14a-8(i)(10)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/arlingtonvapropp033122-14a8.pdf
AT&T Inc.	1/24/22	Action	14a-8(i)(3)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/zhaot&t012422-14a8.pdf
AT&T Inc.	1/26/22	No Action	14a-8(e)(2)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/chandatt012622-14a8.pdf
AT&T Inc.	3/10/22	No Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenatt031022-14a8.pdf

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AutoNation, Inc.	2/25/22	Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenautonation022522-14a8.pdf
AutoZone, Inc.	9/17/21	No Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/asyouowautozone101221-14a8.pdf
Avinger, Inc.	8/23/22	No Action	14a-8(f)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/zamanavinger082322-14a8.pdf
Badger Meter, Inc.	2/23/22	Action	14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/northstarbadger022322-14a8.pdf
Bank of America Corporation	3/1/22	No Action	14a-8(c)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddensteinerbao030122-14a8.pdf
Baxter International Inc.	1/12/22	Action	14a-8(c)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinerbaxter011222-14a8.pdf
Best Buy Co., Inc.	4/22/22	No Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenbestbuy042222-14a8.pdf
Best Buy Co., Inc.	3/23/22	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/teamstersbestbuy032322-14a8.pdf
BlackRock, Inc.	4/4/22	Action	14a-8(i)(2); 14a-8(i)(6); 14a-8(i)(3); 14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritechieblackrock040422-14a8.pdf
BlackRock, Inc.	4/4/22	No Action	14a-8(i)(7)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ncpprblackrock040422-14a8.pdf
Brinker International, Inc.	9/15/22	Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/humanebrinker091522-14a8.pdf
Broadridge Financial Solutions, Inc.	9/16/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritechiebroadridge091622-14a8.pdf
Charles River Laboratories International, Inc.	1/24/22	Withdrawn	Company already implements proposal	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/youngcnrl012422-14a8.pdf
Chemed Corporation	3/28/22	No Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenchemed032822-14a8.pdf
Cheniere Energy, Inc.	4/7/22	No Action	14a-8(f)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/taggartcheniere040722-14a8.pdf
Chubb Limited	3/26/22	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/greencenturychubb032622-14a8.pdf
Chubb Limited	3/26/22	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10); 14a-8(i)(11)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/asyouowchubb032622-14a8.pdf
Church & Dwight Co., Inc.	2/28/22	Action	14a-8(b)(1)(iii); 14a-8(f); 14a-8(i)(3)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenchurch022822-14a8.pdf
Cisco Systems, Inc.	10/3/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritechiecisco100322-14a8.pdf
Citigroup Inc.	3/7/22	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/harringtonbostoncitigroup030722-14a8.pdf

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Coca-Cola Consolidated, Inc	2/23/22	No Action	14a-8(i)(12)(iii)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/teamsterscocacola022322-14a8.pdf
Colgate-Palmolive Company	1/26/22	No Action	14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddencolgate012622-14a8.pdf
Comcast Corporation	4/13/22	Action	14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/kantorcomcast041322-14a8.pdf
Comcast Corporation	4/6/22	No Action	14a-8(h)(3)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddencomcast040622-14a8.pdf
Comcast Corporation	4/13/22	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/grossmancomcast041322-14a8.pdf
CoStar Group, Inc.	4/5/22	Action	14a-8(b)(1)(iii); 14a-8(f); 14a-8(f)(1)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddencostar040522-14a8.pdf
Costco Wholesale Corporation	11/15/21	No Action	14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/americanbaptistcostco111521-14a8.pdf
Costco Wholesale Corporation	11/12/21	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/gccmicostco111021-14a8.pdf
CVS Health Corporation	3/17/22	Action	14a-8(i)(3); 14a-8(i)(7)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ncpprcvcs031722-14a8.pdf
CVS Health Corporation	3/15/22	Action	14a-8(i)(5); 14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/youngcvcs031522-14a8.pdf
CVS Health Corporation	3/18/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/trilliumcvcs031822-14a8.pdf
DaVita Inc.	2/4/22	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/carpentersdavita020422-14a8.pdf
Deere & Company	1/3/22	No Action	14a-8(i)(7)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ncpprdeere010322-14a8.pdf
Deere & Company	11/12/21	Withdrawn	Company already implements proposal	Neutral	General Civil Rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/greencenturydeere111221-14a8.pdf
DexCom, Inc.	2/11/22	Withdrawn	Company already implements proposal	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/youngdexcom021122-14a8.pdf
Dollar Tree, Inc.	5/2/22	No Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/uniteddollar050222-14a8.pdf
Dominion Energy, Inc.	3/10/22	Action	14a-8(i)(10)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cathcartdominion031022-14a8.pdf
Dominion Energy, Inc.	2/22/22	Withdrawn	Company agreed to include in proxy materials in proxy materials	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/backerdominion022222-14a8.pdf
Dominion Energy, Inc.	2/4/22	Withdrawn	Company agreed to engage	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/newyorkdominion020422-14a8.pdf
Dow Inc.	2/15/22	Action	14a-8(b); 14a-8(f)	left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddendow021522-14a8.pdf
Dow Inc.	2/15/22	No Action	14a-8(e)(2)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/behardow021522-14a8.pdf

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DuPont de Nemours, Inc.	2/7/22	Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinerdupont020722-14a8.pdf
Eagle Bancorp, Inc.	3/29/22	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/hamiltoneagle032922-14a8.pdf
Edison International	2/23/22	No Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenedison022322.pdf
Edwards Lifesciences Corporation	12/22/21	Withdrawn	Legal Deficiency	left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/youngedwards122221-14a8.pdf
Eli Lilly and Company	3/7/22	Action	14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/trinitylilly030722-14a8.pdf
Eli Lilly and Company	12/23/21	Action	14a-8(i)(10); 14a-8(i)(11)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/commonspintelilly030822-14a8.pdf
Eli Lilly and Company	3/9/22	Action	14a-8(i)(10); 14a-8(i)(11)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/seuelililly030922-14a8.pdf
Eli Lilly and Company	1/26/22	Withdrawn	Duplicate proposal	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/asyousowellililly012622-14a8.pdf
Etsy, Inc.	4/19/22	No Action	14a-8(e)(2)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/calpersetsy041922-14a8.pdf
Etsy, Inc.	2/2/22	Withdrawn	Company enacted proposal	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/hulletetsy030222-14a8.pdf
Etsy, Inc.	2/7/22	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/carpentersetsy020722-14a8.pdf
Exact Sciences Corporation	4/22/22	Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritchieexact042222-14a8.pdf
Expeditors International of Washington, Inc.	3/22/22	Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenexpeditors032222-14a8.pdf
Exxonmobil Corporation	3/15/22	No Action	14a-8(i)(12)(iii)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinercheveddenexxon031522-14a8.pdf
Exxonmobil Corporation	3/22/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/aflicioexxon032222-14a8.pdf
Exxonmobil Corporation	2/10/22	Withdrawn	Legal Deficiency	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/vermontexxon021022-14a8.pdf
Fortive Corporation	4/11/22	Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenfortive041122-14a8.pdf
Fox Corporation	9/6/22	Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddensteinerfox090622-14a8.pdf
GameStop Corp.	4/21/22	No Action	14a-8(e)(2)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sapienzagamestop042122-14a.pdf
GameStop Corp.	4/21/22	No Action	14a-8(e)(2)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sapienzagamestop042122-14a.pdf

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GameStop Corp.	4/21/22	No Action	14a-8(e)(2)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/crandallgamestop042122-14a8.pdf
General Electric Company	3/14/22	Action	14a-8(i)(3); 14a-8(i)(4); 14a-8(i)(7); 14a-8(i)(10)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/harangozoge031422-14a8.pdf
General Electric Company	1/6/22	Withdrawn	Duplicate proposal	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/socge010622-14a8.pdf
General Motors Company	4/18/22	Action	14a-8(i)(10)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/nlpcgm041822-14a8.pdf
Gilead Sciences, Inc.	3/14/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/maryknollgilead031422-14a8.pdf
IDACORP, Inc.	4/1/22	No Action	14a-8(i)(10)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/tidwellidacorp040122-14a8.pdf
Intel Corporation	3/16/22	Action	14a-8(i)(3)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenintel031622-14a8.pdf
Intel Corporation	3/18/22	No Action	14a-8(i)(7)	Right	Conservative Civil Rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/hotzintel031822-14a8.pdf
Intercontinental Exchange, Inc.	3/15/22	Action	14a-8(i)(9)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenice031522-14a8.pdf
International Business Machines Corporation	2/8/22	No Action	14a-8(e)(2)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/chandibm020822-14a8.pdf
International Business Machines Corporation	12/29/21	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/moritchieibm122921-14a8.pdf
IQVIA Holdings Inc.	1/12/22	Action	14a-8(c)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/youngiqvia011222-14a8.pdf
IQVIA Holdings Inc.	1/20/22	No Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddeniqvia012022-14a8.pdf
J.B. Hunt Transport Services, Inc.	1/26/22	Withdrawn	Legal Deficiency	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/trilliumjbhunt012622-14a8.pdf
Johnson & Johnson	2/7/22	Action	14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/oxfamjohnson020722-14a8.pdf
Johnson & Johnson	2/9/22	Action	14a-8(i)(10)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/nlpcjohnson020922-14a8.pdf
Johnson & Johnson	2/11/22	Action	14a-8(i)(11)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mercyjohnson021122-14a8.pdf
Johnson & Johnson	3/3/22	Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ritterjohnson030322-14a8.pdf
Johnson & Johnson	3/4/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sharehldbmsjohnson030422-14a8.pdf
Johnson & Johnson	3/2/22	Action	14a-8(i)(7)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/vermontjohnson030222-14a8.pdf

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Johnson & Johnson	2/8/22	Action	14a-8(i)(7); 14a-8(i)(11)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/fieldjohnson020822-14a8.pdf
JPMorgan Chase & Co.	3/17/22	Action	14a-8(i)(10)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/nlpcjpmorgan031722-14a8.pdf
JPMorgan Chase & Co.	3/25/22	Action	14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mercyjpmorgan032522-14a8.pdf
JPMorgan Chase & Co.	3/25/22	Action	14a-8(i)(7); 14a-8(i)(11)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sierrajpmorgan032522-14a8.pdf
JPMorgan Chase & Co.	3/25/22	No Action	14a-8(b); 14a-8(f)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/armitagejpmorgan032522-14a8.pdf
JPMorgan Chase & Co.	3/25/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritchiejpmorgan032522-14a8.pdf
JPMorgan Chase & Co.	3/25/22	No Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ottjpmorgan032522-14a8.pdf
JPMorgan Chase & Co.	1/28/22	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/bostonjpmorgan012822-14a8.pdf
KeyCorp	2/8/22	No Action	14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenkeycorp020822-14a8.pdf
Kinder Morgan, Inc.	2/14/20222	Withdrawn	Company agreed to engage	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/asyousowkinder021422-14a8.pdf
Laboratory Corporation of America Holdings	3/3/22	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenlabcorp030322-14a8.pdf
Lantheus Holdings, Inc.	3/11/22	Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritchielantheus031122-14a8.pdf
Legacy Housing Corporation	10/5/22	No Action	14a-8(f)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/pperslegacy100522-14a8.pdf
Levi Strauss & Co.	2/8/22	Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/peta020822-14a8.pdf
Levi Strauss & Co.	2/10/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ncpprlevi021022-14a8.pdf
Lowe's Companies, Inc.	4/7/22	Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/teamsterlowes040722-14a8.pdf
Lowe's Companies, Inc.	4/7/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/efalowes040722-14a8.pdf
Mastercard Incorporated	4/22/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ersimastercard042222-14a8.pdf
McDonald's Corporation	4/5/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/socmcdonalds040522-14a8.pdf
Merck & Co., Inc.	2/15/22	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/carpentersmerck021522-14a8.pdf
Meta Platforms, Inc.	4/2/22	Action	14a-8(i)(10)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ncpprmeta040222-14a8.pdf

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Meta Platforms, Inc.	3/31/22	Action	14a-8(i)(12)(iii)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/asyouowmeta033122-14a8.pdf
Meta Platforms, Inc.	4/2/22	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/shareholdermeta040222-14a8.pdf
Meta Platforms, Inc.	4/2/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/arjunameta040222-14a8.pdf
Meta Platforms, Inc.	3/30/22	Action	14a-8(i)(7); 14a-8(i)(12)(ii)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mercymeta033022-14a8.pdf
Meta Platforms, Inc.	4/2/22	No Action	14a-8(f)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/zevinmeta040222-14a8.pdf
Meta Platforms, Inc.	3/17/22	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritchiemeta031722-14a8.pdf
Microsoft Corporation	4/7/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritchiemicrosoft0100722-14a8.pdf
Moderna, Inc.	2/8/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/oxfammoderna020822-14a8.pdf
Moderna, Inc.	2/17/22	Withdrawn	Company enacted proposal	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/lqimamoderna021722-14a8.pdf
Moody's Corporation	1/26/22	Withdrawn	Company already implements proposal	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritchiemoody012622-14a8.pdf
Morgan Stanley	3/25/22	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sierramorgan032522-14a8.pdf
NextEra Energy, Inc.	3/4/22	Action	14a-8(b); 14a-8(f); 14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/youngnextera030422-14a8.pdf
NextEra Energy, Inc.	1/12/22	Withdrawn	Company agreed to engage	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/connecticutnextera011222-14a8.pdf
Northrop Grumman Corporation	2/16/22	Withdrawn	Legal Deficiency	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sistersnorthrop021622-14a8.pdf
Occidental Petroleum Corporation	3/15/22	Action	14a-8(i)(10)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/bentaoccidental031522-14a8.pdf
OGE Energy Corp.	3/22/22	Action	14a-8(i)(9); 14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenoge032222-14a8.pdf
PayPal Holdings, Inc.	4/7/22	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/heagypaypal040722-14a8.pdf
PepsiCo, Inc.	3/12/22	Action	14a-8(c)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/harringtonpepsico031222-14a8.pdf
PepsiCo, Inc.	2/8/22	No Action	14a-8(i)(11)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/nlpcpepsico020822-14a8.pdf

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PepsiCo, Inc.	3/14/22	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/youngpepsico031422-14a8.pdf
Pfizer Inc.	2/10/22	Action	14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/leventhalwaltonpfizer021022-14a8.pdf
Pfizer Inc.	2/22/22	Action	14a-8(i)(10)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/incpprfpfizer022222-14a8.pdf
Pfizer Inc.	3/8/22	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sfrancispfizer030822-14a8.pdf
Pfizer Inc.	2/23/22	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/oxfampfizer022322-14a8.pdf
Pfizer Inc.	2/24/22	Action	14a-8(i)(7); 14a-8(i)(10); 14a-8(i)(11)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/bishoppfizer022422-14a8.pdf
Pfizer Inc.	2/22/22	No Action	14a-8(i)(11)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/tarapfizer022222-14a8.pdf
Pfizer Inc.	1/20/22	No Action	14a-8(i)(12)(iii)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinerpfizer012022-14a8.pdf
Pfizer Inc.	2/11/22	Withdrawn	Company agreed to engage	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/trinitypfizer021122-14a8.pdf
Post Holdings, Inc.	10/29/21	Withdrawn	Company agreed to engage	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/fspapost110421-14a8.pdf
PPG Industries, Inc.	3/1/22	No Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenppg030122-14a8.pdf
PPL Corporation	3/9/22	No Action	14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinerppl030922-14a8.pdf
Qumu Corporation	4/5/22	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/dolphinqumu040522-14a8.pdf
Quotient Technology Inc.	5/6/22	No Action	14a-8(i)(2); 14a-8(e)(2)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/pomeroyquotient050622-14a8.pdf
Redfin Corporation	4/22/22	Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritchieredfin042222-14a8.pdf
Reliance Steel & Aluminum Co.	1/19/22	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenreliance011922-14a8.pdf
Repligen Corporation	4/1/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/youngrepligen040122-14a8.pdf
Rite Aid Corporation	5/3/22	Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinerriteaid050322-14a8.pdf

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Rite Aid Corporation	5/2/22	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/krolriteaid050222-14a8.pdf
Ruth's Hospitality Group, Inc.	4/8/22	No Action	14a-8(i)(13)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/tingasruth041122-14a8.pdf
S&P Global Inc.	2/1/22	Withdrawn	Legal Deficiency	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritechieyoungsp020122-14a8.pdf
salesforce.com, inc.	3/10/22	Withdrawn	Duplicate proposal	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/jzdsalesforce031022-14a8.pdf
Sempra Energy	3/15/22	No Action	14a-8(i)(4)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/garciasempra031522-14a8.pdf
Snowflake Inc.	3/22/22	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritechiesnowflake032222-14a8.pdf
South Jersey Industries, Inc.	1/18/22	Withdrawn	Legal Deficiency	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/kaufmannsouthjersey011822-14a8.pdf
Southwestern Energy Company	3/15/22	Action	14a-8(b)(1)(iii); 14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinersouthwestern031522-14a8.pdf
Starbucks Corporation	1/19/22	No Action	14a-8(i)(10)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcprrstarbucks011922-14a8.pdf
Starbucks Corporation	11/18/21	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/mcritechiastarbucks112321-14a8.pdf
State Street Corporation	4/1/22	Action	14a-8(i)(2); 14a-8(i)(6); 14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritechiastatestreet040122-14a8.pdf
STERIS plc	3/23/22	Withdrawn	Company has already substantially implemented the Proposal	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritechisteris052322-14a8.pdf
Stryker Corporation	2/7/22	Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/youngstryker020722-14a8.pdf
Target Corporation	2/22/22	Withdrawn	Company agreed to engage	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mercycartarget022222-14a8.pdf
Target Corporation	3/2/22	Withdrawn	Company enacted proposal	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/soctarget030222-14a8.pdf
Target Corporation	2/15/22	Withdrawn	Company agreed to engage	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/videnttarget021522-14a8.pdf
Teladoc Health, Inc.	1/31/22	Withdrawn	Company agreed to include in proxy materials in proxy materials	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritechieladoc013122-14a8.pdf
Tesla, Inc.	5/6/22	No Action	14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sumtristesta0506221-14a8.pdf
Texas Instruments Incorporated	2/18/22	Withdrawn	Company enacted proposal	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/njcpftexas021822-14a8.pdf
Texas Pacific Land Corporation	9/26/22	Action	14a-8(i)(10)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/goldsteintexaspacific092622-14a8.pdf

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Texas Pacific Land Corporation	9/26/22	No Action	14a-8(i)(11)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/beddowtexaspacific092622-14a8.pdf
Texas Pacific Land Corporation	9/26/22	No Action	14a-8(i)(13)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/huberttexaspacific092622-14a8.pdf
Texas Pacific Land Corporation	9/26/22	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/fundtexaspacific092622-14a8.pdf
Texas Pacific Land Corporation	11/23/21	No Action	14a-8(i)(8)(ii)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/gliksbergtexaspacific112321-14a8.pdf
Texas Pacific Land Corporation	12/22/21	Withdrawn	Legal Deficiency	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/kellypaulsentexaspacific122221-14a8.pdf
The AES Corporation	2/16/22	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenaes021622-14a8.pdf
The Allstate Corporation	2/8/22	No Action	14a-8(b)(1)(iii); 14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinerallstate020822-14a8.pdf
The Allstate Corporation	1/24/22	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/nacarpentersallstate012422-14a8.pdf
The Bank of New York Mellon Corporation	1/24/22	Action	14a-8(i)(3)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinerbankny012422-14a8.pdf
The Boeing Company	2/10/22	Action	14a-8(i)(10)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/nlpcboeing021022-14a8.pdf
The Coca-Cola Company	3/10/22	Action	14a-8(b)(1)(ii); 14a-8(f); 14a-8(i)(12)(iii)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/nicocacoca031022-14a8.pdf
The Coca-Cola Company	2/16/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/krauscocacoca021622-14a8.pdf
The GEO Group, Inc.	4/7/22	No Action	14a-8(e)(2)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/seigeo040722-14a8.pdf
The Goldman Sachs Group, Inc.	3/8/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/harringtongoldman030822-14a8.pdf
The Goodyear Tire & Rubber Company	3/7/22	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddengoodyear030722-14a8.pdf
The Hartford Financial Services Group, Inc.	3/28/22	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/greencenturyhartford032822-14a8.pdf
The Hershey Company	3/28/22	Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/abhmshershey032822-14a8.pdf
The Kraft Heinz Company	1/26/22	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/handlerykraft012622-14a8.pdf
The Kraft Heinz Company	2/14/22	Withdrawn	Company enacted proposal	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/jyleskraft021422-14a8.pdf

