

August 13, 2008

As a series 7 Registered Representative, I am unable to give guarantees to my clients on their investments. It seems to me that that is part of the definition of a security. An individual may participate in growth and can also lose some or all of their investment.

Certainly with a guarantee for of not losing principal, an EIA does not qualify as a security.

Please reconsider.

Dabney Klosterkemper