

From: [JC Rotunda](#)
To: [Regulatory Comments](#)
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Wall Street should be attracting bankers that do the right thing for the American economy. But instead, the chance for a fat bonus on dangerous trading attracts gamblers looking for quick riches.

While this rulemaking is a step in the right direction, two provisions were notably left out that would have ensured bankers are held personally accountable for their deals:

1. Senior banker incentive pay should be deferred for four years, so that it is not paid pro-rata.
2. A portion of delayed incentive pay should be in a no-fault pool for fines on the bank, so that shareholders aren't forced to incur the fine for their bank's risks. This portion should consist of bail-in bonds, or Total Loss Absorbing Capacity bonds.

It's time to stop the unchecked greed at the Big Banks that caused the Great Recession.

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