

Our concerns are about the SEC's proposed changes to the custody rule.

The proposed surprise audit appears to be more of a political reaction to public criticism of the SEC and congressional pressure following the Madoff scandal than an effective regulatory response.

The truth be told, Mr. Madoff came under NASD/FINRA as a broker for 30 years and only 2 years as a registered investment advisor. FINRA supposedly audits broker/dealers on a quarterly basis, so the question arises; who is at risk? I think the SEC should hold FINRA accountable for its share of oversight.

Sending a notice to our clients about opening their account with us is confusing more than informative. We already give them copies of their signed paperwork, along with information about the custodian we use.

In order to enhance consumer protection, if this is the intention of the government, I would support Congress appropriating additional resources to the SEC who has the proper infrastructure in place already, and with these tax dollars presented to the SEC, they would hire and train additional examination staff.

In summary, if there were ever anything to consider, it would be to put the consumer first; above all things not have our government be influencing those parties who have other agendas.