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The Kroger Co.	4/14/22	Withdrawn	Company agreed to engage	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/sisterspakroger041422-14a8.pdf
The Procter & Gamble Company	8/19/22	No Action	14a-8(i)(7)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/youngp&q081922-14a8.pdf
The Procter & Gamble Company	6/18/22	Withdrawn	Company agreed to engage	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/greenp&q071822-14a8.pdf
The TJX Companies, Inc.	4/15/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/teamsterstix041522-14a8.pdf
The TJX Companies, Inc.	4/15/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/trilliumtjx041522-14a8.pdf
The Travelers Companies, Inc.	3/31/22	Action	14a-8(i)(10)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/asyouowtravelers033122-14a8.pdf
The Travelers Companies, Inc.	3/30/22	Action	14a-8(i)(2); 14a-8(i)(6); 14a-8(i)(3)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/trilliumfriendtravelers033022-14a8.pdf
The Travelers Companies, Inc.	4/1/22	Action	14a-8(i)(3); 14a-8(i)(5); 14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/arjunatravelers040122-14a8.pdf
The Travelers Companies, Inc.	3/30/22	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/greencenturytravelers033022-14a8.pdf
The Walt Disney Company	1/19/22	Action	14a-8(b); 14a-8(f)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/nlpcwalthdisney011922-14a8.pdf
The Walt Disney Company	1/19/22	Action	14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/arjunawalthdisney011922-14a8.pdf
The Walt Disney Company	1/19/22	Action	14a-8(i)(7)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ncpprwalthdisney011922-14a8.pdf
The Walt Disney Company	1/6/22	No Action	14a-8(e)(2)	Right	Conservative Civil Rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/rieksewalthdisney010622-14a8.pdf
The Walt Disney Company	1/12/22	No Action	14a-8(f)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/stubberudwalthdisney011222-14a8.pdf
The Walt Disney Company	1/19/22	No Action	14a-8(i)(3)	Right	Conservative Civil Rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/grauwalthdisney011922-14a8.pdf
The Wendy's Company	3/16/22	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/humanewendy031622-14a8.pdf
The Western Union Company	3/3/22	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenwestern030322-14a8.pdf
Tractor Supply Company	3/9/22	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive Environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/mcritchietractor030922-14a8.pdf
Verizon Communications Inc.	3/17/22	Action	14a-8(i)(3); 14a-8(i)(7)	Right	Conservative Civil Rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/milloyverizon031722-14a8.pdf

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Verizon Communications Inc.	2/24/22	No Action	14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinerverizon022422-14a8.pdf
Verizon Communications Inc.	3/17/22	No Action	14a-8(i)(7)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ncpprverizon031722-14a8.pdf
Verizon Communications Inc.	1/14/22	Withdrawn	Company enacted proposal	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/rehmverizon011422-14a8.pdf
Visa Inc.	11/8/22	No Action	14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenvisa110822-14a8.pdf
Walgreens Boots Alliance, Inc.	10/12/21	Action	14a-8(e)(2)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/steinerwalgreens101221-14a8.pdf
Walgreens Boots Alliance, Inc.	11/8/22	No Action	14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/youngqwalgreens110822-14a8.pdf
Walgreens Boots Alliance, Inc.	11/8/22	No Action	14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenwalgreens110822-14a8.pdf
Walgreens Boots Alliance, Inc.	10/26/21	Withdrawn	Company lacks power to implement proposal	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/youngqwalgreens102621-14a8.pdf
Walmart Inc.	4/12/22	Action	14a-8(i)(7)	Left	Progressive Civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/kalishwalmart041222-14a8.pdf
Well Fargo & Company	2/28/22	Action	14a-8(i)(3); 14a-8(i)(10)	Right	Known Conservative Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/nlpcwellsfargo022822-14a8.pdf
Xerox Holdings Corporation	2/9/22	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/carpentersxerox020922-14a8.pdf
Xylem Inc.	1/26/22	No Action	14a-8(f)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenxylem012622-14a8.pdf
Yelp Inc.	3/25/22	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/ayslongviewyelp032522-14a8.pdf
Yum! Brands, Inc.	2/4/22	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/rissman020422-14a8.pdf
Zoetis Inc.	3/30/22	No Action	14a-8(i)(10)	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/cheveddenzoetis033022-14a8.pdf
Zynga Inc.	5/6/22	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/steinerzynga060322-14a8.pdf
Zynga Inc.	2/1/22	Withdrawn	Pending Legal Action	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2022/calperszynga020122-14a8.pdf

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COMPANY NAME	DATE OF LETTER	ACTION/NO ACTION	REASON	ALIGNMENT	EXPLANATION OF ALIGNMENT	LINK
3M Company	3/9/21	Action	14a-8(i)(7)	Left	Known Progressive Investor	3M Company: Rule 14a-8 no-action letter (sec.gov)
AbbVie Inc.	3/2/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	AbbVie Inc.: Rule 14a-8 no-action letter (sec.gov)
Activision Blizzard, Inc.	4/9/21	No Action	14a-8(i)(7)	Left	Known Progressive Investor	Activision Blizzard, Inc.: Rule 14a-8 no-action letter (sec.gov)
Alaska Air Group, Inc.	2/5/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Known Progressive Investor	Alaska Air Group, Inc.: Rule 14a-8 no-action letter (sec.gov)
Alcoa Corporation	10/9/20	No Action	14a-8(b); 14a-8(f)	Neutral	General Company Management Issues	Alcoa Corporation: Rule 14a-8 no-action letter (sec.gov)
Alphabet Inc.	4/16/21	Action	14a-8(i)(2); 14a-8(i)(3); 14a-8(i)(6); 14a-8(i)(7)	Left	Known Progressive Investor	Alphabet Inc.: Rule 14a-8 no-action letter (sec.gov)
Alphabet Inc.	4/16/21	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Known Progressive Investor	Alphabet, Inc.: Rule 14a-8 no-action letter (sec.gov)
Alphabet Inc.	4/16/21	No Action	14a-8(i)(10)	Neutral	General Company Management Issues	Alphabet Inc.: Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	4/9/21	Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Amazon.com, Inc.: Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	4/7/21	Action	14a-8(i)(11)	Left	Progressive Civil Rights	Amazon.com, Inc.: Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	4/9/21	Action	14a-8(i)(7)	Left	Progressive Civil Rights	Amazon.com, Inc.: Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	4/7/21	Action	14a-8(i)(7)	Left	Progressive Civil Rights	Amazon.com, Inc.: Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	4/2/21	No Action	14a-8(b); 14a-8(f)	Right	Known Conservative Investor	Amazon.com, Inc.: Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	2/23/21	No Action	14a-8(b); 14a-8(f)	Neutral	General Company Management Issues	Amazon.com, Inc.: Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	4/7/21	No Action	14a-8(i)(10)	Left	Progressive Civil Rights	Amazon.com; Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	4/2/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Amazon.com, Inc.: Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	4/7/21	No Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil Rights	Amazon.com, Inc.: Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	4/9/21	No Action	14a-8(i)(7); 14a-8(i)(10)	Neutral	General Company Management Issues	Amazon.com, Inc.: Rule 14a-8 no-action letter (sec.gov)
Amazon.com, Inc.	2/19/21	Withdrawn	Duplicate proposal	Left	Progressive Civil Rights	Amazon.com, Inc.: Rule 14a-8 no-action letter (sec.gov)
American Express Company	2/26/21	No Action	14a-8(i)(7)	Right	Known Conservative Investor	American Express Company: Rule 14a-8 no-action letter (sec.gov)
AmerisourceBergen Corporation	12/10/20	Withdrawn	Company agreed to engage	Left	Progressive Civil Rights	AmerisourceBergen Corporation: Rule 14a-8 no-action letter (sec.gov)
Anm, Inc.	2/5/21	No Action	14a-8(d); 14a-8(f)	Left	Known Progressive Investor	Anthem, Inc.: Rule 14-8 no-action letter (sec.gov)
Annaly Capital Management, Inc.	3/2/21	No Action	14a-8(h)(3)	Left	Known Progressive Investor	Annaly Capital Management, Inc.: Rule 14a-8 no-action letter (sec.gov)
Apple Inc.	12/17/20	No Action	14a-8(i)(10)	Left	Progressive Civil Rights	Apple Inc.; Rule 14a-8 no-action letter (sec.gov)
Apple Inc.	12/17/20	No Action	14a-8(i)(10)	Right	Known Conservative Investor	Apple Inc.: Rule14a-8 no-action letter (sec.gov)
Applied Materials, Inc.	12/17/20	Action	14a-8(i)(10)	Left	Progressive Civil Rights	Applied Materials, Inc.: Rule 14a-8 no-action letter (sec.gov)
Arlington Asset Investment Corp.	4/23/21	No Action	14a-8(i)(1); 14a-8(i)(2); 14a-8(i)(6); 14a-8(i)(7)	Neutral	General Company Management Issues	Arlington Asset Investment Corp.: Rule 14a-8 no-action letter (sec.gov)
Assembly Biosciences, Inc.	2/1/21	Withdrawn	Company enacted proposal	Left	Known Progressive Investor	Assembly Biosciences, Inc.: Rule 14a-8 no-action letter (sec.gov)
AT&T	12/23/20	No Action	14a-8(b); 14a-8(f)	Left	Progressive Civil Rights	AT&T Inc.: Rule 14a-8 no-action letter (sec.gov)
AT&T	12/23/20	No Action	14a-8(b); 14a-8(f)	Unknown	Not enough information to determine alignment	AT&T Inc.: Rule 14a-8 no-action letter (sec.gov)
AT&T	12/23/20	No Action	14a-8(b); 14a-8(f); 14a-8(i)(7)	Left	Known Progressive Investor	AT&T Inc.: Rule 14a-8 no-action letter (sec.gov)

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AT&T	4/23/21	No Action	14a-8(e)(2)	Left	Progressive Civil Rights	AT&T Inc.: Rule 14a-8 no-action letter (sec.gov)
AT&T	1/15/21	No Action	14a-8(i)(7)	Right	Known Conservative Investor	AT&T Inc.: Rule 14a-8 no-action letter (sec.gov)
AT&T	2/1/21	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	AT&T Inc.: Rule 14a-8 no-action letter (sec.gov)
Bank of New York Mellon Corporation	1/15/21	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known Progressive Investor	The Bank of New York Mellon Corporation: Rule 14a-8 no-action letter (sec.gov)
Baxter International Inc.	1/8/21	Action	14a-8(i)(10)	Left	Known Progressive Investor	Baxter International Inc.: Rule 14a-8 no-action letter (sec.gov)
Becton, Dickinson and Company	11/25/20	Action	14a-8(i)(2); 14a-8(i)(3)	Left	Known Progressive Investor	Becton, Dickinson and Company: Rule 14a-8 no-action letter (sec.gov)
Bio-Path Holdings, Inc.	10/2/20	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Neutral	General Company Management Issues	Bio-Path Holdings, Inc.: Rule 14a-8 no-action letter (sec.gov)
BlackRock, Inc.	4/2/21	No Action	14a-8(i)(7); 14a-8(i)(10)	Left	Known Progressive Investor	BlackRock, Inc.: Rule 14a-8 no-action letter (sec.gov)
Boeing Company	2/23/21	No Action	14a-8(i)(3); 14a-8(i)(6); 14a-8(i)(8); 14a-8(i)(9)	Neutral	General Company Management Issues	The Boeing Company: Rule 14a-8 no-action letter (sec.gov)
Boeing Company	1/8/21	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	The Boeing Company: Rule 14a-8 no-action letter (sec.gov)
Booking Holdings Inc.	4/9/21	Action	14a-8(i)(10)	Left	Known Progressive Investor	Booking Holdings Inc.: Rule 14a-8 no-action letter (sec.gov)
Booz Allen Hamilton Holding Corporation	4/7/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Booz Allen Hamilton Holding Corporation: Rule 14a-8 no-action letter (sec.gov)
Brinker International, Inc.	9/22/21	Action	14a-8(i)(7)	Left	Progressive Civil Rights	Brinker International, Inc.: Rule 14a-8 no-action letter (sec.gov)
Broadridge Financial Solutions, Inc.	9/22/21	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil Rights	Broadridge Financial Solutions, Inc.: Rule 14a-8 no-action letter (sec.gov)
California Water Service Group	3/12/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Known Progressive Investor	California Water Service Group: Rule 14a-8 no-action letter (sec.gov)
Campbell Soup Company	9/22/21	Action	14a-8(i)(7)	Left	Progressive Civil Rights	Campbell Soup Company: Rule 14a-8 no-action letter (sec.gov)
Cardinal Health, Inc.	8/23/21	Action	14a-8(i)(10)	Left	Known Progressive Investor	Cardinal Health Inc.: Rule 14a-8 no-action letter (sec.gov)
CDW Corporation	3/22/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	cheveddencdw032221-14a8.pdf (sec.gov)
Charles River Laboratories International, Inc.	3/17/21	No Action	14a-8(e)(2)	Left	Known Progressive Investor	Charles River Laboratories International, Inc.: Rule 14a-8 no-action letter (sec.gov)
Charles Schwab Corporation	3/5/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	The Charles Schwab Corporation: Rule 14a-8 no-action letter (sec.gov)
Cheniere Energy, Inc.	3/19/21	No Action	14a-8(b); 14a-8(f); 14a-8(c)	Left	Progressive Environmentalism	Cheniere Energy, Inc.: Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	3/22/21	Action	14a-8(e)(2)	Left	Known Progressive Investor	Chevron Corporation: Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	3/22/21	Action	14a-8(e)(2)	Left	Known Progressive Investor	Chevron Corporation: Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	3/30/21	Action	14a-8(i)(3); 14a-8(i)(10); 14a-8(i)(11)	Left	Progressive Environmentalism	Chevron Corporation: Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	3/30/21	Action	14a-8(i)(7); 14a-8(i)(11)	Left	Progressive Civil Rights	Chevron Corporation: Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	3/30/21	No Action	14a-8(i)(10)	Left	Progressive Environmentalism	Chevron Corporation: Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	3/30/21	No Action	14a-8(i)(7)	Left	Progressive Environmentalism	Chevron Corporation: Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	3/30/21	No Action	14a-8(i)(7); 14a-8(i)(11)	Left	Progressive Environmentalism	Chevron Corporation: Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	2/12/21	Withdrawn	Legal Deficiency	Left	Progressive Environmentalism	Chevron Corporation: Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	2/12/21	Withdrawn	Company agreed to engage	Left	Progressive Civil Rights	Chevron Corporation: Rule 14a-8 no-action letter (sec.gov)
Chubb Limited	3/26/21	No Action	14a-8(i)(3); 14a-8(i)(5); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil Rights	Chubb Ltd.: Rule 14a-8 no-action letter (sec.gov)
Church & Dwight Co.	1/15/21	No Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known Progressive Investor	Church & Dwight Co., Inc.: Rule 14a-8 no-action letter (sec.gov)

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Church & Dwight Co.	2/1/21	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	Church & Dwight Co., Inc.; Rule 14a-8 no-action letter (sec.gov)
Churchill Downs Incorporated	2/1/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Churchill Downs Incorporated; Rule 14a-8 no-action letter (sec.gov)
Churchill Downs Incorporated	2/19/21	No Action	14a-8(i)(7)	Left	Known Progressive Investor	Churchill Downs, Inc.; Rule 14a-8 no-action letter (sec.gov)
Cisco Systems, Inc.	8/6/21	No Action	14a-8(b); 14a-8(f); 14a-8(c)	Left	Progressive Civil Rights	Cisco Systems, Inc.; Rule 14a-8 no-action letter (sec.gov)
Citigroup Inc.	2/26/21	Action	14a-8(i)(10)	Left	Progressive Civil Rights	Citigroup Inc.; Rule 14a-8 no-action letter (sec.gov)
Citigroup Inc.	2/26/21	Action	14a-8(i)(5)	Left	Progressive Civil Rights	Citigroup Inc.; Rule 14a-8 no-action letter (sec.gov)
Coca-Cola Company	2/12/21	Action	14a-8(b); 14a-8(f)	Left	Progressive Civil Rights	The Coca-Cola Company; Rule 14a-8 no-action letter (sec.gov)
Comcast Corporation	3/30/21	No Action	14a-8(b); 14a-8(f); 14a-8(h)(3)	Left	Known Progressive Investor	Comcast Corporation; Rule 14a-8 no-action letter (sec.gov)
Comcast Corporation	4/9/21	No Action	14a-8(i)(10)	Left	Progressive Civil Rights	Comcast Corporation; Rule 14a-8 no-action letter (sec.gov)
Compass Minerals International, Inc.	3/2/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Known Progressive Investor	Compass Minerals International, Inc.; Rule 14a-8 no-action letter (sec.gov)
ConocoPhillips Company	3/19/21	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Environmentalism	ConocoPhillips Company; Rule 14a-8 no-action letter (sec.gov)
Costco Wholesale Corporation	11/25/20	Withdrawn	Company agreed to engage	Left	Progressive Environmentalism	Costco Wholesale; Rule 14a-8 no-action letter (sec.gov)
Costco Wholesale Corporation	10/2/20	Withdrawn	Company has already substantially implemented the Proposal	Left	Progressive Environmentalism	Costco Wholesale Corporation; Rule 14a-8 no-action letter (sec.gov)
Costco Wholesale Corporation	9/30/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Known Progressive Investor	Costco Wholesale Corporation; Rule 14a-8 no-action letter (sec.gov)
Crown Holdings, Inc.	3/2/21	No Action	14a-8(i)(2)	Left	Known Progressive Investor	Crown Holdings, Inc.; Rule 14a-8 no-action letter (sec.gov)
CTS Corporation	3/19/21	No Action	14a-8(i)(2); 14a-8(i)(10)	Left	Known Progressive Investor	CTS Corporation; Rule 14a-8 no-action letter (sec.gov)
Cummins Inc.	2/5/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Cummins Inc.; Rule 14a-8 no-action letter (sec.gov)
CVS Health Corporation	3/12/21	Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	CVS Health Corporation; Rule 14a-8 no-action letter (sec.gov)
CVS Health Corporation	3/17/21	Action	14a-8(i)(10)	Left	Known Progressive Investor	CVS Caremark Corporation; Rule 14a-8 no-action letter (sec.gov)
CVS Health Corporation	3/22/21	No Action	14a-8(i)(5); 14a-8(i)(7)	Left	Known Progressive Investor	CVS Health Corporation; Rule 14a-8 no-action letter (sec.gov)
CVS Health Corporation	2/19/21	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	CVS Health Corporation; Rule 14a-8 no-action letter (sec.gov)
Dana Incorporated	2/5/21	No Action	14a-8(h)(3)	Left	Known Progressive Investor	Dana Holding Corporation; Rule 14a-8 no-action letter (sec.gov)
Danaher Corporation	2/5/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Danaher Corporation; Rule 14a-8 no-action letter (sec.gov)
Deere & Company	10/22/20	No Action	14a-8(h)(3)	Left	Known Progressive Investor	Deere & Company; Rule 14a-8 no-action letter (sec.gov)
Digital Realty Trust, Inc.	4/16/21	No Action	14a-8(e)(2)	Left	Progressive Civil Rights	Digital Realty Trust, Inc.; Rule 14a-8 no-action letter (sec.gov)
Discovery, Inc.	4/2/21	No Action	14a-8(b); 14a-8(f)	Right	Known Conservative Investor	Discovery, Inc.; Rule 14a-8 no-action letter (sec.gov)
Discovery, Inc.	4/2/21	No Action	14a-8(i)(12)(i)	Left	Known Progressive Investor	Discovery, Inc.; Rule 14a-8 no-action letter (sec.gov)
Dollar Tree, Inc.	4/9/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Dollar Tree, Inc.; Rule 14a-8 no-action letter (sec.gov)
Dominion Energy, Inc.	2/5/21	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	Dominion Energy, Inc.; Rule 14a-8 no-action letter (sec.gov)
Donaldson Company, Inc.	9/7/21	No Action	14a-8(b); 14a-8(f); 14a-8(c); 14a-8(i)(1); 14a-8(i)(7)	Left	Progressive Civil Rights	Donaldson Company, Inc.; Rule 14a-8 no-action letter (sec.gov)
Dow Inc.	2/5/21	Action	14a-8(i)(3)	Left	Known Progressive Investor	Dow Inc.; Rule 14a-8 no-action letter (sec.gov)
Dow Inc.	2/5/21	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	Dow Inc.; Rule 14a-8 no-action letter (sec.gov)

