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May 2, 2025

Jennifer Piorko Mitchell
Office of the Corporate Secretary
FINRA
1735 K Street, NW
Washington, DC 20006

RE: Comments on FINRA Regulatory Notice 25-05 and Proposed Rule 3290

Dear Ms. Mitchell,

I am writing to express my strong opposition to FINRA’s proposed Rule 3290, as outlined in Regulatory Notice 25-05. While I fully support FINRA’s mission to protect investors, this proposal overreaches its scope and places an excessive burden on licensed professionals.

Under the proposed rule, representatives holding a FINRA license would be required to obtain prior written approval from their broker-dealer before engaging in a broad range of personal financial activities — including the purchase of cryptocurrency, securities, commodities, real estate, insurance, and banking products. Extending this requirement to spouses, partners, and household members is not only intrusive, but it also sets a concerning precedent.

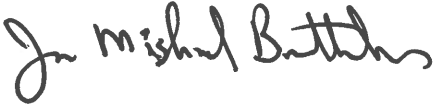
Expecting written approval for routine personal decisions — such as purchasing a home, opening a savings account, or buying life insurance — does nothing to enhance investor protection. Instead, it compromises personal autonomy and burdens both advisors and broker-dealers with unnecessary administrative friction.

The rule’s broad definition of “investment-related activity” risks stifling innovation and diversity in financial strategies. It could push many financial professionals to abandon their FINRA licenses in favor of operating under SEC jurisdiction — ultimately weakening the value and relevance of FINRA oversight.

I urge FINRA to withdraw or significantly revise this proposal. A more focused approach that targets genuine conflicts of interest, rather than ordinary financial behavior, would better serve both the investing public and the professionals who advise them.

Thank you for considering this feedback.

Sincerely,

A handwritten signature in black ink that reads "Jon Michael Bartholomew". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Jon Michael Bartholomew
Financial Advisor
GWN Securities / KM Capital