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Jennifer Piorko Mitchell  
Office of the Corporate Secretary  
FINRA  
1735 K Street Washington, DC 20006-1506

***RE: Regulatory Notice 18-22 Proposed Amendment to Discovery Guide To Require Production of Insurance Information***

I am submitting this letter in support of the proposed amendments to the Discovery Guide which require Respondent to produce details regarding any insurance coverage which may cover investor claims.

For the past nearly 30 years my practice has focused on the representation of investors seeking recovery of losses due to the fraud and/or negligence of stockbrokers and registered broker dealers. I have been a member of the Public Investors Arbitration Bar Association (PIABA) since inception in the early 1990's.

FINRA is well aware of the fact that unpaid arbitration awards against thinly capitalized broker dealers is an issue of genuine concern, having recently addressed the issue in the February 2018 Discussion Paper-FINRA Perspectives on Customer Recovery.

The existence and extent of any insurance coverage is important to members of the public who are seeking recovery of damages for stockbroker malpractice. Approving this proposal merely puts FINRA arbitration procedures in line with similar procedures that exist in many of the States, including Florida. Florida Statute 627.4137 requires disclosure of liability insurance coverage and limits.

FINRA should require respondents in FINRA arbitration proceedings to provide a copy of the policy, including any amendments and riders, to Claimants. The existence of any said coverage should remain inadmissible just as is the case with confidential settlement discussions.

The proposed rule should be adopted.

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