
From: Geoffrey Herring [mailto:gherring@insuringyourmoney.com]
Sent: Thursday, June 25, 2009 12:31 PM
To: Comments, Public
Subject: Regulatory Notice 09-25

Insured Financial Solutions, LLC
Authorized Representative Tarkenton Financial, LLC
1535 W. Northfield Blvd., Ste. 12
Murfreesboro, TN 37129
Office: 615-869-0490
Toll Free: 866-585-2460
Fax: 615-869-0495

June 26, 2009

Dear FINRA Representatives:

Today is yet another day that regulatory oversight of non-securities products is forefront to those in the insurance industry who must continue to address concerns over the correct type of regulatory oversight versus excessive oversight. There is much going on in the debate over what should be regulated and by whom.

As such, I find myself questioning whether Regulatory Notice 09-25 should be consuming the time of so many on both sides of the equation when similar matters are currently being contested in court (e.g., 151 matters at hand).

Please let it be known that I, as a licensed insurance professional, strongly object to expanding FINRA's suitability obligations to recommendations that do not involve securities. As my colleagues, insurance professionals, registered representatives, advisors, etc., should all agree, people who do their job correctly and promote suitable solutions for their clients should be allowed to do so in the current and very appropriately regulated environments for such suitability. Those who chose to avoid suitability guidelines, promote unsuitable sales and/or engage in misleading sales practices should be aggressively prosecuted!

That said, FINRA does not currently have jurisdiction over products and services which are not securities, and neither FINRA nor broker/dealers have the resources or product-specific expertise necessary to oversee non-securities transactions. I submit to you that FINRA's authority should not be expanded to include non-securities products and services.

As stated earlier, and to emphasize this more clearly, FINRA's consideration of expansive rules

and regulatory authority is currently being debated on Capitol Hill, by the SEC as well as FINRA, and policymakers within the Administration. As such, I feel strongly that it would be inappropriate to make any judicious changes while this debate is ongoing.

I thank you for your time, for all that you do to make this industry, and these industries, more responsive to the true needs of the client, and hope that you will consider my thoughts and suggestions in the professional manner in which they are intended.

Make this your Greatest Day!

Geoffrey Herring, MA, BSN, CLTC

President, Insured Financial Solutions, LLC
Authorized Representative, **Tarkenton** Financial, LLC
12 Lincoln Square
1535 W. Northfield Blvd.
Murfreesboro, TN 37129

Direct 615-869-0490 ext. 15
Toll Free 866-585-2460 ext. 15

Protecting Your Family, Income, Assets, and Choices

Associate, Long Term Care Financial Partners, LLP
Member, National Association of Insurance and Financial Advisors
Member, Corporation for Long Term Care

"Twenty years from now you will be more disappointed by the things you didn't do than by the ones you did, so throw off the bowlines---sail away from safe harbour. Catch the trade winds in your sails! Explore; dream; discover!"

-- MARK TWAIN

Confidentiality Notice: This e-mail communication and any attachments may contain confidential and privileged information for the use of the designated recipients named above. If you are not the intended recipient, you are hereby notified that you have received this communication in error and that any review, disclosure, dissemination, distribution or copying of it or its contents is prohibited. If you have received this communication in error, please notify me immediately by replying to this message and deleting it from your computer. Thank you.