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Duke Energy Corporation	3/2/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Duke Energy Corporation; Rule 14a-8 no-action letter (sec.gov)
Duke Energy Corporation	3/9/21	No Action	14a-8(i)(10)	Right	Known Conservative Investor	Duke Energy Corporation; Rule 14a-8 no-action letter (sec.gov)
Duke Energy Corporation	1/8/21	Withdrawn	Company agreed to include in proxy materials	Left	Progressive Government Submission	Duke Energy Corporation; Rule 14a-8 no-action letter (sec.gov)
Easterly Government Properties, Inc.	3/22/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Easterly Government Properties, Inc.; Rule 14a-8 no-action letter (sec.gov)
Eli Lilly and Company	2/12/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Eli Lilly and Company; Rule 14a-8 no-action letter (sec.gov)
Eli Lilly and Company	2/12/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Eli Lilly and Company; Rule 14a-8 no-action letter (sec.gov)
Eli Lilly and Company	2/26/21	No Action	14a-8(i)(3); 14a-8(i)(10)	Left	Progressive Civil Rights	Eli Lilly and Company; Rule 14a-8 no-action letter (sec.gov)
Essential Utilities, Inc.	1/8/21	Withdrawn	Company agreed to implement proposal	Left	Progressive Government Submission	Essential Utilities, Inc.; Rule 14a-8 no-action letter (sec.gov)
Evergy, Inc.	2/26/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Evergy, Inc.; Rule 14a-8 no-action letter (sec.gov)
Exelon Corporation	3/2/21	Action	14a-8(i)(7)	Right	Known Conservative Investor	Exelon Corporation; Rule 14a-8 no-action letter (sec.gov)
Expeditors International of Washington, Inc.	12/23/20	No Action	14a-8(h)(3)	Left	Known Progressive Investor	Expeditors International of Washington, Inc.; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	2/26/21	Action	14a-8(i)(10)	Left	Progressive Civil Rights	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	3/9/21	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Progressive Environmentalism	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	2/26/21	No Action	14a-8(b); 14a-8(f); 14a-8(i)(7)	Left	Progressive Civil Rights	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	3/9/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	1/15/21	Withdrawn	Company enacted proposal	Left	Progressive Government Submission	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	1/8/21	Withdrawn	Company agreed to engage	Left	Progressive Civil Rights	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	2/1/21	Withdrawn	Company enacted proposal	Left	Known Progressive Investor	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Facebook, Inc.	3/26/21	No Action	14a-8(i)(7)	Right	Known Conservative Investor	Facebook, Inc.; Rule 14a-8 no-action letter (sec.gov)
FedEx Corporation	8/2/21	Action	14a-8(i)(7)	Left	Known Progressive Investor	FedEx Corporation; Rule 14a-8 no-action letter (sec.gov)
Ferro Corporation	3/2/21	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known Progressive Investor	Ferro Corporation; Rule 14a-8 no-action letter (sec.gov)
FirstEnergy Corp.	1/15/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	FirstEnergy Corporation; Rule 14a-8 no-action letter (sec.gov)
Flowserve Corporation	3/30/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Flowserve Corporation; Rule 14a-8 no-action letter (sec.gov)
Fortinet, Inc.	3/5/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Known Progressive Investor	Fortinet, Inc.; Rule 14a-8 no-action letter (sec.gov)
Fox Corporation	8/23/21	Action	14a-8(i)(10)	Left	Known Progressive Investor	Fox Corporation; Rule 14a-8 no-action letter (sec.gov)
General Dynamics Corporation	1/8/21	No Action	14a-8(e)(2)	Left	Progressive Civil Rights	General Dynamics Corporation; Rule 14a-8 no-action letter (sec.gov)
General Electric Company	2/12/21	No Action	14a-8(i)(3)	Neutral	General Company Management Issues	General Electric Company; Rule 14a-8 no-action letter (sec.gov)
General Mills, Inc.	8/6/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	General Mills, Inc.; Rule 14a-8 no-action letter (sec.gov)
General Motors Company	4/20/21	Action	14a-8(d); 14a-8(f)	Left	Known Progressive Investor	General Motors Company; Rule 14a-8 no-action letter (sec.gov)
General Motors Company	4/20/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	General Motors Company; Rule 14a-8 no-action letter (sec.gov)
General Motors Company	4/20/21	No Action	14a-8(d); 14a-8(f)	Left	Known Progressive Investor	General Motors Company; Rule 14a-8 no-action letter (sec.gov)
GEO Group, Inc.	2/1/21	Withdrawn	Duplicate proposal	Left	Progressive Government Submission	The GEO Group, Inc.; Rule 14a-8 no-action letter (sec.gov)

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Gilead Sciences, Inc.	12/23/20	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	Gilead Sciences, Inc.; Rule 14a-8 no-action letter (sec.gov)
Goldman Sachs Group, Inc.	3/9/21	No Action	14a-8(i)(3); 14a-8(i)(7)	Left	Known Progressive Investor	The Goldman Sachs Group, Inc.; Rule 14a-8 no-action letter (sec.gov)
Goodyear Tire	2/5/21	Action	14a-8(i)(3)	Left	Known Progressive Investor	The Goodyear Tire & Rubber Company; Rule 14a-8 no-action letter (sec.gov)
Hess Corporation	3/12/21	Withdrawn	Company enacted proposal	Left	Progressive Environmentalism	Hess Corporation; Rule 14a-8 no-action letter (sec.gov)
Hewlett Packard Enterprise Company	1/15/21	No Action	14a-8(b); 14a-8(f); 14a-8(e)(2)	Left	Known Progressive Investor	Hewlett Packard Enterprise Company; Rule 14a-8 no-action letter
Home Depot, Inc.	3/17/21	Action	14a-8(i)(10)	Left	Known Progressive Investor	The Home Depot, Inc.; Rule 14a-8 no-action letter (sec.gov)
Home Depot, Inc.	3/19/21	Action	14a-8(i)(7)	Left	Progressive Civil Rights	The Home Depot, Inc.; Rule 14a-8 no-action letter (sec.gov)
Home Depot, Inc.	3/17/21	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	The Home Depot, Inc.; Rule 14a-8 no-action letter (sec.gov)
Home Depot, Inc.	2/19/21	Withdrawn	Company agreed to engage	Left	Progressive Environmentalism	The Home Depot, Inc.; Rule 14a-8 no-action letter (sec.gov)
Hormel Foods Corporation	10/9/20	Withdrawn	Company enacted proposal	Left	Known Progressive Investor	Hormel Foods Corporation; Rule 14a-8 no-action letter (sec.gov)
Huntington Ingalls Industries, Inc.	3/5/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Huntington Ingalls Industries, Inc.; Rule 14a-8 no-action letter (sec.gov)
Intel Corporation	3/12/21	No Action	14a-8(i)(7)	Right	Conservative Civil Rights	Intel Corporation; Rule 14a-8 no-action letter (sec.gov)
International Business Machines Corporation	2/19/21	Action	14a-8(i)(10)	Left	Progressive Civil Rights	International Business Machines Corporation; Rule 14a-8 no-action letter
International Business Machines Corporation	1/15/21	Action	14a-8(i)(3)	Left	Progressive Civil Rights	International Business Machines Corporation; Rule 14a-8 no-action letter
International Business Machines Corporation	1/15/21	No Action	14a-8(b); 14a-8(f); 14a-8(i)(7)	Left	Known Progressive Investor	International Business Machines Corporation; Rule 14a-8 no-action letter
Invitae Corporation	2/19/21	Withdrawn	Company agreed to include in proxy materials	Left	Known Progressive Investor	Invitae Corporation; Rule 14a-8 no-action letter
IPG Photonics Corporation	2/1/21	Withdrawn	Company agreed to engage	Left	Progressive Civil Rights	IPG Photonics Corporation; Rule 14a-8 no-action letter
IPG Photonics Corporation	2/1/21	Withdrawn	Company agreed to engage	Left	Progressive Civil Rights	IPG Photonics Corporation; Rule 14a-8 no-action letter
IQVIA Holdings Inc.	12/23/20	No Action	14a-8(i)(10)	Left	Known Progressive Investor	IQVIA Holdings Inc.; Rule 14a-8 no-action letter
JetBlue Airways Corporation	3/12/21	Action	14a-8(i)(3)	Left	Known Progressive Investor	JetBlue Airways Corporation; Rule 14a-8 no-action letter
Johnson & Johnson	2/5/21	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil Rights	Johnson and Johnson; Rule 14a-8 no-action letter
Johnson & Johnson	2/5/21	Action	14a-8(i)(10)	Left	Progressive Civil Rights	Johnson & Johnson; Rule 14a-8 no-action letter
Johnson & Johnson	2/19/21	Action	14a-8(i)(7); 14a-8(i)(10)	Right	Known Conservative Investor	Johnson & Johnson; Rule 14a-8 no-action letter (sec.gov)
Johnson & Johnson	2/26/21	No Action	14a-8(b); 14a-8(f); 14a-8(i)(10); 14a-8(i)(11)	Left	Progressive Civil Rights	Johnson & Johnson; Rule 14a-8 no-action letter (sec.gov)
Johnson & Johnson	2/12/21	No Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil Rights	Johnson & Johnson; Rule 14a-8 no-action letter
Johnson & Johnson	12/23/20	Withdrawn	Company agreed to engage	Left	Progressive Government Submission	Johnson & Johnson; Rule 14a-8 no-action letter (sec.gov)
JPMorgan Chase & Co.	3/22/21	Action	14a-8(i)(10)	Left	Progressive Civil Rights	JPMorgan Chase & Company; Rule 14a-8 no-action letter
JPMorgan Chase & Co.	3/26/21	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Known Progressive Investor	JPMorgan Chase & Co.; Rule 14a-8 no-action letter
JPMorgan Chase & Co.	3/26/21	No Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive Civil Rights	JPMorgan Chase & Co.; Rule 14a-8 no-action letter

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JPMorgan Chase & Co.	3/9/21	No Action	14a-8(i)(7); 14a-8(i)(10)	Right	Known Conservative Investor	JPMorgan Chase & Co.: Rule 14a-8 no-action letter
JPMorgan Chase & Co.	2/23/21	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	JPMorgan Chase & Co.: Rule 14a-8 no-action letter
JPMorgan Chase & Co.	2/1/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Known Progressive Investor	JPMorgan Chase and Company: Rule 14a-8 no-action letter
Kimberly-Clark Corporation	2/5/21	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	Kimberly-Clark Corporation: Rule 14a-8 no-action letter
Kohl's Corporation	2/19/21	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	Kohl's Corporation: Rule 14a-8 no-action letter
Kraft Heinz Company	2/5/21	No Action	14a-8(h)(3)	Left	Known Progressive Investor	The Kraft Heinz Company: Rule 14a-8 no-action letter
Kraft Heinz Company	2/19/21	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	The Kraft Heinz Company: Rule 14a-8 no-action letter
Kraft Heinz Company	2/12/21	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	The Kraft Heinz Company: Rule 14a-8 no-action letter
Kroger Co.	4/20/21	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	The Kroger Co.: Rule 14a-8 no-action letter
L3Harris Technologies, Inc.	1/15/21	No Action	14a-8(h)(3)	Left	Progressive Civil Rights	Lincoln National Corporation: Rule 14a-8 no-action letter
Lincoln National Corporation	3/2/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Linde plc: Rule 14a-8 no-action letter
Linde plc	4/2/21	No Action	14a-8(i)(1); 14a-8(i)(2)	Left	Known Progressive Investor	L3Harris Technologies, Inc.: Rule 14a-8 no-action letter
Lyft, Inc.	3/5/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Progressive Government Submission	Lyft, Inc.: Rule 14a-8 no-action letter
Marathon Petroleum Corporation	2/26/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Marriott International, Inc.: Rule 14a-8 no-action letter
MarineMax, Inc.	10/22/20	Withdrawn	Proposal not offered	Left	Progressive Environmentalism	MarineMax, Inc.: Rule 14a-8 no-action letter (sec.gov)
Marriott International, Inc.	3/22/21	No Action	14a-8(i)(10)	Neutral	General Company Management Issues	MarineMax, Inc.: Rule 14a-8 no-action letter
Marriott International, Inc.	3/26/21	No Action	14a-8(i)(3); 14a-8(i)(7)	Left	Known Progressive Investor	Marathon Petroleum Corporation: Rule 14a-8 no-action letter
Mastercard Incorporated	3/30/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Mastercard Incorporated: Rule 14a-8 no-action letter
Mattel, Inc.	3/26/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Mattel, Inc.: Rule 14a-8 no-action letter
McDonald's Corporation	2/19/21	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	McDonald's Corporation: Rule 14a-8 no-action letter
McDonald's Corporation	3/26/21	No Action	14a-8(i)(7); 14a-8(i)(12)(ii)	Right	Known Conservative Investor	McDonald's Corporation: Rule 14a-8 no-action letter (sec.gov)
McDonald's Corporation	2/23/21	Withdrawn	Company agreed to engage	Left	Progressive Government Submission	McDonald's Corporation: Rule 14a-8 no-action letter
McDonald's Corporation	2/26/21	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	McDonald's Corporation: Rule 14a-8 no-action letter
Microsoft Corporation	9/28/21	No Action	14a-8(i)(12)(ii)	Left	Known Progressive Investor	Microsoft Corporation: Rule 14a-8 no-action letter
Microsoft Corporation 	9/7/21	Withdrawn	Duplicate proposal	Left	Progressive Civil Rights	Microsoft Corporation: Rule 14a-8 no-action letter
Mid-Sourh Bancorp, Inc.	4/9/21	No Action	14a-8(i)(3); 14a-8(i)(7)	Neutral	General Company Management Issues	Mid-Southern Bancorp, Inc.: Rule 14a-8 no-action letter
Molson Coors Beverage Company	3/5/21	No Action	14a-8(b)	Left	Known Progressive Investor	Molson Coors Beverage Company: Rule 14a-8 no-action letter
Moody's Corporation	2/23/21	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	Moody's Corporation: Rule 14a-8 no-action letter

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Moody's Corporation	12/23/20	Withdrawn	Company agreed to implement proposal	Left	Known Progressive Investor	Moody's Corporation: Rule 14a-8 no-action letter
Morningstar, Inc.	2/23/21	Withdrawn	Proposal not offered	Right	Conservative Civil Rights	Morningstar, Inc.: Rule 14a-8 no-action letter
MSCI Inc.	1/15/21	Withdrawn	Company enacted proposal	Left	Known Progressive Investor	MSCI Inc.: Rule 14a-8 no-action letter
Myriad Genetics, Inc.	10/9/20	No Action	14a-8(e)(2)	Neutral	General Company Management Issues	Myriad Genetics, Inc.: Rule 14a-8 no-action letter
NanoString Technologies, Inc.	4/16/21	Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	NanoString Technologies, Inc.: Rule 14a-8 no-action letter
NanoString Technologies, Inc.	4/23/21	Request	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	NanoString Technologies, Inc.: Rule 14a-8 no-action letter
National HealthCare Corporation	2/19/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Progressive Government Submission	National HealthCare Corporation: Rule 14a-8 no-action letter (sec.gov)
NCR Corporation	1/15/21	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	NCR Corporation: Rule 14a-8 no-action letter
Netflix, Inc.	4/9/21	No Action	14a-8(i)(7)	Right	Known Conservative Investor	Netflix, Inc.: Rule 14a-8 no-action letter
NETGEAR, Inc.	4/9/21	No Action	14a-8(i)(3)	Left	Known Progressive Investor	NETGEAR, Inc.: Rule 14a-8 no-action letter
New York Times Company	2/1/21	No Action	14a-8(b)	Right	Conservative Civil Rights	The New York Times Company: Rule 14a-8 no-action letter
NextEra Energy, Inc.	3/12/21	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	NextEra Energy, Inc.: Rule 14a-8 no-action letter
NIKE, Inc.	8/2/21	Action	14a-8(i)(10)	Left	Progressive Civil Rights	NIKE Inc: Rule 14a-8 no-action letter
Northrop Grumman Corporation	3/19/21	Action	14a-8(i)(3)	Left	Known Progressive Investor	Northrop Grumman Corporation: Rule 14a-8 no-action letter
Northrop Grumman Corporation	3/26/21	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Progressive Civil Rights	Northrop Grumman Corporation: Rule 14a-8 no-action letter
NortonLifeLock Inc.	7/16/21	No Action	14a-8(b); 14a-8(f); 14a-8(c)	Left	Progressive Civil Rights	NortonLifeLock Inc.: Rule 14a-8 no-action letter
Occidental Petroleum Corporation	3/19/21	Action	14a-8(i)(7)	Left	Progressive Environmentalism	Occidental Petroleum: Rule 14a-8 no-action letter
Omeros Corporation	4/20/21	No Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive Civil Rights	Omeros Corporation: Rule 14a-8 no-action letter
Omnicom Group Inc.	3/17/21	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	Omnicom Group Inc.: Rule 14a-8 no-action letter
Pacific Gas and Electric Company	3/17/21	No Action	14a-8(i)(5); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil Rights	Pacific Gas and Electric Company: Rule 14a-8 no-action letter
Paycom Software, Inc.	2/1/21	Withdrawn	Legal Deficiency	Left	Known Progressive Investor	Paycom Software, Inc.: Rule 14a-8 no-action letter
Paylocity Holding Corporation	10/9/20	No Action	14a-8(e)(2)	Neutral	General Company Management Issues	Paylocity Holding Corporation: Rule 14a-8 no-action letter
PayPal Holdings, Inc.	4/2/21	Action	14a-8(i)(10)	Left	Progressive Civil Rights	PayPal Holdings, Inc.: Rule 14a-8 no-action letter
PayPal Holdings, Inc.	4/2/21	No Action	14a-8(i)(4); 14a-8(i)(7)	Neutral	General Company Management Issues	PayPal Holdings, Inc.: Rule 14a-8 no-action letter
PepsiCo, Inc.	3/12/21	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Known Progressive Investor	PepsiCo, Inc.: Rule 14a-8 no-action letter
PepsiCo, Inc.	3/5/21	Withdrawn	Not enough information to determine withdrawal reason	Left	Known Progressive Investor	PepsiCo, Inc.: Rule 14a-8 no-action letter
Pfizer Inc.	2/19/21	Action	14a-8(i)(10)	Left	Progressive Civil Rights	Pfizer Inc.: Rule 14a-8 no-action letter
Pfizer Inc.	2/26/21	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil Rights	Pfizer Inc.: Rule 14a-8 no-action letter

