

Office of Regulations and Interpretations
Employee Benefits Security Administration
Room N-5655
U.S. Department of Labor
200 Constitution Ave., N.W.
Washington, DC 20210

Re: **RIN 1210-AB95**

Dear Mr. Dewitt:

I am writing to encourage you to support the proposed rule that protects pension funds from Environmental, Social, and Corporate Governance (“ESG”) investing. Politically motivated pension fund managers jeopardize the finances of millions of hardworking folks throughout the country. As an attorney who has represented shareholders, as well as institutions against predatory class action attorneys, I welcome this regulation that reigns in misplaced activism. It is a step in the right direction.

Pension fund managers have a fiduciary responsibility to ensure maximum growth for the funds that they manage. ESG investing is contrary to this fundamental responsibility, because managers instead focus on achieving a political agenda. These agendas do not optimize the growth of the fund; instead, they work to advance the misaligned interests of a few activists, at the expense of the majority of investors, many of whom are retirees and workers.

Simply put, folks rely on their pension funds to save for their retirement and financial longevity. The risk is too great to allow politics to get in the way. This proposed rule establishes a concrete means to guarantee that the integrity of the funds are maintained.

As an attorney, I represented classes of shareholders against public companies whose executives allowed personal greed to betray their obligations to investors. I also defended companies and institutions against plaintiff’s attorneys who exploited regulations and front-line employees to enrich themselves with large settlements. From both sides, I have fought against those that seek to siphon off critical business investment to pursue personal, ego-driven agendas.

I personally know a great deal of friends, family and neighbors in my home state of Colorado who have seen their savings dissipate because of “activist investing.” I was very pleased to learn about the Department of Labor’s concern and dedication to this issue. We must update federal laws to protect our seniors and colleagues from this dangerous and worrying investment trend.

If ESG principles were aligned with investing, then such an investment strategy would significantly outperform the broader market. Instead, consistent research has shown that ESG investments perform far worse than standard index funds. During this difficult

time in our history, we should do everything in our power to protect the financial interests of working people from political agendas that they do not welcome or support.

I thank you in advance for your consideration and prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Harrison, Esq.", with a stylized flourish at the end.

Thomas Harrison, Esq.

Attorney at Law