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May 1, 2025

Ms. Jennifer Piorko Mitchell  
Office of the Corporate Secretary  
FINRA  
1735 K Street  
Washington, DC 20006

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

Dear Ms. Mitchell,

As President of a Registered Investment Advisory (RIA) firm having registered representatives at a member firm that is independent and not affiliated in any manner with my RIA firm, and CEO of a limited purpose FINRA registered broker dealer, I strongly object to the newly proposed Rule 3290 in Regulatory Notice 25-05.

This proposed Rule would subject certain independent RIA/IAs to an additional layer of corporate and regulatory oversight that doesn't exist for other RIA/IAs that do not have FINRA licensure. Further, the proposed Rule claims jurisdiction over real estate, banking, and insurance businesses, where FINRA has no right to regulate under its Charter or are otherwise subject to regulation by other Federal and/or State(s) agencies.

I have read the Comment Letter submitted by Mr. Purcell of PKS Investments, a firm several of our IA representatives are registered with and I fully agree with his stated arguments against promulgating the proposed Rule 3290. It will be impossible to comply with client privacy mandates, and his citation of voluminous conflicting rules and guidance presages greater regulatory confusion and turmoil should Rule 3290 be adopted.

Registered Investment Advisory firms already are regulated by the SEC and States and are not subject to FINRA jurisdiction. We are fiduciaries and subject to those standards. Imposition of FINRA Rules, that are in no way related to our business, on only those RIA firms that have

person(s) also registered with an unaffiliated FINRA member creates an uneven regulatory environment and serves no purpose other than an unwarranted expansion of FINRA's jurisdiction.

I strongly believe that the proposed Rule 3290 as currently written, together with the guidance and analysis provided within Regulatory Notice 25-05, should not be adopted. I respectfully ask that FINRA reconsider the proposed Rule as originally drafted and discussed in Regulatory Notice 18-08. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to be 'SW', followed by a long horizontal line extending to the right.

Steve Weinman

President of Summit Financial LLC  
CEO L.S. Securities LLC