

Total Clarity Wealth Management, Inc.

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To: Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Via Email: Rule-comments@sec.gov

Dear Commissioners:

I am writing in regard to File Number: S7-14-19.

I have read through the justification for this rule change and believe that while the intent is good, there are going to be some very adverse effects if it is approved as proposed. In particular, it will very likely make completely illiquid some perfectly legitimate small cap stocks that trade over the counter. I think a compromise solution would be to make an exception for companies that trade over \$5.00 per share and for those stocks that are traded on a major foreign exchange, which would specifically include the Toronto exchange. The problem as I see it, is the pump and dump schemes that some unethical brokers have used. We do not want to hurt ethical brokers, legitimate market makers and legitimate stocks, which I fear will be damaged by this proposed rule. In our own work, we sometimes buy over the counter stocks. They are typically ones of long standing and include ones that have been in existence for over 100 years and sell for more than \$50.00 per share. Some of them would be affected by this rule, we believe. Many non-SEC filers who would be affected by this do not have financials available quarterly, but certainly do annually. Making orphans of these stocks would be a grievous error in our view.

Best regards,



Tom H. Sleeter
Chief Investment Officer

THS/ak