



Securities Arbitration Clinic  
St. Vincent DePaul Legal Program,  
Inc.

8000 Utopia Parkway  
Queens, NY 11439  
Tel (718) 990-6930  
Fax (718) 990-6931  
www.stjohns.edu

VIA On-Line Submission

February 4, 2013

Ms. Elizabeth M. Murphy  
Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Re: File Number SR-FINRA-2013-002  
Proposed Rule Change to Amend FINRA Rule 2267 (Investor Education and Protection)

Dear Ms. Murphy:

Thank you for the opportunity to comment on the proposed rule change to amend FINRA Rule 2267 (Investor Education and Protection), that requires members to include a prominent description of and link to the FINRA BrokerCheck. We are writing this comment on behalf of the Securities Arbitration Clinic of St. John's University School of Law. The Securities Arbitration Clinic is part of the St. Vincent De Paul Legal Program, Inc., a not-for-profit legal services organization.

The Securities Arbitration Clinic represents aggrieved investors and is committed to investor education and protection. Accordingly, the Clinic has a strong interest in the rules governing the public disclosure of information about brokers, and ensuring that investors have sufficient information available to them to make informed decisions when determining either to continue to do business with, or form a new relationship with, an investment professional.

The Clinic is supportive of the proposed rule change requiring members to include a description of and link to FINRA BrokerCheck relating to a member's investment banking or

securities business maintained by or on behalf of any person associated with a member. Including this information on members' websites, social media pages, and any comparable Internet presence may prevent brokers from falsifying their certification or exaggerating their credentials. We believe that this information may guide investors to make informed decisions when hiring a particular investment professional.

FINRA established BrokerCheck in order to provide the public with information on the business practices, professional background, and conduct of member firms and their associated persons. Based upon market research, many investors are unaware of BrokerCheck's existence. We believe that requiring members to include a text description and web address format for the link to BrokerCheck will increase investor awareness and use. By providing the direct link, investors will be taken to a firm's or individual's specific results, saving them time and energy and making BrokerCheck an easy to use research tool.

The Clinic believes that the proposed rule change may help keep investors informed about the individuals with whom they are doing business. We believe that any costs to comply with this rule will be minimal and outweighed by the benefits it provides to investors.

We encourage FINRA to continually improve BrokerCheck. Thank you for your consideration of this matter.

Sincerely,

/s/

Pamela Albanese  
Legal Intern

Christine Lazaro, Esq.  
Acting Director