

BrokerCheck Report

LIFESCI CAPITAL

CRD# 168404

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®



BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

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Thank you for using FINRA BrokerCheck.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. [For more information about FINRA, visit www.finra.org.](http://www.finra.org)



LIFESCI CAPITAL

CRD# 168404

SEC# 8-69305

Main Office Location

1700 BROADWAY
40TH FLOOR
NEW YORK, NY 10019
Regulated by FINRA New York Office

Mailing Address

1700 BROADWAY
40TH FLOOR
NEW YORK, NY 10019

Business Telephone Number

646 597-6987

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a limited liability company.
This firm was formed in New York on 03/14/2013.
Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 2 Self-Regulatory Organizations
- 53 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 8 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm has referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	1



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in New York on 03/14/2013.

Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

LIFESCI CAPITAL, LLC

Doing business as LIFESCI CAPITAL

CRD# 168404

SEC# 8-69305

Main Office Location

1700 BROADWAY
40TH FLOOR
NEW YORK, NY 10019

Regulated by FINRA New York Office

Mailing Address

1700 BROADWAY
40TH FLOOR
NEW YORK, NY 10019

Business Telephone Number

646 597-6987



Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any):	MCDONALD, ANDREW IAN 4853168
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF EXECUTIVE OFFICER & OWNER
Position Start Date	03/2013
Percentage of Ownership	50% but less than 75%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	RICE, MICHAEL YEHUDA 1551556
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT & OWNER
Position Start Date	03/2013
Percentage of Ownership	50% but less than 75%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	

Legal Name & CRD# (if any):	BENDER, STEVEN CHRISTOPHER 2650187
Is this a domestic or foreign entity or an individual?	Individual
Position	CFO/ FINOP



Firm Profile

Direct Owners and Executive Officers (continued)

Position Start Date 09/2013

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No

Legal Name & CRD# (if any): EVERTTS, ADAM GERALD
6240428

Is this a domestic or foreign entity or an individual? Individual

Position DOR - DIRECTOR OF RESERACH

Position Start Date 08/2018

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No

Legal Name & CRD# (if any): KARMIOL, MICHAEL BRETT
4264477

Is this a domestic or foreign entity or an individual? Individual

Position HEAD OF CAPITAL MARKETS

Position Start Date 07/2024

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No

Firm Profile



Direct Owners and Executive Officers (continued)

Legal Name & CRD# (if any):	VISCO, GLENN 2407619
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF COMPLIANCE OFFICER
Position Start Date	10/2024
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

No information reported.



Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.





Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 2 SROs and 53 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	06/18/2014

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	06/18/2014
Nasdaq Stock Market	Approved	04/03/2023



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	07/12/2022
Alaska	Approved	06/21/2022
Arizona	Approved	06/29/2022
Arkansas	Approved	06/27/2022
California	Approved	06/27/2014
Colorado	Approved	07/14/2014
Connecticut	Approved	01/02/2015
Delaware	Approved	04/02/2019
District of Columbia	Approved	07/11/2022
Florida	Approved	08/22/2022
Georgia	Approved	06/30/2022
Hawaii	Approved	08/02/2022
Idaho	Approved	06/22/2022
Illinois	Approved	02/18/2015
Indiana	Approved	07/11/2022
Iowa	Approved	06/17/2022
Kansas	Approved	06/27/2022
Kentucky	Approved	06/27/2022
Louisiana	Approved	07/06/2022
Maine	Approved	07/11/2022
Maryland	Approved	07/24/2014
Massachusetts	Approved	09/12/2013
Michigan	Approved	07/13/2022
Minnesota	Approved	09/09/2015
Mississippi	Approved	06/17/2022
Missouri	Approved	07/15/2022
Montana	Approved	07/05/2022
Nebraska	Approved	08/03/2022
Nevada	Approved	07/11/2022
New Hampshire	Approved	07/01/2022
New Jersey	Approved	03/17/2015
New Mexico	Approved	07/13/2022
New York	Approved	06/25/2014

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	07/01/2022
North Dakota	Approved	07/21/2022
Ohio	Approved	07/08/2022
Oklahoma	Approved	06/22/2022
Oregon	Approved	07/11/2022
Pennsylvania	Approved	06/30/2014
Puerto Rico	Approved	08/04/2022
Rhode Island	Approved	06/17/2022
South Carolina	Approved	07/20/2022
South Dakota	Approved	07/18/2022
Tennessee	Approved	07/20/2022
Texas	Approved	08/04/2022
Utah	Approved	06/17/2022
Vermont	Approved	07/19/2022
Virgin Islands	Approved	08/11/2022
Virginia	Approved	07/27/2022
Washington	Approved	06/22/2022
West Virginia	Approved	07/28/2022
Wisconsin	Approved	07/12/2022
Wyoming	Approved	07/24/2022



Firm Operations

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 8 types of businesses.

