

SECURITIES EXCHANGE COMMISSION		<div style="border: 1px solid black; padding: 5px; text-align: center;"> RECEIVED NOV 06 2019 OFFICE OF THE SECRETARY </div>
Denial of FINRA Forum for Expungement Arbitration: Applicant: Curtis Richard Edmark v. Respondent: Financial Industry Regulatory Authority	FILE NO. <u>3-19594</u>	
APPLICATION FOR REVIEW		

On September 17, 2019, Curtis Richard Edmark (“Mr. Edmark”), who resides at [REDACTED], Wisconsin [REDACTED], submitted a Statement of Claim to the Financial Industry Regulatory Authority (“FINRA”) Office of Dispute Resolution requesting a hearing for the expungement of his CRD record as it relates to the customer dispute occurrence number 1926461 (“the Occurrence”). On October 4, 2019, counsel for Mr. Edmark received notice that the Director of FINRA Office of Dispute Resolution (“the Director”) denied FINRA forum for arbitration for expungement of the Occurrence. This notice did not state the reason as to why the Occurrence is not eligible for arbitration, citing Industry Code Rule 13203(a):

- (a) The Director may decline to permit the use of the FINRA arbitration forum if the Director determines that, given the purposes of FINRA and the intent of the Code, the subject matter of the dispute is inappropriate, or that accepting the matter would pose a risk to the health or safety of arbitrators, staff, or parties or their representatives. Only the Director may exercise the authority under this Rule.

Industry Code Rule 13203(a) is excessively vague, and allows for an egregious amount of discretion on the part of the Director. It offers no true guidance on what is not eligible for FINRA forum and allows for many inconsistencies. In fact, counsel for Mr. Edmark has represented other Associated Persons in FINRA arbitration for expungement of disclosures arising from and has

succeeded on the merits in many cases. Based on Mr. Edmark's obligations to abide by FINRA Rules, he is bound to FINRA arbitration for disputes between himself and a Member Firm. The Director has abused their discretion by denying forum in such an inconsistent and arbitrary manner. Especially in this as the Director provided no reason as to the ineligibility of the Occurrence.

Mr. Edmark submits this Application for Review to the Commission requesting that he be permitted to bring his case in the forum that he is both entitled to and bound to by the FINRA Industry Code Rules. Whether the Occurrence is eligible for expungement should be subsequently determined by the Panel that is assigned in arbitration, in accordance with FINRA Industry Code Rules 2080 and 13805.

Dated: November 1, 2019

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Harris Freedman', is written over a horizontal line.

Harris Freedman, Esq.

Of Counsel

T: (720) 845-1252

E: legal.freedman@hlbslaw.com

HLBS Law

9737 Wadsworth Pkwy, Ste. G-100

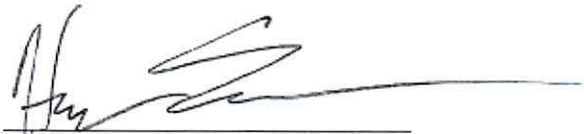
Westminster, CO 80021

SECURITIES EXCHANGE COMMISSION	
Denial of FINRA Forum for Expungement Arbitration: Applicant: Curtis Richard Edmark v. Respondent: Financial Industry Regulatory Authority	FILE NO. _____
NOTICE OF APPEARANCE FOR APPLICANT	

Please accept this as my notice of appearance for Applicant in the above captioned matter.

Dated: November 1, 2019

Respectfully submitted,



Harris Freedman, Esq.

Of Counsel

T: (720) 845-1252

E: legal.freedman@hlbslaw.com

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9737 Wadsworth Pkwy, Ste. G-100

Westminster, CO 80021

CERTIFICATE OF SERVICE

I, Olivia Peterson, on November 1, 2019, served the original and three copies of Mr. Edmark's Application for Review and Notice of Appearance on:

Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F St., NE
Room 10915
Washington, DC 20549-1090
Fax: 202-772-9324

[X] (BY FAX) I caused the documents to be sent to the persons at the fax number listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[X] (BY MAIL) I caused the documents to be sent by US Certified Mail to the persons listed above. I did not receive notice or indication from the US Postal Service that the delivery would be unsuccessful.

[X] (STATE) I certify (or declare) under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct.

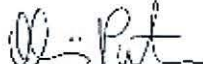
On this date, I also served the original and three copies of Mr. Edmark's Application for Review and Notice of Appearance on:

General Counsel
FINRA
1735 K Street, NW
Washington, DC 20006
Email: nac.casefilings@finra.org

[X] (BY EMAIL) I caused the documents to be sent to the persons at the e-mail address listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[X] (BY MAIL) I caused the documents to be sent by US Certified Mail to the persons listed above. I did not receive notice or indication from the US Postal Service that the delivery would be unsuccessful.

[X] (STATE) I certify (or declare) under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct.



Olivia Peterson
9737 Wadsworth Parkway, Suite G-100
Westminster, CO 80021