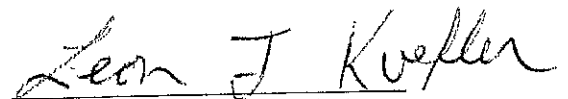


**Leon Kuefler**  
**29727 383<sup>rd</sup> Avenue**  
**Belgrade, MN 56312**

FINRA  
Washington DC

This letter will serve as my comment to Finra's review of allowing compensated non-attorneys to represent clients in arbitration. I am fully support for having a non-attorney represent the public in arbitration because I used one, Cold Spring Advisory and they won my case against Spartan Capital for \$41,842.00. Obviously, because it turned out good for me and I had a positive experience, I found them extremely competent. I also found Cold Spring's platform very economical and fair. Even after I won my award, Spartan Capital tried to overturn my arbitration award in NY State Court. However, Cold Spring, at their own expense hired an attorney to represent me in that action, that case was finally denied and Spartan paid the entire amount of the award.

I do not understand why Finra would consider prohibiting or restricting NAR firms and I am not in favor of Finra doing so. If that was the case I would have never got back the money I wrongly lost because of some very bad brokers. Let the NAR firms, like Cold Spring Advisory, keep doing what they do.



Leon Kuefler