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Pfizer Inc.	2/12/21	No Action	14a-8(b); 14a-8(f); 14a-8(i)(10)	Left	Known Progressive Investor	Pfizer, Inc.: Rule 14a-8 no-action letter
Pfizer Inc.	2/12/21	No Action	14a-8(d); 14a-8(f)	Left	Progressive Civil Rights	Pfizer, Inc.: Rule 14a-8 no-action letter
Pfizer Inc.	2/1/21	Withdrawn	Legal Deficiency	Left	Progressive Government Submission	Pfizer Inc.: Rule 14a-8 no-action letter
Philip Morris International Inc.	1/8/21	No Action	14a-8(i)(3); 14a-8(i)(7)	Neutral	General Company Management Issues	Philip Morris International Inc.: Rule 14a-8 no-action letter
Pilgrim's Pride Corporation	3/19/21	Action	14a-8(i)(7)	Left	Progressive Civil Rights	Pilgrim's Pride Corporation: Rule 14a-8 no-action letter
Pilgrim's Pride Corporation	3/23/21	No Action	14a-8(b); 14a-8(f); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Environmentalism	Pilgrim's Pride Corporation: Rule 14a-8 no-action letter
Pinnacle West Capital Corporation	3/12/21	No Action	14a-8(d); 14a-8(f)	Left	Known Progressive Investor	Pinnacle West Capital Corporation: Rule 14a-8 no-action letter
PPG Industries, Inc.	2/1/21	No Action	14a-8(i)(9); 14a-8(i)(10)	Left	Known Progressive Investor	PPG Industries, Inc.: Rule 14a-8 no-action letter
PPL Corporation	2/12/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	PPL Corporation: Rule 14a-8 no-action letter
PPL Corporation	3/12/21	No Action	14a-8(b); 14a-8(f); 14a-8(i)(2)	Left	Known Progressive Investor	PPL Corporation: Rule 14a-8 no-action letter
PRA Health Sciences, Inc. 	3/17/21	Action	14a-8(e)(2)	Left	Known Progressive Investor	PRA Health Sciences, Inc.: Rule 14a-8 no-action letter
Procter and Gamble	7/16/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Progressive Environmentalism	The Procter & Gamble Company: Rule 14a-8 no-action letter
Progressive Corporation	3/5/21	No Action	14a-8(i)(10)	Right	Known Conservative Investor	The Progressive Corporation: Rule 14a-8 no-action letter
Repligen Corporation	2/1/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Known Progressive Investor	Repligen Corporation: Rule 14a-8 no-action letter
Restaurant Brands International Inc.	3/2/21	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	Restaurant Brands International Inc.: Rule 14a-8 no-action letter
Rite Aid Corporation	4/23/21	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	Rite Aid Corporation: Rule 14a-8 no-action letter
Royal Caribbean Cruises Ltd.	2/26/21	Withdrawn	Legal Deficiency	Right	Conservative Civil Rights	Royal Caribbean Cruises Ltd.: Rule 14a-8 no-action letter
salesforce.com, inc.	4/20/21	No Action	14a-8(i)(10)	Right	Known Conservative Investor	salesforce.com, inc.: Rule 14a-8 no-action letter
Seagate Technology plc	8/2/21	No Action	14a-8(i)(7)	Right	Conservative Civil Rights	Seagate Technology plc: Rule 14a-8 no-action letter
SeaWorld Entertainment, Inc.	4/20/21	No Action	14a-8(i)(3); 14a-8(i)(4); 14a-8(i)(7); 14a-8(i)(10)	Left	Known Progressive Investor	SeaWorld Entertainment, Inc.: Rule 14a-8 no-action letter
Sempra Energy	3/12/21	Action	14a-8(i)(10)	Left	Progressive Environmentalism	Sempra Energy: Rule 14a-8 no-action letter
Sempra Energy	1/15/21	No Action	14a-8(b); 14a-8(f)	Left	Progressive Environmentalism	Sempra Energy: Rule 14a-8 no-action letter
ServiceNow, Inc.	4/16/21	Action	14a-8(i)(10)	Left	Known Progressive Investor	ServiceNow, Inc.: Rule 14a-8 no-action letter
ServiceNow, Inc.	4/23/21	Request	14a-8(i)(10)	Left	Known Progressive Investor	ServiceNow, Inc.: Rule 14a-8 no-action letter
Skyworks Solutions, Inc.	2/12/21	Withdrawn	Company agreed to engage	Left	Progressive Environmentalism	Skyworks Solutions, Inc.: Rule 14a-8 no-action letter
Sourn Company	3/22/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	The Southern Company: Rule 14a-8 no-action letter

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Stanley Black & Decker, Inc.	1/15/21	No Action	14a-8(i)(10)	Left	Known Progressive Investor	Stanley Black & Decker, Inc.: Rule 14a-8 no-action letter
Starbucks Corporation	12/23/20	No Action	14a-8(i)(7)	Right	Known Conservative Investor	Starbucks Corporation: Rule 14a-8 no-action letter
Starbucks Corporation	12/17/20	Withdrawn	Company agreed to engage	Left	Progressive Civil Rights	Starbucks Corporation: Rule 14a-8 no-action letter
State Street Corporation	3/26/21	No Action	14a-8(i)(2); 14a-8(i)(3); 14a-8(i)(6); 14a-8(i)(7); 14a-8(i)(10)	Left	Known Progressive Investor	State Street Corporation: Rule 14a-8 no-action letter
Stericycle, Inc.	4/2/21	Action	14a-8(i)(10)	Left	Known Progressive Investor	Stericycle, Inc.: Rule 14a-8 no-action letter
Syneos Health, Inc.	2/23/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Known Progressive Investor	Syneos Health, Inc.: Rule 14a-8 no-action letter
Syneos Health, Inc.	2/23/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Known Progressive Investor	Syneos Health, Inc.: Rule 14a-8 no-action letter
Target Corporation	4/9/21	No Action	14a-8(e)(2) ; 14a-8(i)(1); 14a-8(i)(7)	Neutral	General Company Management Issues	Target Corporation: Rule 14a-8 no-action letter
Target Corporation	4/9/21	No Action	14a-8(i)(10)	Right	Known Conservative Investor	Target Corporation: Rule 14a-8 no-action
Target Corporation	3/26/21	Withdrawn	Company agreed to engage	Left	Progressive Civil Rights	Target Corporation: Rule 14a-8 no-action letter
Target Corporation	3/12/21	Withdrawn	Duplicate proposal	Left	Known Progressive Investor	Target Corporation: Rule 14a-8 no-action letter
Tejon Ranch Co.	3/12/21	No Action	14a-8(i)(7); 14a-8(i)(10)	Neutral	General Company Management Issues	Tejon Ranch Co.: Rule 14a-8 no-action letter
TETRA Technologies, Inc.	2/1/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	TETRA Technologies Inc.: Rule 14a-8 no-action letter
Texas Instruments Incorporated	2/12/21	Withdrawn	Company has already substantially implemented the Proposal	Left	Progressive Civil Rights	Texas Instruments Incorporated: Rule 14a-8 no-action letter
Texas Instruments Incorporated	12/17/20	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	Texas Instruments Incorporated: Rule 14a-8 no-action letter
Texas Pacific Land Corporation	9/28/21	Action	14a-8(e)(2)	Neutral	General Company Management Issues	Texas Pacific Land Corporation: Rule 14a-8 no-action letter
Texas Pacific Land Corporation	9/28/21	Action	14a-8(e)(2)	Neutral	General Company Management Issues	Texas Pacific Land Corporation: Rule 14a-8 no-action letter
Texas Pacific Land Corporation	10/5/21	Request	(reconsid.)Rule 14a-8(i)(7)	Neutral	General Company Management Issues	Texas Pacific Land Corporation: Rule 14a-8 no-action letter
TJX Companies, Inc.	4/9/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	The TJX Companies, Inc.: Rule 14a-8 no-action letter
TJX Companies, Inc.	4/9/21	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	The TJX Companies, Inc.: Rule 14a-8 no-action letter
Tractor Supply Company	3/9/21	Action	14a-8(i)(2); 14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Known Progressive Investor	Tractor Supply Company: Rule 14a-8 no-action letter
Tractor Supply Company	2/1/21	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive Environmentalism	Tractor Supply Company: Rule 14a-8 no-action letter
Tribune Publishing Company	3/22/21	No Action	14a-8(e)(2)	Neutral	General Company Management Issues	Tribune Publishing Company: Rule 14a-8 no-action letter
Truist Financial Corporation	2/1/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Truist Financial Corporation: Rule 14a-8 no-action letter
Tyson Foods Inc.	12/17/20	No Action	14a-8(i)(4); 14a-8(i)(7)	Left	Progressive Environmentalism	Tyson Foods Inc.: Rule 14a-8 no-action letter
U.S. Silica Holdings, Inc.	3/23/21	Action	14a-8(i)(10)	Left	Progressive Government Submission	U.S. Silica Holdings, Inc.: Rule 14a-8 no-action letter
Union Pacific Corporation	3/22/21	Action	14a-8(b); 14a-8(f); 14a-8(c); 14a-8(i)(11)	Left	Progressive Environmentalism	Union Pacific Corporation: Rule 14a-8 no-action letter

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Union Pacific Corporation	3/19/21	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Union Pacific Corporation; Rule 14a-8 no-action letter
Valero Energy Corporation	2/12/21	Action	14a-8(b); 14a-8(f); 14a-8(i)(7); 14a-8(i)(10)	Left	Known Progressive Investor	Valero Energy Corporation; Rule 14a-8 no-action letter
Verizon Communications Inc.	12/23/20	No Action	14a-8(b); 14a-8(f)	Left	Progressive Civil Rights	Verizon Communications Inc.; Rule 14a-8 no-action letter
Verizon Communications Inc.	2/5/21	No Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Right	Known Conservative Investor	Verizon Communications Inc.; Rule 14a-8 no-action letter
Verizon Communications Inc.	3/2/21	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	Verizon Communications Inc.; Rule 14a-8 no-action letter
Walgreens Boots Alliance, Inc.	10/22/20	No Action	14a-8(b); 14a-8(f)	Left	Known Progressive Investor	Walgreens Boots Alliance, Inc.; Rule 14a-8 no-action letter
Walgreens Boots Alliance, Inc.	11/25/20	No Action	14a-8(i)(7)	Right	Known Conservative Investor	Walgreens Boots Alliance, Inc.; Rule 14a-8 no-action letter
Walgreens Boots Alliance, Inc.	11/25/20	Withdrawn	Company has already substantially implemented the Proposal	Left	Progressive Civil Rights	Walgreens Boots Alliance, Inc.; Rule 14a-8 no-action letter
Walmart Inc.	2/19/21	Action	14a-8(i)(7)	Left	Progressive Civil Rights	Walmart Inc.; Rule 14a-8 no-action letter
Walmart Inc.	4/7/21	No Action	14a-8(i)(7)	Right	Conservative Civil Rights	Walmart Inc.; Rule 14a-8 no-action letter
Walmart Inc.	3/26/21	Withdrawn	Company agreed to implement proposal	Left	Progressive Government Submission	Walmart Inc.; Rule 14a-8 no-action letter
Walmart Inc.	2/26/21	Withdrawn	Company enacted proposal	Left	Progressive Civil Rights	Walmart Inc.; Rule 14a-8 no-action letter (sec.gov)
Walmart Inc. 	3/12/21	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	Walmart Inc.; Rule 14a-8 no-action letter
Walt Disney Company	12/23/20	Action	14a-8(i)(3); 14a-8(i)(7)	Right	Known Conservative Investor	The Walt Disney Company; Rule 14a-8 no-action letter
Walt Disney Company	9/28/21	No Action	14a-8(b); 14a-8(f); 14a-8(c); 14a-8(i)(7)	Neutral	General Company Management Issues	The Walt Disney Company; Rule 14a-8 no-action letter
Walt Disney Company	1/8/21	No Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive Civil Rights	The Walt Disney Company; Rule 14a-8 no-action letter
Walt Disney Company	12/23/20	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	The Walt Disney Company; Rule 14a-8 no-action letter
Wells Fargo	2/1/21	Withdrawn	Company agreed to engage	Left	Progressive Government Submission	Wells Fargo and Company; Rule 14a-8 no-action letter
Wells Fargo	3/9/21	Withdrawn	Company agreed to engage	Left	Known Progressive Investor	Wells Fargo & Company; Rule 14a-8 no-action letter
Wendy's	3/12/21	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Civil Rights	The Wendy's Company; Rule 14a-8 no-action letter
Yum! Brands, Inc.	2/19/21	No Action	14a-8(i)(7)	Left	Progressive Civil Rights	Yum! Brands Inc.; Rule 14a-8 no-action letter

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COMPANY NAME	DATE OF LETTER	ACTION/NO ACTION	REASON	ALIGNMENT	EXPLANATION OF ALIGNMENT	LINK
Abbot Laboratories	2/12/20	Action	14a-8(b); 14a-8(f); 14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/vpicabbott021220-14a8.pdf
Abbott Laboratories	2/27/20	No Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/cheveddenabbottrecon022720-14a8.pdf
AbbVie Inc.	1/29/20	Action	14a-8(i)(7)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/riervpic012920-14a8.pdf
Addus HomeCare Corporation	3/27/20	No Action	14a-8(e)(2)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/procapaddus032720-14a8.pdf
Alphabet Inc	4/22/20	No Action	14a-8(i)(7)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ncppralphabtrecon041520-14a8.pdf
Alphabet Inc	3/6/20	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ctwinvestmentalphabet030620-14a8.pdf
Alphabet Inc.	4/9/20	No Action	14a-8(i)(7)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ncppralphabet040920-14a8.pdf
Amazon.com, Inc	4/9/20	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/teamstersctwamazonrecon040920-14a8.pdf
Amazon.com, Inc	3/13/20	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/zhaamazon031320-14a8.pdf
Amazon.com, Inc	3/20/20	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/mercydignityamazon032020-14a8.pdf
Amazon.com, Inc.	4/1/20	Action	14a-8(i)(11)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/sistersetalamazon040120-14a8.pdf
Amazon.com, Inc.	4/1/20	Action	14a-8(i)(5); 14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/oxfametalamazon0401420-14a8.pdf
Amazon.com, Inc.	3/27/20	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ohmanamazon032720-14a8.pdf
Amazon.com, Inc.	3/27/20	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/zevinsisersamazon032720-14a8.pdf
Amazon.com, Inc.	4/1/20	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/teamstersctwamazon040120-14a8.pdf
Amazon.com, Inc.	3/27/20	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/sacksamazon032720-14a8.pdf
Amazon.com, Inc.	4/1/20	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/phungamazon040120-14a8.pdf
Ameren Corporation	3/6/20	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/sierraclubameren030620-14a8.pdf
American Axle & Manufacturing Holdings, Inc.	2/25/20	Withdrawn	Did not intend to submit proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/procapamerican022520-14a8.pdf
Amgen Inc	2/12/20	No Action	14a-8(i)(7)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ppersamgen021220-14a8.pdf
AMN Healthcare Services, Inc.	3/6/20	Action	14a-8(c); 14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/cheveddenamn030620-14a8.pdf

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Apple Inc.	12/6/19	Action	14a-8(i)(12)(ii)	Right	Conservative civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/sumofusapple120619-14a8.pdf
Apple Inc.	1/17/20	No Action	14a-8(i)(12)(i)	Right	Known conservative investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ncpprapplerecon011720-14a8.pdf
Apple Inc.	12/6/19	No Action	14a-8(i)(3)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/zhaapple120619-14a8.pdf
Apple Inc.	12/20/19	No Action	14a-8(i)(7)	Right	Known conservative investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/ncpprapple122019-14a8.pdf
Applied Materials, Inc.	12/20/19	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/steinerapplied122019-14a8.pdf
AT&T Inc.	1/31/20	Action	14a-8(i)(3)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/zhaott013120-14a8.pdf
AT&T Inc.	12/9/19	No Action	14a-8(b); 14a-8(f)	Right	Conservative civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/bailevatt120919-14a8.pdf
AT&T Inc.	1/9/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenat&t010920-14a8.pdf
AT&T Inc.	1/31/20	No Action	14a-8(i)(10)	Right	Known conservative investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ncppratt013120-14a8.pdf
AT&T Inc.	2/25/20	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/zhaottrecon022520-14a8.pdf
Atrion Corporation	2/14/20	Withdrawn	Did not intend to submit proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/procapatrimon021420-14a8.pdf
AutoNation, Inc.	1/24/20	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenautonation012420-14a8.pdf
Bank of America Corporation	2/12/20	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/harringtonboa021220-14a8.pdf
Bank of America Corporation	2/5/20	No Action	14a-8(i)(10)	Right	Known conservative investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ncpprboa020520-14a8.pdf
Bank of America Corporation	1/24/20	No Action	14a-8(e)(2)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/strobharboa012420-14a8.pdf
Best Buy Co., Inc	3/27/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenbestbuy032720-14a8.pdf
BlackRock, Inc	2/25/20	Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/asyouowtblackrock022520-14a8.pdf
Booz Allen Hamilton Holding Corporation	4/14/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenbooz041420-14a8.pdf
Bristol-Myers Squibb Company	2/12/20	No Action	14a-8(i)(7)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ppersbristolmyers021220-14a8.pdf
Broadway Financial Corporation	5/12/20	No Action	14a-8(e)(2)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/commercebroadway051220-14a8.pdf
Cadence Design Systems, Inc.	1/24/20	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddencadence012420-14a8.pdf
Camden National Corporation	3/27/20	No Action	14a-8(e)(2)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/procapnycamden032720-14a8.pdf
Cardinal Health, Inc.	8/14/20	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ibtgcardinal081420-14a8.pdf
CBRE Group, Inc.	2/14/20	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/afciocbre021420-14a8.pdf
CDW Corporation	2/25/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddencdw022520-14a8.pdf
Cheniere Energy, Inc.	3/20/20	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/taggartcheniere032020-14a8.pdf

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Chesapeake Utilities Corporation	2/25/20	Withdrawn	Did not intend to submit proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/procapchesapeake022520-14a8.pdf
Chevron Corporation	3/6/20	No Action	14a-8(b); 14a-8(f)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/followthischevron030620-14a8.pdf
Chevron Corporation	3/20/20	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/parkfoundationchevron032020-14a8.pdf
Chevron Corporation	3/6/20	No Action	14a-8(i)(11)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/pperschevron030620-14a8.pdf
Chevron Corporation	3/6/20	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/activehomechevron030620-14a8.pdf
Chimera Investment Corporation	3/27/20	No Action	14a-8(e)(2)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/procapchimera032720-14a8.pdf
Chipotle Mexican Grill, Inc.	2/7/20	Action	14a-8(i)(10)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/nyscrfchipotle020720-14a8.pdf
Cisco Systems, Inc.	8/27/20	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/mcritchiesisco082720-14a8.pdf
Citigroup Inc	2/25/20	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/harringtoncitigroup022520-14a8.pdf
Citigroup Inc.	1/9/20	No Action	14a-8(e)(2)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/lindnercitigroup010920-14a8.pdf
Citigroup Inc.	2/5/20	No Action	14a-8(i)(10)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ncpprcitigroup020520-14a8.pdf
Comcast Corporation	4/9/20	Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/arjunajennecomcast040920-14a8.pdf
Comcast Corporation	4/1/20	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/zhaocomcast040120-14a8.pdf
Comcast Corporation	3/20/20	No Action	14a-8(i)(7)	Right	Conservative civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/nunziatocomcastetal032020-14a8.pdf
Community Trust Bancorp, Inc.	2/12/20	Withdrawn	Legal deficiency	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/presbyterianctb021220-14a8.pdf
ConocoPhillips Company	2/25/20	No Action	14a-8(e)(2)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/followthisconoco022520-14a8.pdf
CoreCivic, Inc.	1/24/20	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/friedmanncorecivic012420-14a8.pdf
Cowen Inc.	4/14/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/steinercheveddencowen041420-14a8.pdf
CSX Corporation	2/28/20	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/gallaghercsx022820-14a8.pdf
CVS Health Corporation	3/6/20	No Action	14a-8(i)(7)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ccnycv030620-14a8.pdf
Designer Brands Inc.	2/12/20	Withdrawn	Did not intend to submit proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/procapdesigner021220-14a8.pdf
Devon Energy Corporation	4/1/20	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/asyouowetaldevon040120-14a8.pdf
Discover Financial Services	3/20/20	No Action	14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/cheveddenyoungdiscover032020-14a8.pdf
Dollar General Corporation	1/31/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/cheveddenollar013120-14a8.pdf
Dollar General Corporation	3/6/20	No Action	14a-8(i)(7)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ocnydollar030620-14a8.pdf
Dollar Tree, Inc.	3/6/20	No Action	14a-8(i)(7)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ocnyetalollar030620-14a8.pdf

