

APRIL 4, 2018

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

RE: Proposed Rule Amending Membership Application Program

Thank you for the opportunity to comment on the referenced issue.

I support the intent of the proposed changes.

The proposed changes, I believe, would go a long way towards cleaning up the industry and memorializing a best practice. However, I would caution that the proposed regulation take into consideration due process and assumption of innocence for the representative who may be affected by such a rule.

A rule that requires all Broker-Dealers to operate on the same page would not allow a broker-dealer to be pressured, for whatever reason, to take-on a representative who perhaps should not be in the industry. More importantly if a representative or Firm skips on an arbitration award, that should be grounds enough for FINRA to deny registration until such time as the Firm and the representative, if jointly liable, cure the award. This a case of rules based regulation being necessary.

Thanks again for the opportunity to comment.

With kind regards,


Chester Hebert

CEO