

# JEWEL INVESTMENTS

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May 13, 2005

Mr. William H. Donaldson  
Chairman  
U.S. Securities and Exchange Commission  
450 Fifth Street, NW  
Washington, D.C. 20549

4-504



Dear Mr. Donaldson:

I urge the Commission to pass a rule requiring *any* corporate communication regarding company share buybacks to also have in the very same paragraph or breath the number of shares issued during the reported period and the price at which these shares were issued, and a net number and price. This way, shareholders will more easily know the true economics of a buyback and the corollary: the amount of their money spent for management compensation through the negative arbitrage of repurchasing shares sold to management at below market prices.

What invariably happens now, as you know, is that companies report the gross amount of shares repurchased but disregard the number of shares issued. Of course, the shares being issued are almost always sold at prices substantially below those repurchased because of the exercising of below market stock options.

With economic accounting, presumably the Commission's standard, I would think it would be fair to infer from corporate communications proclaiming such and such number of shares have been repurchased, that the number of shares outstanding has been reduced commensurately and that ongoing shareholders own proportionately more of the company.

Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink that reads "James Schainuck". The signature is fluid and cursive.

James Schainuck

JS/njm

cc: U. S. Securities and Exchange Commissioners:  
Mr. Paul S. Atkins  
Mr. Roel C. Campos  
Ms. Cynthia A. Glassman  
Mr. Harvey J. Goldschmid