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Jonathan G. Katz, Secretary U.S. Securities and Exchange Commission 450 Fifth Street, N.W. Washington, D.C. 20549-0609 RECEIVED

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RE: Rule Comments

Dear Mr. Katz:

Since it took me six months to track down everything that went wrong with my investments, most of which related to breakpoints not being given properly, I am thrilled that the SEC is redoing the mutual-fund forms to require disclosures to investors that will give them the information needed. However, while I think the information and the format used certainly satisfy the ethical and moral obligations of necessary disclosures, the forms are not very "user friendly." I have the following comments to make in that regard.

- 1. I do not have a problem with the information that is given in the examples that I received. I do think that the language is a little erudite and presumes a certain level of expertise. Because I am an attorney and have spent the last two years investigating and bringing suit against the person and entities that caused my monetary damages, I understand what is trying to be conveyed. However, I do not think I would have understood the complexities two years ago. You need to have someone sit down with a person that has not been in the investment field and ask them if they can explain the contents.
- 2. The forms themselves should be much more basic and simplistic. The information should be contained in an easy-to-read format. I am enclosing a copy of one of sales confirmations which I received on a regular basis. While I have a problem with the lack of information and the deceptiveness of having a box labeled "commissions" which is always filled in "0" (and no corresponding box labeled "loads") and there is no indication of the net selling price (NAV) and the

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selling price which includes the loads charged (POP), the format is clean and straightforward. A similar format should be used and asterisks or footnotes could be used to give more complete information underneath. The basic problem here is that the information reads like a prospectus and most investors are not going to take the time and trouble to read through all the information. However, if a simplistic form has a box labeled "sales charge" or "commissions" or "loads" as an example, and then has an asterisk showing that the explanation is provided if desired, I believe that most people would have a better chance of understanding what they are getting into.

3. I also think that a signature line is needed to show that the information was actually given to the investor. Perhaps a placement of the investor's initials next to the most "troublesome" disclosures would be warranted.

I hope that my comments and suggestions have been of some help in your quest to find a better vehicle to provide much-needed disclosure information to future investors. I applaud your efforts.

Sincerely yours,

Donna M. Hardeman

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