

© Carrie Devorah
carriedev@gmail.com
(562) 688 2883
FINRA Has Permission To Publish My Comment.
Any and All Other Entities Seeking To Publish This
Comment Must Receive Permission & License

14-37 FINRA

Comment on a Rule Proposal
to Implement the
Comprehensive Automated
Risk Data System Request:

Carrie Devorah
PUBLIC INVESTOR **_*****
carriedev@gmail.com
(562) 688 2883

© Carrie Devorah
carriedev@gmail.com
(562) 688 2883
FINRA Has Permission To Publish My Comment.
Any and All Other Entities Seeking To Publish This
Comment Must Receive Permission & License

FINRA soliciting comments on Comprehensive Automated Risk Data System (CARDS) Proposal is tantamount to asking a pedophile for advice on children. There are some things ya' just don't do., like parodying the government process of soliciting public comments when FINRA is not a government entity, a fact FINRA itself gives mixed answers about.

Moreso, FINRA collecting Data on Users is nothing less than a sham when FINRA destroys and expunges Bad Data on FINRA members & Industry persons without advising visitors to FINRA the Person or Brokerages background has been cleansed of complaints and crimes a regular citizen would have been jailed for and lost civil rights like voting, living, thereafter, with a scarlet letter F for felon instead of Freedom FINRA white collar criminals walk the streets enjoying.

Whats good for the goose is good for the gander. FINRA wants to collect CARDS. Investors want FINRA cons exposed enabling a safer decision making process of a Financial Advisor, Broker or Brokerage.

Moreso, Investors want accountability of FINRA management that thought up and continue to perpetrate this Investor Con, as far back as the NASD.

FINRA on its website's about page says "FINRA is not part of the government. We're an independent, not-for-profit organization authorized by Congress to protect America's investors by making sure the securities industry operates fairly and honestly."

FINRA isn't authorized by Congress. FINRA General Counsel Terri Reicher says so. What gives with an entity publishing "Regulatory Alerts" on its website home page? Well, hmmm, ducks, as in "if it walks like one and talks like one...."

FINRA is an SRO, a self regulated authority. Let's say that again, in capitol letters. SELF. FINRA is a business league, with dues paying members. FINRA General Counsel Terri Reicher writes that FINRA's By Laws, Rules and Code of Procedure apply only to FINRA's dues paying members, so why is FINRA soliciting comments from the Public. The Public doesn't pay dues nor, as FINRA General Counsel Terri Reicher emailed, the public does not have a license FINRA can take away. FINRA's Comment page states "Why We Want Your Comments

FINRA is required to file with the SEC proposed rules that govern the conduct of FINRA member firms. Prior to filing a proposed rule with the SEC, FINRA generally solicits comments on the proposal from members, investors, and the general public through a *Regulatory Notice*, which is posted on FINRA's website." Recap.... "P-r-o-p-o-s-e-d r-u-l-e-s t-h-a-t g-o-v-e-r-n t-h-e c-o-n-d-u-c-t o-f F-I-N-R-A m-e-m-b-e-r f-i-r-m-s-.

© Carrie Devorah
carriedev@gmail.com
(562) 688 2883
FINRA Has Permission To Publish My Comment.
Any and All Other Entities Seeking To Publish This
Comment Must Receive Permission & License

Interesting.

If the purpose of these “Comment” solicitations is the image of compliancy, then, there must be a penalty for pretending to be something FINRA is not, in the guise of purporting to be about Investor Protection. Dues paying members don’t care about investors. Dues paying members care about dues paying members outcomes, even on issues of CARDS, Comprehensive Automated Risk Data. Besides, FINRA has already begun collecting Data on Customers. So what is the purpose of the Comment Solicitation.

A month or so back, FINRA initiated a sign in to FINRA’s brokercheck site. Before FINRA initiated this sign in, investors, and others, to FINRA’s brokercheck would land on FINRA’s home page, initiate a Broker or brokerage search in the right column, as many times as one wanted, or needed, as the case may be. If there were cookies or other data aggregating going on, the Customer did not know, returning as often as one needed to feel better about their potential Financial advisor. The Investors could search freely, without being intimidated.

Now? Things have changed. Corrected, FINRA changed ‘things’ prior to soliciting Comments on FINRA, on all things, FINRA collecting data. FINRA is intimidating Investors who, at least, felt their searches on Persons of The Investors Interest, were being searched in Anonymity. Nope. Tracked.

The Investor doesn’t know who the Information is being shared with. Call this a shot in the dark... maybe, scoff, the Investor’s searches are being shared with the Investor’s Broker or brokerage or Party to an Arbitration or Mediation the Investor is in opposition to or with. The repercussion? The impact?

Investors will search less.

What is needed is FINRA being replaced or, better yet, FINRA being barred from posing as an Investor Protector when FINRA appears to be little more than a Wolf in Sheep’s clothing, or, a pedophile watching over a playground of innocent, trusting children conditioned to respect their elders.

