

From: [Kevin Licciardello](#)
To: [Comments, Public](#)
Subject: RE: FINRA Requests Comment on Short Interest Position Reporting Enhancements and Other Changes Related to Short Sale Reporting
Date: Saturday, July 10, 2021 10:51:48 AM

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Hello,

I'm writing to comment about my personal belief on how FINRA should be short interest positions, and the like.

First off, through public data, court findings, and analysis of call and put purchases, it's quite clear that the short interest percentage being disclosed is FAR from accurate. Shy of asking the SEC to [REDACTED] cracking down on naked short sales, I'd simply like to request that THE REAL SHORT INTEREST % BE DISCLOSED. This manipulation will only continue to erode our markets and our reputation until it's too late. The entire stock market remains afloat because some people still believe in the system. Once that's gone people will cease to invest this way and there may be dire consequences. Do you guys really want a few bad actors simply taking the global economy hostage because of their greed and hubris? I don't think so, and I hope you're seeking comments to actually take them to heart and apply some of these requests.

I think you guys have known for decades what changes need to be made to fix the problems with shorting. The reason nothing has been done so far is because these oversight organizations are in bed with the hedge funds and have no incentive to change anything. Fines are the cost of business, and the public only sees them as the governing bodies cut for letting them get away with their crimes. It's nice to see new rules getting implemented, yet they need to be enforced. Less fines, more prosecution. If you guys don't have the authority to prosecute, then make the fines 10X of whatever the profits were made illegally.

I propose disclosure of:

- Total # of all short positions open by any company / # shares issued by company. Perhaps call it Actual Short Interest, or Transparency!
- Rather than letting calls/puts be used to cover up shorts, make them all report short and long positions and all puts and calls.

If not, I think the only plausible solution to the corruption and manipulation is for new generations to change the way the socks are distributed: encrypted public ledger, aka stocks on blockchain. No more naked shorts. No more FTD's. No more rehypothecation of shares. No more BS settlement times that allow for more of the above. In the meantime, just enforce rules that exist, and let the public know the actual short positions of these corrupt hedge funds!

Sincerely,

Kevin Licciardello