

Via email to rule-comments@sec.gov

September 12, 2022

Vanessa A. Countryman Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

RE: Substantial Implementation, Duplication, and Resubmission of Shareholder Proposals Under Exchange Act Rule 14a-8 (File No. S7-20-22)

Dear Ms. Countryman:

Veris Wealth Partners welcomes the opportunity to provide this comment letter in response to the Notice of Proposed Rulemaking " Substantial Implementation, Duplication, and Resubmission of Shareholder Proposals Under Exchange Act Rule 14a-8 " (File No. S7-20-22) ("Proposal").

We support this Proposal as an important step in providing investors and companies more clarity on three exclusions included in Rule-14a-8: substantial implementation, duplication and resubmission.

The shareholder proposal rule (Rule 14a-8 of the Securities Exchange Act of 1934) is a vitally important, market-based mechanism for shareholders to communicate with boards, management, and other shareholders on important corporate governance risks as well as social and environmental issues that are not being properly addressed.

For decades, the shareholder proposal process has been one of the most visible and effective ways in which investors can practice responsible ownership. It provides shareholders' the ability to file resolutions at companies' annual meetings.

The SEC should move quickly to finalize these sensible amendments to Rule 14a-8. These changes will make the shareholder proposal process more efficient, objective and predictable.

Thank you for considering these comments.

Sincerely,



Stephanie Cohn Rupp
CEO, Veris Wealth Partners