

October 2, 2009

Dear SEC Members:

I agree that some steps should be taken to curb 'pay-to-play' scandals but I fiercely disagree with your proposed banning an entire industry of placement agents because in any industry, criminal scams of this type are the result of only a very few individuals, and without the deceitful actions of government employees and investment managers, the 'pay-to-play' scheme could never be executed.

The proposed placement agent ban should be eliminated because: a) it will devastate the placement agent business and cause severe job losses in an already troubled economy; b) the vast majority of emerging, small and middle-market investment managers will simply not survive or be forced to operate at a huge disadvantage; c) pension funds will see a significant reduction in their access to potential investment opportunities; and d) pension funds will no longer be able to use placement agents to help them pre-screen potential investment manager candidates

I plead the SEC to eliminate the ban on placement agents and instead ban political contributions and impose more regulatory oversight of investment managers, government employees with decision making authority, consultants and placement agents.

Sincerely,



Melinda Gagyor
Fulcrum Financial Inquiry, LLC