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**Rosh Financial Services, Inc.**  
INSURANCE • ANNUITIES • MUTUAL FUNDS

SEP 2 2008

August 28, 2008

Senator Jon Kyle  
2200 E Camelback, Suite 120  
Phoenix, AZ 85016-3456

Dear Senator Jon Kyle,

I am writing regarding proposed SEC Rule 151 A , a proposal which would subject Indexed Annuities, which are already regulated by the individual states to dual regulation and would have profound implications for the way these products are developed, marketed and sold. The securities regulation will add little benefit to consumer protection. Many states have already adopted the NAIC Annuity Disclosure Model Regulation and most , if not all, of the major index annuity carriers have mandated the use of a disclosure statement or certificate describing all important terms and conditions of the annuity contract, including prominent disclosure of surrender charges. Many, if not all, major indexed annuity carriers conduct suitability reviews of all sales in all states. Suitability reviews required of brokers under FINRA rules would not add any meaningful protections over and above what is already being done. Thanks for your consideration and help in this matter.

Sincerely yours,

Ronald Goldman  
7223 E Tailfeather Drive  
Scottsdale, AZ 85255