

September 25th, 2009

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

Dear Ms. Murphy,

SeaCrest Investment Management appreciates the opportunity to comment on the Securities and Exchange Commission's (hereinafter referred to as "Commission") proposed rules regarding "pay-to-play", (File No. S7-18-09). SeaCrest is an investment management firm registered with the State of New York and is also a certified minority-owned enterprise. Our core business involves developing proprietary investment products and working with institutional clients.

SeaCrest strongly supports the Commission's efforts to expose and eliminate corruption related to the management of public pension funds. SeaCrest:

- Fully supports a ban on all campaign contributions to elected officials and their respective political parties that are responsible for or influential in the allocation of public funds to investment advisors.
- Strongly opposes a ban on the use of the third party marketers to solicit government business.

Campaign Contributions

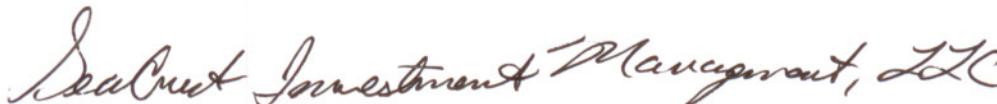
The vast majority of placement agents, investment advisers and public pension fund officials are ethical, law abiding professionals who serve their investors, constituents and community well. SeaCrest believes that a ban on both direct contributions to individuals and indirect contributions to their respective political parties will serve well in upholding the financial profession's integrity. SeaCrest also believes that vigorous enforcement is necessary with respect to the registration and licensing of placement agents with the Commission. This will provide comfort that the same moral compass is maintained by all relevant parties.

Third Party Marketers

However, SeaCrest respectfully urges the Commission to avoid any regulation or guidance with respect to banning Third Party Marketers from promoting investment products to public entities. The adoption of this or similar regulation would effectively eliminate the relatively smaller investment management firms (such as SeaCrest) from competing with the larger firms as advisors as they are financially constrained from taking on a proprietary sales force. SeaCrest believes a reduction in competition will be detrimental not only to the smaller investment firms but, more importantly, to the stakeholders (e.g. taxpayers) who would benefit from added product choice and potentially better investment performance.

In conclusion, SeaCrest respectfully requests the SEC to apply appropriate and robust regulation addressing play-to-pay and refrain from erecting barriers to competition on small investment advisors by applying unnecessary regulation upon the Third Party Marketers.

Thank you.



SeaCrest Investment Management, LLC