

# PUBLIC SUBMISSION

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Fiduciary Duties Regarding Proxy Voting and Shareholder Rights

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Fiduciary Duties Regarding Proxy Voting and Shareholder Rights

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Comment 0009 Lund 09112020

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## Submitter Information

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## General Comment

Re: 1210-AB91  
Destination: Office of Regulations and Interpretations, Employee Benefits Security Administration, U.S. Department of Labor.

Pension fund managers may vote held equity shares in a manner contrary to my values.

Two alternatives:

1. Pension funds should pass along equity voting to its members with the number of votes pro-rated based on the pensioner's estimated equity in the fund.

This could result in an overwhelming number of voting opportunities with small and fractional share equivalents.

2. Allow pensioners to choose, for their share of the equity in the fund, a fund management group that will vote shares with specified values and fee structures. Allow pensioners to periodically change fund management groups.