March 25, 2025

The Honorable French Hill

Chair
Committee on Financial Services
United States House of Representatives

The Honorable Maxine Waters

Ranking Member
Committee on Financial Services
United States House of Representatives

RE: Accredited Investor Alliance – Please Consider Legislation to Expand the Accredited Investor Definition, Which Would Help Expand Access to Capital

Dear Chairman Hill and Ranking Member Waters:

Thank you for scheduling the March 25, 2025, hearing titled *Beyond Silicon Valley:* Expanding Access to Capital Across America.

The undersigned organizations and companies, which comprise the Accredited Investor Alliance (AIA), urge you to consider and approve legislation that would simplify and expand the accredited investor definition. Stakeholders established the AIA in 2024 to advocate for expanding the pool of accredited investors, which would support individuals and those saving for retirement and advance businesses of all sizes – both early-stage and established – across the economy.

Meaningfully expanding the pool of accredited investors while preserving appropriate investor protections would help democratize access to investment opportunities and foster capital formation, ensuring that a broader demographic can partake in the financial growth and innovation our country offers.

The AIA advocates for a detailed and multifaceted examination of the accredited investor definition by Congress and the U.S. Securities and Exchange Commission (SEC), taking into account the broader dynamics of our ever-changing economy and the increasingly pivotal role of private markets.

The AIA believes that income and net worth thresholds alone are not determinative of a person's financial sophistication or acumen, and that there should be additional pathways for individuals to qualify as accredited investors.¹

¹ The SEC in 2020 expanded the accredited investor definition to include individuals with a Series 7, 65 and 82 license, but additional and appropriate credentials, including the Series 66, CPA, CFP and CFA designations, were not included. Moreover, the SEC has not proposed expansion to qualifying education and job experience.

We also believe that the current conduct standards applicable to financial professionals working with investors, such as the investment adviser fiduciary duty and the broker-dealer's best interest standard, are sufficiently robust and provide adequate safeguards to ensure that recommended investments are suitable for and in the best interest of investors.

Bipartisan legislation has been consistently and overwhelmingly advanced by the House of Representatives over several Congresses. The AIA is grateful to Chairman Hill for championing the *Fair Investment Opportunities for Professional Experts Act* last Congress, which the House passed on June 5, 2023. As you know, this legislation would enable individuals with certain licenses and pertinent education or job experience to qualify as an accredited investor.

On March 8, 2024, the House passed the *Expanding Access to Capital Act*, a package of capital formation legislation previously examined by the Committee on Financial Services. The package incorporated several bills expanding the accredited investor definition, namely legislation that would provide accredited status to investors who receive individualized investment advice or individualized investment recommendations with respect to a private offering from a qualified professional.

Thank you again for convening today's hearing. The AIA appreciates your consideration of straightforward legislation to meaningfully expand the accredited investor definition while preserving vital investor protections, which would strengthen our economy and expand access to capital across America.

Sincerely,

The Accredited Investor Alliance

American Securities Association
Angel Capital Association

CAIS

Carta

Defined Contribution Alternatives Association

Engine

Financial Services Institute

Financial Technology Association

The Inland Real Estate Group of Companies

Institute for Portfolio Alternatives

Investment Adviser Association

Nareit

National Association of Insurance and Financial Advisors

Small Business & Entrepreneurship Council

CC: The Honorable Ann Wagner
The Honorable Brad Sherman