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Dominion Energy, Inc	2/14/20	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/smithdominion021420-14a8.pdf
Dominion Energy, Inc	3/6/20	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/asyouowtaggart030620-14a8.pdf
Dow Inc	2/12/20	No Action	14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/steinerdow021220-14a8.pdf
eBay Inc.	4/1/20	No Action	14a-8(i)(2); 14a-8(i)(6)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/zhaoebay040120-14a8.pdf
Eli Lilly and Company	1/31/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddeneli013120-14a8.pdf
Euronet Worldwide, Inc.	2/14/20	Withdrawn	Did not intend to submit proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/procapeuronet021420-14a8.pdf
Extreme Networks, Inc.	9/18/2020	No Action	14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddensteinerextreme091820-14a8.pdf
Exxonmobil Corporation	3/6/20	Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cummingsexxon030620-14a8.pdf
Exxonmobil Corporation	3/20/20	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Right	Known conservative investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/milloyexxon032020-14a8.pdf
Exxonmobil Corporation	2/28/20	No Action	14a-8(b); 14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/drexlerexxon022820-14a8.pdf
Exxonmobil Corporation	3/6/20	No Action	14a-8(b); 14a-8(f)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/followthisexxon030620-14a8.pdf
Exxonmobil Corporation	3/20/20	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/asyouowbeharexon032020-14a8.pdf
Exxonmobil Corporation	3/13/20	No Action	14a-8(i)(11)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/bnp-paribasexxon031320-14a8.pdf
Exxonmobil Corporation	3/6/20	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/activehomeexxon030620-14a8.pdf
Exxonmobil Corporation	3/6/20	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/lambexxon030620-14a8.pdf
Exxonmobil Corporation	2/12/20	Withdrawn	Withdrawal agreement undisclosed	Right	Conservative civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/stellexxon021220-14a8.pdf
Facebook, Inc.	1/31/20	Withdrawn	Company agreed to engage	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/asyouowfacebook013120-14a8.pdf
FedEx Corporation	6/19/20	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/petersonfedex061920-14a8.pdf
Ferro Corporation	1/9/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/steinerferro010920-14a8.pdf
First Horizon National Corporation	1/31/20	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/figureBvalkenburgh013120-14a8.pdf
Fitbit, Inc	3/20/20	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddensteinerfitbit032020-14a8.pdf
Fortive Corporation	2/12/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenfortive021220-14a8.pdf
General Dynamics Corporation	1/16/20	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddengeneraldynamics011620-14a8.pdf
General Electric Company	2/14/20	No Action	14a-8(i)(4)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/harangozoge021420-14a8.pdf
General Electric Company	2/28/20	No Action	14a-8(i)(4)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/harangozogerecon022820-14a8.pdf
General Electric Company	2/5/20	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/asyouowntaylor020520-14a8.pdf
General Motors Company	3/27/20	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenmayhughgm032720-14a8.pdf

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General Motors Company	3/27/20	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/cheveddendollingerlauveqm032720-14a8.pdf
Genuine Parts Company	12/20/19	Action	14a-8(b); 14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/asyouowultra122019-14a8.pdf
HealthStream, Inc.	3/27/20	No Action	14a-8(e)(2)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/procaphealthstream032720-14a8.pdf
Hertz Global Holdings, Inc.	2/28/20	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/asyouowhertz022820-14a8.pdf
Hess Corporation	4/9/20	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/asyouowetalhess040920-14a8.pdf
Hewlett Packard Enterprise Company	1/29/20	Action	14a-8(i)(2); 14a-8(i)(3); 14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/cheveddenhp012920-14a8.pdf
Highlands REIT, Inc.	2/7/20	No Action	14a-8(i)(2); 14a-8(i)(6)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/sarasinhighlands020720-14a8.pdf
HollyFrontier Corporation	2/7/20	Withdrawn	Company agreed to engage	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/unitedsteelworkershollyfrontier020720-14a8.pdf
Honeywell International Inc	1/29/20	Action	14a-8(i)(2); 14a-8(i)(3); 14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/cheveddenhoneywell012920-14a8.pdf
HP Inc.	12/20/19	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/kimhp122019-14a8.pdf
Huntsman Corporation	1/16/20	No Action	14a-8(b); 14a-8(f)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/asyouowhuntsman011620-14a8.pdf
Intel Corporation	3/6/20	No Action	14a-8(i)(7)	Right	Conservative civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/hotzintel030620-14a8.pdf
International Business Machines Corporation	12/20/19	Action	14a-8(b); 14a-8(f); 14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/steineribm122019-14a8.pdf
International Business Machines Corporation	12/13/19	No Action	14a-8(b); 14a-8(f)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/mannoibm121319-14a8.pdf
IntriCon Corporation	3/27/20	No Action	14a-8(e)(2)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/procapintricon032720-14a8.pdf
InvenTrust Properties Corp.	2/7/20	No Action	14a-8(i)(10)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/branfmaninventrust020720-14a8.pdf
iRobot Corporation	3/13/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/mcritchierobot031320-14a8.pdf
J.B. Hunt Transport Services, Inc.	2/7/20	Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/trilliumbhunt020720-14a8.pdf
Johnson & Johnson	1/29/20	Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/trilliumoneida012920-14a8.pdf
Johnson & Johnson	1/31/20	No Action	14a-8(i)(10)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ncppjohnson013120-14a8.pdf
Johnson & Johnson	2/12/20	No Action	14a-8(i)(7)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/vermontjohnson021220-14a8.pdf
Johnson & Johnson	2/12/20	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ijensetaljohnson021220-14a8.pdf
Jounce Therapeutics, Inc.	2/25/20	Withdrawn	Did not intend to submit proposal	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/procapjounce022520-14a8.pdf
JPMorgan Chase & Co	2/28/20	Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/asyouowkariger022820-14a8.pdf

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JPMorgan Chase & Co	1/31/20	Withdrawn	Duplicate proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/nathanjpmorgan013120-14a8.pdf
JPMorgan Chase & Co	1/31/20	Withdrawn	Company agreed to engage	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cleanfieldbridgesjpmorgan013120-14a8.pdf
JPMorgan Chase & Co.	1/29/20	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenjpmorgan012920-14a8.pdf
JPMorgan Chase & Co.	3/13/20	Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/trilliumjpmorgan031320-14a8.pdf
JPMorgan Chase & Co.	3/13/20	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/strobharjpmorgan031320-14a8.pdf
JPMorgan Chase & Co.	2/28/20	No Action	14a-8(b); 14a-8(f)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/asyouowbrankmann022820-14a8.pdf
JPMorgan Chase & Co.	2/5/20	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/harringtonjpmorgan020520-14a8.pdf
JPMorgan Chase & Co.	3/6/20	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cullmanjpmorgan030620-14a8.pdf
JPMorgan Chase & Co.	3/6/20	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/baltimorejpmorgan030620-14a8.pdf
JPMorgan Chase & Co.	3/6/20	Withdrawn	Company agreed to engage	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/bostonjpmorgan030620-14a8.pdf
Juniper Networks, Inc.	2/25/20	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/zhaojuniper022520-14a8.pdf
Kaman Corporation	1/16/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenkaman011620-14a8.pdf
Kohl's Corporation	1/16/20	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/providencetalkohls011620-14a8.pdf
L Brands, Inc.	2/25/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenbrands022520-14a8.pdf
Lear Corporation	3/6/20	Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/goodshepherdlear030620-14a8.pdf
Lennar Corporation	12/20/19	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/propplennar122019-14a8.pdf
Liberty Broadband Corporation	3/13/20	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/asyouowlonqviewliberty031320-14a8.pdf
Linde plc	4/9/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenlinde040920-14a8.pdf
Marriott International, Inc.	3/27/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/aflicionmarriott032720-14a8.pdf
Marriott International, Inc.	3/13/20	No Action	14a-8(i)(5)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/petamarriott031320-14a8.pdf
McDonald's Corporation	2/12/20	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ppersmcdonalds021220-14a8.pdf
McDonald's Corporation	3/20/20	No Action	Withdrawn	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ibvmmcdonalds032020-14a8.pdf
McKesson Corporation	5/26/20	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/changliumckesson052620-14a8.pdf
MetLife, Inc.	4/9/20	Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/garciamelife040920-14a8.pdf
MGM Resorts International	1/16/20	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/strobharmgm011620-14a8.pdf
Moody's Corporation	1/24/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/mcritchleyoungmoody012420-14a8.pdf
Navient Corporation	2/25/20	No Action	14a-8(i)(7)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ersinavient022520-14a8.pdf

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NCR Corporation	2/5/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/youngncr020520-14a8.pdf
Newell Brands Inc.	2/25/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/cheveddennewell022520-14a8.pdf
Newmont Goldcorp Corporation	1/9/20	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/nyscrfnewmont010920-14a8.pdf
NextDecade Corporation	8/27/20	Withdrawn	Legal deficiency	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/taggartnextdecade082720-14a8.pdf
NextEra Energy, Inc.	2/28/20	Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/angusnextera022820-14a8.pdf
NIKE, Inc.	6/19/20	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/cirquenike061920-14a8.pdf
NIKE, Inc.	6/19/20	No Action	14a-8(i)(7)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ncpprnike061920-14a8.pdf
Norfolk Southern Corporation	2/12/20	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/straussnorfolk021220-14a8.pdf
Northrop Grumman Corporation	3/13/20	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/stdominicnorthrop031320-14a8.pdf
Northrop Grumman Corporation	3/13/20	No Action	14a-8(b); 14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/codepinknorthrop031320-14a8.pdf
NorthWestern Corporation	1/9/20	No response	pending litigation	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/tosdalnorthwestern-010920-14a8.pdf
O'Reilly Automotive, Inc.	2/14/20	No Action	14a-8(b); 14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/asyoussowmillers021420-14a8.pdf
Ormat Technologies, Inc.	3/20/20	Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/trilliumassetormat032020-14a8.pdf
Oshkosh Corporation	11/21/19	No Action	14a-8(i)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/cheveddenoshkosh112119-14a8.pdf
PACCAR Inc	1/31/20	No Action	14a-8(i)(10)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/stringerpaccar013120-14a8.pdf
PayPal Holdings, Inc.	1/31/20	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/northstarpaypal013120-14a8.pdf
PetMed Express, Inc.	4/14/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/mcritchiepetmed032620-14a8-incoming.pdf
Pfizer Inc.	1/16/20	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/cheveddenpfizer011620-14a8.pdf
Pfizer Inc.	1/29/20	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/sistersfrancispfizer012920-14a8.pdf
Pfizer Inc.	2/5/20	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/strobharpfizer020520-14a8.pdf
Pfizer Inc.	1/31/20	No Action	14a-8(i)(10)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ncpprpfizer013120-14a8.pdf
PG&E Corporation	5/26/20	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/cheveddenpge052620-14a8.pdf
Philip Morris International Inc.	12/13/19	No Action	14a-8(i)(13)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/ballphilipmorris121319-14a8.pdf
PNM Resources, Inc.	3/6/20	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/davishittnm030620-14a8.pdf
PPG Industries, Inc	1/16/20	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/sistersstjosephppg011620-14a8.pdf

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PPG Industries, Inc.	1/16/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenppg011620-14a8.pdf
Prudential Financial, Inc.	2/28/20	Withdrawn	Company agreed to engage	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ritcherprudential022820-14a8.pdf
QEP Resources, Inc.	1/9/20	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenqep010920-14a8.pdf
QUALCOMM Inc.	11/21/19	No Action	14a-8(b); 14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/schaeferqualcomm112119-14a8.pdf
Quest Diagnostics Incorporated	1/24/20	No Action	14a-8(h)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenquest012420-14a8.pdf
Republic Services, Inc.	2/14/20	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ibtrfrepulic021420-14a8.pdf
Resideo Technologies, Inc.	3/27/20	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenresideo032720-14a8.pdf
ResMed Inc	8/27/20	No Action	14a-8(i)(5)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenyoungresmed082720-14a8.pdf
RH	4/9/20	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/petarh040920-14a8.pdf
Rite Aid Corporation	4/14/20	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/krolriteaid041420-14a8.pdf
S&P Global Inc.	2/25/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddens&p022520-14a8.pdf
salesforce.com, inc	4/22/20	No Action	14a-8(i)(7)	Right	Known conservative investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/mcprsalesforcerecon041520-14a8.pdf
salesforce.com, inc.	4/9/20	No Action	14a-8(i)(7)	Right	Known conservative investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/mcprsalesforce040920-14a8.pdf
SeaWorld Entertainment, Inc.	2/7/20	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/petaseaworld020720-14a8.pdf
Sempra Energy	3/6/20	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/asyouowtaggartsempra030620-14a8.pdf
ServiceNow, Inc.	4/9/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenmcritchieetalservice040920-14a8.pdf
Smith & Wesson Brands, Inc.	8/14/20	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/catholicealthetal081420-14a8.pdf
Southwestern Energy Company	1/24/20	Action	14a-8(b); 14a-8(f); 14a-8(c)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/steinersouthwestern012420-14a8.pdf
Sprint Corporation	12/13/19	No Action	14a-8(b); 14a-8(f)	Neutral	General Civil Rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/flemingsprint112719-14a8-incoming.pdf
State Street Corporation	3/6/20	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/mcritchiecheveddenstate030620-14a8.pdf
Sturm, Ruger & Company, Inc.	2/28/20	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/catholicealthetal022820-14a8.pdf
T. Rowe Price Group, Inc	2/14/20	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/mcritchietrp021420-14a8.pdf
T. Rowe Price Group, Inc.	3/13/20	Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/zevintrp031320-14a8.pdf
Teladoc Health, Inc.	3/20/20	No Action	14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/youngmrcritchieteladoc032020-14a8.pdf
The Allstate Corporation	1/9/20	No Action	14a-8(h)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/steinercheveddenallstate010920-14a8.pdf
The Bank of New York Mellon Corporation	1/24/20	Action	14a-8(b); 14a-8(f); 14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/steiner43bankny012420-14a8.pdf
The Bank of New York Mellon Corporation	1/24/20	No Action	14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/steiner50bankny012420-14a8.pdf

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The Boeing Company	1/9/20	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/mcritchieyoungboeing010920-14a8.pdf
The Clorox Company	8/14/20	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenmcritchieclorox081420-14a8.pdf
The GEO Group, Inc.	3/27/20	Action	14a-8(i)(4); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/seiugeo032720-14a8.pdf
The Goldman Sachs Group, Inc.	2/25/20	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/harringtongoldman022520-14a8.pdf
The Home Depot, Inc	1/29/20	Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenhomedepot012920-14a8.pdf
The Home Depot, Inc	3/20/20	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/northstarhomedepot032020-14a8.pdf
The Manitowoc Company, Inc	12/20/19	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/cheveddenmanitowoc122019-14a8.pdf
The Progressive Corporation	3/20/20	No Action	Withdrawn	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/asyouowultrahazenprogressive032020-14a8.pdf
The Southern Company	3/6/20	No Action	14a-8(i)(11)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddensouthern030620-14a8.pdf
The Southern Company	3/13/20	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/asyouowbeharlabrosse031320-14a8.pdf
The TJX Companies, Inc	3/20/20	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/northstartjx032020-14a8.pdf
The TJX Companies, Inc.	4/9/20	Action	14a-8(i)(10)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/nyscrftjx040920-14a8.pdf
The TJX Companies, Inc.	4/9/20	Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/harringtontjx040920-14a8.pdf
The TJX Companies, Inc.	4/9/20	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/berksonetaltjx040920-14a8.pdf
The Walt Disney Company	12/6/19	Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/sisterstagneswalt120619-14a8.pdf
The Walt Disney Company	12/6/19	No Action	14a-8(i)(11)	Right	Known conservative investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/ncpprwalt120619-14a8.pdf
The Walt Disney Company	12/6/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/perriconewalt120619-14a8.pdf
TimkenSteel Corporation	12/20/19	No Action	14a-8(e)(2)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/procap122019-14a8.pdf
Tribune Publishing Company	2/14/20	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/tngcwatribune021420-14a8.pdf
Upwork Inc.	4/1/20	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/mcritchieyoungupwork040120-14a8.pdf
Verizon Communications Inc.	12/20/19	No Action	14a-8(b); 14a-8(f)	Neutral	General Civil Rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2019/flemingverizon122019-14a8.pdf
Walmart Inc.	4/1/20	Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/murraywalmart040120-14a8.pdf
Walmart Inc.	3/6/20	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ctwalmart030620-14a8.pdf
Walmart Inc.	3/27/20	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/ibtgfwalmart032720-14a8.pdf
Wells Fargo & Company	1/29/20	Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/cheveddenwellsfargo012920-14a8.pdf
Wells Fargo & Company	2/12/20	Withdrawn	Company already implements proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpin/cf-noaction/14a-8/2020/harringtonwellsfargo021220-14a8.pdf

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Wells Fargo & Company	2/5/20	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/asyouowells020520-14a8.pdf
Wells Fargo & Company	2/12/20	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/blackmanwellsfargo021220-14a8.pdf
Wheeler Real Estate Investment Trust, Inc.	12/3/19	Action	14a-8(b); 14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/bowerswheeler120319-14a8.pdf
Wynn Resorts, Limited	12/13/19	Withdrawn	Legal deficiency	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/cheveddenwynn121319-14a8.pdf
Xerox Holdings Corporation	3/6/20	No Action	14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/steinercheveddenxerox030620-14a8.pdf
Xerox Holdings Corporation	2/12/20	No Action	14a-8(i)(10)	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ppresxerox021220-14a8.pdf
Yum! Brands, Inc.	3/20/20	Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/haageschnipyum032020-14a8.pdf
Yum! Brands, Inc.	3/6/20	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2020/ctwyum030620-14a8.pdf

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COMPANY NAME	DATE OF LETTER	ACTION/NO ACTION	REASON	ALIGNMENT	EXPLANATION OF ALIGNMENT	LINK
Abbott Laboratories	2/28/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Abbott Laboratories; Rule 14a-8 no-action letter (sec.gov)
Abbott Laboratories	2/28/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Abbott Laboratories; Rule 14a-8 no-action letter (sec.gov)
AbbVie	2/28/19	Action	14a-8(i)(7)	Left	Progressive civil rights	AbbVie Inc.; Rule 14a-8 no-action letter (sec.gov)
AbbVie	2/27/19	No Action	14a-8(i)(10)	Left	Known progressive investor	AbbVie Inc.; Rule 14a-8 no-action letter (sec.gov)
AbbVie	2/15/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	AbbVie Inc.; Rule 14a-8 no-action letter (sec.gov)
AbbVie	1/30/19	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	AbbVie Inc.; Rule 14a-8 no-action letter (sec.gov)
Advance Auto Parts	4/9/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Advance Auto Parts, Inc.; Rule 14a-8 no-action letter (sec.gov)
Air Products and Chemicals	10/15/19	Withdrawn	Company agreed to engage	Left	Progressive environmentalism	Air Products and Chemicals, Inc.; Rule 14a-8 no-action letter (sec.gov)
Alphabet	4/19/19	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Progressive civil rights	arjunanyscrf1041919-14a8.pdf (sec.gov)
Alphabet	4/16/19	No Action	14a-8(i)(12)(i)	Right	Conservative civil rights	Alphabet Inc.; Rule 14a-8 no-action letter (sec.gov)
Amazon	4/3/19	Action	14a-8(b); 14a-8(f); 14a-8(i)(7)	Left	Progressive civil rights	Amazon.com, Inc.; Rule 14a-8 no-action letter (sec.gov)
Amazon	4/3/19	Action	14a-8(i)(5); 14a-8(i)(7)	Left	Progressive civil rights	Amazon.com, Inc.; Rule 14a-8 no-action letter (sec.gov)
Amazon	3/28/19	Action	14a-8(i)(5); 14a-8(i)(7); 14a-8(i)(11)	Left	Progressive civil rights	Amazon.com, Inc.; Rule 14a-8 no-action letter (sec.gov)
Amazon	4/3/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Amazon.com; Rule 14a-8 no-action letter (sec.gov)
Amazon	3/28/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Amazon.com, Inc.; Rule 14a-8 no-action letter (sec.gov)
Amazon	3/6/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Amazon.com, Inc.; Rule 14a-8 no-action letter (sec.gov)
Amazon	3/28/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Amazon.com, Inc.; Rule 14a-8 no-action letter (sec.gov)
Amazon	3/4/19	Withdrawn	Company agreed to engage	Left	Progressive environmentalism	Amazon.com, Inc.; Rule 14a-8 no-action letter (sec.gov)
AMC Networks	4/23/19	No Action	14a-8(i)(6)	Left	Known progressive investor	AMC Networks, Inc.; Rule 14a-8 no-action letter (sec.gov)
American Outdoor Brands Corporation	6/25/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	American Outdoor Brands Corporation; Rule 14a-8 no-action letter (sec.gov)
Ameriprise Financial	2/14/19	Withdrawn	Company agreed to implement proposal	Neutral	General Company Management Issues	Ameriprise Financial, Inc.; Rule 14a-8 no-action letter (sec.gov)

