

From: Blake G. Hurt
Proposal: 1432 (RIN 7100 AD 82) Reg. V V - Proprietary Trading and Certain Interests In, and Relationships
Subject: Volcker Rule -- Prohibitions and Restrictions on Proprietary Trading and Certain Interests In, and R

Comments:

Please refer to the attached file.

Public Comments on Prohibitions and Restrictions on Proprietary Trading and Certain Interests In, and Relationships with, Hedge Funds and Private Equity Funds:

Title: Prohibitions and Restrictions on Proprietary Trading and Certain Interests In, and Relationships with, Hedge Funds and Private Equity Funds
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Comment: Reduction in financial risk must be motivated by senior management through simple rules. My suggestion is the following rule:

"On the day that a financial institution declares bankruptcy, the top six senior executives of the firm will be personally liable for an amount equal to ninety percent (90%) of their cumulative past three years' compensation.

In addition, any person who was one of the top six senior executives in the prior six months to the bankruptcy declaration, will also be liable."

It is certainly possible for a CEO to take a risk, but it is doubtful that all the top management will want to take excessive risks. Note that there is no blame associated with this rule; if it fails, you owe. Since it is only 90% of the compensation, it is likely that the executives will still make more than the bulk of their employees.

It is possible that all of senior management moves all their assets to their spouses; in that case, they would just be faced with personal bankruptcy, which seems fitting given the failure of their firm.

Responsibility needs to be felt at the top.

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