



February 14, 2017

Rep. Matthew Lesser; Sen. Gary A. Winfield; Sen. Henri Martin, Co-Chairs
Joint Banking Committee
Legislative Office Building, Room 2400
Hartford, CT 06106

**RE: HB 7029 – AN ACT CONCERNING THE PROTECTIONS OF ELDERLY PERSONS
FROM ACTUAL OR SUSPECTED ABUSE**

Dear Co-Chairs Lesser, Martin, and Winfield:

The Securities Industry and Financial Markets Association (“SIFMA”)¹ is a national trade association which brings together the shared interests of hundreds of broker-dealers, banks and asset managers. SIFMA has been a vocal advocate in the fight against senior financial exploitation for nearly a decade. Among other things, SIFMA has educated policymakers and the general public on the need for increased investor protections, founded a Senior Investor Protection working group of financial firms that now includes 150+ representatives from 50+ firms, and has worked with many states to enact laws permitting holds on suspicious transactions and/or disbursements. Most recently, SIFMA has worked with our regulators to help shape a similar national rule,² which was approved by the Securities and Exchange Commission on February 3, 2017. SIFMA strongly applauds the introduction of HB 7029, which – as currently drafted – would permit banks and credit unions, but not securities firms, to delay or refuse to execute suspect transactions and disbursements.

Financial exploitation is an incredible threat to seniors across the United States, with some reports estimating that cost at tens of billions of dollars annually. To make matters worse, the National Adult Protective Services Association has estimated that only 1 in 44 cases are ever reported to the authorities. Third-parties such as bank tellers or financial advisors can be in a unique position to identify and stop financial exploitation that would not otherwise be identified – especially if those advisors have a long-standing relationship with their client. With 10,000 Americans turning 65 every day for the next 13 years, the time to act is now.

For this reason, SIFMA would like to work with you on an amendment that would broaden the definition of financial institution to include investment advisors, broker-dealers and other entities registered with the Securities and Exchange Commission. You may also want to consider expanding the definition of transaction to include securities related activity and applying the bill’s protections not only to seniors but also to vulnerable adults.

We look forward to working with you to better protect Connecticut seniors. Thank you for your time and consideration. If you have questions or need further information, please contact our Connecticut lobbyists, Patrick McCabe and Maureen Flaherty, at (860) 293-2581, or myself at (212) 313-1311.

Best regards,
/s/
Kim Chamberlain
Managing Director & Associate General Counsel
SIFMA State Government Affairs

¹ SIFMA is the voice of the U.S. securities industry, representing the broker-dealers, banks and asset managers whose 889,000 employees provide access to the capital markets, raising over \$2.4 trillion for businesses and municipalities in the U.S., serving retail clients with over \$16 trillion in assets and managing more than \$62 trillion in assets for individual and institutional clients including mutual funds and retirement plans. For more information, visit <http://www.sifma.org>.

² FINRA Rule 2165.