centaurus
financial inc.

Investment and Advisory Services

July 21, 2017

VIA EMAIL
EBSA.FiduciaryRuleExamination@dol.gov

Office of Exemption Determinations
Employee Benefits Security Administration
Attention: D-11933
U.S. Department of Labor
200 Constitution Avenue, NW
Suite 400
Washington, DC 20210

Re: Request for Information (RIN 1210-AB82)

To Whom It May Concern:

Centaurus Financial, Inc. ("Centaurus" and references to "we" or "our") is appreciative of the opportunity to respond to the above referenced Request for Information (RFI).

As we have indicated in previous correspondence, we are not, and have never been, opposed to a fiduciary standard. In practice, we are already held to this higher standard in many forms and by existing regulation (and regulators) in many circumstances. Our culture as a firm further demands that our clients' best interests are always served. While we fully support the spirit of this new regulation, we are strongly opposed to the rule as it is currently written.

Our response to RFI No. 1 is set forth below. We will provide additional responses to the remaining questions pursuant to the respective deadline.

RFI Question 1 - Potential Delay of January 1, 2018 Applicability Date

1. Would a delay in the January 1, 2018, applicability date of the provisions in the BIC Exemption, Principal Transactions Exemption and amendments to PTE 84-24 reduce burdens on financial services providers and benefit retirement investors by allowing for

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more efficient implementation responsive to recent market developments? Would such a delay carry any risk? Would a delay otherwise be advantageous to advisers or investors? What costs and benefits would be associated with such a delay?

If time is not taken to conduct a complete and thorough review, which may result in subsequent modification, the rule as written will not accomplish what it was designed to achieve. To the contrary, retirement investors will experience higher costs, reduced product availability, limited choice of investment strategies and, in many cases, limited access to professional advice altogether.

It is our position that a twenty-four-month delay is warranted. Such a delay would certainly reduce the burdens on financial services providers and also benefit retirement investors. The combination of a thoughtful review by the DOL, including SEC involvement and leadership, and ongoing industry evolution/innovation, will undoubtedly require more time for the desired result to be achieved.

Current regulatory structures, on multiple levels, along with the newly implemented Impartial Conduct Standards, will mitigate any potential risks associated with the much needed delay. In our opinion, the anticipated cohesive strategy and rule implementation created by such a delay would far outweigh any potential risks and ultimately benefit retirement investors in the end.

The financial services industry has already spent a tremendous amount of time and financial resources in order to comply with the current version of the rule. In a recent analysis published on April 15, 2017, The Financial Services Institute (FSI) commissioned Oxford Economics to survey and interview member firms regarding their implementation efforts in preparing for the DOL Fiduciary Rule. The survey estimated that FSI members have already incurred costs of $189 million in preparation for the rule and that further expenditures would add up to an additional $205 million should the rule continue in its current form. This has caused a significant burden on independent broker/dealers already and will ultimately have adverse effects on retirement investors.

If a further delay is not implemented, we as an industry, will likely continue to see many unnecessary expenses passed on to retirement investors. This is too important to our industry and investors to be rushed. To realistically believe that all open items can be resolved satisfactorily by January 1, 2018 would be foolish. We can, with confidence, predict cost savings for financial service providers and more importantly, retirement investors, as a result of a full vetting of the rule and associated implementation.

We appreciate your thoughtful consideration of our comments. If you require any further information, please do not hesitate to contact Adam Simon at (714) 456-1790, Ext. 269.

Sincerely,

Ron King
Chief Executive Officer

Westley King
President

Jerry Duhovic
Chief Administrative Officer

John Adams
Chief Operating Officer

Sheri Lejman
Chief Financial Officer

Marco Fuentes
Chief Compliance Officer

Robert Castaneda
Chief Information Officer

Adam Simon
VP, Operations

Brian Harlan
Corporate Counsel