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Anadarko Petroleum Corporation	3/4/19	Action	14a-8(i)(7)	Left	Progressive environmentalism	Anadarko Petroleum Corporation; Rule 14a-8 no-action letter (sec.gov)
Annaly Capital Management	2/22/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Annaly Capital Management, Inc.; Rule 14a-8 no-action letter (sec.gov)
Anthem	2/21/19	No Action	14a-8(b); 14a-8(f)	Left	Progressive environmentalism	Anthem, Inc.; Rule 14a-8 no-action letter (sec.gov)
Anthem	2/15/19	No Action	14a-8(i)(2)	Left	Known progressive investor	Anthem, Inc.; Rule 14a-8 no-action letter (sec.gov)
AT&T	1/29/19	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	AT&T Inc.; Rule 14a-8 no-action letter (sec.gov)
AT&T	1/29/19	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	AT&T Inc.; Rule 14a-8 no-action letter (sec.gov)
AutoZone	10/9/19	No Action	14a-8(i)(10)	Left	Known progressive investor	AutoZone, Inc.; Rule 14a-8 no-action letter (sec.gov)
Bank of America Corporation	2/21/19	Action	14a-8(c); 14a-8(i)(7)	Left	Progressive civil rights	Bank of America Corporation; Rule 14a-8 no-action letter (sec.gov)
Bank of America Corporation	2/21/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Bank of America Corporation; Rule 14a-8 no-action letter (sec.gov)
Bank of America Corporation	2/26/19	No Action	14a-8(i)(7)	Right	Conservative civil rights	Bank of America Corporation; Rule 14a-8 no-action letter (sec.gov)
Bank of America Corporation	2/15/19	Withdrawn	Company agreed to engage	Left	Progressive environmentalism	Bank of America Corporation; Rule 14a-8 no-action letter (sec.gov)
BlackRock	3/21/19	No Action	14a-8(b); 14a-8(f)	Neutral	General Company Management Issues	BlackRock, Inc.; Rule 14a-8 no-action letter (sec.gov)
Bristol-Myers Squibb Company	3/8/19	Action	14a-8(i)(7)	Left	Progressive civil rights	Bristol-Myers Squibb Company; Rule 14a-8 no-action letter (sec.gov)
Bristol-Myers Squibb Company	3/1/19	No Action	14a-8(i)(7)	Left	Known progressive investor	Bristol-Myers Squibb Company; Rule 14a-8 no-action letter (sec.gov)
Cadence Design Systems	2/27/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Cadence Design Systems, Inc.; Rule 14a-8 no-action letter (sec.gov)
Caterpillar	4/4/19	No Action	14a-8(e)(2)	Left	Known progressive investor	Caterpillar Inc.; Rule 14a-8 no-action letter (sec.gov)
CBRE Group	3/18/19	Action	14a-8(i)(10)	Left	Known progressive investor	CBRE Group, Inc.; Rule 14a-8 no-action letter (sec.gov)
CBRE Group	3/6/19	Action	14a-8(i)(7)	Left	Known progressive investor	CBRE Group, Inc.; Rule 14a-8 no-action letter (sec.gov)
CBS Corporation	3/15/19	Action	14a-8(i)(7)	Left	Known progressive investor	CBS Corporation; Rule 14a-8 no-action letter (sec.gov)
CBS Corporation	3/8/19	Withdrawn	Legal deficiency	Left	Progressive civil rights	CBS Corporation; Rule 14a-8 no-action letter (sec.gov)
CBS Corporation	2/1/19	Withdrawn	Legal deficiency	Left	Progressive civil rights	CBS Corporation; Rule 14a-8 no-action letter (sec.gov)
Cheniere Energy	2/25/19	Withdrawn	Company agreed to engage	Left	Progressive environmentalism	Cheniere Energy, Inc.; Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	3/15/19	Action	14a-8(i)(6)	Left	Progressive environmentalism	Chevron Corporation; Rule 14a-8 no-action letter (sec.gov)
Chevron Corporation	3/28/19	No Action	14a-8(i)(11)	Left	Progressive environmentalism	Chevron Corporation; Rule 14a-8 no-action letter (sec.gov)
Citigroup	1/28/19	Withdrawn	Company agreed to engage	Left	Progressive environmentalism	Citigroup Inc.; Rule 14a-8 no-action letter (sec.gov)
Comcast Corporation	4/4/19	No Action	14a-8(e)(2)	Neutral	General Company Management Issues	Comcast Corporation; Rule 14a-8 no-action letter (sec.gov)

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Comcast Corporation	3/14/19	No Action	14a-8(i)(11)	Left	Progressive civil rights	Comcast Corporation; Rule 14a-8 no-action letter (sec.gov)
CoreCivic	3/15/19	Action	14a-8(i)(10)	Left	Known progressive investor	CoreCivic, Inc.; Rule 14a-8 no-action letter (sec.gov)
CoreCivic	3/15/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	CoreCivic, Inc.; Rule 14a-8 no-action letter (sec.gov)
CorVel Corporation	6/5/19	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	CorVel Corporation; Rule 14a-8 no-action letter (sec.gov)
Costco Wholesale Corporation	10/2/19	Withdrawn	Company already implements proposal	Left	Known progressive investor	Costco Wholesale Corporation; Rule 14a-8 no-action letter (sec.gov)
Costco Wholesale Corporation	10/16/19	Withdrawn	Company already implements proposal	Left	Progressive civil rights	Costco Wholesale Corporation; Rule 14a-8 no-action letter (sec.gov)
Devon Energy Corporation	3/4/19	No Action	14a-8(i)(7)	Left	Known progressive investor	Devon Energy Corporation (sec.gov)
Domino's Pizza	2/19/19	Withdrawn	Company agreed to implement proposal	Left	Progressive environmentalism	Domino's Pizza, Inc.; Rule 14a-8 no-action letter (sec.gov)
Dover Corporation	2/6/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Dover Corporation; Rule 14a-8 no-action letter (sec.gov)
Duke Energy Corporation	3/12/19	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Right	Known Conservative Investor	Duke Energy Corporation; Rule 14a-8 no-action letter (sec.gov)
Duke Energy Corporation	3/6/19	No Action	14a-8(d); 14a-8(f)	Left	Known progressive investor	Duke Energy Corporation; Rule 14a-8 no-action letter (sec.gov)
Dunkin' Brands Group	3/6/19	Action	14a-8(i)(10)	Left	Progressive civil rights	Dunkin' Brands Group, Inc.; Rule 14a-8 no-action letter (sec.gov)
eBay	4/10/19	No Action	14a-8(i)(3)	Left	Progressive civil rights	eBay Inc.; Rule 14a-8 no-action letter (sec.gov)
Eli Lilly and Company	2/28/19	Action	14a-8(i)(5)	Right	Conservative civil rights	Eli Lilly and Company; Rule 14a-8 no-action letter (sec.gov)
Eli Lilly and Company	2/22/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Eli Lilly and Company; Rule 14a-8 no-action letter (sec.gov)
Eli Lilly and Company	3/1/19	No Action	14a-8(i)(7)	Left	Known progressive investor	Eli Lilly and Company; Rule 14a-8 no-action letter (sec.gov)
Exelon Corporation	3/12/19	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Right	Known Conservative Investor	Exelon Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	4/2/19	Action	14a-8(i)(10)	Left	Progressive civil rights	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	3/28/19	Action	14a-8(i)(10)	Left	Progressive environmentalism	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	4/2/19	Action	14a-8(i)(10)	Left	Progressive environmentalism	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	4/2/19	Action	14a-8(i)(10); 14a-8(i)(11)	Left	Progressive civil rights	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	3/28/19	No Action	14a-8(f)	Right	Known Conservative Investor	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	4/3/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	3/29/19	No Action	14a-8(i)(10)	Left	Progressive environmentalism	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	4/2/19	No Action	14a-8(i)(10)	Right	Conservative civil rights	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
Exxonmobil Corporation	4/2/19	No Action	14a-8(i)(7)	Left	Progressive environmentalism	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)

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Exxonmobil Corporation	3/25/19	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	Exxonmobil Corporation; Rule 14a-8 no-action letter (sec.gov)
FedEx Corporation	6/5/19	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	FedEx Corporation; Rule 14a-8 no-action letter (sec.gov)
Ferro Corporation	2/6/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Ferro Corporation; Rule 14a-8 no-action letter (sec.gov)
Fitbit	3/20/19	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known progressive investor	Fitbit, Inc.; Rule 14a-8 no-action letter (sec.gov)
FleetCor Technologies	4/4/19	No Action	14a-8(e)(2)	Left	Known progressive investor	FleetCor Technologies, Inc.; Rule 14a-8 no-action letter (sec.gov)
Fortive Corporation	3/13/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Fortive Corporation; Rule 14a-8 no-action letter (sec.gov)
Frontier Communications Corporation	2/19/19	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	Frontier Communications Corporation; Rule 14a-8 no-action letter (sec.gov)
General Dynamics	2/11/19	Action	14a-8(i)(3)	Left	Known progressive investor	General Dynamics Corporation; Rule 14a-8 no-action letter (sec.gov)
General Electric	3/6/19	Action	14a-8(i)(3)	Neutral	General Company Management Issues	General Electric Company; Rule 14a-8 no-action letter (sec.gov)
General Electric	3/1/19	No Action	14a-8(f)	Neutral	General Company Management Issues	General Electric Company; Rule 14a-8 no-action letter (sec.gov)
General Electric	3/5/19	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	General Electric Company; Rule 14a-8 no-action letter (sec.gov)
General Electric	2/15/19	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	General Electric Company; Rule 14a-8 no-action letter (sec.gov)
GEO Group	3/15/19	Action	14a-8(i)(2); 14a-8(i)(6); 14a-8(i)(3); 14a-8(i)(7)	Left	Progressive civil rights	The GEO Group, Inc.; Rule 14a-8 no-action letter (sec.gov)
GEO Group	3/15/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	The GEO Group, Inc.; Rule 14a-8 no-action letter (sec.gov)
Gilead Sciences	3/7/19	Action	14a-8(b) 14a-8(f); 14a-8(i)(7)	Left	Known progressive investor	Gilead Sciences, Inc.; Rule 14a-8 no-action letter (sec.gov)
Gilead Sciences	3/6/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Gilead Sciences, Inc.; Rule 14a-8 no-action letter (sec.gov)
Goldman Sachs	3/12/19	No Action	14a-8(i)(7)	Left	Known progressive investor	The Goldman Sachs Group, Inc.; Rule 14a-8 no-action letter (sec.gov)
Goldman Sachs	2/5/19	Withdrawn	Company agreed to engage	Left	Progressive environmentalism	The Goldman Sachs Group, Inc.; Rule 14a-8 no-action letter (sec.gov)
Hanesbrands	2/5/19	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	Hanesbrands Inc.; Rule 14a-8 no-action letter (sec.gov)
HCA Healthcare	2/21/19	No Action	14a-8(i)(10)	Left	Known progressive investor	HCA Healthcare, Inc.; Rule 14a-8 no-action letter (sec.gov)
Hecla Mining Company	3/1/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Hecla Mining Company; Rule 14a-8 no-action letter (sec.gov)
Hess Corporation	4/11/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Hess Corporation; Rule 14a-8 no-action letter (sec.gov)
HollyFrontier Corporation	2/11/19	No Action	14a-8(e)(2)	Left	Known progressive investor	HollyFrontier Corporation; Rule 14a-8 no-action letter (sec.gov)
Honeywell International	3/1/19	No Action	14a-8(i)(11)	Left	Progressive civil rights	Honeywell International Inc.; Rule 14a-8 no-action letter (sec.gov)
Intel Corporation	3/15/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Intel Corporation; Rule 14a-8 no-action letter (sec.gov)
Invesco Ltd	3/8/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Invesco Ltd.; Rule 14a-8 no-action letter (sec.gov)
JB Hunt Transport Services	2/14/19	Action	14a-8(i)(7)	Left	Progressive environmentalism	J.B. Hunt Transport Services, Inc.; Rule 14a-8 no-action letter (sec.gov)

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Johnson & Johnson	2/8/19	Action	14a-8(i)(10)	Left	Progressive Government Submission	Johnson & Johnson; Rule 14a-8 no-action letter (sec.gov)
Johnson & Johnson	2/28/19	Action	14a-8(i)(7)	Left	Progressive civil rights	Johnson & Johnson; Rule 14a-8 no-action letter (sec.gov)
Johnson & Johnson	2/6/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Johnson & Johnson; Rule 14a-8 no-action letter (sec.gov)
Johnson & Johnson	2/11/19	No Action	14a-8(i)(2)	Neutral	General Company Management Issues	Johnson & Johnson; Rule 14a-8 no-action letter (sec.gov)
Johnson & Johnson	2/14/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Johnson & Johnson; Rule 14a-8 no-action letter (sec.gov)
JPMorgan Chase & Co	3/20/19	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Known progressive investor	JPMorgan Chase & Co.; Rule 14a-8 no-action letter (sec.gov)
JPMorgan Chase & Co	3/20/19	Action	14a-8(i)(3); 14a-9; 14a-8(i)(3)	Left	Known progressive investor	JPMorgan Chase & Co.; Rule 14a-8 no-action letter (sec.gov)
JPMorgan Chase & Co	3/22/19	No Action	14a-8(i)(7)	Left	Known progressive investor	JPMorgan Chase & Co.; Rule 14a-8 no-action letter (sec.gov)
JPMorgan Chase & Co	3/13/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	JPMorgan Chase & Co.; Rule 14a-8 no-action letter (sec.gov)
JPMorgan Chase & Co	2/21/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	JPMorgan Chase & Co.; Rule 14a-8 no-action letter (sec.gov)
JPMorgan Chase & Co	3/19/19	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	JPMorgan Chase & Co.; Rule 14a-8 no-action letter (sec.gov)
JPMorgan Chase & Co	3/15/19	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	JPMorgan Chase & Co.; Rule 14a-8 no-action letter (sec.gov)
JPMorgan Chase & Co	3/15/19	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	JPMorgan Chase & Co.; Rule 14a-8 no-action letter (sec.gov)
JPMorgan Chase & Co	3/15/19	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	JPMorgan Chase & Co; Rule 14a-8 no-action letter (sec.gov)
Kaman Corporation	2/15/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Kaman Corporation; Rule 14a-8 no-action letter (sec.gov)
Kellogg Company	1/31/19	No Action	14a-8(i)(8)(ii)	Left	Known progressive investor	Kellogg Company; Rule 14a-8 no-action letter (sec.gov)
KeyCorp	3/22/19	No Action	14a-8(i)(10)	Left	Known progressive investor	KeyCorp; Rule 14a-8 no-action letter (sec.gov)
Leidos Holdings	2/22/19	Action	14a-8(i)(9)	Left	Known progressive investor	Leidos Holdings, Inc; Rule 14a-8 no-action letter (sec.gov)
Impinj	7/11/19	No Action	14a-8(i)(8)(ii)	Left	Known progressive investor	Impinj, Inc.; Rule 14a-8 no-action letter (sec.gov)
Marathon Oil Corporation	2/21/19	Withdrawn	Company agreed to implement proposal	Left	Progressive environmentalism	Marathon Oil Corporation; Rule 14a-8 no-action letter (sec.gov)
Marathon Petroleum Corporation	3/8/19	Action	14a-8(i)(3)	Left	Known progressive investor	Marathon Petroleum Corporation; Rule 14a-8 no-action letter (sec.gov)
Martin Marietta Materials	3/1/19	Withdrawn	Company agreed to implement proposal	Left	Progressive environmentalism	Martin Marietta Materials, Inc.; Rule 14a-8 no-action letter (sec.gov)
MasterCard	4/25/19	Action	14a-8(i)(7)	Left	Progressive civil rights	MasterCard Incorporated; Rule 14a-8 no-action letter (sec.gov)
Mastercard	4/24/19	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	MasterCard Incorporated; Rule 14a-8 no-action letter (sec.gov)
McDonald's Corporation	3/12/19	No Action	14a-8(i)(7)	Left	Known progressive investor	McDonald's Corporation; Rule 14a-8 no-action letter (sec.gov)

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McDonald's Corporation	3/22/19	No Action	14a-8(i)(7)	Left	Progressive environmentalism	McDonald's Corporation; Rule 14a-8 no-action letter (sec.gov)
McDonald's Corporation	3/5/19	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	McDonald's Corporation; Rule 14a-8 no-action letter (sec.gov)
McDonald's Corporation	3/5/19	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	McDonald's Corporation; Rule 14a-8 no-action letter (sec.gov)
McDonald's Corporation	3/7/19	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive environmentalism	McDonald's Corporation; Rule 14a-8 no-action letter (sec.gov)
MetLife	3/18/19	No Action	14a-8(b); 14a-8(f)	Neutral	General Company Management Issues	MetLife, Inc.; Rule 14a-8 no-action letter (sec.gov)
MGE Energy	3/13/19	No Action	14a-8(i)(7)	Left	Progressive environmentalism	MGE Energy, Inc.; Rule 14a-8 no-action letter (sec.gov)
MGE Energy	2/6/19	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive environmentalism	MGE Energy, Inc.; Rule 14a-8 no-action letter (sec.gov)
Microsoft Corporation	8/6/19	No Action	14a-8(b); 14a-8(f)	Neutral	General Company Management Issues	Microsoft Corporation; Rule 14a-8 no-action letter (sec.gov)
Mondeléz International	2/21/19	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	Mondeléz International, Inc.; Rule 14a-8 no-action letter (sec.gov)
Mondeléz International	2/21/19	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	Mondeléz International, Inc.; Rule 14a-8 no-action letter (sec.gov)
Mylan NV	4/30/19	Action	14a-8(i)(1)	Left	Progressive civil rights	Mylan N.V.; Rule 14a-8 no-action letter (sec.gov)
NCR Corporation	2/15/19	No Action	14a-8(i)(10)	Left	Known progressive investor	NCR Corporation; Rule 14a-8 no-action letter (sec.gov)
Nektar Therapeutics	3/28/19	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	Nektar Therapeutics; Rule 14a-8 no-action letter (sec.gov)
New York Community Bancorp	4/11/19	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	New York Community Bancorp, Inc.; Rule 14a-8 no-action letter (sec.gov)
NextEra Energy	3/19/19	No Action	14a-8(i)(11)	Left	Progressive civil rights	NextEra Energy, Inc.; Rule 14a-8 no-action letter (sec.gov)
NIKE	6/5/19	No Action	14a-8(b); 14a-8(f)	Neutral	General Company Management Issues	Nike, Inc.; Rule 14a-8 no-action letter (sec.gov)
NIKE	7/16/19	No Action	14a-8(i)(10)	Right	Conservative civil rights	NIKE, Inc.; Rule 14a-8 no-action letter (sec.gov)
Norfolk Southern Corporation	2/6/19	Action	14a-8(c); 14a-8(i)(3)	Left	Known progressive investor	Norfolk Southern Corporation; Rule 14a-8 no-action letter (sec.gov)
Northrop Grumman Corporation	3/13/19	Action	14a-8(i)(3)	Left	Known progressive investor	Northrop Grumman Corporation; Rule 14a-8 no-action letter (sec.gov)
Northrop Grumman Corporation	3/19/19	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	Northrop Grumman Corporation; Rule 14a-8 no-action letter (sec.gov)
NTN Buzztime	4/11/19	No Action	14a-8(i)(8)(iv)	Neutral	General Company Management Issues	NTN Buzztime, Inc.; Rule 14a-8 no-action letter (sec.gov)
O'Reilly Automotive	2/5/19	Withdrawn	Legal deficiency	Left	Known progressive investor	O'Reilly Automotive, Inc.; Rule 14a-8 no-action letter (sec.gov)
PACCAR	1/28/19	Withdrawn	Company already implements proposal	Left	Known progressive investor	PACCAR, Inc.; Rule 14a-8 no-action letter (sec.gov)
Pacific Gas and Electric Company	1/30/19	Withdrawn	Duplicate proposal	Neutral	General Company Management Issues	Pacific Gas and Electric Company; Rule 14a-8 no-action letter (sec.gov)
Paycom Software	2/1/19	No Action	14a-8(i)(8)(ii)	Left	Known progressive investor	Paycom Software, Inc.; Rule 14a-8 no-action letter (sec.gov)
PDL BioPharma	3/1/19	No Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	PDL BioPharma, Inc.; Rule 14a-8 no-action letter (sec.gov)
PepsiCo	3/8/19	Action	14a-8(i)(10)	Left	Known progressive investor	PepsiCo, Inc.; Rule 14a-8 no-action letter (sec.gov)

