



# FURGISON LAW GROUP

---

Telephone: (310) 356-6890  
Email: jon@furgisonlawgroup.com

445 31<sup>ST</sup> STREET  
Hermosa Beach, California 90254

July 28, 2020

## VIA EMAIL

Office of Exemption Determinations  
Employee Benefits Security Administration  
U.S. Department of Labor  
200 Constitution Ave., N.W.  
Suite 400  
Washington, D.C. 20210

Re: Application No. D-12011  
Improving Investment Advice for Workers & Retirees

To whom it may concern:

I am writing to strongly oppose the proposed retirement advice proposed rule. I am an attorney who represents retirees and working Americans. Your proposal will hurt hard-working Americans by allowing conflicted investment advice to infect their retirement accounts. I urge you to withdraw your proposal and try again to come up with a rule that helps everyday retirement savers, rather than Wall Street.

Your proposal makes it more likely that working people trying to save for retirement will be misled into relying on conflicted advice and sales recommendations, that are not in their best interest and dressed up as investment advice. I know that my clients are not alone in needing to make every dollar count, especially during this time of economic uncertainty. Many of my clients can't afford to see their hard-earned money siphoned out of their retirement account and into the pockets of the financial industry and the Labor Department shouldn't allow this to happen.

All hard-working Americans deserve to be certain that if they hire someone for investment advice on their retirement money (even if they just want a one or two time-conversation) the advice will be in their best interest and not tainted by any conflicts of interest, like sales incentives. Your proposed rule would not give them that certainty. They also deserve to be confident that their workplace retirement plan is not inappropriately loaded up with high cost investment choices. Your proposed rule would not provide that certainty, either.

We are in the midst of a shaky and economic time because of the current pandemic. I expect my government to be doing everything it can to make sure working people stay afloat, and that includes helping us all attain a secure retirement. Your proposal fails in this regard. I urge you to withdraw it.

U.S. Department of Labor  
July 28, 2020  
Page 2 of 2

Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink that reads "Jon Furgison". The signature is written in a cursive style with a large, stylized initial "J".

Jon C. Furgison