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Via Electronic Filing

Elizabeth Murphy
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

RE: Release No. 34-70227; File No. SR-FINRA-2013-034 (Proposed Rule Change to Amend the Form U4 Regarding the Reporting of Unsatisfied Judgments and Liens)

Dear Secretary Murphy:

The Cornell Securities Law Clinic (the "Clinic") submits this comment to support the proposal (the "Rule Proposal") of the Financial Industry Regulatory Authority ("FINRA") to amend the Uniform Application for Securities Industry Registration or Transfer ("Form U4") with respect to the reporting of unsatisfied judgments and liens. The Clinic is a Cornell Law School curricular offering in which law 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, please see <http://securities.lawschool.cornell.edu>.

Section 14 of the current Form U4 sets forth a series of questions regarding the existence of disclosure events. One of these questions involves unsatisfied judgments and liens. FINRA found that the Judgment/Lien Disclosure Reporting Page ("DRP") only elicited information about "the date a judgment or lien was filed" and not the "date that the registered representative learned of the judgment or lien." The latter piece of information will enable the Compliance Registration Depository ("CRD") system to accurately identify untimely registrations and to subsequently apply late fees regarding such matters.

FINRA is thus proposing to amend Section 4 of the Judgment/Lien DRP in order to request both: (1) the date the judgment or lien was filed with a court; and (2) the date the registered representative learned of the matter. (*See* Rule Proposal, at 6). FINRA believes that



the proposed amendment will provide for a more effectively automated CRD system, which limits erroneous late disclosure fees that stem from inaccurate assessments of registration dates.

The Clinic supports the Rule Proposal for three reasons:

(1) *Disclosure of Representative Promptness.* The amendment will benefit investors by revealing the promptness of registered representatives in disclosing the date that they learned of judgments and liens. The production of such information will benefit investors because registered representatives will likely be more motivated to report judgments and liens in a timely manner.

(2) *More Consistency with Section 15A(b)(6) Goals.* The amendment will also benefit investors by making the DRP more consistent with the goals of Section 15A(b)(6) in the Securities Exchange Act of 1934. Specifically, a better reporting of information will protect investors, as well as the general public, from potentially manipulative practices that stem from an incomplete collection of representative information.

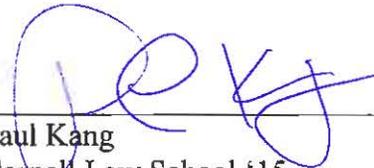
(3) *Minimized Late Fees.* Finally, the amendment will also benefit registered representatives by minimizing late fees. This amendment will thus create a more efficient CRD system for representatives by reducing the assessment of erroneous late fees while not placing any additional burden on competition.

For the foregoing reasons, the Clinic supports FINRA's Rule Proposal.

Respectfully submitted,



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