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June 11, 2026

Ms. Vanessa Countryman
Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090

Via email to rule-comments@sec.gov

RE: File No. SR-FINRA-2026-001 (Proposed Rule Change to Adopt FINRA Rule 3290 (Outside Activities Requirements))

Dear Ms. Countryman:

The Financial Industry Regulatory Authority, Inc. ("FINRA") submits this letter in response to comments received by the Securities and Exchange Commission ("SEC" or "Commission") regarding the above-referenced rule filing (the "Proposal"). The Proposal, as amended in Partial Amendment No. 1, would adopt FINRA Rule 3290 and delete existing FINRA Rules 3270 (Outside Business Activities) and 3280 (Private Securities Transactions of an Associated Person). The Proposal focuses on outside activities appropriately within members' purview that potentially present heightened risks for members and the public. In so doing, the Proposal would bolster members' review of these activities while reducing unnecessary burdens.

The Commission published the Proposal for public comment in the Federal Register on February 3, 2026.[1] The Commission received 2,029 comment letters on the proposed rule change, 90 of which were individualized letters and 1,939 of which were one of four letter types.[2] On May 1, 2026, FINRA responded to the comments and filed Partial Amendment No. 1 to propose amendments based on the comments received by the SEC.[3]

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1 See Securities Exchange Act Release No. 104746 (January 29, 2026), 91 FR 5003 (February 3, 2026) (Notice of Filing of File No. SR-FINRA-2026-001).

2 See Attachment A: Alphabetical List of Commenters to File No. SR-FINRA-2026-001. The Commission received 1,714 comments of Letter Type A, 99 comments of Letter Type B, 82 comments of Letter Type C and 44 comments of Letter Type D.

3 See letter from Matthew Vitek, Associate General Counsel, FINRA, to Vanessa Countryman, Secretary, SEC, dated May 1, 2026 ("First Response Letter") and

On May 6, 2026, the SEC published a notice and order in the Federal Register to solicit comments on the Partial Amendment and to institute proceedings pursuant to Section 19(b)(2)(B) of the Securities Exchange Act of 1934 to determine whether to approve or disapprove the Proposal as modified by the Partial Amendment.[4] The SEC received seven comment letters in response to the Order.[5] Five of the commenters expressed support for the Proposal as amended.[6] While ASA expressed support, it urged the SEC to note in its approval order the importance of FINRA promptly issuing guidance in a number of areas. In addition, Cambridge urged the SEC to disapprove proposed Supplementary Material .03 (Activity at an Unaffiliated Registered Investment Adviser) to proposed Rule 3290, and AlphaTrust raised concerns regarding proposed Supplementary Material .06 (Supervision of Imposed Conditions or Limitations). The following is FINRA's response to the comments.

I. Requested Guidance

ASA urged the SEC to note in its approval order the importance of FINRA promptly issuing guidance in a number of areas. FINRA appreciates ASA's efforts to

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Partial Amendment No. 1 to SR-FINRA-2026-001 filed on May 1, 2026, https://www.finra.org/rules-guidance/rule-filings/sr-finra-2026-001.

4 See Securities Exchange Act Release No. 105355 (May 1, 2026), 91 FR 24613 (May 6, 2026) (Order Instituting Proceedings to Determine Whether to Approve or Disapprove File No. SR-FINRA-2026-001).

