

Mr. Jason A. DeWitt
Office of Regulations and Interpretations
Employee Benefits Security Administration
Room N-5655
U.S. Department of Labor
200 Constitution Ave., N.W.
Washington, DC 20210

Dear Mr. DeWitt,

As the former Treasurer of Routt County, Colorado, I understand the importance of protecting and growing public investment funds both in the short- and long-term. Investment strategies should be determined by what will most maximize investors' return on their investments. Proxy voting advisory firms that utilize robo-voting are contracted by various investment and pension funds to provide recommendations on proxy proposals and advise funds how to vote on these recommendations. These firms are obliged to act in the best interests of their preferred political and social causes, rather than maximizing returns.

I currently serve as the chief of a volunteer fire department and am actively involved in firefighter organizations that rely on their pension funds and public sector deposits. As a fire chief, I have worked closely with firefighters and other first responders across Colorado. Many men and women who are in my organizations put their lives on the line to protect and save the lives of others. These generous individuals rely on a strong pension fund to provide financial security when they retire. We owe it to these first responders to ensure their pension accounts are managed in a fiscally responsible way. I recognize that the new proposed rule applied to private pension funds, but many state regulators should follow the guidance of the Labor Department's new rule for oversight with public pension funds.

I often times see how various proxy voting firms spend substantial money to effect investment decisions, for both pensions or public sector deposits. As a leader in my community, I refused to compromise a huge property tax bill owed by a major mining firm, despite the great pressure as stemming from them being a significant employer, as I had the duty as to protect the public's purse. Robo-voting will endanger and weaken the pensions and investments and of hardworking Americans, many of whom may not even know what these firms stand for. These reckless and irresponsible actions must be addressed. Robo-voting will undermine the investments of millions of people across the country that fail to disclose their potential conflicts of interest which prevent them from providing sound financial advice. I do not see how this robo-voting practice benefits Americans. If anything, this puts millions of Americans at risk for financial instability.

Pension funds are incredibly challenging to manage due to cyclical economic conditions and tough market decisions. Leave these decisions to certified professionals that have years of expertise and who are willing to give unfettered advice. Rather than voting with regards to personal and political agendas, I urge you to reconsider the role of robo-voting in pension funds

and public sector deposits. The use of robo-voting serves more to advance proxy advisory firms' stances on various ESG policies than to grow and protect the investments they are charged with overseeing.

I appreciate your consideration and hard work on this matter and please help exercise greater oversight these companies. Americans are relying on you to protect their aforesought investments and pension fund accounts.

My sincere thanks,

A handwritten signature in blue ink, appearing to read 'Brita Horn', with a stylized flourish extending to the right.

Brita Horn

*Fire Chief, Rock Creek Volunteer Fire Department
Former Routt County, Colorado Treasurer*