Types of Business

Broker or dealer making inter-dealer markets in corporation securities over-the-counter

Broker or dealer retailing corporate equity securities over-the-counter

Underwriter or selling group participant (corporate securities other than mutual funds)

Put and call broker or dealer or option writer

Non-exchange member arranging for transactions in listed securities by exchange member

Trading securities for own account

Private placements of securities

Other - INVESTMENT BANKING, MERGERS & ACQUISITIONS ADVISORY SERVICES, SALE OF HEDGE FUNDS AND OTHER PRIVATE FUNDS, AND RESEARCH -FIRM COMMITMENT OFFERING

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.

This firm does not engage in other non-securities business.

Non-Securities Business Description:

Firm Operations



Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does refer or introduce customers to other brokers and dealers.

Name:	WEDBUSH SECURITIES INC.
CRD #:	877
Business Address:	1000 WILSHIRE BLVD. LOS ANGELES, CA 90017
Effective Date:	08/02/2018
Description:	LIFESCI CAPITAL LLC IS AN INTRODUCING BROKER WITH A FULLY DISCLOSED CLEARING ARRANGEMENT WITH WEDBUSH SECURITIES. LIFESCI CAPITAL LLC DOES NOT HOLD OR MAINTAIN CUSTOMER FUNDS OR SECURITIES.

Firm Operations

Industry Arrangements



This firm does have books or records maintained by a third party.

Name: MYCOMPLIANCEOFFICE, INC.
Business Address: 535 5TH AVE,
NEW YORK, NY 10017
Effective Date: 01/01/2022
Description: MEMBER HAS CONTRACTED WITH ("MCO") MYCOMPLIANCEOFFICE INC
TO STORE AND MAINTAIN CERTAIN BOOKS AND RECORDS

Name: DBCOM CONSULTING INC / EQUBE
Business Address: 2 RESEARCH WAY
PRINCETON, NJ 08540
Effective Date: 03/01/2023
Description: MEMBER HAS CONTRACTED WITH DBCOM CONSULTING INC / EQUBE
TO STORE AND MAINTAIN CERTAIN BOOKS AND RECORDS

Name: GLOBAL RELAY COMMUNICATIONS INC
Business Address: 286 MADISON AVENUE
NEW YORK, NY 10017
Effective Date: 03/01/2013
Description: MEMBER HAS CONTRACTED WITH GLOBAL RELAY TO STORE AND
MAINTAIN CERTAIN BOOKS AND RECORDS

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does not have customer accounts, funds, or securities maintained by a third party.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.



Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

LIFESCI VENTURE MANAGEMENT, LLC is under common control with the firm.

Business Address:	250 WEST 55TH STREET 34TH FLOOR NEW YORK, NY 10019
Effective Date:	12/01/2016
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	THE OWNERS OF LIFESCI CAPITAL ARE THE MAJORITY OWNERS OF LIFESCI VENTURE MANAGEMENT, LLC. ANDREW MCDONALD AND MICHAEL RICE HAVE COMMON CONTROL AND OWNERSHIP WITH THIS ENTITY

LIFESCI INDEX PARTNERS LLC is under common control with the firm.

Business Address:	250 WEST 55TH STREET 16B 173705 NEW YORK, NY 10019
Effective Date:	07/01/2014
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	LIFESCI INDEX PARTNERS LLC AND LIFESCI CAPITAL SHARE COMMON OWNERSHIP. THE OWNERS OF LIFESCI CAPITAL ARE THE MAJORITY

Firm Operations



Organization Affiliates (continued)

OWNERS OF LIFESCI INDEX PARTNERS LLC. ANDREW MCDONALD AND
MICHAEL RICE HAVE COMMON CONTROL OR OWNERSHIP OF THIS ENTITY.

This firm is not directly or indirectly, controlled by the following:

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank



Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	1	0

Disclosure Event Details

What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
 - A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" event involves allegations that have not been proven or formally adjudicated.
 - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" event has been concluded and its resolution is not subject to change.
 - A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