5 See letter from Jeffrey Burg, President, AlphaTrust Advisors, to Secretary Countryman, SEC, submitted May 15, 2026 ("AlphaTrust"); letter from Mark Quinn, Director of Regulatory Affairs, Cetera Financial Group, to J. Matthew DeLesDernier, Deputy Secretary, SEC, dated May 26, 2026 ("Cetera"); letter from David T. Bellaire, Executive Vice President & General Counsel, Financial Services Institute, to Vanessa Countryman, Secretary, SEC, dated May 27, 2026 ("FSI"); letter from Jessica Giroux, Chief Legal Officer, American Securities Association, to Vanessa Countryman, Secretary, SEC, dated May 27, 2026 ("ASA"); letter from Seth A. Miller, General Counsel, Cambridge Investment Research, Inc., to Vanessa Countryman, Secretary, SEC, dated May 27, 2026 ("Cambridge"); letter from Matthew Morningstar, Group Managing Director and Chief Legal Officer, LPL Financial, to Vanessa Countryman, Secretary, SEC, dated May 27, 2026 ("LPL"); and letter from Alyssa M. Pompei, Vice President & Assistant General Counsel and Bernard V. Canepa, Managing Director & Associate General Counsel, Securities Industry and Financial Markets Association, to Vanessa Countryman, Secretary, SEC, dated May 27, 2026 ("SIFMA").

6 See ASA, Cetera, FSI, LPL and SIFMA.

identify areas where additional clarity may benefit members implementing the rule. To further assist members, FINRA provides clarification on several of these areas below.

For example, ASA requested guidance on how proposed Rule 3290 would apply to various real estate scenarios. The definition of "investment-related activity" in proposed Rule 3290(f)(3) expressly includes outside activity pertaining to "real estate." While the list of "financial assets" in the definition is not exhaustive, the inclusion of specific examples such as "real estate" is intended to provide regulatory clarity as to the applicability of the rule with respect to those examples. At the same time, to enhance regulatory efficiency, FINRA provided an exclusion for certain personal real estate activities, as set forth in proposed Rule 3290(g)(3)(C).[7] Accordingly, outside activities pertaining to real estate would be subject to the rule unless they meet the exclusion in proposed Rule 3290(g)(3)(C).

ASA also requested guidance concerning associated persons' personal securities investments, including how to address beneficial ownership interests held through immediate family members. Relatedly, NASAA previously requested expanding the concept of personal investment to include any securities transaction for which an associated person has a beneficial interest.[8] Under proposed Rule 3290, prior written notice of an outside securities transaction would be required only if the associated person participated in such transaction.[9] Accordingly, the rule would not require notification of the immediate family members' own private securities transactions absent participation by the associated

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7 Proposed Rule 3290(g)(3)(C) excludes the purchase, sale, rental or lease of a main home and up to two secondary homes that are: (1) solely owned by the associated person or the associated person and immediate family; (2) owned by the associated person as a sole proprietorship; (3) owned by a corporation, LLC, partnership, limited partnership, or other entity that is solely owned by the associated person or the associated person and immediate family; or (4) owned by a trust with the associated person or the associated person and immediate family as the sole beneficiaries.

8 See NASAA.

9 Pursuant to proposed Rule 3290(f)(3)(B), "investment-related activity" expressly "includes an associated person's participation in any manner in a personal investment involving a securities transaction, sometimes referred to as 'buying away,' other than transactions indicated in paragraph (g)(3)(A) of this Rule." Paragraph (g)(3)(A) excludes personal investments that are "securities transactions subject to or delineated in Rule 3210." Proposed Rule 3290 also excludes associated persons' "securities transactions among immediate family for which the associated person (including a registered person) receives no selling compensation." See proposed Rule 3290(g)(2).

person. Members retain discretion to apply broader notification requirements if they determine such obligations are appropriate for their risk profile and business model.

ASA further requested guidance on when a registered person's day-to-day activity at an affiliated bank, credit union, or insurance company is covered by the affiliate exclusion, and how the exclusion applies when the registered person's primary employer is the affiliate and their broker-dealer association is part-time or limited in scope. FINRA notes that the rule text for the affiliate exclusion does not distinguish whether the member or an affiliate is a registered person's primary employer. Under proposed Rule 3290(g)(1), the rule would not apply to an associated person's (including a registered person's) activities on behalf of a member or its affiliate (e.g., investment adviser (IA) activity conducted for a dually registered broker-dealer/IA or IA, insurance or banking activity conducted at an affiliate of the member).

