

Fidelity Securities Fund
Fidelity Blue Chip Value Fund

VIA ELECTRONIC MAIL: imshareholderproposals@sec.gov

December 20, 2019

U.S. Securities & Exchange Commission
100 F Street NE
Washington, DC 20549
Attn: Office of Disclosure and Review

Re: Shareholder Proposals for Fidelity Blue Chip Value Fund,
series of Fidelity Securities Fund
(File No. 811-04118)

Ladies and Gentlemen:

On Aug 29, 2007 and June 3, 2010, letters from Nechama Liss-Levinson (the "Proponent") were received at the principal executive offices of Fidelity Blue Chip Value Fund (the "Fund"). The letters request that a proposal be submitted to shareholders at the next scheduled meeting for the Fund. As detailed in the letters, copies of which are attached, the proposal requests that the Board of Trustees of the Fund implement certain procedures to prevent the Fund from holding investments in companies that, in management's judgment, substantially contribute to genocide or crimes against humanity.

Pursuant to Rule 14a-8(b)(1), to be eligible to submit a proposal, a shareholder must have continuously held at least \$2,000 in market value, or 1%, of the company's securities entitled to be voted on the proposal at the meeting for at least one year by the date the proposal is submitted, and must continue to hold those securities through the date of the meeting. Upon receipt of the letters, the Fund verified that the Proponent met the eligibility requirements to submit a proposal pursuant to Rule 14a-8(b)(1). In preparation for an upcoming shareholder meeting, the Fund attempted to verify that the Proponent continues to satisfy the eligibility requirements of Rule 14a-8(b)(1). The Fund determined that the Proponent was not a record owner of any Fund shares. On August 28 and October 9, 2018, we sent letters, copies of which are attached, to the Proponent to request the information necessary to confirm that the Proponent continues to meet the requirements of Rule 14a-8(b)(1). To date, we have received no response from the Proponent to the Fund's request and the Proponent has not provided the information necessary to permit the Fund to confirm that the Proponent continues to satisfy the requirements of Rule 14a-8(b)(1).

The next shareholder meeting for the Fund is scheduled to be held on or about May 20, 2020. Because the Fund is unable to confirm based on its records that Ms. Liss-Levinson continues to be a shareholder of the Fund and has continuously held the requisite amount of Fund shares since

Office of Disclosure and Review

December 20, 2019

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submitting the proposal as required by Rule 14a-8(b)(1) and because Ms. Liss-Levinson has not responded to two requests to provide additional holdings information, we intend to omit this proposal from the proxy statement for the Fund as permitted by Rule 14a-8(f)(1).

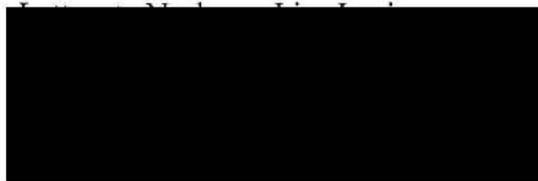
If you have questions or comments concerning this matter, please contact Brian Blackburn at (617) 563-7121.

Sincerely,



Cynthia Lo Bessette
Secretary of the Trust

Enclosures:



FIDELITY SECURITIES FUND
Fidelity Blue Chip Value Fund

**VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED**

October 9, 2018

[REDACTED]
[REDACTED]
[REDACTED]

Dear Ms. Liss-Levinson:

Your shareholder proposal, dated June 3, 2010, was previously received in the principal executive offices of Fidelity Blue Chip Value Fund (the "Fund"), a series of Fidelity Securities Fund (the "Trust").

Rule 14a-8(b)(1) provides that in order to be eligible to submit a proposal for inclusion in a proxy statement for a fund, a shareholder must have "continuously held at least \$2,000 in market value, or 1%, of the company's securities entitled to be voted on the proposal at the meeting for at least one year by the date [the shareholder] submit[s] the proposal and "must continue to hold those securities through the date of the meeting." As required by Rule 14a-8(b)(2), you have provided a written statement that you "intend to meet Rule 14a-8 requirements including the continuous ownership of the required stock value until after the date of the respective shareholder meeting."

