1750-100
Comment Letter No. 28

GLG PARTNERS, INC.
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January 6, 2010

Mr. Russell Golden, Technical Director
Financial Accounting Standards Board
401 Merritt 7
P. O. Box 5116
Norwalk, CT 06856-5116

Re: File Reference No. 1750-100 – Consolidation (Topic 810), ***Amendments to Statement 167 for Certain Investment Funds***

Dear Mr. Golden:

GLG Partners Inc. (NYSE: GLG) appreciates the opportunity to comment on the Exposure Draft of the proposed accounting standards update, Consolidation (Topic 810), *Amendments to Statement 167 for Certain Investment Funds*. We are a US listed, global asset management company with greater than $21.5 billion under management. We provide investment management services to our multi-strategy investment funds on behalf of a diverse group of institutional, high net worth and retail clients.

We support this amendment to Statement 167. We believe that our consolidated financial statements would not transparently present either the financial position or the results of our operations if our financial statements included the assets and liabilities of the investment funds we manage. We believe that financial statement users would generally "look through" the impact of the consolidation of the investment manager's funds and be confused with a presentation that consolidated the funds managed by the Asset Manager, notwithstanding any additional disclosures that would otherwise be required.

We note that for potentially impacted entities:

- The investment funds are set up to provide investment management services on an agency basis for the benefit of the investors in those funds;
- The investment funds are not set up in order to obtain funding for the Asset Manager and the assets of the funds are not available for use by the Asset Manager;
- Any debt or leverage held by the investment funds is non-recourse to the Asset Manager;

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- The risk of investment loss on the assets of the funds is borne entirely by the investors in those funds. The manager does not share in that risk of loss and has no financial obligations to the investment funds; and
- The investment manager receives management and incentive fees that are not subject to any subordination, are customary and market based and do not represent any equity interests in the funds.

We have discussed the potential impact of Statement 167 (prior to the Exposure Draft being issued) with many of the users of our financial statements, including equity investors (current and potential), debt investors, our banks and other financial institutions and a recent Standard & Poor's report titled, *New Accounting Rules Will Alter The Financial Statements Of Certain U.S. Asset Managers*, dated December 2, 2009 (updated from a version previously published October 7, 2009) generally reflects the feedback that we have received.

To summarize:

- Our business model is to earn investment advisory fees for managing assets as an agent for our clients;
- The current income statement presentation, which details management and incentive fees earned as well as the management company's expenses and the realized and unrealized gains of investments held for their own account, if any, is the most useful presentation to analyze the operations of an asset management company; and
- A liquidity analysis of an asset management company does not include resources that are unavailable to it such as the assets of the funds that they manage. Similarly, debt that is non-recourse to the management company, such as the leverage that a fund may enter into, is not considered a liability of the management company.

Accordingly, we believe that dramatically changing the current presentation of the primary financial statements of an asset manager to require consolidation of the funds that it manages would not improve financial reporting.

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As the FASB proceeds with the IASB in its joint deliberations, we believe as we understand do many others in our industry, that the Boards should provide a conceptual framework to indicate when a manager or service provider is acting as a principal or as an agent. We believe that framework should focus on whether the service provider is obligated to provide subordinated financial support to the funds and whether third party investors have substantive removal rights. Also, the framework should be principals based and flexible to adapt to market changes in fee and co-investing arrangements.

We appreciate the opportunity to comment on this Exposure Draft and welcome the opportunity to work with you and your staff as you further develop this Topic.

Sincerely,

GLG PARTNERS, INC.

Jeffrey M. Rojek
Chief Financial Officer