ASA also requested guidance on how members should design risk-based outside activity review programs for non-registered associated persons and apply a risk-based framework to passive personal investments in private securities. FINRA notes that each member may develop and implement its own supervisory system that is reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable FINRA rules. Proposed Rule 3290 establishes minimum requirements related to outside activities while permitting members flexibility in designing supervisory programs through their Written Supervisory Procedures. For example, consistent with FINRA's prior statements in the First Response Letter, the Proposal would not limit a member's ability to expand the scope of its assessment of an associated person's activity or to implement additional safeguards, if the member determines such approaches would be appropriate for its business.

In addition to ASA's requests for guidance, other commenters have identified areas where additional guidance may be helpful.[10] As noted in the First Response Letter, if the Commission approves the proposed rule change, FINRA will consider providing additional guidance on these or other topics as appropriate.

II. Supervision of Unaffiliated Registered IA Activity

Five commenters addressed proposed Supplementary Material .03, which would treat activity at an unaffiliated registered IA as an outside activity of a registered person and not an outside securities transaction. ASA, Cetera, LPL and SIFMA expressly supported

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[10] For example, St. John's previously recommended that FINRA "should require members to provide guidance to help investors understand which activities are supervised by the firm and which are not." While the Proposal would not address disclosure to customers, members may consider whether to provide information regarding the member's policies concerning outside activities.

the revised requirements for unaffiliated registered IA activity under the Proposal. ASA, LPL and SIFMA believed that requiring broker-dealer supervision of registered IA activities creates duplicative oversight, with ASA and SIFMA supporting notice and assessment obligations for such activity. Cetera noted that the Proposal allows members to tailor their supervisory processes to their business models while maintaining meaningful protections through notice, member assessment, and member discretion to apply conditions or prohibit activities.

Cambridge urged the SEC to disapprove this provision, asserting that this aspect of the Proposal would materially weaken investor protection, contradict prior FINRA precedent, and do so at a time when other regulatory developments are already reducing oversight of IA activity. FINRA respectfully disagrees with Cambridge's position for the reasons discussed below.

A. Regulatory Duplication

Cambridge contended that FINRA's reliance on regulatory duplication as justification for eliminating supervision of IA activity is insufficient and that the existence of fiduciary duties and SEC or state oversight should not excuse additional broker-dealer responsibilities. Cambridge asserted that the fiduciary duty is merely a legal standard governing post-violation conduct that does not safeguard against noncompliant or unethical behavior. Cambridge noted that SEC enforcement actions repeatedly show that independent IA activity misconduct often persists for years before detection, reflecting the intermittent nature of IA examinations.[11]

SIFMA asserted that unless and until Congress expands FINRA's authority to oversee investment advisory activities that are currently regulated by the Commission and states, the Proposal offers a workable solution for broker-dealers to supervise these activities at their discretion. SIFMA further noted that concerns regarding gaps in supervision disregard both the comprehensive regulatory regime for registered IAs, as well as members' general risk-assessment obligations with respect to outside activities.

FINRA's approach maintains core investor protections and reflects an appropriate allocation of supervisory and oversight responsibility among entities and regulators with relevant expertise and authority. Registered IAs are subject to direct SEC or state regulation, fiduciary obligations, and comprehensive compliance systems specifically designed to govern IA conduct. Extending broker-dealer supervisory requirements to IA activity creates practical challenges, confusion regarding applicable regulatory standards, and duplicative supervision without commensurate investor protection benefits.

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[11] Hill previously questioned FINRA's approach with respect to IAs in light of disciplinary proceedings and arbitration complaints involving private securities transactions and outside business activities.

Importantly, under the Proposal, members retain full discretion to impose supervisory obligations, conditions or limitations on such activities beyond what the rule requires, or even to prohibit such activities, if the member determines such measures are appropriate for its business model and risk profile. The Proposal simply eliminates the mandatory requirement, thereby respecting the regulatory framework for IAs.

