

Date: August 27, 2009

Subject: File No. S7-18-09: Political Contributions by Certain Investment Advisers

From: David M. Love, CFA

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The broad-based ban on placement agents as proposed in File No. S7-18-09 is unjustified. Because it does not differentiate between legitimate firms in the business and the illegitimate pay-to-play entities, if enacted it would seriously damage a valuable segment of the investment industry. In turn, it would harm the ultimate investors that the SEC is charged with protecting.

My perspective is based on more than forty years of experience in the investment business as a nationally-ranked institutional analyst, an asset manager, and marketer. For the past 13 years, I have worked with C.P. Eaton Partners, LLC, a highly-regarded, global placement agent.

My current responsibilities at our firm include the oversight and management of our Asian operations. So, while I take issue with the proposed ban on legitimate placement agents for a variety of reasons, I shall focus on the valuable international role played by these professionals to help bridge the divide between different geographies, markets and cultures. For example, our Shanghai office is a great vantage point from which to see the next wave of Asian-based fund managers, which pensions will want to access. Our local presence and knowledge of the market guarantees LPs that they will see attractive investment opportunities in one of the most important economies worldwide.

Over the past five years, we have facilitated LP commitments of more than \$3 billion to Asian-based funds, predominantly from investors in the U.S., including a number of public pension fund investors. Most of the managers receiving commitments were sponsoring first-time funds and had little to no experience in fund raising internationally, making our local presence and global network an undeniably valuable resource for these managers. It is fair to say that, absent the involvement of a placement agent, these best-of-breed managers would have had a difficult time introducing their funds to the institutional marketplace. They lack the marketing platforms and resources provided by the placement agent. Had the ban been in effect as proposed, it is quite possible that valuable Asian investment opportunities would have been missed by American investors. As such, the SEC's proposed actions would detrimentally affect the global economy.

Yes, political pay-to-play practices should be stopped. However, the proposed "baby-with-the-bathwater" ban on all placement agents is overreaching to the extreme and counterproductive to the SEC's positive mission. Thank you for receiving comments on this important issue.

Cordially,

David M. Love, CFA

Managing Director