

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



December 20, 2019

Re: File Number S7-22-19

Dear Ms. Countryman,

After working the last 40 years as an attorney for the state of Ohio in the Bureau of Workers Compensation, I retired this summer. I was passionate about my career and glad to have those decades serving others. Now I am happy to be retired, and have more time with family. I am hopeful that my OPERS pension will grow with the market in the coming decades, but I'm worried that this assumption is on shaky ground with the current state of pension management.

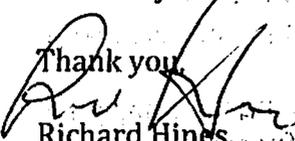
I do not mean pension management by the OPERS membership and employers, but at the further reaches of our investments. Now that I am retired and no longer actively contributing to my pension, I rely on the growth of existing investments to buoy OPERS sufficiently in the coming years.

However, the politicization of investment funds by proxy advisors to make a point with a vocal minority puts this future growth at grave risk. These firms should be required to disclose any conflicts of interest and any information of interest that could be construed as influencing their proxy recommendations. Investors are due this level of transparency from these firms if this sort of information impacts proxy recommendations and fund direction or growth.

We are also planning ahead for our two children through 529 accounts managed by the state of Ohio. Those relying on investments like these are also due the respect of having those investments protected from conflicts that cost not only growth in the short term but upset the stability of funds that will cost them returns in the long run.

Again, I, and others like me, are relying on the steady growth of OPERS for a healthy retirement and I do hope the new measures by the SEC will contribute to the stability necessary for this to be the case.

Thank you,


Richard Hines
Ohio