B. Broker-Dealer Liability and Competition

Cambridge suggested that eliminating the supervisory requirement creates a mismatch between ongoing supervisory expectations and the means to satisfy them, exposing firms to liability without corresponding oversight tools. Cambridge also asserted that the Proposal introduces competitive incentives for firms to choose not to supervise unaffiliated IA activity as a recruiting advantage, resulting in a regulatory race to the bottom.

The Proposal maintains meaningful protections, including prior written notice, upfront member assessment, and member discretion to impose conditions or limitations on unaffiliated IA activity as they deem appropriate.[12] These tools provide members with appropriate means to address risks they identify in connection with unaffiliated IA activities, while respecting the regulatory boundaries between broker-dealer and IA oversight. Moreover, the Proposal does not alter members' core supervisory obligations under federal law or FINRA Rule 3110 (Supervision), which includes a duty to investigate "red flags" suggesting misconduct.[13]

FINRA acknowledged in its filing the possibility of competitive impacts on members and their associated persons depending on the business model of the member and the policies that the member adopts.[14] FINRA believes it is appropriate to eliminate a one-

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12 For example, a member could impose conditions or limitations on the products or services offered.

13 See, e.g., Pellegrino, 2008 SEC LEXIS 2843, at *25 (stating that "[t]he duty of supervision includes the responsibility to investigate 'red flags' that suggest that misconduct may be occurring and to act upon the results of such investigation." (citing In re Michael Studer, Exchange Act Release No. 50543A, 2004 SEC LEXIS 3157, at *22 (November 30, 2004)); In re Dennis Kaminski, Exchange Act Release No. 65347, 2011 SEC LEXIS 3225, at *25 (September 16, 2011) (stating that "Once indications of irregularity arise, supervisors must respond appropriately." (citing In re La Jolla Cap. Corp., Exchange Act Release No. 41755, 1999 LEXIS 1642, at *21 (August 18, 1999))). See also, e.g., Notice to Members 99-45 (June 1999) ("The 'reasonably' designed standard means, for example, that indications of problems, or 'red flags,' must be investigated.").

14 See supra note 1, 91 FR 5003, 5008.

size-fits-all mandate that creates practical challenges and duplicative oversight without commensurate investor protection benefits. This reflects FINRA's commitment to risk-based, tailored supervision.

Cambridge also requested that the Commission provide a safe harbor to broker-dealers from regulatory enforcement and civil liability if an unaffiliated IA violates regulatory or legal standards or harms clients, to the extent the Commission approves the Proposal. FINRA defers to the Commission to consider this request if the Proposal is approved.

C. Privacy Concerns

Cambridge suggested that privacy concerns are anecdotal and overstated, and that information-sharing agreements and consent mechanisms are readily available to overcome any impediments. Cambridge contended that the absence of historical enforcement actions against firms for privacy violations suggest such constraints are neither novel nor prohibitive.

FINRA continues to believe that lack of sufficient access to information from unaffiliated IAs constitutes a practical constraint that can impede a broker-dealer's ability to effectively supervise unaffiliated IA activity. These information access constraints can arise under various privacy laws and rules or may reflect competitive and business practices that limit information sharing between IAs and unaffiliated broker-dealers. Although some members and IAs may have implemented effective information-sharing arrangements under the existing rules, this does not diminish the practical constraints that impede many members' ability to effectively supervise unaffiliated IA activity. Practical hurdles to obtaining information regarding unaffiliated IA activities have been observed in FINRA examinations.

D. Regulatory Oversight

Cambridge expressed concern that the Proposal removes broker-dealer oversight at a time when other regulatory developments may reduce oversight of segments of the IA industry. Cambridge argued against eliminating broker-dealer supervision at this juncture.

