

---

**From:** John Morrow  
**Sent:** Wednesday, November 29, 2023 10:07 AM  
**To:** NASAA Comments  
**Cc:** Amy Kopleton; Bouchard, Stephen (DISB); Mike Dewine  
**Subject:** [EXTERNAL]Comment Regarding Revisions to Business Practices Rule

North American Securities Administrators Association  
Suite 990  
750 First Street NE  
Washington, DC 20002

Broker-Dealer Committees:

This letter is submitted in response to NASAA's call for comments on the proposed revisions to its model Business Practices Rule.

As an individual who supports streamlining regulations, I am concerned with how NASAA's proposal could add to the regulatory burden in states. NASAA's stated mission is to promote "consistent" securities regulation. However, its proposal is likely to lead to a maze of state-by-state regulations that is confusing for investors and burdensome for industry.

At issue is NASAA's approach. NASAA writes that its revisions are intended to "update" its model rule in light of the SEC's adoption of Reg BI. However, it is difficult to square this assertion with the proposal's invitation to states to treat the proposal as a "menu" of provisions from which they can pick and choose. Reg BI sought to create a uniform standard of investor protection. By inviting states to diverge from each other, NASAA's proposal would achieve something very different and not necessarily in consumers' interest.

As a former local elected official, I am also alarmed that NASAA's proposal lacks an economic impact analysis. When considering this proposal, states like Ohio should be able to understand the tradeoffs that come with its adoption, including the expected benefits for consumers, the costs to businesses, and the costs to the state to oversee compliance. Such an analysis accompanies most bills that come before state legislatures, and it would be helpful if NASAA provided one with its model rule.

In conclusion, there are simple and straightforward ways that NASAA could encourage states to find consistency with federal regulations. NASAA's "menu" approach does not appear to be one of these ways. I encourage the organization to find an alternative approach and attach a cost estimate to it.

Thank you for your consideration,

John Morrow  
Wellsville City Councilmember, Former  
Wellsville School Board Member, Former

CC: Ohio Governor Mike DeWine

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.