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PepsiCo	2/14/19	No Action	14a-8(i)(10)	Left	Known progressive investor	PepsiCo, Inc.; Rule 14a-8 no-action letter (sec.gov)
PepsiCo	2/22/19	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	PepsiCo, Inc.; Rule 14a-8 no-action letter (sec.gov)
PepsiCo	1/28/19	Withdrawn	Company agreed to implement proposal	Left	Progressive environmentalism	PepsiCo, Inc.; Rule 14a-8 no-action letter (sec.gov)
Pfizer	2/7/19	Action	14a-8(i)(3)	Left	Known progressive investor	Pfizer Inc.; Rule 14a-8 no-action letter (sec.gov)
Pfizer	2/28/19	Action	14a-8(i)(7)	Left	Progressive civil rights	Pfizer Inc.; Rule 14a-8 no-action letter (sec.gov)
Pfizer	2/28/19	Action	14a-8(i)(7)	Right	Conservative civil rights	Pfizer Inc.; Rule 14a-8 no-action letter (sec.gov)
Pfizer	2/28/19	No Action	14a-8(i)(11)	Left	Progressive civil rights	Pfizer Inc.; Rule 14a-8 no-action letter (sec.gov)
Pfizer	3/1/19	No Action	14a-8(i)(7)	Left	Known progressive investor	Pfizer Inc.; Rule 14a-8 no-action letter (sec.gov)
Pfizer	2/12/19	Withdrawn	Company agreed to implement proposal	Left	Progressive Government Submission	Pfizer Inc.; Rule 14a-8 no-action letter (sec.gov)
PG&E Corporation	3/13/19	Action	14a-8(i)(6); 14a-8(i)(7)	Neutral	General Company Management Issues	PG&E Corporation; Rule 14a-8 no-action letter (sec.gov)
Philip Morris International	1/31/19	No Action	14a-8(i)(13)	Neutral	General Company Management Issues	Philip Morris International Inc.; Rule 14a-8 no-action letter (sec.gov)
Phillips 66	3/13/19	Action	14a-8(i)(3); 14a-8(i)(6)	Left	Progressive environmentalism	Phillips 66; Rule 14a-8 no-action letter (sec.gov)
Pinnacle West Capital Corporation	2/1/19	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	Pinnacle West Capital Corporation; Rule 14a-8 no-action letter (sec.gov)
PNM Resources	4/2/19	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive environmentalism	PNM Resources, Inc.; Rule 14a-8 no-action letter (sec.gov)
PNM Resources	3/22/19	No Action	14a-8(i)(10)	Left	Progressive environmentalism	PNM Resources, Inc.; Rule 14a-8 no-action letter (sec.gov)
PNM Resources	4/2/19	No Action	14a-8(i)(10)	Neutral	General Company Management Issues	PNM Resources, Inc.; Rule 14a-8 no-action letter (sec.gov)
PPG Industries	2/8/19	No Action	14a-8(i)(10)	Left	Known progressive investor	PPG Industries, Inc.; Rule 14a-8 no-action letter (sec.gov)
Reliance Steel & Aluminum	4/2/19	No Action	14a-8(i)(5)	Left	Known progressive investor	Reliance Steel & Aluminum Co.; Rule 14a-8 no-action letter (sec.gov)
Rite Aid	3/29/19	No Action	14a-8(i)(11)	Neutral	General Company Management Issues	Rite Aid Corporation; Rule 14a-8 no-action letter (sec.gov)
Ross Stores	3/29/19	Action	14a-8(i)(7)	Left	Progressive environmentalism	Ross Stores, Inc.; Rule 14a-8 no-action letter (sec.gov)
Royal Caribbean Cruises	3/14/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Royal Caribbean Cruises Ltd.; Rule 14a-8 no-action letter (sec.gov)
Saga Communications	3/12/19	Action	14a-8(i)(6)	Left	Progressive Government Submission	Saga Communications, Inc.; Rule 14a-8 no-action letter (sec.gov)
SBA Communications Corporation	2/6/19	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	SBA Communications Corporation; Rule 14a-8 no-action letter (sec.gov)
Sempra Energy	1/31/19	Withdrawn	Legal deficiency	Left	Progressive environmentalism	Sempra Energy; Rule 14a-8 no-action letter (sec.gov)
Senior Housing Properties Trust	3/13/19	No Action	14a-8(b)	Neutral	General Company Management Issues	Senior Housing Properties Trust; Rule 14a-8 no-action letter (sec.gov)

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Sturm Ruger & Company	2/28/19	Withdrawn	Legal deficiency	Left	Progressive civil rights	Sturm Ruger & Company, Inc.; Rule 14a-8 no-action letter (sec.gov)
Sturm Ruger & Company	2/28/19	Withdrawn	Legal deficiency	Left	Progressive civil rights	Sturm Ruger & Company; Rule 14a-8 no-action letter (sec.gov)
SunTrust Banks	2/5/19	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	SunTrust Banks, Inc.; Rule 14a-8 no-action letter (sec.gov)
Symantec Corporation	8/5/19	Action	14a-8(e)(2)	Left	Known progressive investor	Symantec Corporation; Rule 14a-8 (sec.gov)
Texas Instruments Incorporated	2/28/19	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	Texas Instruments Incorporated; Rule 14a-8 no-action letter (sec.gov)
The AES Corporation	2/21/19	No Action	14a-8(i)(10)	Left	Known progressive investor	The AES Corporation; Rule 14a-8 no-action letter (sec.gov)
The Allstate Corporation	3/15/19	No Action	14a-8(i)(10)	Neutral	General Company Management Issues	The Allstate Corporation; Rule 14a-8 no-action letter (sec.gov)
The Bank of New York Mellon Corporation	2/15/19	No Action	14a-8(i)(10)	Left	Known progressive investor	The Bank of New York Mellon Corporation; Rule 14a-8 no-action letter (sec.gov)
The Clorox Company	8/7/19	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	The Clorox Company; Rule 14a-8 no-action letter (sec.gov)
The Coca-Cola Company	2/21/19	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	The Coca-Cola Company; Rule 14a-8 no-action letter (sec.gov)
The Procter & Gamble Company	7/15/19	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	The Procter & Gamble Company; Rule 14a-8 no-action letter (sec.gov)
The Southern Company	3/13/19	No Action	14a-8(i)(10)	Left	Known progressive investor	The Southern Company; Rule 14a-8 no-action letter (sec.gov)
The TJX Companies	4/9/19	No Action	14a-8(i)(10)	Left	Progressive environmentalism	The TJX Companies, Inc.; Rule 14a-8 no-action letter (sec.gov)
The Wendy's Company	4/10/19	No Action	14a-8(i)(10)	Left	Progressive civil rights	The Wendy's Company; Rule 14a-8 no-action letter (sec.gov)
TheStreet	3/8/19	No Action	14a-8(h)(3)	Left	Known progressive investor	TheStreet, Inc.; Rule 14a-8 no-action letter (sec.gov)
Tractor Supply Company	3/12/19	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	Tractor Supply Company; Rule 14a-8 no-action letter (sec.gov)
Trans World Entertainment Corporation	5/2/19	No Action	14a-8(i)(2); 14a-8(i)(6)	Neutral	General Company Management Issues	Trans World Entertainment Corporation; Rule 14a-8 no-action letter (sec.gov)
Trans World Entertainment Corporation	5/2/19	No Action	14a-8(i)(8)	Neutral	General Company Management Issues	Trans World Entertainment Corporation; Rule 14a-8 no-action letter (sec.gov)
TransDigm Group Incorporated	1/28/19	Withdrawn	Legal deficiency	Left	Progressive environmentalism	TransDigm Group Incorporated; Rule 14a-8 no-action letter (sec.gov)
United Technologies Corporation	3/8/19	No Action	14a-8(h)(3)	Left	Known progressive investor	United Technologies Corporation; Rule 14a-8 no-action letter (sec.gov)
United Technologies Corporation	3/1/19	No Action	14a-8(i)(10)	Left	Known progressive investor	United Technologies Corporation; Rule 14a-8 no-action letter (sec.gov)
United Therapeutics Corporation	4/4/19	No Action	14a-8(i)(8)(ii)	Left	Known progressive investor	United Therapeutics Corporation; Rule 14a-8 no-action letter (sec.gov)
Valero Energy Corporation	1/31/19	No Action	14a-8(b); 14a-8(f)	Neutral	General Company Management Issues	Valero Energy Corporation; Rule 14a-8 no-action letter (sec.gov)
Valero Energy Corporation	1/28/19	Withdrawn	Company agreed to engage	Left	Progressive civil rights	Valero Energy Corporation; Rule 14a-8 no-action letter (sec.gov)
Verizon Communications	2/15/19	Action	14a-8(i)(7)	Left	Progressive civil rights	Verizon Communications Inc.; Rule 14a-8 no-action letter (sec.gov)
Verizon Communications	2/14/19	Action	14a-8(i)(7)	Left	Progressive civil rights	Verizon Communications Inc.; Rule 14a-8 no-action letter (sec.gov)
Verizon Communications	2/14/19	Action	14a-8(i)(7)	Left	Progressive civil rights	Verizon Communications Inc.; Rule 14a-8 no-action letter (sec.gov)
Verizon Communications	2/19/19	No Action	14a-8(i)(10)	Left	Progressive civil rights	Verizon Communications Inc.; Rule 14a-8 no-action letter (sec.gov)

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Verizon Communications	1/29/19	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	Verizon Communications Inc.; Rule 14a-8 no-action letter (sec.gov)
Verizon Communications	1/30/19	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	Verizon Communications Inc.; Rule 14a-8 no-action letter (sec.gov)
Visa	10/30/19	No Action	14a-8(b); 14a-8(f)	Left	Progressive civil rights	Visa Inc.; Rule 14a-8 no-action letter (sec.gov)
Visa	10/11/19	No Action	14a-8(i)(10)	Left	Progressive civil rights	Visa Inc.; Rule 14a-8 no-action letter (sec.gov)
Walmart	3/28/19	No Action	14a-8(b); 14a-8(f)	Left	Progressive civil rights	Walmart Inc.; Rule 14a-8 no-action letter (sec.gov)
Walmart	4/4/19	No Action	14a-8(i)(3)	Left	Progressive civil rights	Walmart, Inc.; Rule 14a-8 no-action letter (sec.gov)
Walmart	4/8/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Walmart Inc.; Rule 14a-8 no-action letter (sec.gov)
Wells Fargo & Company	2/21/19	Action	14a-8(c); 14a-8(i)(7)	Left	Progressive civil rights	Wells Fargo & Company; Rule 14a-8 no-action letter (sec.gov)
Wells Fargo & Company	3/1/19	No Action	14a-8(i)(10)	Left	Known progressive investor	Wells Fargo & Company; Rule 14a-8 no-action letter (sec.gov)
Wells Fargo & Company	2/27/19	No Action	14a-8(i)(7)	Left	Known progressive investor	Wells Fargo & Company; Rule 14a-8 no-action letter (sec.gov)
Wells Fargo & Company	3/5/19	No Action	14a-8(i)(7)	Left	Known progressive investor	Wells Fargo & Company; : Rule 14a-8 no-action letter (sec.gov)
Wells Fargo & Company	2/27/19	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	Wells Fargo & Company; Rule 14a-8 no-action letter (sec.gov)
XPO Logistics	4/4/19	Action	14a-8(b); 14a-8(f); 14a-8(h)(3); 14a-8(i)(3); 14a-8(i)(10)	Left	Known progressive investor	XPO Logistics, Inc.; Rule 14a-8 no-action letter (sec.gov)
XPO Logistics	4/4/19	Action	14a-8(i)(3)	Left	Known progressive investor	XPO Logistics, Inc.; Rule 14a-8 no-action letter (sec.gov)
XPO Logistics	3/6/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	XPO Logistics, Inc.; Rule 14a-8 no-action letter (sec.gov)
Yum! Brands	3/6/19	No Action	14a-8(i)(7)	Left	Progressive civil rights	Yum! Brands, Inc.; Rule 14a-8 no-action letter (sec.gov)

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COMPANY NAME	DATE OF LETTER	ACTION/NO ACTION	REASON	ALIGNMENT	EXPLANATION OF ALIGNMENT	LINK
AbbVie Inc	3/14/18	Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/unitedchurch031418-14a8.pdf
AbbVie Inc	2/16/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/steinerabbvie021618-14a8.pdf
AECOM	12/21/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenaecom122118-14a8.pdf
Aetna Inc.	2/8/18	No Action	14a-8(i)(6)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenaetna020818-14a8.pdf
Alaska Air Group, Inc.	2/12/18	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenharrington021218-14a8.pdf
Alexandria Real Estate Equities, Inc.	1/26/18	Withdrawn	Company has already substantially implemented the Proposal	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/comptrollemrycetal012618-14a8.pdf
Allegheny Technologies Incorporated	2/27/18	No Action	14a-8(f)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/anthonyoslomkoski022718-14a8.pdf
Allergan plc	2/7/18	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/allcio020718-14a8.pdf
Alliant Energy Corporation	3/30/18	Action	14a-8(i)(5); 14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mycersetal033018-14a8.pdf
Amazon.com, Inc.	2/6/18	No Action	14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/davidridenor020618-14a8.pdf
Amazon.com, Inc.	3/6/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/amalgamatedbank030618-14a8.pdf
Amazon.com, Inc.	1/18/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/stephensacks011818-14a8.pdf
Amazon.com, Inc.	4/10/18	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/greencentury041018-14a8.pdf
Amazon.com, Inc.	3/23/18	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/dianasimpson03231818-14a8.pdf
Amazon.com, Inc.	3/16/18	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/aficio031618-14a8.pdf
Amazon.com, Inc.	2/23/18	Withdrawn	Company agreed to engage	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/zevinreighton022318-14a8.pdf
Amazon.com, Inc.	2/5/18	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/zevinreighton020518-14a8.pdf
Amazon.com, Inc.	1/16/18	Withdrawn	Company agreed to engage	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/elizabethbowles011618-14a8.pdf
Ameren Corporation	1/22/18	No Action	14a-8(i)(12)(iii)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/sierraclub012218-14a8.pdf
Ameren Corporation	2/8/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/missouricoalition020818-14a8.pdf

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American Airlines Group Inc.	4/2/18	Action	14a-8(i)(9)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenamerican040218-14a8.pdf
American Airlines Group Inc.	3/23/18	No Action	14a-8(i)(7)	Neutral	General civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/flyersrights032318-14a8.pdf
AmerisourceBergen Corporation	1/11/18	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/uawretireetal011118-14a8.pdf
AmerisourceBergen Corporation	1/11/18	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/sisterstrancisetal011118-14a8.pdf
Amgen Inc.	3/16/18	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mercyinvestment031618-14a8.pdf
Analog Devices, Inc.	12/18/18	Withdrawn	Company agreed to implement proposal	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/comptrollemcetal121818-14a8.pdf
Anthem, Inc.	3/19/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/dalewannen031918-14a8.pdf
Apple Inc.	11/21/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mcriteapple112118-14a8.pdf
Apple Inc.	12/4/18	Action	14a-8(i)(3); 14a-8(i)(7); 14a-8(i)(10)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/ncpr120418-14a8.pdf
Apple Inc.	11/19/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jinqzhao111918-14a8.pdf
Apple Inc.	11/20/18	No Action	14a-8(i)(12)(ii)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nationallegal112018-14a8.pdf
Applied Materials, Inc.	12/21/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jinqzhao122118-14a8.pdf
Applied Materials, Inc.	1/17/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jinqzhao011718-14a8.pdf
Assembly Biosciences, Inc.	2/26/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mcritechevedden022618-14a8.pdf
Avalon Holdings Corporation	1/16/18	No Action	14a-8(i)(8)(iv)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/anilnalluri011618-14a8.pdf
Bank of America Corporation	1/19/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenboa011918-14a8.pdf
Bank of America Corporation	1/30/18	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/harringtonmercy013018-14a8.pdf
Bimini Capital Management, Inc.	3/28/18	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/danielhoffman032818-14a8.pdf
Biogen Inc.	3/16/18	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/azzadassetetal031618-14a8.pdf
Bloomin' Brands, Inc.	2/9/18	Action	14a-8(i)(3)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/humanesocietybloomin020918-14a8.pdf
Blue Buffalo Pet Products, Inc.	2/28/18	Withdrawn	Pending legal action	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/calvertinvestment022818-14a8.pdf
BorgWarner Inc.	2/9/18	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenborgwarner020918-14a8.pdf
Bristol-Myers Squibb Company	3/16/18	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/trinityhealth031618-14a8.pdf

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Bristol-Myers Squibb Company	1/22/18	No Action	14a-8(f); 14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenbristol012218-14a8.pdf
Capital One Financial Corporation	2/21/18	No Action	14a-8(i)(9)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddencapital022118-14a8.pdf
CBS Corporation	8/22/18	No Action	14a-8(i)(4)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/stephenpattencbs082218-14a8.pdf
Celgene Corporation	3/14/18	Action	14a-8(b); 14a-8(f); 14a-8(i)(3); 14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenmcrritcheyoungcelgene031418-14a8.pdf
Cerus Corporation	4/13/18	Action	14a-8(i)(3); 14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/michaelsalzhauer041318-14a8.pdf
CF Industries Holdings, Inc.	1/30/18	No Action	14a-8(i)(9)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenindustries013018-14a8.pdf
Chevron Corporation	2/27/18	Action	14a-8(i)(3)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/azzadassetetal022718-14a8.pdf
Chevron Corporation	3/28/18	Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/parkfoundation032818-14a8.pdf
Chevron Corporation	3/28/18	Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/betsykriegeretal032818-14a8.pdf
Chevron Corporation	1/30/18	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/peta013018-14a8.pdf
Chubb Limited	2/13/18	No Action	14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/stewarttaggart021318-14a8.pdf
Cisco Systems, Inc.	8/6/18	Withdrawn	Company agreed to include in proxy materials	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mcritchichevedden080618-14a8.pdf
Citigroup Inc.	1/31/18	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/steinercheveddenCitigroup013118-14a8.pdf
Citigroup Inc.	3/6/18	Action	14a-8(i)(5); 14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/ctwinvestment030618-14a8.pdf
Citigroup Inc.	3/7/18	Action	14a-8(i)(5); 14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/aficio030718-14a8.pdf
Citigroup Inc.	12/17/18	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/ctwinvestment121718-14a8.pdf
Cognizant Technology Solutions Corporation	3/30/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenmcrritcheyoung033018-14a8.pdf
Cognizant Technology Solutions Corporation	4/2/18	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenCognizant040218-14a8.pdf
Comcast Corporation	2/26/18	No Action	14a-8(f)	Right	Conservative civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/davidridenourcomcast022618-14a8.pdf
Comcast Corporation	3/13/18	No Action	14a-8(i)(6)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddencomcast031318-14a8.pdf
Comcast Corporation	2/28/18	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/sistersfrancis022818-14a8.pdf
Comcast Corporation	2/27/18	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/waldenasset022718-14a8.pdf