FINRA recognizes that regulatory frameworks are dynamic and that multiple regulators share a mission for investor protection. FINRA respects the SEC's and state securities commissions' regulatory authority over IAs. Determinations regarding regulatory thresholds and the division of responsibility between federal and state regulators appropriately rest with those bodies. The Proposal maintains important protections, including upfront notice, member assessment and member discretion to apply conditions or prohibit activities, while eliminating duplicative supervisory burdens and respecting the established regulatory framework for IA oversight.

III. Reasonable Supervision of Conditions or Limitations

AlphaTrust raised concerns about how proposed Supplementary Material .06 (requiring members to "reasonably supervise" conditions or limitations imposed on approved outside activities) interacts with attorney-client privilege and Rules of Professional Conduct governing law firm practice.

AlphaTrust noted that legal services concomitant to investment-related activity fall within proposed Rule 3290's scope, and that registered persons with interests in law firms commonly encounter conditions or limitations imposed by their members. AlphaTrust asserted that supervising compliance with such conditions typically requires access to information protected by attorney-client privilege, which law firm attorneys cannot disclose. AlphaTrust suggested that a carve-out, safe harbor, exemptive relief or additional guidance for professional OBAs would be appropriate.

ASA requested confirmation that when a member imposes conditions or limitations on an associated person's activity at an unaffiliated registered IA, the supervisory obligation under proposed Rule 3290.06 would not require the member to oversee the associated person's conduct at the unaffiliated RIA to verify compliance with those conditions.

As FINRA explained in the First Response Letter, Rule 3290 does not impose an obligation to impose conditions or limitations; rather, it requires that if a member imposes conditions or limitations, it must reasonably supervise compliance with the conditions or limitations. As is the case under current Rules 3270 and 3280, members have discretion to determine whether or not to impose any conditions or limitations, and if they do, what types of conditions or limitations on outside activities are appropriate and workable given the nature of the activity and applicable constraints.

Accordingly, FINRA does not believe a blanket carve-out, safe harbor, or exemptive relief for professional OBAs is warranted. However, proposed Rule 3290 includes general exemptive authority allowing FINRA staff, pursuant to the FINRA Rule 9600 Series, to conditionally or unconditionally grant an exemption from any provision of proposed Rule 3290 for good cause shown, after taking into account all relevant factors and provided that such exemption is consistent with the purposes of proposed Rule 3290, the protection of investors, and the public interest. As such, FINRA remains open to considering additional guidance or exemptive relief on a case-by-case basis where specific facts and circumstances demonstrate that such guidance or relief is appropriate.

IV. Harmonizing Form U4 with Proposed Rule 3290

SIFMA reiterated its request for FINRA to coordinate with the Commission and state securities regulators to harmonize the Form U4 "other business" disclosure requirement with Rule 3290's narrowed scope. SIFMA stated that, as a practical matter,

firms are unlikely to amend their policies and procedures if Form U4 still requires disclosure of non-investment related activities.

While Form U4 requirements are outside the scope of proposed Rule 3290, FINRA reiterates that it will endeavor to work with the SEC and states to harmonize the requirements where appropriate.

V. Implementation

ASA reiterated its request for an effective date of at least 12 months following Commission approval to allow firms to update policies, procedures, training, and technology platforms. ASA also requested implementation guidance to support a smooth transition.

As FINRA stated in its First Response Letter, if the Commission approves the proposed rule change, FINRA will determine an effective date balancing an adequate implementation time with the objective of reducing unnecessary burdens. FINRA also remains committed to working with members during implementation and will evaluate whether additional guidance would be appropriate.

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FINRA believes that the foregoing responds to the material issues raised by the commenters to the rule filing and has determined not to further amend the Proposal in response to the comments. If you have any questions, please contact me at (240) 386-6490, email: matthew.vitek@finra.org.

