

**Comments for the SEC Proxy Process Docket**  
**Re: File No. 4-725: SEC Staff Roundtable on the Proxy Process**

Brent J. Fields  
Secretary, Securities and Exchange Commission  
100 F St NE, Washington, D.C. 20549-1090

Dear Mr. Fields,

Even after a year of economic growth and stock market gains, public pension plans are still in a place of volatility. These plans are the main source of retirement income for public retirees such as myself. We are civil servants who devoted our professional lives to serving fellow Americans. As politicization continues to run rampant in public pension management, two driving forces are contributing to the instability of American retirement accounts.

Public pension plans should make investment decisions that will deliver the greatest return on investments and ensure that pensioners can receive the benefits promised for a lifetime of work. Institutional Shareholder Services (ISS) and Glass Lewis, as proxy advisory firms for pension funds across the country, are driving political and social agendas through their disproportionate control of the proxy advisory marketplace. These firms have no stake in the game to drive their recommendations and without a necessary regulatory requirement to operate with fiduciary responsibility, their involvement in critical decisions that impact pension fund performance hurt pensioners.

As fiduciaries, the leaders of public pension plans must make decisions that are not always popular. Retirement plans must control risk through sound investment policy, prudent stewardship and long-term financial gain. Retirees rely on these funds for decades at a time; decisions based on the political whim of the day are not only irresponsible but also do a disservice to the countless civil servants across the United States.

With around 97 percent of the market space in proxy advisory services controlled by these two companies, any decision handed down regarding shareholder voting carries immense importance. It is my concern as a pensioner that ISS and Glass Lewis prioritize political causes, namely ESG investing, above stable returns and prudent corporate management. ISS and Glass Lewis's mismanagement of proxy power is a dangerous gamble for people like myself that rely on public pensions for a secure retirement.

While commendable that some investors choose to base their investment decisions on personal beliefs, political and social opinions have no place in the management of pension or index funds where individual investors have no say. Investment decisions must benefit all investors; without prudent management, pension funds could face even greater underfunding, leaving millions of American civil servants without retirement income.

The Employees Retirement System of Rhode Island, of which I'm a member, already faces more than \$5 billion in underfunding. It is concerning that instead of working to close this pension liability, fund leadership is being pushed by proxy advisors to address social and environmental causes.

The SEC should be commended for addressing the issues of the proxy advisory system as it relates to public pension plans. Without addressing the politicized nature of this process, American pension plans will continue to digress. By bringing this issue to the table, the SEC has already begun to shed light on the political nature of proxy advisory services, and has hopefully taken the first step to stabilize the public pension system.

Thank you for addressing this issue and the consideration of these views.

Sincerely,

Karen Shore

Cranston, RI