

May 13, 2025

Jennifer Piorko Mitchell

Office of the Corporate Secretary

FINRA

1700 K Street, NW

Washington, DC 20006

RE: Request for Comment on FINRA Regulatory Notice 25-05

Dear Ms. Mitchell,

We are pleased to hear that FINRA is looking to streamline and reduce unnecessary burdens regarding the existing requirements for reporting and approving non-securities related outside business activities. Over the last few years we have seen an increase in registered persons having a second job, side hustle or hobbies that result in income. One of the reasons we see so many non-securities outside business activities is because anyone looking to start a career in the securities industry, requires weeks or even months of studying and the cost of the exam and study materials add up quickly. Even after successfully obtaining the required licenses it may take several months before you can build your book of business and start receiving commissions. Requiring the firm to take the time to review, approve and monitor outside business activities that have no direct impact on the securities industry, in our opinion, continues to add costs to supervision and brings additional risk to the firm. Any action taken to eliminate the burden of reporting and monitoring non-securities related outside business is seen as a great improvement.

Another area of concern, is in regards to the supervision and recordkeeping obligation for outside IA activities at an unaffiliated IA. We as a firm have policies and procedures in place to oversee the Registered Representatives broker dealer transactions. Their relationship with clients under an unaffiliated IA should be separate as they are already regulated by the SEC or state securities authorities. Requiring the broker dealer to supervise and keep records from an unaffiliated IA business adds an unnecessary risk to the firm and potentially goes against the IA's client privacy policy. We should have no direct access to the IA client's personal information and then forcing the broker dealer to obtain, store and supervise this information will only add additional costs to the firm and risks to the client.

I appreciate the opportunity to comment on FINRA Regulatory Notice 25-05.

Thank you,