



607 Fourteenth Street N.W.
Washington, D.C. 20005-2003
PHONE: 202.628.6600
FAX: 202.434.1690
www.perkinscoie.com

Mary C. Moynihan
PHONE: (202) 434-1645
FAX: (202) 654-9697
EMAIL: MMoynihan@perkinscoie.com

November 18, 2010

Elizabeth M. Murphy, Esq.
Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Re: Proposed Rule 202(a)(11)(G)-1 under the Investment Advisers Act of 1940 File Number S7-25-10

Dear Ms. Murphy:

We represent a number of single family offices in the Mid-Atlantic area. We are submitting this letter to express the views of a specific single family office on the rule that the Commission must adopt to implement the authority granted to it in Section 409 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”) to define the term “family office.” As you know, an entity that can comply with the rule will be excluded from the definition of “investment adviser” and not be subject to registration or regulation under the Investment Advisers Act of 1940 (“Advisers Act”). Because Section 403 of the Dodd-Frank Act repeals Section 203(b)(3) of the Advisers Act on July 21, 2011, this specific single family office strongly supports the timely adoption of a rule under Section 202(a)(11)(G) of the Advisers Act that will exclude single family offices from the definition of “investment adviser.”

This single family office supports the analysis in the letter submitted by the Private Investor Coalition Inc. (“Coalition”) regarding Proposed Rule 202(a)(11)(G)-1 (“Proposed Rule”). Taking into account the recommendations that were made throughout that comment letter, this single family office believes that, in general, the Proposed Rule would meet the needs of many single family offices, including its own single family office.

Elizabeth M. Murphy, Esq.
November 18, 2010
Page 2

This single family office wishes to note that, if it cannot satisfy all of the conditions of any rule that the Commission may finally adopt, it will expect to file an individual application for an exemptive order under new Section 202(a)(11)(H), and seek an exemptive order based on its particular facts and circumstances.

Thank you for this opportunity to express the views of this specific single family office.

Very truly yours,

Mary C. Moynihan