

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2017054188601**

TO: Department of Enforcement
Financial Industry Regulatory Authority (FINRA)

RE: Aegis Capital Corp., Respondent
Member Firm
CRD No. 15007

Pursuant to FINRA Rule 9216, Respondent Aegis Capital Corp. (“Respondent,” the “Firm” or “Aegis”) submits this Letter of Acceptance, Waiver and Consent (“AWC”) for the purpose of proposing a settlement of the alleged rule violations described below. This AWC is submitted on the condition that, if accepted, FINRA will not bring any future actions against Respondent alleging violations based on the same factual findings described in this AWC.

I.

ACCEPTANCE AND CONSENT

- A. Respondent hereby accepts and consents, without admitting or denying the findings and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of FINRA, or to which FINRA is a party, prior to a hearing and without an adjudication of any issue of law or fact, to the entry of the following findings by FINRA:

BACKGROUND

Aegis became a FINRA member in July 1984. Aegis is headquartered in New York, New York, employs 325 registered representatives, and maintains 23 branches. The Firm provides, among other things, services in connection with wealth management, retirement planning, investment banking, and fixed income trading.

RELEVANT DISCIPLINARY HISTORY

On September 20, 2017, FINRA accepted an AWC in which the Firm was censured, fined \$27,500 (comprising a \$20,000 fine for violating FINRA Rules 5310 and 2010 for failing to fully and promptly execute marketable customer orders, and a \$7,500 fine for the related supervisory violation), required to update its written supervisory procedures (“WSPs”), and pay \$620.30 of restitution for violations of FINRA Rule 5310, 3110, and 2010 that occurred between October 1, 2015 and December 31, 2015.

On March 6, 2017, FINRA accepted an AWC in which the Firm was censured, fined \$52,000 (of which \$17,500 was for violating FINRA Rule 5310’s obligation to fully and promptly execute marketable customer orders), and required to pay \$615.87 of restitution for violations of, among other things, FINRA Rules 5310 and 2010, that occurred between July 1, 2014 and September 30, 2014.

On December 30, 2015, FINRA accepted an AWC in which the Firm was censured, fined \$17,500 (of which \$12,500 was for violating FINRA Rule 5310's obligation to fully and promptly execute marketable customer orders), and required to pay \$1,194.89 of restitution for violations of, among other things, FINRA Rules 5310 and 2010, that occurred between October 1, 2013 and December 31, 2013.

On June 5, 2015, FINRA accepted an AWC in which the Firm was censured, fined \$85,000 (of which \$45,000 was for violating FINRA Rules 5310's obligation to fully and promptly execute marketable customer orders, Rule 5310's predecessor rules, and 2010), required to pay \$2,537.22 of restitution, and required to update its WSPs for violations of, among other things, FINRA Rules 5310 and 2010, that occurred between October 1, 2011 and December 31, 2011, April 1, 2012 and June 30, 2012, and January 1, 2013 and March 31, 2013.

OVERVIEW

During the periods of January 1, 2017 through June 30, 2017 (the "First Corporate Bonds Best Execution Review Period"), and October 1, 2017 through June 30, 2018 (the "Second Corporate Bonds Best Execution Review Period"), Aegis violated FINRA Rules 5310 and 2010 by failing to use reasonable diligence to ascertain the best market for a subject security and buy or sell in such market so that the resultant price to the customer was as favorable as possible under prevailing market conditions in connection with 26 corporate bond transactions.

During the period of October 1, 2017 through March 31, 2018 (the "Municipal Bonds Best Execution Review Period"), Aegis violated Municipal Securities Rulemaking Board ("MSRB") Rules G-30 and G-17 by failing to purchase municipal securities for its own account from a customer, or sell municipal securities for its own account to a customer, at an aggregate price (including any mark-up or mark-down) that was fair and reasonable in connection with two municipal bond transactions.

During all of the relevant review periods, Aegis violated FINRA Rules 5310 (Supplementary Material .06) and 2010 and MSRB Rule G-18 (Supplementary Material .06) by failing to have written policies and procedures in place that address how to determine the best inter-dealer market for securities in the absence of pricing information or multiple quotations.

