



Since 1958

Tuesday, June 23, 2009

Marcia E Asquith
Office of the Corporate Secretary, FINRA
1735 K Street NW
Washington, DC 20006-1506

JHM 2 9 20

RE: FINRA Regulatory Notice 09-25

FINRA
Notice to Members

Office of the Corporate Secretary-Admin.

Dear Ms Asquith,

I have been a licensed insurance professional since 1959. I am writing to you because I strongly object to expanding FINRA's suitability obligations to recommendations that do not involve securities.

I firmly believe that people who promote unsuitable sales and engage in misleading sales practices should be aggressively prosecuted and subject to meaningful sanctions

I do not believe that FINRA has any jurisdiction over products and services which are not securities. Neither FINRA nor the broker/dealers have the resources or product-specific expertise necessary to oversee all of the non-securities transactions.

I do not believe that FINRA's authority should be expanded to include non-securities products and services, as they have a problem handling security products. Look at Mandoff and others.

The various State Department of Insurance already regulate the many comprehensive regulation at the state level. Consumer protection is a very important subject and can be better managed at the state level and with much less confusing regulatory requirements....the Goal is for Consumer Protection.....not more Regulation by Career Government employees and departments.

There is a debate on Capitol Hill, in the Administration, the SEC, and FINRA, as well as private sector stakeholders, are currently debating issues concerning the standard of care which broker/dealers and investment advisors owe to their clients. They are considering whether such standards should be expanded or changed going forward. It would be inappropriate for FINRA to expand or revise current suitability requirements. This debate is underway and changes will be made in the months ahead.

For the reasons stated above, I urge you not to expand FINRA's suitability obligations to include recommendations that do not involve securities.

Thank you in advance for your time to consider my views on this issue.

Sincerely

Elmo Cure. Jr.