



Frederick Gortner
Managing Director

October 2, 2009

Dear SEC Chairman and Board Members:

While we have read about recent "pay to play" scandals and support the SEC efforts to curb such abuses, we strongly disagree with the proposed regulation banning the use of placement agents when dealing with public pension plans. We believe that stronger regulatory oversight would be a more effective policy tool.

Founded in 1995, Paladin Realty Partners, LLC is an institutional real estate investment management firm with total AUM of \$3+ billion and a primary investment focus on Latin America and other emerging markets. As our company's investment opportunities grew, so did our need to expand and diversify our institutional investor relationships.

Towards this end, last year we engaged Triton Pacific Capital to be the exclusive placement agent for our most recent fund. In this role, Triton Pacific spent countless hours assisting us with a wide variety of tasks, including validating and synthesizing our historical performance, refining our presentation, identifying our key strengths and differentiating characteristics, and articulating the benefits of our fund and the investment opportunities we intend to pursue. In addition, Triton Pacific identified, prescreened and prioritized hundreds of potential domestic and international institutional investors, and ultimately introduced our firm to a wide variety of investors who's objectives best matched our own. They arranged and moderated each meeting, keeping the discussion on-point, and they coordinated follow-up items to ensure they were handled thoroughly and timely. Triton Pacific also assisted us in addressing and resolving investor due diligence issues as they arose.

As can be seen from the above, Triton Pacific's services contributed significantly to our endeavors and we fully expect they will continue to add significant value in the future. Our firm is simply too small to afford the staff that would have been needed to coordinate all of these functions as effectively.

Without quality placement agents like Triton Pacific, emerging small and mid-cap investment management firms like ours would be forced to operate at a significant and inequitable disadvantage to larger investment managers that have the financial resources to employ large, experienced teams of investor relations and in-house placement professionals. Institutional investors also value placement agents as they benefit from the services rendered by firms like Triton Pacific in filtering out managers that would likely not qualify as institutionally acceptable investment fiduciaries.

PALADIN REALTY PARTNERS, LLC

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We ask the SEC to eliminate the ban on placement agents and instead impose more regulatory oversight.

Thank you for taking our views into consideration on this very important matter.

Sincerely,

A handwritten signature in blue ink, appearing to be 'F. Gortner', with a long horizontal flourish extending to the right.

Frederick Gortner

Managing Director,
Paladin Realty Partners, LLC