

Office of Regulations and Interpretations
Employee Benefits Security Administration
Room N-5655
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Attention: Proxy Voting and Shareholder Rights NPRM

Rule Number: RIN 1210-AB91

Dear Mr. DeWitt,

My name is Tony Griffee and I am writing to you to address robo-voting and its implications within the proposed Department of Labor rule on proxy voting. It is essential that the Department of Labor amends the proposed rule to ensure pension holders' retirement savings are not harmed through robo-voting.

I appreciate that the Department of Labor has clarified that plans are not required to vote on all proxy matters. I also agree that votes should be found to have a positive economic impact, but the language on how that is determined could use further clarification. The Department of Labor requires validation for ESG-related investing, and I think the same principles could be applied to ensuring proxy votes have a positive economic impact.

I believe this will benefit not only investors but also fiduciaries, as they will no longer feel pressured by outside groups. My company, Cushman and Wakefield, leases office space to many governmental entities and I have seen firsthand that they are susceptible to pressure. I believe caving in on pension issues is easy for companies seeking goodwill in other areas. Americans need companies to hire firms focused 100% on maximizing returns. This rule will give them a legal requirement, taking the matter out of their hands.

Robo-voting, or the practice of fiduciaries automatically voting for proxy issues or a shareholder proposal based off proxy recommendations.

concerns me. I have a 401K and vested pension rights and I would not be comfortable with my fiduciary robo-voting. I think they should have an ethical and legal responsibility to make sure investors can see proxy votes and how they will be affected by them. I would like to see robo-voting eliminated, or at the least, dramatically reformed.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tony Griffie', with a long horizontal flourish extending to the right.

Tony Griffie
442 Galena Street
Aurora CO 80010