

Date: September 10, 2009

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

From: Mr. Attilio A. Albani, Jr.

Affiliation: Co-Founder & CEO -- Pinnacle Trust Partners, LLC

On behalf of Pinnacle Trust Partners, LLC (and PTP Securities, LLC – Member FINRA & SIPC), an independent placement agent focused on alternative investments, I write in support of the proposed pay-to-play restrictions and ban on political contributions set forth in proposed SEC Rule 206(4)-5 but against the overall ban on the use of placement agents by investment advisers seeking to do business with public funds.

Pinnacle has nine employees and is headquartered in Simsbury, CT. Pinnacle's primary business is to raise institutional capital for alternative investment strategies. Pinnacle has avoided even the suggestion of impropriety and has operated with full disclosure when presenting our clients to institutional investors. Consequently, those who would seek to influence investment decisions through corrupt pay-to-play and political strategies negatively impact our reputation and business practices. The illegal pay-to-play practices have put our industry in a difficult position and we fully support the SEC's efforts to deter and stop these practices from happening in the future.

However, we feel that the Rule goes too far by proposing a total ban on the use of placement agents by investment advisers seeking to do business with public funds. Pinnacle (like many of our competitors) consistently represents small or new investment managers who do not have the ability to reach out to the over 2,000 institutional investment organizations that are part of Pinnacle's network. Likewise, the resources of public investment fund managers are limited and it is often difficult for them to research small or new managers. Placement agents bridge this gap by introducing these investment fund managers to what are often compelling investment opportunities.

Without the assistance of placement agents, the investment opportunities shown to public funds would be substantially reduced and the portfolio returns of these public funds would be significantly impaired. Therefore, we believe that the proposed Rule will actually end up negatively impacting the public funds which it intends to benefit.

In conclusion, we support the provisions of the proposed Rule 206(4)-5 which restrict pay-to-play and certain political contributions as well feel they will be effective in preventing future violations which place our entire industry in a negative light. We do not support the ban on placement agents by firms doing business with public funds because such a ban will actually hurt the public funds it seeks to protect.

Respectfully submitted by:

Pinnacle Trust Partners, LLC