

**UNITED STATES OF AMERICA**  
**before the**  
**SECURITIES AND EXCHANGE COMMISSION**

Admin. Proc. File No. 3-21933

In the Matter of the Application of  
NYPPEX, LLC and LAURENCE ALLEN  
For Review of Disciplinary Action Taken by  
FINRA

**AMENDED APPLICATION FOR REVIEW AND APPEAL**  
**OF CERTAIN FINDINGS AND RULINGS OF THE NATIONAL ADJUDICATORY**  
**COUNCIL OF FINRA ADVERSE TO NYPPEX, LLC AND LAURENCE ALLEN**

Under Section 19(d)(2) of the Securities and Exchange Act of 1934 [15 U.S.C. § 19(d)(2)] and Rule 420 of the Commission’s Rules of Practice [17 C.F.R. § 201.420], NYPPEX, LLC (“NYPPEX”) and Laurence G. Allen (“Mr. Allen”) (collectively, “Appellants”), by their undersigned counsel, timely apply to have the United States Securities and Exchange Commission (“SEC”) review and reverse certain findings and rulings of the National Adjudicatory Council (“NAC”) of the Financial Industry Regulatory Authority (“FINRA”), dated April 8, 2024 (“Decision”).

Appellants seek review of the NAC Decision’s findings and rulings concerning alleged violations of: (1) Article III, Section 3(b) of FINRA’s By-Laws and FINRA Rules 8311 and 2010 for association while subject to a statutory disqualification, (2) FINRA Rules 2210(e) and 2010 for posting a press release on the internet, and (3) FINRA Rules 8210 and 2010 regarding their alleged failures to provide complete responses to FINRA’s 8210 requests. The NAC: (1) made findings of fact contrary to and unsupported by the record and evidence; (2) abused its authority and discretion by making unfair and arbitrary findings and conclusions; (3) exceed its

authority and power delegated to and by the Securities and Exchange Commission; and (4) violated Respondents rights guaranteed by the U.S. Constitution, including the Fifth Amendment, all which resulted in a bar and fines against Mr. Allen and fines and a one-year suspension against NYPPEX that were unsupported by the facts and the law.

Dated: June 25, 2024

/s/ Adriaen M. Morse Jr.

Adriaen M. Morse Jr.

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*Attorneys for Respondents NYYPEX, LLC and  
Laurence G. Allen*

## **CERTIFICATE OF SERVICE**

In accordance with Rule 151 of the SEC Rules of Practice [17 CFR § 201.151], I hereby certify that a true copy of the forgoing Amended Application for Review and Appeal was served on the following on this 25<sup>th</sup> day of June, 2024, in the manner indicated below:

**Via the Commission's Electronic Filings in Administrative Proceedings:**

The Office of the Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Room 10915  
Washington, D.C. 20549-1090

**Via U.S. Mail and email to:**

FINRA  
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/s/ Adriaen M. Morse Jr.

Adriaen M. Morse Jr.