

For the love of Pete, STOP. If your intention is to drive small firms out of business, you are doing a very good job.

You ask how the “disclosure of information will affect business”: in small businesses, it takes away yet more time from the manager to do his primary job, which is doing a good job for clients and not dealing with never-ending regulatory burdens, questions, forms and meetings. Every hour a manager takes on compliance is an hour not devoted to clients.

Your estimate of time and costs is, as usual, ludicrous. Three hours and \$750! I have taken nearly three hours just to read and try to understand your convoluted and repetitive 104-page document. (This time includes several interruptions to take and digest Tums.)

If my time has any cost, then I have already spent over \$750. Every time you make what to you may seem like a minor and innocuous change, it requires discussions between compliance officers and management, meetings, procedures and memos, plus calls to outside attorneys. ADV answered are prepared, reviewed by management, reviewed by the CCO, questioned by the CCO, proved by management, and amendments suggested and debated. This all takes time, lots of it. And if management time costs anything, then lots of dollars as well.

You ask about effectiveness of ADV. You, and the compliance industry you have spawned, are turning the ADV into a document that, like fund prospectuses, very few investors actually read. Your incessant regulation is, in addition to being burdensome and costly, counterproductive.

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