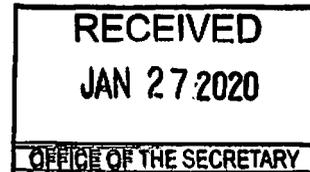


Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609



Re: File Number S7-22-19

January 21, 2020

Dear Ms. Countryman:

I am concerned for the pension security that military Veterans rely on. So many servicemen and women enter public service careers following their time in our military and something must be done about the proxy firms that can steer these pensions in the wrong direction based on a narrow, activist agenda.

I value a diversity of views and opinions; diversity makes our communities strong, vibrant, and interesting. But this diversity of opinions should have any impact on the stability of public pension fund security and their administration.

The market should drive pension growth and pension fund managers should be responsible for the portfolios they manage. At no time should the political opinions of the proxy advisory firms out of New York City have a bearing on the health and welfare of Colorado's public pensions.

And yet this happens. Glass Lewis and Institutional Shareholder Services, which for all intents and purposes are the entire proxy advisory market, have a record of making vote recommendations based on social, environmental, and governance agendas, which are based on opinion and groupthink. These are two factors that should be kept as far from pension investments as possible.

Too many Americans, and particularly military Veterans like myself, work honestly for their pensions for many years and run the very real risk of having that stability jeopardized at the end of a long career. Thank you for looking into this less than transparent market.

A handwritten signature in black ink, appearing to read "Leanne D. Wheeler". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ms. Leanne D. Wheeler
US Air Force Veteran (Desert Storm)