Investor’s private information is used, by FINRA and its members, in the course of FINRA arbitrations. FINRA trained arbitrators and FINRA Case Managers are schooled in the art of pressuring investors while giving members sleight of hand, one after the other. Produce Discovery? Industry professional says non exists. SEC rules state Client records and files must be kept 6 years. Arbitrators? Case Managers look the other way on that rule. Claimant’s counsel demands Discovery of Industry respondents tax returns, bank records, debts, civil suits and

© Carrie Devorah
carriedev@gmail.com
(562) 688 2883
FINRA Has Permission To Publish My Comment.
Any and All Other Entities Seeking To Publish This
Comment Must Receive Permission & License

other? FINRA Case Manager looks the other way instead compelling Investors to produce Tax Returns and Brokerage statements then used against Investors to humiliate the Investor, on the record of FINRA's official digital audio of the Arbitration.

Protecting Investor's data? After the data collection has begun. Sorta like trying to put the horse back in the barn.... When the barn is already gone up in flames, in this case, enflaming the Investing public.

What would be appropriate, rather than FINRA collecting data on Investors, that Congress force FINRA to give up FINRA's having anything to do with Investors, both as a data disseminator and as an Arbitration/mediation forum; force FINRA to replace back in to Brokers and Brokerage records all the information FINRA has expunged from the broker and brokerage FINRA brokerchecks; publish the number of times a FINRA participant has been sued, how many of the lawsuits were never reported to FINRA brokercheck.

Look, a non neutral entity cannot be compliant with the FAA, the Federal Arbitration Act. Just no way in hell can you make a size 12 foot fit in to a size 6 glass slipper. FINRA must be shut down. And the legislators that have followed FINRA's deceptive lead all these years? 2016, is near upon the voting public. Let 2014 be a reminder of what happens when the voting public figures things out, like how the hell has Congress succumbed to FINRA, a cash rich company, holding arbitrations in over 70 American cities, with international MoU's.

MOU? Memorandums of Understanding. FINRA has MOU's signed with Canada, England, Australia, Hong Kong, to name a few. Investor information will be shared globally.

Lest we forget, FINRA has no oversight over Investment Advisors, yet conducts Arbitrations between Investors and Investment Advisors.

FINRA needs to be shut down. FINRA's sham is just that. No matter how much lipstick you put on a pig, it will always be a pig. Besides, everything online is compromised in seconds. Not an if but a fact.

So I ask again, why is FINRA faking out the Public and Congress with a CARDS comment when, already FINRA is collecting data (Fair Use Copy & Paste For Purpose Of Responding To The Comment), stated, clearly, bluntly in the Terms & Conditions FINRA implemented a month ago as an "agreement" before viewing Industry persons online FINRA brokerhistory.

© Carrie Devorah
carriedev@gmail.com
(562) 688 2883
FINRA Has Permission To Publish My Comment.
Any and All Other Entities Seeking To Publish This
Comment Must Receive Permission & License

“ Terms & Conditions

1. FINRA collects, compiles, organizes, indexes, digitally converts and maintains regulatory information from registered persons, member firms, government agencies and other sources and maintains information in the proprietary Central Registration Depository ("CRD®") database and system. FINRA releases such information through FINRA BrokerCheck, which provides information from the CRD system to the investing public. Your access to FINRA BrokerCheck information provided through FINRA's CRD database and system does not transfer any rights in CRD, FINRA BrokerCheck or related technologies to you.

2. Your use of FINRA BrokerCheck information is conditioned upon your acceptance, without modification, of all terms and conditions of this Agreement. Any information accessed, requested or provided through FINRA BrokerCheck must be accessed, requested and used in accordance with the terms and conditions specified in this Agreement. FINRA reserves any rights not expressly granted under these terms and conditions. Additionally, FINRA reserves the right, at its sole discretion, to modify the terms and conditions for use of FINRA BrokerCheck information at any time by changing this Agreement, and any changes are effective immediately. Such changes will be posted on the FINRA BrokerCheck web-site.

3. CRD and FINRA BrokerCheck are proprietary databases and employ proprietary software, but FINRA makes no exclusive proprietary claim to the information in the FINRA BrokerCheck system that is not created by FINRA. You are neither restricted nor prohibited by FINRA from obtaining a copy of any original filing or information from a non-FINRA source.

4. The information provided through FINRA BrokerCheck shall be used ONLY for your own personal or professional use, and in accordance with all other terms and conditions of this Agreement:

- a. to assist you, your clients or your organization in determining whether to conduct or continue to conduct securities or commodities business with FINRA member firms or their associated persons;*
- b. to assist you, your clients or your organization in judicial proceedings or arbitration proceedings relating to securities or commodities transactions; or*
- c. for non-commercial purposes consistent with the promotion of just and equitable principles of trade and the protection of investors and the public interest.*

5. The information provided to you through FINRA BrokerCheck is provided to you ONLY for your own personal or professional use. All other uses are prohibited. You agree that you will not duplicate, download, publish, publicly display, modify or otherwise distribute the information retrieved from FINRA BrokerCheck for any purpose other than as expressly permitted by this Agreement. In no event

may you offer to others any information retrieved from FINRA BrokerCheck for commercial purposes, or as part of a subscription service or similar arrangement. You agree that you will not use the information retrieved from FINRA BrokerCheck to develop or create a database of information to be sold, licensed or made otherwise commercially available. You agree that you will not use any process to monitor or copy FINRA BrokerCheck information in bulk, or to make voluminous, excessive or repetitive requests for information. You further agree that you will not use any device, software or routine to bypass any software or hardware that prohibits volume requests for information, you will not interfere with or attempt to interfere with the proper working of FINRA BrokerCheck, and you will not take any action that imposes an unreasonable or disproportionately large load on FINRA BrokerCheck or FINRA.