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Computer Task Group, Incorporated	4/17/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/harperasset041718-14a8.pdf
CoreCivic, Inc.	1/2/18	No Action	14a-8(e)(2)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/alextriedmann010218-14a8.pdf
Costco Wholesale Corporation	11/16/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mcritchieyoung111618-14a8.pdf
CSX Corporation	2/8/18	Withdrawn	Company agreed to implement proposal	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/johnfishwick020818-14a8.pdf
CVS Health Corporation	2/5/18	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/myrayoung020518-14a8.pdf
CytRx Corporation	6/26/18	Action	14a-8(e)(2)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/gregorycallenderetal062618-14a8.pdf
CytRx Corporation	6/26/18	Action	14a-8(e)(2); 14a-8(i)(2); 14a-8(i)(6); 14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/gregorycallenderetal062618-14a8.pdf
CytRx Corporation	6/26/18	No Action	14a-8(e)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/gregorycallenderetal062618-14a8.pdf
CytRx Corporation	6/26/18	No Action	14a-8(i)(1)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/gregorycallenderetal062618-14a8.pdf
CytRx Corporation	6/26/18	No Action	14a-8(i)(1); 14a-8(i)(2); 14a-8(i)(8)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/gregorycallenderetal062618-14a8.pdf
CytRx Corporation	6/26/18	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/gregorycallenderetal062618-14a8.pdf
Delta Air Lines, Inc	3/12/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddendelta031218-14a8.pdf
Delta Air Lines, Inc	3/28/18	No Action	14a-8(i)(7)	Neutral	General civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/flyersrights032818-14a8.pdf
Discover Financial Services	2/16/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/myrayoung021618-14a8.pdf
Dominion Energy, Inc.	12/17/18	No Action	14a-8(f)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/stewarttaggart121718-14a8.pdf
DTE Energy Company	2/2/18	Action	14a-8(b); 14a-8(f); 14a-8(i)(6); 14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/kennethfink020218-14a8.pdf
DTE Energy Company	12/18/18	No Action	14a-8(e)(2)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/kennethfink121818-14a8.pdf
DTE Energy Company	12/18/18	No Action	14a-8(e)(2)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/sarahmoore121818-14a8.pdf
DTE Energy Company	2/8/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/sarahmoore020818-14a8.pdf
DTE Energy Company	1/25/18	Withdrawn	Company agreed to implement proposal	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/asyouosowetal012518-14a8.pdf
Duke Energy Corporation	2/14/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenduke021418-14a8.pdf
Duke Energy Corporation	1/9/18	Withdrawn	Company agreed to engage	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mercysisters010918-14a8.pdf
Dunkin' Brands Group, Inc.	2/22/18	No Action	14a-8(i)(5)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/wannensustainvest022218-14a8.pdf
eBay Inc	2/26/18	No Action	14a-8(i)(9)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenebay022618-14a-8.pdf

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eBay Inc.	3/29/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/zevinassetal032918-14a-8.pdf
eBay Inc.	3/6/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jingzhao030618-14a8.pdf
Ecobal Inc	2/2/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenecolab020218-14a8.pdf
Edgewell Personal Care Company	10/15/18	Withdrawn	legal deficiency	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/califomistate101518-14a8.pdf
Edwards Lifesciences Corporation	1/16/18	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenedwards011618-14a8.pdf
Eli Lilly and Company	1/26/18	Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/peta012618-14a8.pdf
Eli Lilly and Company	3/2/18	Action	14a-8(i)(5); 14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nycr030218-14a8.pdf
Eli Lilly and Company	3/2/18	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mercyuaw030218-14a8.pdf
Eli Lilly and Company	1/8/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/williamsteinerei10818-14a8.pdf
Entergy Corporation	3/14/18	Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/asyousowetel031418-14a8.pdf
EOG Resources, Inc.	2/26/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/trilliumiller022618-14a8.pdf
Express Scripts Holding Company	3/7/18	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nyscr030718-14a8.pdf
Express Scripts Holding Company	1/16/18	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenwalden011618-14a8.pdf
Exxonmobil Corporation	3/20/18	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/officenycomptrollerexxon032018-14a8.pdf
Exxonmobil Corporation	2/14/18	No Action	14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/evesprunt021418-14a8.pdf
Exxonmobil Corporation	3/23/18	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/arjunacapital032318-14a8.pdf
Exxonmobil Corporation	2/13/18	Withdrawn	Company already implements proposal	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/stevenmilloy021318-14a8.pdf
Facebook, Inc.	2/26/18	No Action	14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/davidridenourfacebook022618-14a8.pdf
FedEx Corporation	7/3/18	Action	14a-8(i)(1), 14a-8(i)(2); 14a-8(i)(6)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenfedex070318-14a8.pdf
FedEx Corporation	6/28/18	No Action	14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mornisadavisfedex062818-14a8.pdf
First Solar, Inc.	3/12/18	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/heartlandinitiative031218-14a8.pdf
Ford Motor Company	2/6/18	Action	14a-8(i)(11)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jamesmcritchie020618-14a8.pdf
Ford Motor Company	1/2/18	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/martinharangozo010218-14a8.pdf

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Franklin Resources, Inc.	12/4/18	No Action	14a-8(i)(9)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mcritechiefranklin120418-14a8.pdf
General Electric Company	3/1/18	Action	14a-8(i)(4)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/martinharangozo030118-14a8.pdf
General Electric Company	1/2/18	No Action	14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/andrewdale010218-14a8.pdf
General Electric Company	1/3/18	No Action	14a-8(i)(11)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/timothyroberts010318-14a8.pdf
General Electric Company	1/2/18	Withdrawn	Duplicate proposal	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nyscrf010218-14a8.pdf
General Motors Company	4/18/18	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/arkayfoundationetal041818-14a8.pdf
Gilead Sciences, Inc	2/15/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/bostoncommon021518-14a8.pdf
Government Properties Income Trust	2/20/18	No Action	14a-8(b)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/unitehere022018-14a8.pdf
Hawaiian Holdings, Inc.	2/6/18	No Action	14a-8(f)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/stewarttaggart020618-14a8.pdf
HCA Healthcare, Inc	1/23/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenhca012318-14a8.pdf
Hospitality Properties Trust	3/20/18	Action	14a-8(b), 14a-8(i)(1); 14a-8(i)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nycersetal032018-14a8.pdf
Hospitality Properties Trust	3/23/18	Action	14a-8(b); 14a-8(i)(1); 14a-8(c); 14a-8(i)(2); 14a-8(i)(6); 14a-8(i)(3); 14a-8(i)(8)(ii)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/unitehere032318-14a8.pdf
Host Hotels & Resorts, Inc.	2/28/18	Action	14a-8(i)(3)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/uniteherehost022818-14a8.pdf
Huron Consulting Group Inc.	2/1/18	No Action	14a-8(i)(10)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/waynelipski020118-14a8.pdf
Illumina, Inc.	2/1/18	No Action	14a-8(i)(8)(ii)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jamesmcritchie020118-14a8.pdf
Intel Corporation	3/16/18	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenyoung031618-14a8.pdf
International Business Machines Corporation	1/17/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mcritechievedden011718-14a8.pdf
iRobot Corporation	2/9/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jamesmcritchie020918-14a8.pdf
ITT Inc.	2/22/18	No Action	14a-8(i)(9)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenitt022218-14a8.pdf
JetBlue Airways Corporation	1/23/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenjetblue012318-14a8.pdf
Johnson & Johnson	2/2/18	Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/ppersjohnson020218-14a8.pdf
Johnson & Johnson	1/29/18	No Action	14a-8(i)(3)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/normanfulton012918-14a8.pdf

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Johnson & Johnson	1/31/18	No Action	14a-8(i)(7)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/ncppr013118-14a8.pdf
JPMorgan Chase & Co.	3/30/18	Action	14a-8(b); 14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/williamsteiner033018-14a8.pdf
JPMorgan Chase & Co.	3/29/18	Action	14a-8(d); 14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/williamrosenfeld032918-14a8.pdf
JPMorgan Chase & Co.	3/30/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/christenfundetal033018-14a8.pdf
JPMorgan Chase & Co.	3/30/18	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/ohnharrington033018-14a8.pdf
JPMorgan Chase & Co.	2/28/18	No Action	14a-8(i)(7)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/ncpprijmorgan022818-14a8.pdf
JPMorgan Chase & Co.	2/26/18	No Action	14a-8(i)(9)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/kennethsteiner022618-14a8.pdf
Laboratory Corporation of America Holdings	2/15/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/peta021518-14a8.pdf
Lincoln National Corporation	3/29/18	Action	14a-8(i)(3); 14a-8(i)(8)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/kennethsteiner032918-14a8.pdf
Mallinckrodt plc	3/7/18	Withdrawn	Company agreed to engage	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mercyinvestmentetal030718-14a8.pdf
McDonald's Corporation	2/26/18	No Action	14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jennifermcdownell022618-14a8.pdf
McDonald's Corporation	3/9/18	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/congregationbenedictineetal030918-14a8.pdf
McDonald's Corporation	3/2/18	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mercyinvestmentetal030218-14a8.pdf
MetLife, Inc.	4/16/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddensteiner041618-14a8.pdf
Nasdaq, Inc.	2/2/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/kennethsteiner020218-14a8.pdf
Navidea Biopharmaceuticals, Inc.	5/11/18	No Action	14a-8(c)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/davidbuppatal051118-14a8.pdf
Navient Corporation	4/26/18	Withdrawn	Company agreed to include in proxy materials	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/employee retirement042618-14a8.pdf
Navient Corporation	3/20/18	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/officenycomptrolernavient032018-14a8.pdf
NetApp, Inc.	6/26/18	No Action	14a-8(i)(9)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenetapp062618-14a8.pdf
New York Community Bancorp, Inc	2/23/18	Withdrawn	Withdrawal agreement undisclosed	Unknown	Not enough information to determine alignment	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jeffreydoppel022318-14a8.pdf
NextEra Energy, Inc.	3/30/18	Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nyscrfnextera033018-14a8.pdf
NIKE, Inc.	6/22/18	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/aflicio062218-14a8.pdf
Northrop Grumman Corporation	2/9/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddennorthrop020918-14a8.pdf

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Occidental Petroleum Corporation	1/30/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenoccidental103018-14a8.pdf
Ohio Laborers' Fringe Benefits Programs	3/8/18	Action	14a-8(i)(3); 14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/laborersdistrict030818-14a8.pdf
Parker-Hannifin Corporation	7/26/18	Withdrawn	Company agreed to implement proposal	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/comptrollernycetal072618-14a8.pdf
PayPal Holdings, Inc	3/9/18	No Action	14a-8(i)(2); 14a-8(i)(6)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenpaypal030918-14a8.pdf
PayPal Holdings, Inc	3/6/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/amalgamatedbankpaypal030618-14a8.pdf
PepsiCo, Inc.	2/6/18	Withdrawn	Company agreed to implement proposal	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/asyouowdenhart020618-14a8.pdf
Pfizer Inc	12/20/18	No Action	14a-8(i)(11)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2019/cheveddenpfizer122018-14a8.pdf
Pfizer Inc.	3/1/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/trinityhealth030118-14a8.pdf
Pfizer Inc.	1/16/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/kennethsteinerpfizer011618-14a8.pdf
Pfizer Inc.	1/11/18	No Action	14a-8(i)(11)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/ppers011118-14a8.pdf
Pfizer Inc.	2/12/18	No Action	14a-8(i)(7)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/ncppr021218-14a8.pdf
PNM Resources, Inc.	3/28/18	Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/levinsonfoundation032818-14a8.pdf
PNM Resources, Inc.	3/23/18	Action	14a-8(i)(3); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/robertdavis032318-14a8.pdf
PNM Resources, Inc.	3/30/18	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/hitttrust033018-14a8.pdf
PNM Resources, Inc.	3/20/18	No Action	14a-8(i)(10)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/homanstrust032018-14a8.pdf
PPG Industries, Inc.	1/23/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenppg012318-14a8.pdf
Raytheon Company	2/12/18	Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenraytheon021218-14a8.pdf
RE/MAX Holdings, Inc.	2/26/18	No Action	14a-8(f)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/heartlandinitiative022618-14a8.pdf
Red Hat, Inc.	6/12/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nathancummingsred061218-14a8.pdf
RH	5/11/18	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/peta051118-14a8.pdf
Rite Aid Corporation	4/23/18	Action	14a-8(i)(7); 14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/sistersstfrancisetal042318-14a8.pdf

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Rite Aid Corporation	4/17/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nyscrf041718-14a8.pdf
Ross Stores, Inc.	2/13/18	Withdrawn	Withdrawal agreement undisclosed	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/humansociety021318-14a8.pdf
salesforce.com, inc.	4/4/18	Action	14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenmcritchieyoungsalesforce040418-14a8.pdf
Sears Holdings Corporation	2/9/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/humansocietysears020918-14a8.pdf
SeaWorld Entertainment, Inc.	4/23/18	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/peta042318-14a8.pdf
Senior Housing Properties Trust	2/20/18	No Action	14a-8(b)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/unitehereseniorhousing022018-14a8.pdf
Skyworks Solutions, Inc.	3/23/18	No Action	14a-8(i)(9)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenskyworks032318-14a8.pdf
Sprint Corporation	8/1/18	No Action	14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddensteiner080118-14a8.pdf
Starbucks Corporation	1/4/18	No Action	14a-8(i)(7)	Right	Conservative civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/thomasstrobhar010418-14a8.pdf
State Street Corporation	3/5/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jamesmcritchie030518-14a8.pdf
T. Rowe Price Group, Inc.	1/17/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jamesmcritchie011718-14a8.pdf
T. Rowe Price Group, Inc.	1/10/18	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/zevinaxelrodetal011018-14a8.pdf
Tapestry, Inc.	7/24/18	Withdrawn	Company already implements proposal	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/christinejantz072418-14a8.pdf
Tapestry, Inc.	7/26/18	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/humansociety072618-14a8.pdf
Texas Instruments Incorporated	1/26/18	Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/arjunaoceanrock012618-14a8.pdf
Textron Inc	2/7/18	Action	14a-8(i)(8)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/steinercheveddentextron020718-14a8.pdf
The AES Corporation	1/2/18	No Action	14a-8(f)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mercyinvestment010218-14a8.pdf
The AES Corporation	1/8/18	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/statenvcomptroller010818-14a8.pdf
The Allstate Corporation	1/17/18	No Action	14a-8(i)(1)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/ronaldfriedman011718-14a8.pdf
The Boeing Company	1/12/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenwatt011218-14a8.pdf
The Boeing Company	1/12/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenmcritchieyoung011218-14a8.pdf
The Boeing Company	1/12/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenboeing011218-14a8.pdf

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The Boeing Company	1/9/18	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/johnpatriciajorgensone010918-14a8.pdf
The Boeing Company	1/9/18	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/neilgladstein010918-14a8.pdf
The Cato Corporation	3/29/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/waldenasset032918-14a8.pdf
The Clorox Company	7/6/18	Withdrawn	Company agreed to include in proxy materials	Left	Known progressive investor	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/cheveddenmcritchieclorox070618-14a8.pdf
The Coca-Cola Company	1/24/18	Withdrawn	Company already implements proposal	Right	Known conservative investor	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/ncppr012418-14a8.pdf
The Goldman Sachs Group, Inc.	3/12/18	Action	14a-8(i)(5)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/uua031218-14a8.pdf
The Goldman Sachs Group, Inc.	3/12/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/harringtoninvestments031218-14a8.pdf
The Goldman Sachs Group, Inc.	1/29/18	Withdrawn	Company already implements proposal	Right	Known conservative investor	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/ncppr012918-14a8.pdf
The Goodyear Tire & Rubber Company	1/19/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/cheveddengoodyear011918-14a8.pdf
The Hershey Company	2/14/18	Withdrawn	Company agreed to implement proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/americanbaptist021418-14a8.pdf
The Home Depot, Inc.	3/22/18	No Action	14a-8(i)(11)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/northstarasset032218-14a8.pdf
The Home Depot, Inc.	3/21/18	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/peta032118-14a8.pdf
The Home Depot, Inc.	2/13/18	No Action	14a-8(i)(7)	Right	Known conservative investor	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/ncpprhomedepot021318-14a8.pdf
The Interpublic Group of Companies, Inc.	1/29/18	Withdrawn	legal deficiency	Left	Known progressive investor	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/williamsteiner012918-14a8.pdf
The Kroger Co.	4/4/18	No Action	14a-8(i)(11)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/williamsteiner040418-14a8.pdf
The Manitowoc Company, Inc.	12/17/18	No Action	14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/cheveddenmanitowoc121718-14a8.pdf
The Middleby Corporation	3/23/18	Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/trilliumassetetal032318-14a8.pdf
The Progressive Corporation	1/25/18	Withdrawn	Duplicate proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/arjunacapital012518-14a8.pdf
The TJX Companies, Inc.	4/11/18	Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/northstarasset041118-14a8.pdf
The TJX Companies, Inc.	4/16/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/patriciasilver041618-14a8.pdf
The TJX Companies, Inc.	3/1/18	Withdrawn	Company agreed to implement proposal	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/christinejantz030118-14a8.pdf
The TJX Companies, Inc.	2/22/18	Withdrawn	Duplicate proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/williammims022218-14a8.pdf
The Travelers Companies, Inc.	2/7/18	Withdrawn	Withdrawal agreement undisclosed	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/firstaffirmative020718-14a8.pdf
The Western Union Company	3/1/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/cheveddenwestern030118-14a8.pdf
The Western Union Company	1/25/18	Withdrawn	Company agreed to engage	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfm/cf-noaction/14a-8/2018/greencentury012518-14a8.pdf

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Time Warner Inc.	3/13/18	No Action	14a-8(f)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/steinercheveddentime031318-14a8.pdf
Time Warner Inc.	3/13/18	No Action	14a-8(i)(7)	Right	Conservative civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/davidridenourtime031318-14a8.pdf
Tractor Supply Company	2/5/18	Withdrawn	Company agreed to engage	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/trilliumfoundation020518-14a8.pdf
TravelCenters of America LLC	3/14/18	Action	14a-8(b), 14a-8(i)(1); 14a-8(i)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/unitehere031418-14a8.pdf
Twenty-First Century Fox, Inc.	8/27/18	No Action	14a-8(i)(6)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nathancummings082718-14a8.pdf
Twitter, Inc.	4/2/18	Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jingzhao040218-14a8.pdf
Union Pacific Corporation	2/13/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenmcritchie021318-14a8.pdf
United Continental Holdings, Inc.	4/13/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/comptrollermycetal041318-14a8.pdf
United Continental Holdings, Inc.	3/23/18	No Action	14a-8(i)(7)	Neutral	General civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/flyerights032318-14a8.pdf
United Technologies Corporation	2/14/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenunited0121418-14a8.pdf
Unitil Corporation	1/30/18	No Action	14a-8(i)(8)(ii)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/editthemark013018-14a8.pdf
Verizon Communications Inc	3/8/18	Action	14a-8(i)(3)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/assocbelltel030818-14a8.pdf
Verizon Communications Inc	3/7/18	Action	14a-8(i)(5); 14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/parkfoundation030718-14a8.pdf
Verizon Communications Inc	1/4/18	No Action	14a-8(e)(2)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/kennethsteiner Verizon010418-14a8.pdf
Verizon Communications Inc	3/6/18	No Action	14a-8(i)(7)	Left	Progressive environmentalism	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/trilliumportfolio030618-14a8.pdf
Walgreens Boots Alliance, Inc.	11/13/18	Action	14a-8(i)(3)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenwalgreens111318-14a8.pdf
Walgreens Boots Alliance, Inc.	11/13/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/sisteretal111318-14a8.pdf
Walgreens Boots Alliance, Inc.	11/20/18	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/mercyuawetal112018-14a8.pdf
Walgreens Boots Alliance, Inc.	11/20/18	No Action	14a-8(i)(7)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/myrayoung112018-14a8.pdf
Walmart Inc.	4/11/18	Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/our041118-14a8.pdf
Walmart Inc.	4/13/18	No Action	14a-8(i)(7)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/jacobs041318-14a8.pdf
Walmart Inc.	3/8/18	No Action	14a-8(i)(7)	Neutral	General Company Management Issues	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/harangozo030818-14a8.pdf
Welbilt, Inc	1/17/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/cheveddenwelbilt011718-14a8.pdf
Wells Fargo & Company	3/6/18	No Action	14a-8(i)(10)	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/christenfund030618-14a8.pdf

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Wells Fargo & Company	1/23/18	No Action	14a-8(i)(10)	Left	Known progressive investor	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/harringtoninvestments012318-14a8.pdf
Wells Fargo & Company	3/1/18	Withdrawn	Company agreed to include in proxy materials	Left	Progressive Government Submission	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nyscrf030118-14a8.pdf
Xcel Energy Inc.	2/12/18	Withdrawn	Company already implements proposal	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/nathancummings021218-14a8.pdf
Yum! Brands, Inc.	2/27/18	Withdrawn	legal deficiency	Left	Progressive civil rights	https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2018/benedictinesistersetal022718-14a8.pdf