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

November 18, 2010

Re: **Proposed Rule 202(a)(11)(G)-1 under the Investment Advisers Act of 1940, File No. S7-25-10**

Dear Ms. Murphy:

We are a family office on the very lower end of the overall spectrum. For four generations, our family has worked together in formal and informal ways to manage trusts and investments, and provide common resources and management exclusively for family members and several family companies.

Our Single Family Office (SFO) has been more formally structured with respect to certain investments over the last 3 generations, and continues to evolve and become more sophisticated in various investments.

The principal objective of our SFO is to provide economies of scale to family members. By standardizing and pooling we are able to contract for lower unit costs on investment, accounting, legal and other consultative services. These costs can be more efficiently spread between family members. Another goal over the years of our Family Office is to help family members and related family entities manage their affairs, and share experiences and education with members of the family and their children to perpetuate the successes of the SFO's founders and succeeding generations.

We are a small but growing family office, and the disruption and costs of SEC registration would have a profound effect on our group. We do not hold ourselves out to the public as advisors, or sell investment services. We function solely for the benefit of the descendants of our SFO's founders.

We have only recently heard of the rules being proposed and the possible consequences to us, and we do not have the resources or time available to fully respond. We have read some of the very recent reviews by the **Family Office Exchange** in Chicago, and most recently have seen a letter from **The Private Investors Coalition dated 11/18/2010** to the SEC commenting on the proposed rules. This letter addresses many of our concerns with respect to the language for exclusion from registration requirements.

We urge the SEC to adopt rules which will permit the definition of "founder" to include generations "upstream" from the current living generation. Restricting the definition of "founder" to the person or persons establishing a LLC or similar entity to formalize previously informal arrangements would run counter to the Commission's goals in

adopting the family office exception, namely, to allow intra-family affairs to remain private and efficiently handle intra-family affairs without the cost and expense of registration.

Adoption of a definition of "founder" which looks to the original founder of family wealth management, in our case, 4 generations prior to the current generation, would reflect the reality that many families, especially those which are inclined to resort to SFO status, remain very close, although they may be "distant" cousins under the table of consanguinity. Furthermore, adoption of a definition of founder which would allow upstream application of the term to deceased individuals would have little practical effect, because, as time goes on, family offices set up today will contain "distant cousins" in as little as two generations. In both instances, the more restrictive definition of "family member" adopted by the Commission will ensure that the affairs of the Family Office remain "in the family."