UNITED STATES OF AMERICA BEFORE THE SECURITIES AND EXCHANGE COMMISSION

IN THE MATTER OF THE APPLICATION OF

UHF LOGISTICS GROUP, INC. (OTC:RGLG) SHAREHOLDERS

FOR REVIEW OF ACTION TAKEN BY

FINRA

APPLICATION FOR REVIEW

Shareholders of Entrex Carbon Market, Inc. ("Entrex" or the "Company," f/k/a UHF Logistics Group, Inc.) (the "Shareholders")¹, by their attorneys, hereby submit this Application for review of FINRA's failure to act under FINRA Rule 6490 on Entrex's requested corporate actions of a change of stock symbol, change of corporate name, and approval of notice of Entrex's 2023 reverse stock split and December 13, 2024 stock split (the "Corporate Actions").

On December 11, 2023, Entrex submitted an application requesting that FINRA process documentation related to the Corporate Actions, seeking to change its name to Entrex Carbon Market, Inc. to properly reflect a completed business combination. Despite the application being filed over 15 months ago and Entrex's submission of comprehensive documentation in response to numerous and duplicative FINRA requests, including the Company's 18-year corporate history, FINRA has kept the application in a perpetual state of "not reviewed" status, impeding the Company's ability to conduct business and stifling the rights of shareholders.

While FINRA has given itself broad discretion under Rule 6490, the Shareholders contend FINRA disregarded the facts and the best interests of the Company's shareholders and declined to process the Corporate Actions. FINRA's failure to act on the Corporate Actions request for 15 months improperly obstructs the Company's business to the detriment of Shareholders. FINRA's refusal to exercise its discretion under Rule 6490 is beyond the scope of its authority articulated by Congress, and is arbitrary, capricious, and not in accordance with the purposes of the Securities Exchange Act of 1934 ("Exchange Act"). This extended delay violates FINRA's ministerial duties under Rule 6490 and creates, rather than prevents, market confusion, as the Company's legal name under state law differs from its publicly traded name. Moreover, FINRA's indefinite delay without issuing a final decision has effectively denied the Company the

¹ A complete list of the Shareholders making this Application is included in Attachment 1 hereto.

right to Commission review of FINRA's actions, again to the detriment of Entrex Shareholders. FINRA's unreasonable delays are in clear contravention of constitutional principles that require government supervision of private regulatory entities, a clear mandate of the Commission.

I. <u>The Shareholders' Standing to Seek Review</u>

The Entrex Shareholders have standing to seek the Commission's review of FINRA's failure to act, as they have been and continue to be directly harmed by FINRA's failure to process the Corporate Actions, suffering economic impact from market confusion and regulatory uncertainty; are prejudiced from the inability to access FINRA's reasoning or appeal process, as FINRA has not made a formal decision that could be appealed through normal channels; and therefore are entitled to proper Commission oversight - ensuring fair and efficient markets, protecting investors, and maintaining appropriate supervision of self-regulatory organizations, and avoiding regulatory delays that are baseless, arbitrary, and detract from the Company's business and the rights of Shareholders as owners of Entrex.

II. <u>Request for Relief</u>

The Shareholders respectfully request that the Commission find that FINRA's 15 month delay constitutes a constructive denial that is arbitrary, capricious, and inconsistent with the purposes of the Exchange Act. The Shareholders request that the Commission order FINRA to issue a final determination on the Company's Corporate Actions request within 30 days, and find that FINRA's extended delay without rendering a reviewable decision raises significant concerns under the private nondelegation doctrine, and that the Commission examine the constitutionality of Rule 6490's ministerial mandate, which effectively shields FINRA's regulatory actions from governmental supervision. Finally, Shareholders request that the Commission define and impose transparent and appropriate processing timelines for FINRA's review and determination

OS Received 04/08/2025

regarding Corporate Actions submitted for approval under Rule 6490 to prevent other companies and Shareholders from suffering unreasonable delays and the attendant harm endured here.

III. Conclusion

FINRA's 15-month delay in processing the Company's corporate actions for name and symbol change (as well as reverse stock split and later stock split) is unreasonable and harmful to both the Company and its Shareholders. The delay creates market confusion, undermines state corporate law, and raises significant constitutional concerns regarding the proper delegation of regulatory authority to private entities. The Commission should act to ensure that FINRA fulfills its ministerial duties under Rule 6490 in a timely manner and remains subject to appropriate governmental oversight.

The Shareholders hereby request Oral Argument. The applicants may be served through their attorneys, whose address is below.

Dated: April 7, 2025

Respectfully submitted,

/s/ Nicolas Morgan

Nicolas Morgan INVESTOR CHOICE ADVOCATES NETWORK 453 South Spring Street Suite 400 Los Angeles, CA 90013 Attorney for UHF Logistics Group, Inc (Entrex Carbon Market, Inc.) Shareholders

<u>/s/ Tiffany Rowe</u> Tiffany Rowe DC Bar Number 1002218 Washington, DC 20009

CERTIFICATE OF SERVICE

I hereby certify that true copies of the Application for Review, Brief in Support of Application for Review, and Notice of Appearance were served on the following on April 7, 2025, in the manner indicated below:

By FedEx Overnight:

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

FINRA - Office of General Counsel 1735 K Street, NW Washington, DC 20006

By Email:

APFilings@sec.gov

Dated: April 7, 2025

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