Best Regards,

/s/ Matthew E. Vitek

Matthew Vitek
Associate General Counsel

Attachment A: Alphabetical List of Commenters to File No. SR-FINRA-2026-001

1. Jason T. Albin, Chapman Albin (February 20, 2026)
2. Adolfo J. Anzola, Sonn Law Group (February 24, 2026)
3. Nico E. Banks, Banks Law Office (February 19, 2026)
4. Doug Baxley, Merit Financial Advisors (February 22, 2026)
5. David T. Bellaire, Financial Services Institute (February 24, 2026)
6. Jaime Benedetti, BEAM Wealth Advisors (February 23, 2026)
7. Gail C. Bernstein & Monique S. Botkin, Investment Adviser Association (February 24, 2026)
8. Matt Billings, Robinhood Financial LLC and Robinhood Securities, LLC (February 24, 2026)
9. Tony Bingham (February 20, 2026)
10. Michael C. Bixby, Public Investors Advocate Bar Association (February 18, 2026)
11. G. Mark Brewer, Brewer Law Firm, APC (February 24, 2026)
12. Jennifer Brunner, Susan La Fond, Alicia Strout & Gordon Taylor, ACA Foreside (February 24, 2026)
13. Steve Buchwalter (February 24, 2026)
14. John S. Burke, John Sheridan Burke Law LLC (February 20, 2026)
15. Bernard V. Canepa, Securities Industry and Financial Markets Association (February 24, 2026)
16. Anthony C. Ciaccio, Weltz Kakos Gerbi Wolinetz Volynsky LLP (February 24, 2026)

17. David P. Cosgrove, Cosgrove Simpson (February 19, 2026)

18. Timothy J. Dennin (February 24, 2026)

19. Robert Scott Dreher, Dreher Law Firm (February 20, 2026)

20. Samuel B. Edwards, Shepherd Smith Edwards & Kantas, LLP (February 19, 2026)

21. Scott Eichhorn & Melanie S. Cherdack, University of Miami Investor Rights Clinic (February 24, 2026)

22. Jonathan W. Evans, Jonathan W. Evans & Associates (February 24, 2026)

23. Jonathan W. Evans & Michael S. Edmiston, Jonathan W. Evans & Associates (February 19, 2026)

24. Marc Fitapelli, MDF Law PLLC (February 24, 2026)

25. Timothy E. Flatley, Sterling Investment Advisors, Ltd. (February 24, 2026)

26. Katherine M. Flouton, PKS Securities (February 24, 2026)

27. Adam J. Gana & Adam J. Weinstein, Gana Weinstein LLP (February 20, 2026)

28. William F. Galvin, Commonwealth of Massachusetts, Secretary of the Commonwealth (February 24, 2026)

29. Jessica R. Giroux, American Securities Association (February 24, 2026)

30. Robert W. Goehring (February 19, 2026)

31. W. Scott Greco, Greco & Greco, P.C. (February 20, 2026)

32. Andrew M. Greenidge, Epperson & Greenidge, P.A. (February 20, 2026)

33. Nicholas J. Guiliano, The Guiliano Law Group (February 24, 2026)

34. David Gutierrez, Gutierrez Wealth Advisory (February 24, 2026)

35. Michael Hill (February 24, 2026) (“Hill”)

36. August M. Iorio, Iorio Law PLLC (February 24, 2026)

37. Jason J. Kane, Peiffer Wolf Carr Kane Conway & Wise (February 23, 2026)

38. Clifford Kirsch & Eric Arnold, Eversheds Sutherland (on behalf of the Committee of Annuity Insurers) (February 25, 2026)

