

JENNIFER A. BASCIANO	BRIAN T. SILVESTRO
WILLIAM J. BRITT	ROBERT L. TEICHER
SETH O. L. BRODY	MELINDA E. TODGHAM
DOUGLAS R. BROWN	THOMAS J. WALSH, JR.
SETH L. COOPER	
JUSTIN L. GALLETTI	
MARK W. KLEIN	CHARLES S. BRODY
LISA F. METZ	1918-1976
BARBARA S. MILLER	
PETER T. MOTT	OF COUNSEL:
RONALD B. NOREN	FRANK FRITZ OBER
S. GILES PAYNE	LAW OFFICE OF
JAMES E. RICE	DIANE F. MARTUCCI, LLC

September 23, 2009

Elizabeth M. Murphy, Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Re: File Number S7-18-09:Political Contributions by Certain Investment Advisers

Dear Ms. Murphy:

We are writing this letter in response to the above proposed rule in relation to placement agents. The portion of the proposed rule entirely banning placement agents from soliciting public funds is a classic case of throwing out the baby with the bath water. Rather than enacting a ban on the placement agent industry, which is with few exceptions comprised of ethical licensed broker dealers, the proposed rule should be crafted to just retain those sections preventing improper kickbacks and providing better regulation of the placement agent industry.

The marketing of alternative investments is a specialty and is a skill set quite apart from running a private equity fund or a hedge fund. The knowledge and ability to make profit for investors, a skill possessed by fund managers, is something quite distinct from the ability to source appropriate investors for the subject investment class and to properly explain the investment strategy to prospects.

Over the years, placement agents have introduced emerging managers to the institutional marketplace for the first time and have expanded the investment reach of established managers. Experienced placement agents also assist fund managers with preparing due diligence materials and compliant marketing procedures. Placement agents assist institutional investors who are barraged with solicitations on a constant basis. By dealing with a reputable placement agent which has a track record of representing reputable fund managers, an institutional investor is more likely to make a prudent investment selection.

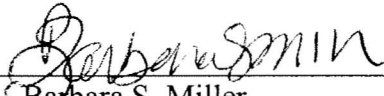
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As this economy is hopefully in a period of recovery, the alternative investment market is critical to capital seeding of new and promising businesses. Forcing fund managers to take on marketing as an in house function without the able assistance of an experienced and reputable placement agent will, in fact, slow down the market recovery which so many individuals in the current administration have worked so hard to achieve.

Thank you for your consideration of these comments.

Very truly yours,

Brody Wilkinson PC

By:   
Barbara S. Miller

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