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Sent: Tuesday, June 23, 2009 11:14 AM  
To: Comments, Public  
Subject: Opposing Expansion of FINRA Suitability Obligations to Recommendations that do NOT Involve Securities

Please, enough of the mindless regs that only serve to layer, complicate and delay crucial decision making by affected business owners. Please keep B/D's out of non-securities matters.

B/D's are busy enough with their current level of cumbersome compliance issues and I suspect the majority of small B/D's (and many large ones) are ill equipped, both from a time and knowledge standpoint, to adequately and effectively monitor the myriad non-securities marketplace transactions and recommendation being made to prospective business owners.

There is adequate non-securities regulation from the states and competition within the industry to help assure (and insure) that sound recommendations are being offered to business owners.

Thanks,

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"Section 105 Qualified Sick Pay Plan"

Most firms do not realize that the IRS can disallow the deduction of wages paid to a disabled employee, including payments to owner, family member and key-employees, because such wages are not considered a necessary business expense unless they are paid pursuant to the terms of a Qualified Sick Pay Plan (under Section 105). Importantly, the QSPP must be in place prior to the disability. So, if you plan on paying yourself or any employee during a disability, do it legally, with a QSPP. You, not Uncle Sam decide who may participate in the Plan. It's easy to install and does not require filing with the IRS. NOTE: Premiums paid on behalf of an employee under an insured QSPP are fully deductible and are not shown to the employee as income.

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