

ROBINSON & LUKENS, INC.

1319 VINCENT PLACE P.O. BOX 956 McLEAN, VA 22101-0956

March 20, 2014



Marcia E. Asquith FINRA Office of the Corporate Secretary 1735 K Street NW Washington, DC 20006

RE: Comprehensive Automated Risk Data System

Dear Ms. Asquith,

Robinson & Lukens, Inc. [CRD Number: 23686] has been as a self clearing Broker dealer for over seventy five years. I am attaching a document that will provide you with a brief profile of my Firm. The business that we conduct and the products that we offer has not changed since we were established in 1938.

Simply stated, implementation of the Comprehensive Automated Risk Data System as it is currently proposed would be an extreme financial and logistical burden for my Firm. Furthermore, and most important, I feel strongly that the system would not offer any additional security or protection for the clientele of my Firm.

Bonnie Wachtel and Wendie Wachtel of Wachtel & Co. have shared with me a copy of their response to you. I agree with and support their position. If this rule is passed, there must be provisions in place that would exempt certain Broker/Dealers for reasons which would include size, nature of business, and past history of compliance. Please do not hesitate to contact me if there may be any questions or any desire or need for additional comments.

Sincerely,

Colin Atkins

President Robinson & Lukens, Inc Robinson & Lukens was established in 1938. Since its inception, the firm has always operated in the Washington D. C. Metropolitan area as a one-office, self-clearing broker/dealer. Robinson & Lukens has focused exclusively on individual investors with long-term investment objectives. Initially, the firm's offices were located in the central business district in Washington, D.C. In 1995 the firm moved to McLean, Virginia. Our present address is 1319 Vincent Place, McLean, VA 22101. The mailing address is P.O. Box 956, McLean, VA 22101. The firm has three principals: J. Colin Atkins, Jr., Suzanne McQueeney and Craig Stevener.

J. Colin Atkins, Jr., who started in the securities industry in 1972, acquired the firm from Clarence Gaiser in 1989 and became the majority shareholder and chief executive officer, and the firm then became Robinson & Lukens, Inc. Craig Stevener, who started in the securities industry in operations in 1979, also joined Robinson & Lukens, Inc. in 1989 as operations manager, corporate vice-president, and minority shareholder. Suzanne McQueeney joined Robinson & Lukens, Inc. in 1991 and continues to serve as director and corporate secretary.

Before the firm was acquired in 1989, there had not been a single customer complaint during Mr. Gaiser's long tenure at the firm. This unblemished record has continued at Robinson & Lukens, Inc. as well. With the exception of an oversight of not being registered in the state of Illinois, neither the firm nor any of its principals has ever been cited by any securities or governmental enforcement agency with any violation of the securities (or any other) laws. Over the years we have built an outstanding record with our clients for good, honest, and ethical service to their needs, a record that all of us at Robinson & Lukens, Inc. take seriously and are very proud of.

Robinson & Lukens, Inc. throughout its long history has limited its recommendations exclusively to stocks, bonds and mutual funds. The firm does not allow margin accounts, any type of option transactions, or commodities trading. The firm offers no proprietary products nor does the firm act as a market maker. All types of insurance products, including annuities, are prohibited. Frequent trading and market-timing strategies are not recommended, and discretionary accounts are prohibited. The recommendation or trading of bonds will be restricted to those only of investment grade.

All fees and compensation to the firm from its clients are generated solely from commissions on security transactions in addition to 12B-1 fees from client mutual fund holdings. The firm does not offer or recommend any fee-based accounts.

Since 1989, the firm has conducted business with over 3,600 accounts. Currently there are over 800 accounts that either carry securities at Robinson & Lukens, Inc. or have mutual fund shares deposited at the respective fund where Robinson & Lukens, Inc. is designated as the servicing dealer on record.