



August 27, 2009

Ms. Elizabeth M. Murphy, Secretary
United States 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:

I am writing in response to your proposed Rule 206(4)-5. I am glad that you are taking a better look at the rules and regulations of Placement Agents. Our company is a highly regulated group of registered professionals who take the letter and spirit of the law very seriously and applaud any efforts to eliminate corruption in our industry. I am confident that there will be no need to ban placement agents if the level of scrutiny that we face from regulators is thoroughly applied to all marketers.

I have been at C. P. Eaton Partners for 12 years. I am a Vice President and serve as office Manager and support our COO, Compliance Officer in maintaining all the books and records required by FINRA, under the Private Placement Rules and Regulations.

During my time here, our company has been audited several times by FINRA and the local auditors. FINRA is in our offices regularly conducting both scheduled and unannounced visits to monitor our compliance with regulations. We have initiated best practices within our firm including Written Supervisory Procedures, a Business Continuity Plan and Anti-Money Laundering Policies. We have worked together with OFAC and FINcen to monitor our databases for information on persons of interest to the authorities.

I believe an appropriate alternative to banning placement agents would be to apply these requirements to all marketers who want to do business with government pensions. We have already adopted a code of conduct along with many of our peers and feel that this should be the industry norm. Regulations can be expanded to include transparency for fees paid to marketers and to prohibit campaign contributions. This should be no problem for any legitimate placement agent as I have never known any member of C.P. Eaton to interact with politicians, only with the investment professionals at pensions. A combination of the above actions should bring the entire industry up to the high standards that almost all placement agents already hold themselves to.

Sincerely,

Leanne Erickson