
From: Glen Clemans [mailto:gclemans@royalaa.com]
Sent: Tuesday, March 15, 2011 8:34 PM
To: EBSA, E-ORI - EBSA
Cc: Jamieson Grabenhorst; Casey Cleveland; h.clemans@verizon.net
Subject: Public Hearing on Definition of Fiduciary

This is to express my grave concern over the potential unintended consequences of the proposed changes to Individual Retirement Accounts.

As I understand it, under the new ruling, commissions and 12b1 training compensation could not be paid in IRA accounts. My concern is this ruling would block access to quality advice for millions of small investors.

I have been in this industry for 24 years. Our firm has thousands of clients. We specialize in providing high quality advice to small and mid sized investors who might be overlooked by larger firms.

The up front commission on a Class A share adequately compensates us for the time in developing a plan and allocation for clients.

Implementation is just the beginning. We perform regular portfolio reviews meetings, suggest NAV exchanges when appropriate, research all manner of things for our clients and are there for them when they need us.

To do this, we have a large staff dedicated solely to client services. The 12b1 trailing compensation is what pays their salaries so that I can provide these services.

Small and mid sized clients might not qualify for a fee based account, or if they do, the total cost to the client would be much higher than the present 12b1 fee, which is generally only 25bp.

Over the past 24 years I have developed important relationships with hundreds of clients. I sincerely hope to be able to be there for them in the next 24 years and beyond. Under the current proposal, this will not be feasible.

Thank you for your attention to this

Glen Clemans
Senior Partner
CGC Financial Services
Five Centerpointe Drive, Suite 270
Lake Oswego, OR 97035
T: 503-670-1958
F: 503-670-1964
gclemans@royalaa.com

The confidentiality and security of your personal investment business is extremely important to us. If you need to communicate instructions concerning transactions, changes to your account or confidential information, please speak to your investment representative directly. For your security, you should not transmit such information by e-mail. CGC Financial Services LLC / Royal

Alliance, Inc. does not accept or process orders or instructions you send by e-mail, fax or messages left on voice mail due to the time sensitive nature of these transactions.

This email and / or attachments contain information from CGC Financial Services LLC / Royal Alliance Inc. that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this email in error, please notify the sender immediately by email or telephone and shred this message.

We appreciate your business and look forward to helping you with your investment needs.

Securities offered through Royal Alliance Associates Inc., Member FINRA & SIPC

Advisory services offered through Royal Alliance Associates Inc., A Registered Investment Advisor

Advisory services offered through CGC Financial Services, A Registered Investment Advisor, not affiliated with Royal Alliance Associates Inc.