
From: Robert Doty [robert.doty@agfs.com]
Sent: Tuesday, March 01, 2011 5:43 PM
To: Comment Letters
Subject: Comment on Proposed Rule G-42 on pay-to-play

I support the thrust of the MSRB's proposal regarding Rule G-42. I also support the comment by the National Association of Independent Public Finance Advisors that contributions to bond elections should be prohibited for both underwriters and financial advisors, other than *de minimus* contributions relating to bond elections in which the contributors are eligible to vote.

By affecting the impact of elections for the purpose of gaining employment, such contributions distort the democratic process. Moreover, in some states, such as California, it is illegal for public entities to contribute for or against such ballot measures. When underwriters or financial advisors contribute to elections in order to gain employment, and then charge questionable compensation, I submit that it is equivalent to money laundering.

I submit respectfully that underwriters do not engage in fair dealing under Rule G-17 when they make such contributions. Municipal advisors violate their fiduciary duty when they encourage, and participate with, their public entity clients and officials of the clients in actions that are undemocratic at best and illegal at worst.

I am hopeful that the Board will declare an end to such actions in the municipal market.

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