

# PUBLIC SUBMISSION

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Fiduciary Duties Regarding Proxy Voting and Shareholder Rights

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## General Comment

Fiduciaries exist to protect solely in the interests of Erisa plan participants and beneficiaries and for the exclusive purpose of providing benefits to participants and beneficiaries and defraying the reasonable expenses of administering the plan. Any other adventurism, such as social activism, introduces unnecessary costs and misspent energies on the part of fiduciaries who are in place to optimize the value of participant assets while avoiding wasteful costs.

Erisa plans must pass investment objectives to be approved as investment options. This required frontend test is sufficient to define the plan's approved parameters. Backend distractions waste participant assets with little or no promise of enhancement to value. Ensure that regulations and laws hold fiduciaries to their defined roles without straying into social activism and other errant tangent activities.