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Via email pubcom@finra.org

Ms. Jennifer Piorko Mitchell
Office of the Corporate Secretary FINRA
1735 K Street, NW Washington, DC 20006-1506

Re: Regulatory Notice 18-22

Dear Ms. Mitchell:

I write in support of the proposed amendment to the Discovery Guide to require routine disclosure of liability insurance coverage by broker/dealers. I have represented investors in FINRA arbitration for nearly fourteen years and have unfortunately experienced too many harmed investors whose litigation stalled and/or completely derailed due to lack of transparency regarding Respondent broker/dealers insurance policies. For example, member firms ability pay is an essential component when advising clients on how much time and money should be spent on their claim, whether they should settle their claims, or whether they should go to a final hearing. Without this information, it becomes at times, difficult if not impossible, for harmed customers to make critical decisions in their pursuit of recovering investment funds that were squandered due to mismanagement of said funds by member firms and their associated persons.

Disclosure of insurance information has long been part of the Federal Rules of Civil Procedure and I urge FINRA to include this requirement as well. This debate has nothing to do with encouraging claims or using the existence of insurance coverage as evidence. Disclosure of insurance information has no bearing on the underlying facts of any one case. Legitimate customer claims will continue to be legitimate claims while weak customer claims will remain weak. To argue otherwise, is illogical. I look forward to FINRA doing the right thing in its determination of requiring disclosure of insurance information.

Sincerely,

A handwritten signature in black ink, appearing to be 'AG', followed by a long horizontal line extending to the right.

Adam Green, Esq.