

December 26, 2019

Vanessa Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609

Re: File No. S7-22-19: Amendments to Exemptions of the Proxy Rules for Proxy Voting Advice

Dear Sec. Countryman,

As someone who relies on my investments for a secure retirement, I question the justification for proxy advisory firms. These are people I have never met who lack an obligation to help grow my investments and yet can have such a large role in decisions related to proxy votes directly impacting the growth of my investments.

Frankly, I was surprised to learn that the people (like the proxy advisory firms in question) who make decisions about my retirement are not already required to put maximizing returns above all other considerations. I sacrifice every pay period by investing some of my pay into my 403(b) rather than using it for something today.

I am a pediatric occupational therapy assistant with a 403(b) through my job. I live and expect to always live a comfortable though not lavish lifestyle. I am stunned to discover that some of the people (like these proxy firms in question) controlling my retirement funds are completely detached from investors like myself and totally unaccountable for their actions.

If the SEC is serious about bringing greater accountability to the proxy proposal and voting process, I think a very good place to start is to hold proxy firms to the same standard that fund managers are held to.

Thank you for the chance to have a say in this process.

Sincerely,

Leah Carlomusto
Pawtucket,
Rhode Island