6. All requests for permission to access or use FINRA BrokerCheck for uses other than those described in paragraphs 4 or 5 of this Agreement must be made in writing to FINRA clearly stating the purpose and manner in which FINRA BrokerCheck is proposed to be used. Requests may be submitted to FINRA, FINRA BrokerCheck, 9509 Key West Avenue, Rockville, Maryland, 20850. FINRA, in its sole discretion, may approve or reject any request that is inconsistent with the terms and conditions of use of FINRA BrokerCheck.

7. Provision of information by FINRA pursuant to FINRA BrokerCheck does not constitute a waiver of any of FINRA's rights, privileges, or immunities with respect to the furnishing of disciplinary or registration information.

8. FINRA does not charge for this service, which is offered pursuant to FINRA's responsibilities as a self-regulatory organization, and, in particular, pursuant to Section 15A(i) of the Securities Exchange Act of 1934. In the provision of this service, FINRA makes no warranties of any kind, and disclaims liability to any person for any actions taken or omitted in good faith with respect to this FINRA BrokerCheck. FINRA is not responsible for and cannot verify information from sources other than FINRA, and does not warrant or guarantee the accuracy or completeness of the information requested. Neither FINRA nor any affiliate or supplier shall be liable for any cause of action in contract, tort, or otherwise, for more than the incremental telecommunications cost incurred to connect to the service. Notwithstanding the above, neither FINRA nor any affiliate or supplier shall be liable for any loss of income, trading loss, or consequential, incidental, or indirect damages, regardless of whether FINRA has been informed of the possibility of such damages.

9. Member firms, registered persons, government agencies, and other sources file disclosure information with FINRA. Consistent with its responsibilities as a self-regulatory organization, FINRA performs a regulatory review of the disclosure information filed before it makes the information available through FINRA BrokerCheck. Most disclosure information is available through FINRA BrokerCheck within two business days of being filed. In certain limited circumstances, disclosure information may not be available through FINRA BrokerCheck within the usual timeframe, but will be made available as soon as practicable.

10. Consistent with rules, policies and procedures approved by the SEC, FINRA will disclose information on individuals, through FINRA BrokerCheck, for ten years after the termination of the individual's FINRA registration and, in certain cases, indefinitely. Additionally, FINRA will disclose indefinitely information on brokerage firms through FINRA BrokerCheck. Disclosure information reported to FINRA after an individual or brokerage firm has terminated may not have been reviewed by the brokerage firm or individual; in addition, brokerage firms and individuals who are no longer

registered are not required to independently report such information.

11. FINRA BrokerCheck includes only information provided to CRD. In substantially all cases, the information provided through FINRA BrokerCheck represents the verbatim record as it was reported to FINRA. However, in certain limited circumstances, FINRA combined information about a single event that was reported by different sources (e.g., a record reporting information on an event that was submitted by a brokerage firm may contain information reported on the same event that was submitted by a regulator). This condition occurred when the data in the Legacy CRD system was converted (i.e., reformatted and transferred) to Web CRD, the Internet-based Central Registration Depository. This condition affects a small percentage of records reported to FINRA prior to August 1999. These converted records contain information that was reported to FINRA in accordance with appropriate reporting protocols applicable to the source filers (e.g., brokerage firms and regulators); however, because of the combination of information from different reporting sources, a record disclosed through FINRA BrokerCheck may not reflect the actual filing submitted to FINRA.

12. The "Individual Broker comments," "Brokerage Firm comments" and "Regulator comments" appear verbatim as they were filed in CRD via Forms U4, U5, and U6. These comments were not written by FINRA and have not been edited by FINRA in any way. FINRA reserves the right to redact customer names, confidential customer information, or offensive or potentially defamatory language from a FINRA BrokerCheck Report consistent with policies and procedures approved by the SEC.

By clicking Accept, I agree to the above Terms & Conditions."

Really, FINRA, really. As for Congress? Need one remind that online frauds may be Wire frauds, just saying... that maybe, cough, law enforcement should be reviewing, since FINRA alleges if it sees a fraud perpetrated by its Dues Paying Members that FINRA may turn that matter over to Law Enforcement. Possibly vet to see if/when FINRA has done so? Just a thought Congress, just a thought....

Sincerely

Carrie Devorah

Public Investor **_*****

Founder

THE CENTER FOR COPYRIGHTS INTEGRITY

www.centerforcopyrightintegrity.com

Where ARTS, IP, ID, IT and ENFORCEMENT Come Together In One Voice Against Online Theft Of Content and Commerce

<https://www.youtube.com/watch?v=I93F73UYmsw&feature=youtu.be>