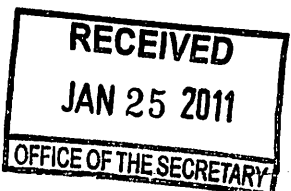


**JEWETT ECONOMIC DEVELOPMENT
CORPORATION
P. O. BOX 189
JEWETT, TEXAS 75846-0189**

January 19, 2011



Ms. Elizabeth M. Murphy
Secretary, Securities and Exchange Commission
100 F. Street NE
Washington, DC 20549-1090

Dear Ms. Murphy

I am writing this letter as Chairman, of the Jewett Economic Development Corporation, an organization of the City of Jewett. I have reviewed the SEC's proposed Rules 15Ba1 to 15Ba7 and request that the SEC revise its interpretation of the definition of the term "municipal advisor" to exclude appointed board members. I do not feel appointed board members should be any different than elected board members and employees of a municipal entity.

Many small cities have a difficult time finding volunteers for appointment to boards. Those individuals that do come forward do not want added reporting requirements or to be subjected to additional fiduciary obligations. Our board members are appointed by the Jewett City Council and serve two-year terms. Though they are not compensated, they are held to the same scrutiny as the City Council Members and have far more risk factors than elected boards or employees.

In summary, the Jewett Economic Development Corporation pleads to have appointed board members treated the same as municipal employees and elected board members. The SEC ruling will put a strangle hold on our local board and we can foresee losing many volunteers that we currently have. I cannot fathom how the ruling will help a small community. It is my

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hope that the SEC will rethink their position on the ruling and consider the ramifications it will cause.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Serafin". The signature is fluid and cursive, with the first name "Scott" and last name "Serafin" clearly distinguishable.

SCOTT SERAFIN
Chairman, Jewett EDC