There needs to be a fair system to remove meritless claims against brokers, especially in the case of 'one off' customer complaints. Maintain the 'majority' decision by an arbitration panel, matching the 'majority' decision in the customer complaint. While there needs to be a 'highest' standard of broker behavior, there are circumstantial events beyond a broker's control, that can lead to disclosures, which follow brokers through customer reviews, job interviews and opportunities throughout a career.

Respectfully submitted,

Jonathan Hagenstein