

*Tell us what you think*

Sales Practices Rules for Transacting in Shares  
of Leveraged/Inverse Investment Vehicles

### Item 1: General Identifying Information

a. Is the firm a Commission-registered investment adviser or a broker-dealer?: Fee Only Registered Investment Adviser

b. What is the size of the firm in terms of:

- 1.) The number of retail investors (as defined in the release)? 400
- 2.) For Investment Advisers, regulatory assets under management? \$150 million
- 3.) For broker-dealers, regulatory net capital?
- 4.) Other (please specify)?

c. Please include any additional general identifying information that you wish to provide, that could add context to your other feedback on the proposal.

We are an active investment manager who works to mitigate downside risk for clients through a variety of investment tools

d. Does the firm accept orders from or place orders for the accounts of retail investors to buy or sell shares of leveraged/inverse investment vehicles (as defined in the proposed sales practices rules)?

Yes many of them

### Item 2: Cost to Comply with the Proposed Due Diligence and Account Approval Requirements

a. What do you expect the cost to your firm would be in order to comply with these proposed requirements (in terms of combined internal and external costs)?

1.) For an investment adviser (check one box): Greater than \$10,000

2.) For a broker-dealer (check one box):

b. Are there any less expensive alternatives to the proposed requirements you can suggest that would still preserve the proposed rules' intended investor protection safeguards?

### Item 3: Other Feedback on Proposed Sales Practices Rules

Instructions: Please include any other additional suggestions or comments about the proposed sales practices rules that you would like to provide.

We need to keep the ability to use leverage inverse funds in order to be able to mitigate downside risks from our long only core equity positions. We do not use inverse and leverage funds in an alpha generation capacity strictly for beta management.

### **Other Ways to Submit Your Feedback**

You also can send us feedback in the following ways (include the file number S7-24-15 in your response):

<a href="#">Print Your Responses</a> and Mail	Secretary Securities and Exchange Commission 100 F Street, NE Washington, DC 20549-1090
<a href="#">Print a PDF of Your Responses</a> and Email	Use the printer friendly page and select a PDF printer to create a file you can email to: <a href="mailto:rule-comments@sec.gov">rule-comments@sec.gov</a>
Print a Blank Copy of <a href="#">this Flier</a> , Fill it Out, and Mail	Secretary Securities and Exchange Commission 100 F Street, NE Washington, DC 20549-1090

**File No. S7-24-15**