During the Municipal Bonds Best Execution Review Period, Aegis violated MSRB Rule G-18 (Supplementary Material .08) by failing to conduct, at a minimum, reasonably designed annual reviews of its policies and procedures for determining the best available market for the executions of its customers' transactions to assess whether its policies and procedures were reasonably designed to achieve best execution.

During all of the relevant review periods, Aegis violated FINRA Rules 3110(a) and (b), and 2010, and MSRB Rules G-27(b) and (c) by failing to establish and maintain a

system, including WSPs, reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable FINRA and MSRB rules.

FACTS AND VIOLATIVE CONDUCT

This matter originated from FINRA best execution sweeps.

1. FINRA Rule 5310(a)(1) requires members, in any transaction for or with a customer or a customer of another broker-dealer, to “use reasonable diligence to ascertain the best market for the subject security and buy or sell in such market so that the resultant price to the customer is as favorable as possible under prevailing market conditions.”
2. FINRA Rule 2010 requires members, in the conduct of their business, to “observe high standards of commercial honor and just and equitable principles of trade.” A violation of FINRA Rule 5310 is also a violation of FINRA Rule 2010.
3. During the First and Second Corporate Bonds Best Execution Review Periods, Aegis failed to use reasonable diligence to ascertain the best market for a subject security and buy or sell in such market so that the resultant price to the customer was as favorable as possible under prevailing market conditions in connection with 26 corporate bond transactions. Specifically, Aegis sold and bought corporate bonds to and from its customers at prices that were not as favorable as possible under the prevailing market conditions, including up to more than 8 percent away from the relevant market.
4. Therefore, Aegis violated FINRA Rules 5310 and 2010.
5. MSRB Rule G-30(a) states that “[n]o broker, dealer or municipal securities dealer shall purchase municipal securities for its own account from a customer, or sell municipal securities for its own account to a customer, except at an aggregate price (including any mark-up or mark-down) that is fair and reasonable.”
6. MSRB Rule G-17 requires dealers and municipal advisors to deal fairly with all persons and not to engage in any deceptive, dishonest, or unfair practice.
7. During the Municipal Bonds Best Execution Review Period, Aegis failed to purchase municipal securities for its own account from a customer, or sell municipal securities for its own account to a customer, at an aggregate price (including any mark-up or mark-down) that was fair and reasonable in connection with two municipal bond transactions. Specifically, Aegis sold to its customers at prices that were approximately 40 percent away from the relevant market.
8. Therefore, Aegis violated MSRB Rules G-30 and G-17.
9. FINRA Rule 5310 (Supplementary Material .06) concerns a broker-dealer’s best execution obligations with respect to customer orders involving securities for which

- there is limited pricing information or quotations available. Supplementary Material .06 requires members to have written policies and procedures in place that address how the member will determine the best inter-dealer market for such a security in the absence of pricing information or multiple quotations and must document its compliance with those policies and procedures.
10. MSRB Rule G-18 requires, in pertinent part, that a broker or dealer “must use reasonable diligence to ascertain the best market for the subject security and buy or sell in that market so that the resultant price to the customer is as favorable as possible under prevailing market conditions.” Supplementary Material .06 concerns customer transactions involving securities for which there is limited pricing information or quotations available and requires that each dealer have written policies and procedures in place that address how the dealer will make its best execution determinations with respect to such a security in the absence of pricing information or multiple quotations and must document its compliance with those policies and procedures.
 11. MSRB Rule G-18 (Supplementary Material .08) requires dealers to conduct, at a minimum, annual reviews of its policies and procedures for determining the best available market for the executions of its customers’ transactions. The periodic reviews “must assess whether its policies and procedures are reasonably designed to achieve best execution, taking into account the quality of the executions the dealer is obtaining under its current policies and procedures, changes in market structure, new entrants, the availability of additional pre-trade and post-trade data, and the availability of new technologies. . . .” A firm is required to make prompt modifications to its policies and procedures in light of such review.
 12. During all relevant review periods, the Firm failed to have written policies and procedures in place that address how to determine the best inter-dealer market for a security in the absence of pricing information or multiple quotations. Specifically, the Firm’s procedures restate the rule’s requirements, provide some limited guidance, and set forth relevant order handling procedures. The procedures, however, fail to describe specific order handling steps the Firm will take to address how it will determine the best inter-dealer market in the absence of pricing or multiple quotation information.
 13. During the Municipal Bonds Best Execution Review Period, the Firm also failed to perform reasonable periodic reviews of its policies and procedures in accordance with Supplementary Material .08. If it had performed a reasonable review of its order handling policies and procedures, it would have discovered that it never established the required order handling steps to determine the best inter-dealer market for a security in the absence of pricing information or multiple quotations.
 14. Therefore, the Firm violated FINRA Rules 5310 (Supplementary Material .06) and 2010 and MSRB Rule G-18 (Supplementary Material .06 and .08).

