

Our firm strives to stay ahead of the regulatory curve as many other firms do as well. We have already taken steps to comply with this proposed rule and prepared to take more if necessary. Our understanding and the message from FINRA the last several years has been that of taking a risk based approach. Does any member firm or examiner feel this is really an area of risk that needs attention? I do not think in the grand scheme this makes any difference. We live in the age of technology where information is available seconds or minutes right after it happened. Clients can search and find information on their current financial professional or proposed professionals they could work with in their area very easily via BrokerCheck, social media, etc. I feel at times we have too much information available to make decisions and analysis paralysis sets in. Please do not move forward with this as there are other areas and risks present that need the time and attention of the member firms and FINRA.

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