39. Law Offices of Robert V. Cornish, Jr PC (February 19, 2026)

40. Frank C. Lawrance, Seacrest Wealth Management (February 24, 2026)

41. Letter Type A

42. Letter Type B

43. Letter Type C

44. Letter Type D

45. Richard A. Lewins, LewinsLaw, PC (February 19, 2026)

46. Matthew Lewis (February 24, 2026)

47. Jamal Mahmood, Main Street Financial Solutions LLC (February 24, 2026)

48. Thomas D. Mauriello, Mauriello Law Firm (February 24, 2026)

49. Glenn Mazer, Mazer Law Firm PC (February 20, 2026)

50. Michael McLane, Redwood Financial Planning (February 22, 2026)

51. David P. Meyer, Meyer Wilson Werning (February 22, 2026)

52. Seth A. Miller, Cambridge Investment Research, Inc. (February 24, 2026)

53. Matthew Morningstar, LPL Financial (February 24, 2026)

54. Mary E. Mortensen (February 19, 2026)

55. Peter J. Mougey, Levin Papantonio Proctor Buchanan O'Brien Barr Mougey P.A. (February 25, 2026)

56. Joe Muzaurieta, Carlson Law (February 20, 2026)

57. Ryan Naugle, Advice & Planning Services (February 22, 2026)

58. Brian Nguyen (February 22, 2026)

59. William Paul Nolan, The Nolan Law Firm (February 21, 2026)

60. Robert W. Pearce, The Law Offices of Robert Wayne Pearce (February 20, 2026)

61. Joseph C. Peiffer, Peiffer Wolf Carr Kane Conway & Wise, LLP (February 24, 2026)

62. Mark Pugsley, The Anti-Fraud Coalition (February 20, 2026)

63. J. Peter Purcell, Purshe Kaplan Sterling Investments (February 22, 2026)

64. Mark Quinn, Cetera Financial Group (February 23, 2026)

65. John A. Ramirez, Woodlands Portfolio Management (February 22, 2026)

66. Michael G. Rapaport, Erez Law (February 24, 2026)

67. Cline E. Reasor, Gratus Wealth Advisors, LLC (February 24, 2026)

68. Robert H. Rex, Rex Securities Law (February 19, 2026)

69. Alex Rogers (February 24, 2026)

70. Howard Rosenfield (February 24, 2026)

71. Marni Rock Gibson, North American Securities Administrators Association, Inc. (February 24, 2026) ("NASAA")

72. Robert Savage, Savage Villoch Law, PLLC (February 19, 2026)

73. Jeffrey Saxon, MDF Law, PLLC (February 24, 2026)

74. Matthew Schwartz, The Schwartz Law Firm, P.A. (February 20, 2026)

75. Ben Shamberger (February 21, 2026)

76. Mark S. Simms, Simms Law PC (February 24, 2026)

77. Scott R. Solod, Hammond Iles Wealth Advisors (February 24, 2026)

78. Jeffrey R. Sonn, Sonn Law Group P.A. (February 20, 2026)

79. J.L. Spray, Mattson Rickets Law Firm, LLP (February 20, 2026)

80. Melinda Jane Steuer (February 19, 2026)

81. Andrew Stoltmann, Stoltmann Law Offices, PC (February 20, 2026)

82. John E. Sutherland, Brickley/Sears, P.A. (February 25, 2026)

83. Sean M. Sweeney, Halling & Cayo, S.C. (February 20, 2026)

84. Matthew Thibaut, Haselkorn & Thibaut (February 24, 2026)

85. Dina Travis, Aniqah Nashiat, Aisha Sabar, Elissa Germaine & Christine Lazaro, St. John's University School of Law (February 24, 2026) ("St. John's")

86. Patricia L. Vannoy, Mattson Ricketts Law Firm, LLP (February 20, 2026)

87. Gary Varnavides, Varnavides Law, PC (February 20, 2026)

88. John B. Veach, III, Veach Law PLLC (February 20, 2026)

89. Scott Wallschlaeger, MPPL Financial (February 22, 2026)

90. Courtney M. Werning, Meyer Wilson Werning (February 19, 2026)

91. D. Daxton White, The White Law Group, LLC (February 24, 2026)

92. Joseph R. Wojciechowski, Stoltmann Law Offices, PC (February 20, 2026)

93. Matthew Wracher (February 24, 2026)

94. William B. Young, Jr. (February 19, 2026)