Based on a review of the Fund's records, we are unable to confirm that you continue to hold the amount of Fund shares required under Rule 14a-8(b)(1). As provided in Rule 14a-8(b)(2), we request that you provide us with information about your holdings so that we may verify your continued eligibility to submit a shareholder proposal for the Fund.

By this letter we hereby provide you with the opportunity to send us information regarding your holdings with respect to shares of the Fund so that we may verify that you have continuously held the requisite amount of Fund shares and, thus, continue to be eligible to submit a shareholder proposal for the Fund. We request that your response be postmarked, or transmitted electronically, no later than 14 days from the date you receive this notification.

Please direct all further correspondence with respect to this shareholder proposal to: Fund Shareholder Meetings, 245 Summer Street, Mailzone V10B, Boston, MA 02110 or (617) 385-2890 (fax).

This letter shall not be deemed to waive any right of the Fund to omit any proposal from the proxy materials for the Fund's next shareholders' meeting for any other reason.

Sincerely,



William C. Coffey
Secretary of the Trust

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 Insured Mail Restricted Delivery (over \$500)

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

FIDELITY SECURITIES FUND
Fidelity Blue Chip Value Fund

**VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED**

August 30, 2018



Dear Ms. Liss-Levinson:

Your shareholder proposal, dated June 3, 2010, was previously received in the principal executive offices of Fidelity Blue Chip Value Fund (the "Fund"), a series of Fidelity Securities Fund (the "Trust").

Rule 14a-8(b)(1) provides that in order to be eligible to submit a proposal for inclusion in a proxy statement for a fund, a shareholder must have "continuously held at least \$2,000 in market value, or 1%, of the company's securities entitled to be voted on the proposal at the meeting for at least one year by the date [the shareholder] submit[s] the proposal and "must continue to hold those securities through the date of the meeting." As required by Rule 14a-8(b)(2), you have provided a written statement that you "intend to meet Rule 14a-8 requirements including the continuous ownership of the required stock value until after the date of the respective shareholder meeting."

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By this letter we hereby provide you with the opportunity to send us information regarding your holdings with respect to shares of the Fund so that we may verify that you have continuously held the requisite amount of Fund shares and, thus, continue to be eligible to submit a shareholder proposal for the Fund. We request that your response be postmarked, or transmitted electronically, no later than 14 days from the date you receive this notification.

Please direct all further correspondence with respect to this shareholder proposal to: Fund Shareholder Meetings, 245 Summer Street, Mailzone V10B, Boston, MA 02110 or (617) 385-2890 (fax).

This letter shall not be deemed to waive any right of the Fund to omit any proposal from the proxy materials for the Fund's next shareholders' meeting for any other reason.

Sincerely,

A handwritten signature in blue ink that reads "Marc R. Bryant".

Marc R. Bryant
Secretary of the Trust

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<p>2. Article Number (Transfer from service label)</p> <p>7018 0360 0000 3432 3196</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Mailpiece <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Confirmation Restricted Delivery (over \$500)</p>

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt



August 29, 2007

Secretary of the Trust
Fidelity Blue Chip Value
82 Devonshire Street
Boston, Massachusetts 02109

Dear Secretary:

I am writing to submit the attached shareholder resolution for inclusion in the fund's next proxy statement and for presentation at the next shareholder meeting. I hold 634 shares of Fidelity Blue Chip Value (Fidelity SEP-IRA Account [REDACTED]). I have been a Fidelity Blue Chip Value shareholder continuously for over one year. I am attaching a statement from Fidelity Investments confirming my ownership of shares with a market value in excess of \$2,000 over a year ago. I have continuously held at least \$2,000 of the fund since that date and it is my intention to continue to do so.

Please confirm receipt of this letter. If for any reason you choose to exclude this proposal from your proxy please notify me at the above address.

Thank you for your consideration.

