

Vanessa Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609
Re: File Number S7-22-19



December 15, 2019

Dear Ms. Countryman,

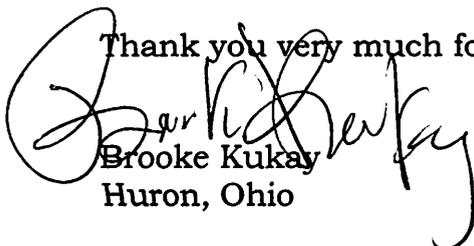
I work as an English teacher and adjunct professor in the great state of Ohio and have contributed to my retirement in the State Teachers Retirement System of Ohio (STRS) my entire career. I am a big believer in what I do. The tendency of certain public pension plan managers to cave to the whims of proxy advisory firms in advising fund direction is a serious threat to the stability of STRS Ohio and pension funds like it across the country.

I understand the role of a proxy firm in advising and even voting on behalf of shareholders. And Glass Lewis and Institutional Shareholder Services are accused of casting votes along ESG lines, which doesn't bother me too much. I care about ESG issues as well—I live next to the Great Lakes, of course I care about environmental stewardship.

However, the fact remains that prioritizing ESG issues when casting votes for corporate governance and fund direction produces consistently lower returns. I am 18 years into my career in the public schools here in Huron County and I expect to be able to retire one day with my pension intact. Fund managers for STRS Ohio have a fiduciary duty to maximize returns on the STRS portfolio and the SEC should extend the oversight necessary to guarantee that all links in this chain answer to that same high standard. As it stands now, these proxy firms have no such accountability.

Ohio STRS is among the largest public pension funds in the country, with nearly a half-million current and retired teachers paying into and drawing pensions from the fund. Those of us investing in our pensions here are playing the long game and the SEC should do what is necessary to make sure we do not fall victim to negligent management and avoidable circumstances in the end.

Thank you very much for looking into this important issue,



Brooke Kukay
Huron, Ohio