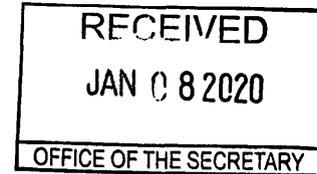


December 13, 2019

Ms. Vanessa Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549
For File Number S7-22-19



Dear Secretary Countryman:

The best part of my day as an attorney at Kademenos, Wisehart, Hines, Dolyk & Zeiher Co., LPA is when a client walks out of a meeting feeling like the weight of the world has been lifted from their shoulders. It's a joy to offer an honest, hardworking person some hope that the legal process might work in their favor.

After earning my law degree at the University of Toledo (while working for noted federal bankruptcy Judge Richard Speer in the Northern District of Ohio) I first joined the firm practicing as a workers' compensation lawyer. Under Judge Speer's encouragement, I expanded my practice to become a bankruptcy lawyer to advocate for people who had hit difficult financial times.

I represent people whose lives are thrown off-track by circumstances they often couldn't foresee or prevent. I've spent 20 years fighting for the rights of injured workers. For the last decade, I've helped clients, who needed the kind of help bankruptcy can provide to get them back on their feet.

Having built my career on helping people at their most financially vulnerable, I'd be remiss if I didn't write today, to implore the U.S. Securities and Exchange to provide new regulations governing proxy advisory firms.

I've had firsthand experience with the questionable practices of proxy advisory firms, when just this year the Financial Industry Regulatory Authority (Finra) slammed Merrill Lynch, Raymond James & Associates Inc. (RJA), and Raymond James Financial Services Inc. (RJFS) with enforcement settlements that required the firms to pay approximately \$12 million in restitution to customers who incurred "excess fees" on 529 college savings plans, based on the firms' failures to reasonably supervise 529 plan share-class recommendations. The very 529 college plans I have funded my own children's college tuition.

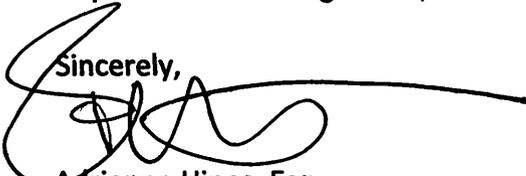
That advisory firm can exert excessive, non-fact-based influence over shareholder voting even regarding contentious issues that aren't part of the main businesses of a company is outrageous. My children's education, my employees' benefits, and my retirement are not pawns for defending against politically-motivated shareholder proposals pushed by conflicted proxy advisors. Prolonged growth and a sustaining of pension budget health for years on end should be the one and only priority.

I also happen to manage an employer-matched 401k program for my six-person law office, so I know what fiduciary responsibility looks like at the line-item level. Our matching program is a useful incentive to recruit attorneys to work at the firm as well as support staff.

Outside of work, I'm a wife and the mother of teenage twins, as well as a board member for the Ottawa County Board of Elections. I believe in teaching my children the value of public service and community leadership by ensuring that local elections are conducted fairly and accurately, and that voters' rights are protected.

To say I strongly believe in civil public discourse would be an understatement. But politics has its place at the voting booth, and our financial future should be kept separate from it.

Sincerely,

A handwritten signature in black ink, appearing to be 'Adrienne Hines', with a long horizontal flourish extending to the right.

Adrienne Hines, Esq.