Sincerely,



[REDACTED]

June 3, 2010

Secretary of the Trust
Attention "Fund Shareholder Meetings"
82 Devonshire Street, Mailzone V10A
Boston, Massachusetts 02109

To the Secretary:

I am writing to submit the enclosed shareholder proposal to Fidelity's Blue Chip Value Fund and Freedom 2020 Fund for inclusion in their next proxy statements and for presentation at their next shareholder meetings. I hope that once this is on the ballot, you will take a favorable, or at least neutral, stance with regard to the proposal.

I hold 694 shares of the Blue Chip Value Fund and 6231 shares of the Freedom 2020 Fund in my Fidelity account number [REDACTED] in my name and address as listed above.

I am also enclosing a statement of my Fidelity account to confirm my ownership of said shares. I have continuously held at least \$2,000 of these two funds for over a year and it is my intention to continue to do so.

Please confirm receipt of this cover letter and two shareholder proposals. If for any reason you choose to exclude this proposal from your proxy please notify me at the above address.

Other shareholders may have submitted this shareholder proposal in support of a campaign initiated by Investors Against Genocide. If another shareholder has already submitted the same proposal, please consider this a joint submission in support of his/her proposal.

Thank you for your consideration.

Sincerely,

HL

[REDACTED]

Genocide-free Investing Shareholder Proposal for the Fidelity Blue Chip Value Fund

WHEREAS:

Fidelity has released no genocide-free investing policy to prevent investments in companies that contribute to genocide. It may at any time increase such holdings or involve new mutual funds. As a result, individuals, through their mutual funds, may inadvertently invest in companies helping to fund genocide because of investment decisions made by Fidelity.

We believe that:

- 1) Investors do not want their pensions and family savings connected to genocide.
 - a) Reasonable people may disagree about what constitutes socially responsible investing, but few people want their savings connected to genocide.
 - b) In the face of the most extreme human rights crises investment companies share responsibility, along with government, to act.
 - c) In KRC Research's 2010 study, 88% of respondents said they would like their mutual funds to be genocide-free.
 - d) Millions of people have voted for shareholder proposals similar to this one, submitted by supporters of Investors Against Genocide, despite active management opposition.

- 2) This problem is particularly important to shareholders because Fidelity:
 - a) Has, for years, been a large holder of PetroChina, which, through its closely related parent, China National Petroleum Company, is internationally recognized as the worst offender helping fund the Government of Sudan's genocide in Darfur.
 - b) Actively opposed earlier shareholder requests for genocide-free investing.
 - c) Continued to buy shares of problem companies even after becoming aware of the investment's connection to the Darfur genocide.
 - d) Claimed to have a policy addressing extreme human rights issues, but has taken no action to avoid problem investments.

- 3) A policy against investments in genocide must:
 - a) Be clear and transparent.
 - b) Apply today and to any future genocide.
 - c) Prevent purchasing shares of companies known to substantially contribute to genocide.
 - d) Require corrective action for existing problem investments. If the fund holds problem companies and can effectively influence their behavior, then time-limited engagement may be appropriate. If not, the problem investments should be sold.

- 4) There are no sound financial, fiduciary, or legal reasons that prevent the fund from having a policy against investments in genocide, as TIAA-CREF demonstrated in 2009.
 - a) Ample competitive investment choices exist, even with index funds.
 - b) Avoiding a small number of problem companies need not have a significant effect on performance, as shown in Gary Brinson's classic asset allocation study.
 - c) Even the most conservative legal concerns can be addressed by a small change to the prospectus.
 - d) Management can easily obtain independent assessments of problem companies and their connection to genocide.

- 5) Investor pressure can help influence foreign governments, as in South Africa. Similarly, divestment pressure on Talisman Energy helped end the conflict in South Sudan.

RESOLVED:

Shareholders request that the Board institute transparent procedures to prevent holding investments in companies that, in management's judgment, substantially contribute to genocide or crimes against humanity, the most egregious violations of human rights.