I wish to state my firm opposition to the rule changes that FINRA is proposing. I have been subject to two frivolous claims in thirty-five years. One complaint was submitted by a woman who in fact had me mistaken for someone else! This was absolutely ludicrous, yet it was attached to my record. Now, FINRA proposes to remake the rule governing expungements of frivolous claims to make them permanent if not expunged within 12 months; this absurdity is so manifest that it actually -- and ironically -- reduces FINRA's standing as a regulator. Cicero said: 'True law is right reason in agreement with nature.' There is nothing that can claim either reason or natural agreement in these proposed changes. They would be laughable if only they had no impact on the livelihood of people who have families to support.

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