



Via Electronic Submission

June 11, 2021

Hon. Gary Gensler, Chair
Securities and Exchange Commission
100 F St, NE
Washington, DC 20549

RE: Public Input on Climate Change Disclosures

Dear Chair Gensler,

Thank you for the opportunity to respond to the Securities and Exchange Commission's (SEC) request for public comment on climate change disclosures issued on March 15, 2021. I have the privilege of working over the last two decades with our firm's Managing Partner, Gilbert Garcia. He has served on two SEC FACA Committees, including the AMAC Committee. We support the AMAC Committee's focus on ESG and their role in advocating for more disclosure.

As a 25-year industry professional and a Partner at Garcia Hamilton & Associates, L.P. (GH&A), we want to be on record in support of the SEC's efforts to increase transparency and data around climate change and climate risk. We believe the SEC is best positioned to provide the regulatory guidance around climate disclosures, beginning with requiring, standardizing, and monitoring climate-related disclosures. A standardized disclosure process would provide a platform that adds transparency to asset owners as they compare investment products in similar asset classes. As ESG has come to the forefront, more investment products claim to be ESG. Without standardized disclosures, it is difficult for investors to make an informed decision on investment products and the issuers within each product.

These standardized disclosures should be required and filed in the reporting/filings that the SEC already requires from issuers. By standardizing the location of these climate-related disclosures, investors would be able to easily access material climate-related risks and opportunities from issuers. To ensure issuers are transparent with material climate-related risk, these disclosures should be subject to enforcement and audit by the SEC. If no enforcement or audit is included in this disclosure process, issuers will be slow to move resources to track, assess, and quantify climate-related risks to asset owners, making it difficult to compare issuers and lead to inconsistencies in the data provided by issuers.

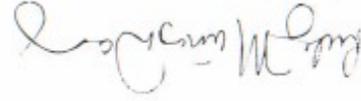
With all the attention and growth of ESG products, investors need a "truth-in-lending" way to differentiate among products and managers. As a minority-owned firm, we strongly believe that a manager/firm must have a high ESG score themselves before they can be allowed to label any of their products ESG. When investing in an ESG product, investors generally assume that the manager adheres to basic principles such as diversity and inclusion at their board level, partner level, senior management level, in their regular business practices, and with their philanthropic efforts.

We appreciate the inclusion of Question #15 in the SEC's request for public input. Mandatory disclosure around Diversity and Inclusion (D&I), including corporate board diversity, C-suite diversity, D&I business practices, and employee gender and diversity statistics, is imperative and should be a priority for the SEC and included in every aspect of the SEC's rules and enforcement. Investors should have access to the best investment management advice and studies show that diverse firms perform as well or better than non-diverse firms in the money management industry. Thus, the exclusion of minority-owned asset management firms continues to inhibit investors from their investment objectives. D&I disclosures would ensure investors receive the best financial services available.

Lastly, we believe SEC pay-to-play rules need review. It is clear that money managers should be above any conflict of interest, real or perceived. Thus, managers should not be allowed to contribute directly to any elected official that has direct influence over the allocation of assets. Current law is not clear regarding degrees of separation nor about the timing of donations. Furthermore, elections are so expensive today that a review of de minimis is warranted. And, public disclosures show that the largest investment firms are spending millions of dollars annually through company sponsored PACs and extensive lobby budgets. While entirely legal, investors must be confident that SEC pay-to-play regulations are not being circumvented by such behavior. It is important that such expenditures do not tip the scale against small and diverse firms when competing for government business at any level.

GH&A fully supports the SEC's continued commitment to transparency and appreciate the opportunity to share our views on the importance of climate-related disclosures. We are available to assist the SEC with any other issues including Diversity & Inclusion. Thank you for this opportunity.

Respectfully,



Ruby Muñoz Dang
Partner / Director of Marketing and Client Services
Garcia Hamilton & Associates, L.P. (GH&A)