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Via Electronic Filing

Florence E. Harmon
Deputy Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

**RE: File Number SR-2010-012
Proposed Rule Change to Amend FINRA Rule 8312
(BrokerCheck Disclosure)**

Dear Ms. Harmon:

The Cornell Securities Law Clinic (the “Clinic”) welcomes the opportunity to comment on the proposal (the “Rule Proposal”) of the Financial Industry Regulatory Authority (“FINRA”) to amend FINRA Rule 8312. The Clinic is a Cornell Law School curricular offering in which students provide representation to public investors and public education as to investment fraud in the largely rural “Southern Tier” region of upstate New York. For more information, see <http://securities.lawschool.cornell.edu>.

The Clinic supports the expansion of FINRA Rule 8312 because it sets a proper balance in providing sufficient information to investors on FINRA members and their associated persons without infringing on the privacy interest of those individuals whose FINRA registrations have terminated. In our comment to the Securities and Exchange Commission (“SEC”) dated September 8, 2009 regarding File Number SR-FINRA-2009-050,¹ the Clinic asked FINRA to modify its proposal and make the entire BrokerCheck record available indefinitely. We are pleased that FINRA is taking these steps to further protect investors.

A. The Clinic Supports the Expansion of BrokerCheck Program

Under the Rule Proposal, FINRA seeks to (1) expand the information released through BrokerCheck, both in terms of scope and time disclosed; and (2) establish a process to dispute the accuracy of (or update) information disclosed through

¹ <http://www.lawschool.cornell.edu/academics/clinicalprogram/securities-law/upload/Comment-of-Cornell-Securities-Law-Clinic-SR-FINRA-2009-050.pdf>



BrokerCheck. If the Rule Proposal is adopted, FINRA would (1) expand the BrokerCheck disclosure period for former associated persons of a member from two years to ten years; (2) permanently make publicly available in BrokerCheck certain information about former associated persons of a member; and (3) make publicly available in BrokerCheck all historic customer complaints.

The original purpose of BrokerCheck was to provide the public with information on the professional background, business practices, and conduct of FINRA members and their associated persons. Its purpose has now broadened to also provide the public with access to information about formerly registered persons who, although no longer in the securities industry in a registered capacity, may be persons about whom the investors may wish to learn relevant information.

While the Clinic would have preferred that information be available indefinitely, the ten year post-registration disclosure period is a reasonable step in expanding investor access to information, and we therefore support the Rule Proposal.

B. The Expansion of BrokerCheck will Protect Investors

The Clinic supports FINRA's proposal to make certain additional information about formerly associated persons of a member publicly available on a permanent basis if any such person was (1) convicted or pled guilty or nolo contendere to a crime, (2) the subject of a civil proceedings of involvement in a violation of any investment-related activity or a civil court finding of involvement in a violation of any investment-related statute or regulation, or (3) named respondent in an invest-related, consumer-initiated arbitration or civil litigation alleging the person was involved in sales practice violation resulting in a arbitration award or civil judgment against the person.

These are all final dispositions and it is appropriate to make them publicly available on a permanent basis since the subject persons had an opportunity to present arguments to an impartial fact-finder about the asserted allegations before the final disposition was rendered.

C. The Clinic Supports Permanent Display of Historic Complaints

The Clinic supports FINRA's proposal to eliminate conditions that must be met before Historic Complaints will be displayed in BrokerCheck allowing for the disclosure of all such Historic Complaints. Investors will be able to make their own determinations on the weight and significance of the Historic Complaints on the individual's record.

D. The Clinic Supports the BrokerCheck Dispute Process

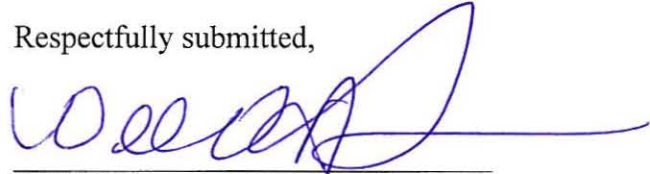
The Clinic recognizes the need for a mechanism for disputing information on BrokerCheck. FINRA proposes the creation of a formalized process for disputing the accuracy of or updating the information displayed about registered or formerly registered

persons through BrokerCheck. The Clinic believes this is a reasonable dispute mechanism which does not jeopardize the integrity of the expansion of BrokerCheck.

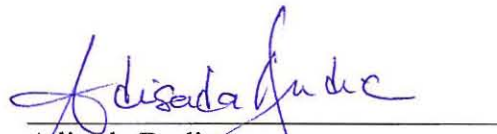
E. Conclusion

The Clinic greatly appreciates the opportunity to comment on this Rule Proposal. The Clinic is pleased with FINRA's proposal to expand BrokerCheck to further protect investors.

Respectfully submitted,



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Director, Cornell Securities Law Clinic



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Cornell Law School, 2011