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September 10, 2009

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

**Re: File Number S7-18-09
Political Contributions by Certain Investment Advisers**

Dear Secretary Murphy:

I am pleased to have this opportunity to provide feedback to the Commission on the proposed rule under the Investment Advisers Act of 1940 concerning Political Contributions by Certain Investment Advisers.

I strongly support the proposed rule, with some recommended modifications, and commend the Commission on its thoughtful efforts to improve protections for our nation's public investors.

As the principal fiduciary for the \$21 Billion Connecticut Retirement Plans and Trust Funds (CRPTF) for more than ten (10) years, I have managed my office through: (i) the aftermath of scandal, federal investigations and prosecution; (ii) legislative and policy reform; and (iii) one of the most challenging economic times in our nation's history. Several aspects similar or identical to the proposed rule were considered and implemented by the State of Connecticut in the past ten years. I believe that our experiences addressing these issues can be informative and instructive for your review process.

While I will always support efforts to provide for the highest ethical conduct in government, my experience with our own state's reforms has taught me to carefully consider the unintended consequences of certain reforms. It is with these considerations in mind that I am furnishing comments on the Proposed Rule.