

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

Re: Financial Factors in Selecting Plan Investments Proposed Regulation (RIN 1210-AB95)

Dear Director Canary:

Thank you for the opportunity to submit comments on the notice of proposed rulemaking entitled "Financial Factors in Selecting Plan Investments". I am a Chartered Financial Analyst (CFA) and accredited investor. My investments have been with Value Aligned funds and managers for the last 12 years. Integrating environmental, social, and governance (ESG) factors into investment activities is essential to fulfilling fiduciary obligations to engage in appropriate risk management. I believe that the Proposed Rule fundamentally and intentionally misconstrues the importance and role of ESG integration in reducing risk and increasing returns. Over the 12 years I have been investing in what I believe in and avoiding what I don't, my investments have outperformed the market. Year in and Year out. Trying to *punish* individual and pension investors for investing according to the risk and values management assessment is counter to the American ideal of free markets and access. The Proposed Rule is likely to lead to confusion and costs for retirement plan fiduciaries. I, therefore, urge you to retain existing guidance and not move forward with a final rule.

There is now substantial data to support the financial performance of ESG Funds. I am shocked that you are not up on the research and data.

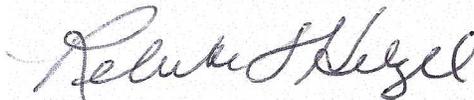
Quite frankly, it smells of politics. It saddens me to see these efforts to turn back the clock and pretend there is not a new reality of climate change. An enlightened approach would be to educate and inform ALL investors on the risk of investing in companies that are escalating the demise of the country as we know it. These companies future is not

bright. It is of their own making. The American way is to let the market decide how quickly they decline. Their financials clearly show dying industries. This is a topic that seems that the agency is not informed on. Denial of Science is from the middle ages. Denial of reality harms long term investors.

History will not look kindly on this attack on Investor's choice to avoid investments which make this existential threat worse.

This is clearly driven by political pressure by an uninformed and ignorant leadership currently in power. Or worse it shows bias toward dying industries. Our country is about moving forward. Shame on you.

Sincerely,

 7-30-2020

Rebekah S Helzel

CFA, MBA