

From: vrevans@bigfoot.com
To: [Comments_Public](#)
Subject: Comment: Regulatory Notice 14-37 (CARDS)
Date: Thursday, November 06, 2014 9:25:55 AM

As an independent financial advisor, I greatly support FINRA`s goal of investor protection but feel that the CARDS proposal is an unwarranted intrusion into clients private records and information and will unnecessarily raise costs to investment firms AND THEIR CLIENTS.

I feel the benefits you project for CARDS, will merely duplicate protections we already implement as safekeepers of client assets and information. I am concerned about additional risks to my clients` data privacy and security and the increasing regulatory costs that may ultimately be passed down to them.

In particular, I have concerns regarding the following issues:

- Data Privacy: I appreciate FINRA`s decision to not collect personally identifiable information in CARDS. That said, the data will still contain information that can potentially be linked back to clients. CARDS data will likely be an extremely attractive target for hackers. FINRA files would constitute another potential portal for "hackers" to gain or attempt to gain entry to private data. I am also concerned that in the event that CARDS is breached, clients will blame their advisors for not keeping this data secure, and the responsibility will fall to us to inform clients of this breach. I encourage FINRA to consider not only the increased risk they would be exposing the public to, but also, the risk to our clients confidence in us that yet another government incursion into their privacy will generate.

- Data Quality: Because FINRA has decided to not collect direct business data in this phase of CARDS, I am concerned that FINRA will lack a complete picture of client holdings and activity. This is likely to introduce significant short-comings in CARDS` ability to be an effective tool for investor protection. It may produce false-positives that will need to be rectified by advisors like myself and broker-dealer staff responding to inquiries from FINRA. My broker-dealer`s home office staff robustly supervises my activity and reviews the suitability of recommendations I make to clients. They possess a complete picture of my clients that CARDS will not have. I am concerned that CARDS will create inefficient work for my broker-dealer and me in responding to inquiries that stem from CARDS` lack of direct business data. Additional inquiries could also result from the CARDS` data lacking a full picture of the client`s entire investment portfolio or the lack of information surround! ing the client`s life circumstances, which are not captured in suitability paperwork and data.

- Additional Transparency: I am concerned that the proposal does not provide sufficient information for the public to weigh the costs and benefits of CARDS. I request that FINRA provide reliable estimates regarding how much money CARDS will save (or cost) investors, and provide details regarding how it reached these estimates. These estimates will allow the public to weigh the likely costs with the expected benefits. In addition, I encourage FINRA to make a commitment to publish data on an on-going basis for the public to assess whether CARDS is, in fact, achieving its goals.

I urge FINRA to consider and respond to these concerns as it continues to develop the CARDS proposal and thank you for taking my comments into account.

Sincerely,

Mr. Vincent Evans

President

The Linnwood Group, LLC

20 E. Pike St. - 2B

Canonsburg PA 15317

Email: vrevans@bigfoot.com