## Fidelity Puritan Trust Fidelity Puritan 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 Puritan Fund, series of Fidelity Puritan Trust

File No. 811-00649

#### Ladies and Gentlemen:

As indicated in the table below, letters were received at the principal executive offices of Fidelity Puritan Fund (the "Fund"), requesting that a proposal be submitted to shareholders at the next scheduled meeting of the Fund. As detailed in the letters, copies of which are attached, the proposals request that the Boards 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.

## Shareholder (each, a "Proponent" and collectively the

Defect Letter (the "Defect Letter")

Proponents)	Proposal Dated	Dated
Ashley B. Berendt	August 8, 2010	August 30, 2018
·		October 9, 2018
Mary Haskell*	November 9, 2007 and July 24,	August 30, 2018
	2010	October 9, 2018
Philippa Solomon (Carolyn	August 10, 2010	August 30, 2018
Blackburn)	-	

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 initial receipt of the letters, the Fund verified that each 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 each Proponent continues to satisfy the eligibility

<sup>\*</sup> Ms. Haskell actively confirmed redemption of her shares on September 20, 2018.

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requirements of Rule 14a-8(b)(1). The Fund determined that each Proponent was not a record owner of the Fund's shares. On the dates referred to above, we sent each Proponent a Defect Letter, copies of which are attached, requesting that the Proponent provide the information necessary to confirm that he or she continues to meet the requirements of Rule 14a-8(b)(1). To date, one Proponent confirmed their redemption of Fund shares and the remaining two Proponents have not responded to the Fund's requests and have not provided the information necessary to permit the Fund to confirm that the requirements of Rule 14a-8(b)(1) continue to be satisfied.

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 any Proponent continues to be a shareholder of the Fund and has continuously held the requisite amount of that Fund's shares since the submission of the proposal as required by Rule 14a-8(b)(1), and because neither Ms. Berendt nor Ms. Blackburn (on behalf of Philippa Solomon) have responded to requests to provide additional holdings information, we intend to omit this proposal from the proxy statements for the Funds 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:** 

Letters to Ashley B. Berendt Letter from Ashley B. Berendt

Letter to Philippa Solomon (Carolyn Blackburn) Letter from Philippa Solomon (Carolyn Blackburn)

cc: Ashley B. Berendt

Philippa Solomon (Carolyn Blackburn)

## FIDELITY PURITAN TRUST Fidelity Puritan Fund

### VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

August 30, 2018



Dear Ms. Berendt:

Your shareholder proposal, dated August 8, 2010, was previously received in the principal executive offices of Fidelity Puritan Fund (the "Fund"), a series of Fidelity Puritan Trust (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,

Marc R. Bryant Secretary of the Trust

Van Bryant



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FMR LLC 200 Seapo

200 Seaport Boulevard VIDE Boston, MA 02210

RETURN RECEIPT
REQUESTED

RECIPIENT NOT AT THIS ADDRESS.

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## FIDELITY PURITAN TRUST Fidelity Puritan Fund

### VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

October 9, 2018



Dear Ms. Berendt:

Your shareholder proposal, dated August 8, 2010, was previously received in the principal executive offices of Fidelity Puritan Fund (the "Fund"), a series of Fidelity Puritan Trust (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.

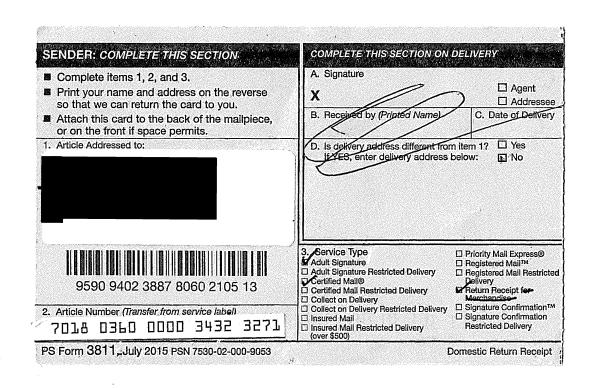
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Sincerely

William C. Coffey Secretary of the Trust





Fidelity Legal Dept
AUG 1 3 2010

Fidelity Investments Secretary of the Trust Attention "Fund Shareholder Meetings" 82 Devonshire Street, Mail Zone V10A Boston, Massachusetts 02109

## To the Secretary:

I am writing to submit the enclosed shareholder proposal to one Fidelity fund for inclusion in its next proxy statement and for presentation at its next shareholder meeting. I hope that once it is on the ballot, you will take a favorable, or at least neutral, stance with regard to the proposal.

The fund and the number of shares I own is:

Fidelity Puritan (FPURX) 1,908.843 shares.

I am also enclosing a statement of my INDIVIDUAL account which confirms my ownership of said shares.

I have continuously held at least \$2,000 of the fund for over a year and it is my intention to continue to do so.

Please confirm receipt of this cover letter and the shareholder proposal. 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.

Thanks for your consideration.

Sincerely,

Ashley B. Berendt

# Genocide-free Investing Shareholder Proposal for Fidelity Puritan (FPURX)

#### 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.

## FIDELITY PURITAN TRUST Fidelity Puritan Fund

## VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

August 30, 2018



Dear Ms. Blackburn:

A shareholder proposal, dated August 10, 2010, from Philippa Solomon was previously received in the principal executive offices of Fidelity Puritan Fund (the "Fund"), a series of Fidelity Puritan Trust (the "Trust"). We understand that, since that date, you have obtained ownership of Ms. Solomon's account.

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.

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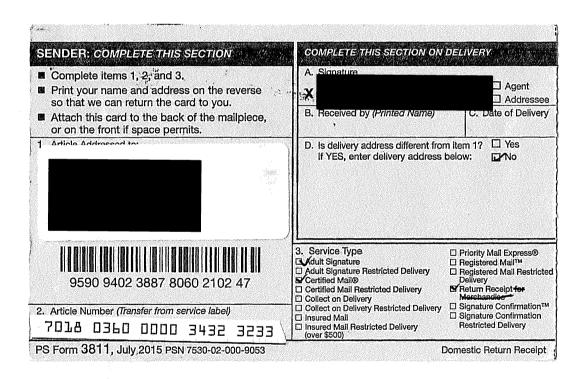
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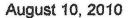
Van Bryant







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

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I am writing to submit the enclosed shareholder proposal to Fidelity Puritan Fund for inclusion in its next proxy statement and for presentation at its next shareholder meeting. 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 2620 shares of Fidelity Puritan Fund in my name and address as listed above.

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

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

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