

August 16, 2022

Ms. Vanessa A. Countryman
Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549-1090

Submitted online via: <https://www.sec.gov/rules/submitcomments.htm>

**RE: Strive Asset Management, LLC Comments to “Investment Company Names”
(File No. S7-16-22)**

Dear Ms. Countryman,

Strive Asset Management, LLC submits the following response to the Securities and Exchange Commission’s proposed rule, “Investment Company Names.”¹ We thank the Commission for its work on this issue and for the opportunity to comment on the Commission’s proposed rule.

Strive Asset Management, LLC² is an Ohio-based asset management firm whose mission is to restore the voices of everyday citizens in the American economy by leading companies to focus on excellence over politics. We write to provide our view on one aspect of the proposed rule.

Specifically, the Commission should not condition the use of “ESG” fund names on compliance with what Commissioner Peirce has termed the “nag rule.”

Under the proposed rule, a fund cannot call itself an “ESG” fund if it is an “ESG-integration fund,” rather than an “ESG-focused fund.”³ And under the proposed Enhanced Disclosure Rule, a fund is considered an ESG-focused fund only if it (1) uses ESG criteria as an investment screen, or (2) deploys a sufficiently activist “engagement strategy with the companies in which it invests.” As explained in greater detail in the letter Strive has submitted in response to the Enhanced Disclosure Rule,⁴ requiring ESG fund managers that do not screen to repeatedly pester the companies in which they invest to prioritize social and political goals over their corporate mission is bad for asset management firms, businesses and investors alike. Strive therefore believes the nag rule should be rejected in its entirety. But if it is adopted, it should not be a precondition for allowing funds that do not screen investments to use the ESG in their name, as doing so will likely

¹ See SEC Proposed Rule on Investment Company Names, available at <https://www.sec.gov/rules/proposed/2022/ic-34593.pdf> (“Proposed Rule”).

² More information is available at www.strive.com.

³ Proposed Rule at 18.

⁴ Attached as Exhibit A.

serve only to further incentivize fund managers to engage in corporate advocacy that is not only wasteful, but harmful.

We again appreciate the opportunity to weigh in on this important issue and thank the Commission's time and consideration of our comments. If there is any way we can be of further assistance, please do not hesitate to reach out to me directly.

Sincerely,

s/Rachel Paulose

Rachel Paulose
General Counsel
Strive Asset Management, LLC

