

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,

I am writing to submit my support for the proposed rule by the Department of Labor. Private pension holders should be protected and never have their pension be put at risk due to proxy advisor's political bias. Proxy advisors have absolutely no room to participate in an ESG agenda at the expense of their clients. The main priority of proxy advisors, and the fund managers that hire them, should be their fiduciary responsibility, and to ensure their beneficiaries are getting the most bang for their buck. This proposed rule rightfully will hold those proxy advisors and fund managers accountable who chose to prioritize their own political agenda over their beneficiaries.

I give the Department of Labor huge kudos for bringing clarity to this issue. Moreover, the rule should go further in mandating that fiduciary managers do not automatically vote for a shareholder proposal without seeing the resources linked to the vote and how it results in an economic benefit to the shareholder. This term "Robo-voting", or when managers automatically vote for a proposal without reviewing the a proxy advisor's proposed plan, needs to have stronger protections required by the Department of Labor so that all plans and investments of proxy advisors are transparent and heavily reviewed.

I am a retired employee of the Human Services Department for the City and County of Denver. During my time working in the office, I witnessed firsthand the real-life consequences of employees' retirement savings not being protected. I saw employees who thought their pension was in solid shape, all of a sudden lose or saw their pension be reduced. This dramatically affected the people who were heavily relying on their pension for retirement. It is a given that community organizations with small pension portfolios would be drawn to and easily pressured into participating in

ESG investing; however, soon enough, the company will realize how it only negatively impacts their employees' pensions.

I have witnessed too many times of dedicated men and women work hard every day only to realize that their pension is not enough for their retirement. I truly believe politics should not be a factor when it comes to putting the livelihood of pension holders at risk. Proxy advisors and fund managers must be held accountable and the Department of Labor's proposed rule will do just that.

Sincerely,

A handwritten signature in blue ink that reads "Lisha Graham". The signature is written in a cursive, flowing style.

Lisha Graham
3334 York Street
Denver CO 80205