



STEADFAST
companies

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May 4, 2015

Office of Regulations and Interpretations
Office of Exemption Determinations
Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

**Re: RIN 1210-AB32 - Comment Period for Conflict of Interest Rule
and Related Exemptions**

Ladies and Gentlemen:

Steadfast REIT Investments, LLC and its affiliates (collectively, “Steadfast”) join the Investment Program Association and others in the financial services industry in requesting a 45-day extension for the comment periods related to proposals concerning fiduciary duties to employee benefit plans and Individual Retirement Account holders (the “Proposal”) contained in the Department of Labor’s (“DOL”) proposed rulemakings published in the April 20, 2015 Federal Register.

Steadfast sponsors two non-traded public REITS with significant investments in multifamily housing throughout the United States, and is concerned with the impact the Proposal may have on our associates and investors.

The Proposal comprises an enormous amount of information and potential changes to long-established regulations, including detailed new rules, a new exemption that will subject IRA advisers to increased legal risk for violations of strict prudence requirements, and a host of detailed changes to widely-used exemptions. Industry members require time to assess its ability to comply with the new conditions of these exemptions, which are fundamental to the ability of many financial services companies to continue to provide essential services to retirement investors. Any new rules will require significant changes in policies and practices, as well as the production of expansive new disclosures.

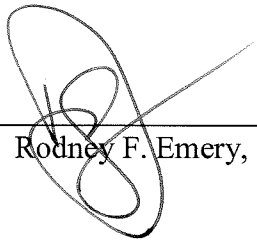
Steadfast requests that the members of the financial services industry—those most affected by the Proposal—receive adequate time to carefully analyze and understand the practical implications of the Proposal. A proposal of this magnitude demands thoughtful and well-informed comments.

Based on history regarding similar proposals, Steadfast believes a 45-day extension of the comment period would be appropriate and provide to the DOL a better quality of comments, resulting in a workable rule that would benefit all parties, including the investors we all strive to protect.

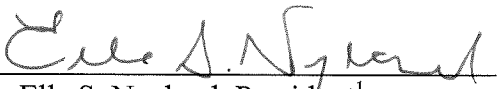
Thank you for your consideration of this request.

Respectfully submitted,

STEADFAST REIT INVESTMENTS, LLC

By: 
Rodney F. Emery, CEO

STEADFAST INCOME ADVISOR, LLC
STEADFAST APARTMENT ADVISOR, LLC

By: 
Ella S. Neyland, President¹

¹ Board Member, Investment Program Association