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To FINRA,

*I understand your organization is seeking comment about Non-Attorney Representatives and their role in the arbitration process, for the purposes of possibly restricting their function or even prohibiting them all together. Below is my comment about this subject.*

*I had a very good experience with my NAR firm, Cold Spring Advisory. They spelled out what I can win and what I can settle for, they were completely upfront about all possible outcome scenario's, even the worst case which would be the possibility of losing my case. I must admit, I had my suspicions that maybe this group could be bad as well because I already got burned by two different brokers, so of course, at first was apprehensive about doing anything more with New York groups. I certainly didn't want to lose any more money, but I ended up putting my trust in Cold Spring Advisory and it did pay off. As far as the stockbrokers, they are a bunch of smooth talkers, and being from the mid-west, we are more trusting of people, but the stockbrokers are not trust worthy at all, so I guess I learned my lesson with them. But, Cold Spring did their job and I came out on the large end of the stick, even after I paid the upfront money to get my case properly prepared.*

*I do believe Cold Spring Advisories work was very competent, especially the forensic booklet was extremely thorough by listing all my transactions over the course of over three years and showed where every dollar went, including margin interest. commissions, profits and losses and brokerage fees.*

*The report created by Cold Spring was so concise and comprehensive, I felt it made a major difference to the outcome of my case and that's why I received a sizable amount back. I feel that report was so complete, the other side couldn't find holes in my case, that might have hurt the final outcome.*

*When I went into this, I really didn't expect to get that large of a settlement that I did, because I have been burned before, but it turned out good and the economic was certainly to my advantage and I am very happy I hooked up with Cold Spring.*

*I do have one other experience with a law firm handling litigation for me, not in arbitration but state court; about a company selling corn overseas to China, that effected prices of the corn. The law firm is suing the company to recover our losses, however they are taking 66% of the recovery and the suit is being dragged on for a very long time. Where Cold Spring took a much less percentage fee, under 33% and the process took only about 15 months to complete.*

*For the fact that I had such a positive experience with my NAR firm, I don't think FINRA should restrict firms like Cold Spring Advisory because Cold Spring has a purpose and it is doing its job out there, protecting people that are completely unaware of these wolves in the world and what they are doing too trusting investors by not giving them a fair shake. So Finra should not amend codes to restrict or prohibit NAR firms functioning in the arbitration forum. Finra has its place and Cold Spring has their place, there no question about that. I just can't understand why Finra would want to restrict these firms? To restrict Cold Spring from doing their job makes no sense to me at all. May be good for the attorney at a 66% rate or maybe good for the*

smooth-talking stock brokers so they have less arbitrations, but certainly not good for the investors out here. Let these firms continue to do good work for hard working people like myself. No system is perfect, but as the old saying goes, if it's not broke, don't try to fix it.

I have said my peace,

  
Ronnie Bartness

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