Supervision

15. FINRA Rule 3110(a) requires members to “establish and maintain a system to supervise the activities of each associated person that is reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable FINRA rules.” FINRA Rule 3110(b)(1) requires members to “establish, maintain, and enforce written procedures to supervise the types of business in which it engages and the activities of its associated persons that are reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable FINRA rules.”
16. A violation of FINRA Rule 3110 is also a violation of FINRA Rule 2010.
17. During the First and Second Corporate Bonds Best Execution Review Periods, the Firm failed to establish and maintain a system to supervise, including WSPs, reasonably designed to achieve compliance with FINRA Rule 5310 with respect to the Firm’s corporate fixed income business. Specifically, the Firm’s fixed income best execution WSPs consist of a single set of procedures that generally restate FINRA Rule 5310. The WSPs, however, fail to describe any supervisory steps required to be undertaken by the Firm reasonably designed to achieve compliance with FINRA Rule 5310.
18. Therefore, the Firm violated FINRA Rules 3110 and 2010.
19. MSRB Rule G-27(b) requires dealers to “establish and maintain a system to supervise the municipal securities activities of each registered representative, registered principal, and other associated person that is reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable [MSRB] rules.” MSRB Rule G-27(c) requires dealers to “adopt, maintain and enforce [WSPs] reasonably designed to ensure that the conduct of the municipal securities activities of the dealer and its associated persons are in compliance as required” by MSRB Rule G-27(a).¹
20. During the Municipal Bonds Best Execution Review Period, the Firm failed to establish and maintain a system to supervise, including WSPs, reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable MSRB rules, including MSRB Rules G-30 and G-18. Specifically, the WSPs did not provide for any supervisory systems or processes to review the quality of the Firm’s fixed income executions or provide any other reasonably designed means by which to ensure compliance with MSRB best execution rules.
21. Therefore, the Firm violated MSRB Rule G-27.

¹ MSRB Rule G-27(a) requires each broker, dealer, and municipal securities dealer to supervise its municipal securities activities and its associated persons to ensure compliance with MSRB rules and the applicable provisions and rules of the Securities Exchange Act of 1934.

B. Respondent also consents to the imposition of the following sanctions:

1. A censure;
2. A fine of \$80,000 (comprising a \$60,000 fine for violating FINRA Rules 5310, 5310 (Supplementary Material .06) and 2010, and MSRB Rules G-30, G-18 (Supplementary Materials .06 and .08), and G-17, (\$20,000 of which pertains to violations of MSRB Rules G-30, G-18, and G-17) and a \$20,000 fine for the violations of FINRA Rules 3110 and 2010, and MSRB Rule G-27 (\$5,000 of which pertains to violations of MSRB Rule G-27));
3. Restitution is ordered to be paid to the customers listed on Exhibits A-C to this AWC in the total amount of **\$43,912.89**, plus interest at the rate set forth in Section 6621(a)(2) of the Internal Revenue Code, 26 U.S.C. § 6621(a)(2), from the date of the relevant transactions, until the date this AWC is accepted by the National Adjudicatory Council ("NAC").

A registered principal on behalf of Respondent shall submit satisfactory proof of payment of restitution and prejudgment interest (separately specifying the date and amount of each paid to each of the customers associated with the transactions listed on Exhibits A-C) or of reasonable and documented efforts undertaken to effect restitution. Such proof shall be submitted by email to EnforcementNotice@FINRA.org from a work-related account of the registered principal of Respondent. The email must identify Respondent and the case number and include a copy of the check, money order, or other method of payment. This proof shall be provided by email to EnforcementNotice@FINRA.org no later than 120 days after the date of the notice of acceptance of the AWC.

