

Bowne Park Capital, Inc

Member FINRA/SIPC

November 11, 2020

Ms. Vanessa Countryman, Secretary
SEC
100 F Street, NW
Washington, DC 20549

Re: Notice 34-90112

Dear Ms. Countryman:

I can go on at length expressing my displeasure with this proposal. Instead I will opt for a brief reply.

I believe this proposal unfairly harms the broker-dealers who are trying to abide by all the rules instead of circumventing the system. We pay registration fees, audit fees and email retention fees to maintain a business in compliance with the rules. By doing so, we are attempting to preserve a level of confidence for the investment public. As part of our daily activities, we maintain records and adhere to financial minimum thresholds. When it is time to conduct an offering, we require client suitability reviews and attempt to gather detailed due-diligence information on the issuers. These activities attempt to create a level playing field for an informed investment decision. We are doing all the right things and now our businesses are being jeopardized by this proposal.

Our marketing leverage is the fact that our business cards have the letters FINRA printed on them. This communicates to the public that we have met testing and character standards. It is a reassurance to potential clients that we are legitimate players with the knowledge and skill sets to help their businesses grow. The registration requirements create a more orderly format and give the public greater confidence in the process and the participants representing them. In my opinion, this proposal opens the door to chaos and puts the public in grave danger. There is no way to calculate how the "bad actors" will exploit this policy to their financial benefit.

I think it is a door we should never open!

Regards,

Robert J Onesti, President

