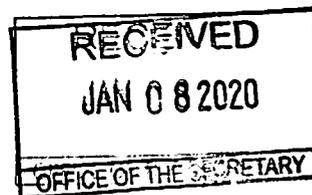


Vanessa Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609



File Number S7-22-19

December 17, 2019

Dear Ms. Countryman,

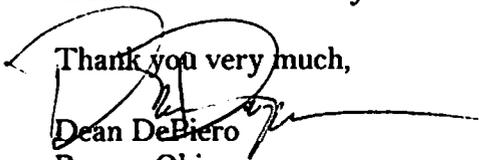
I appreciate the SEC's recent efforts to increase oversight in the proxy process and bring greater accountability to a largely unaccountable party in our financial system. I find it almost laughable how bold proxy advisory firms have been in directing others' investments and how long they have gotten away with their methods.

My great hope is that the SEC will successfully address the pattern of robo-voting that has sprung up at the behest of proxy advisory firms, and in particular Glass Lewis and Institutional Shareholder Services (ISS), who are the greatest offenders. When a fund manager votes the "straight ticket" with a proxy's recommendations, despite what shareholders value or would say to the proposals, that fund manager has disenfranchised the shareholders and given priority to a proxy's political agenda over a fund's returns.

Proxy advisors should be required to justify their recommendations entirely apart from political ideology. Financial returns are a steady, objective scale against which to measure the integrity of decisions impacting these funds. I like to believe I am lucky to have my retirement nest eggs in different baskets. I will be able to rely on my personal 401(k) and a pension from the Ohio Public Employees Retirement System (OPERS) in my retirement years, and I have saved for my children's future by investing in the Ohio 529 college savings plan for both of them. And while I do believe in diversifying, sometimes I see this variety of funds as more ways for the proxy system to sink me and those like me.

After serving my community as mayor and a representative in the Ohio state legislature, I am now a proud partner in a small law firm that offers a 401(k) program with match to our employees. I am on all sides of the investing table. I believe the stakes are high and I believe the SEC recognizes that fact. Please continue in your efforts to reform a system that needs reform badly.

Thank you very much,


Dean DeBiero
Parma, Ohio