Reporting Source: Regulator

Current Status: Final

**Allegations:**

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT WHILE IT PARTICIPATED IN THE INITIAL PUBLIC OFFERING FOR A SPECIAL PURPOSE ACQUISITION COMPANY (SPAC), THE FIRM RECEIVED UNDERWRITING COMPENSATION THAT WAS UNREASONABLE AND INACCURATELY DESCRIBED IN THE OFFERING DOCUMENTS AND TO FINRA. THE FINDINGS STATED THAT THE OFFERING WAS DECLARED EFFECTIVE BY THE SEC WITH UNDERWRITING TERMS MATERIALLY DIFFERED FROM THOSE APPROVED BY FINRA. THE SECURITIES RECEIVED BY THE FIRM AND ITS AFFILIATES REPRESENTED A VALUE OF MORE THAN 30 PERCENT OF THE THE TOTAL PUBLIC OFFERING PROCEEDS. THE FINDINGS ALSO STATED THAT THE FIRM INACCURATELY DESCRIBED ITS UNDERWRITING COMPENSATION IN OFFERING DOCUMENTS AND FINRA FILINGS. ALTHOUGH THE PROSPECTUS STATED THAT THE WARRANTS WERE TO EXPIRE FIVE YEARS AFTER THE EFFECTIVE DATE OF THE REGISTRATION STATEMENT, THE PRIVATE WARRANT AGREEMENT PERMITTED THE HOLDERS TO EXERCISE THEM DURING A PERIOD THAT RAN LONGER THAN FIVE YEARS FROM COMMENCEMENT OF SALES OF THE PUBLIC OFFERING. IN ADDITION, THE FIRM'S FILINGS WITH FINRA AND THE PROSPECTUS STATED THAT THE SECURITIES RECEIVED AS UNDERWRITING COMPENSATION WERE SUBJECT TO A 360-DAY LOCK-UP COMMENCING ON THE EFFECTIVE DATE OF THE REGISTRATION STATEMENT. HOWEVER, NEITHER THE PRIVATE WARRANT AGREEMENT NOR ANY OTHER AGREEMENTS GOVERNING THE PRIVATE WARRANTS PROVIDED FOR A LOCK-UP. THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO MAKE REQUIRED FILINGS WITH FINRA. THE FIRM FAILED TO PROVIDE ANY DOCUMENTS RELATION TO THE MODIFICATION OF THE SPAC UNDERWRITING TERMS AND FAILED TO TIMELY FILE DOCUMENTS, WITH LATE FILINGS RANGING FROM LESS THAN ONE MONTH TO MORE THAN SEVEN MONTHS LATE. FINRA FOUND THAT THE FIRM FAILED TO ESTABLISH A SUPERVISORY SYSTEM, INCLUDING WRITTEN PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH FINRA RULE 5110. THE FIRMS WSPS ACKNOWLEDGED THE FIRM'S OBLIGATION TO COMPLY WITH FINRA RULE 5110 BUT DID NOT HAVE PROCEDURES TO DETERMINE THE FAIRNESS OF UNDERWRITING COMPENSATION OR DISCUSS FILING REQUIREMENTS IMPOSED BY THE RULE. THE FIRM ALSO DID NOT IMPLEMENT ANY SUPERVISORY REVIEW TO MONITOR ITS UNDERWRITING COMPENSATION, BOTH CONTEMPLATED AND RECEIVED, OR ITS FILINGS WITH FINRA, OR ASSIGN SUPERVISORY RESPONSIBILITY FOR COMPLIANCE WITH FINRA RULE 5110 TO ANY INDIVIDUAL OR SUPERVISOR. THE FIRM FAILED TO ESTABLISH REASONABLE SUPERVISORY SYSTEMS AND WSPS CONCERNING THE UNDERWRITING OF PUBLIC SECURITIES EVEN THOUGH IT WAS A PRIMARY BUSINESS ACTIVITY OF THE FIRM.

Initiated By:

FINRA



Date Initiated:	12/04/2024
Docket/Case Number:	2021072554901
Principal Product Type:	Other
Other Product Type(s):	INITIAL PUBLIC OFFERINGS
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	12/04/2024
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$900,000.00
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	THE FIRM WAS CENSURED, FINED \$900,000 AND REQUIRED TO CERTIFY THAT IT HAS REMEDIATED THE ISSUES IDENTIFIED IN THE AWC AND IMPLEMENTED A REASONABLY DESIGNED SUPERVISORY SYSTEM, INCLUDING WSPS. FINE PAID IN FULL ON DECEMBER 13, 2024.
<hr/>	
Reporting Source:	Firm
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING FINRA'S FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO ENTRY OF FINDINGS THAT IT RECEIVED UNFAIR AND UNREASONABLE UNDERWRITING COMPENSATION IN CONNECTION WITH A 2020 SPAC UNDERWRITING, THAT THE UNDERWRITING COMPENSATION WAS INACCURATELY DESCRIBED IN FINRA FILINGS AND OFFERING DOCUMENTS, THAT IN CONNECTION WITH THAT OFFERING AND TWO OTHERS BETWEEN 2020 AND 2023 IT FAILED TO MAKE OR MADE LATE 13 FINRA RULE 5110 FILINGS AND THAT IT FAILED TO IMPLEMENT A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULE 5110.



Initiated By:	FINRA
Date Initiated:	12/04/2024
Docket/Case Number:	2021072554901
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CENSURE, FINE, AND UNDERTAKING
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	12/12/2024
Sanctions Ordered:	Censure Monetary/Fine \$900,000.00
Other Sanctions Ordered:	SEE 12. C.
Sanction Details:	WITHOUT ADMITTING OR DENYING FINRA'S FINDINGS, THE FIRM CONSENTED TO AN UNDERTAKING TO REMEDY THE FINRA RULE 5110 ISSUES IDENTIFIED IN THE AWC, TO IMPLEMENT A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RULE 5110 AND TO CERTIFY REMEDIATION AND COMPLIANCE WITHIN 60 DAYS OF THE AWC.
Firm Statement	THE AWC WAS FINAL DECEMBER 4, 2024. THE US\$900,000 FINE WAS PAID ON DECEMBER 12, 2024.

End of Report



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