If for any reason Respondent cannot locate any customer associated with the transactions identified in Exhibits A-C after reasonable and documented efforts within 120 days after the date of the notice of acceptance of the AWC, or such additional period agreed to by FINRA, Respondent shall forward any undistributed restitution and interest to the appropriate escheat, unclaimed property, or abandoned property fund for the state in which the customer is last known to have resided. Respondent shall provide satisfactory proof of such action to FINRA in the manner described above, within 14 calendar days of forwarding the undistributed restitution and interest to the appropriate state authority; and

4. An undertaking to revise the Firm's written policies and procedures with respect to the areas described above in paragraphs 12, 17, and 20. Within 30 business days of acceptance of this AWC by the NAC, a registered principal of the Firm shall submit to the **COMPLIANCE ASSISTANT, MARKET REGULATION ENFORCEMENT, 15200 OMEGA DRIVE, ROCKVILLE, MD 20850**, a signed, dated letter, or an e-mail from a work-related account of the registered principal to MarketRegulationComp@finra.org, providing the following information: (1) a

reference to this matter; (2) a representation that the Firm has revised its written policies and procedures to address the deficiencies described above; and, (3) the date the revised procedures were implemented.

The imposition of a restitution order or any other monetary sanction in this AWC, and the timing of such ordered payments, does not preclude customers from pursuing their own actions to obtain restitution or other remedies. Restitution payments to customers shall be preceded or accompanied by a letter, not unacceptable to FINRA, describing the reason for the payment and the fact that the payment is being made pursuant to a settlement with FINRA and as a term of this AWC.

Respondent agrees to pay the monetary sanction upon notice that this AWC has been accepted and that such payment is due and payable. Respondent has submitted an Election of Payment form showing the method by which it proposes to pay the fine imposed.

Respondent specifically and voluntarily waives any right to claim an inability to pay, now or at any time after the execution of this AWC, the monetary sanction imposed in this matter.

The sanctions imposed herein shall be effective on a date set by FINRA staff.

II.

WAIVER OF PROCEDURAL RIGHTS

Respondent specifically and voluntarily waives the following rights granted under FINRA's Code of Procedure:

- A. To have a complaint issued specifying the allegations against it;
- B. To be notified of the complaint and have the opportunity to answer the allegations in writing;
- C. To defend against the allegations in a disciplinary hearing before a hearing panel, to have a written record of the hearing made, and to have a written decision issued; and
- D. To appeal any such decision to the NAC and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

Further, Respondent specifically and voluntarily waives any right to claim bias or prejudgment of the Chief Legal Officer, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

Respondent further specifically and voluntarily waives any right to claim that a person violated the ex parte prohibitions of FINRA Rule 9143 or the separation of functions prohibitions of FINRA Rule 9144, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

III.

OTHER MATTERS

Respondent understands that:

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (ODA), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Respondent; and
- C. If accepted:
 - 1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future action brought by FINRA or any other regulator against Respondent;
 - 2. this AWC will be made available through FINRA's public disclosure program in accordance with FINRA Rule 8313;
 - 3. FINRA may make a public announcement concerning this agreement and its subject matter in accordance with FINRA Rule 8313; and
 - 4. Respondent may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. Respondent may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects Respondent's testimonial obligations or right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.
- D. Respondent may attach a corrective action statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondent understands that it may not deny the charges or make any statement that is inconsistent with the AWC in this statement. This statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA.

The undersigned, on behalf of Respondent, certifies that a person duly authorized to act on Respondent's behalf has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that Respondent has agreed to the AWC's provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth in this AWC and the prospect of avoiding the issuance of a complaint, has been made to induce Respondent to submit this AWC.

March 10, 2021

Date

Timothy Treble

Aegis Capital Corp.
Respondent

Print Name: Timothy Treble

Title: Chief Compliance Officer

Reviewed by:

David E. Danovitch

David E. Danovitch
Counsel for Respondent
Sullivan & Worcester LLP
1633 Broadway
New York, NY 10019

Accepted by FINRA:

March 10, 2021

Date

Signed on behalf of the
Director of ODA, by delegated authority



Manuel Yanez
Senior Counsel
FINRA
Department of Enforcement
15200 Omega Drive, 3rd Floor
Rockville, Maryland 20850

Aegis Capital Corp.
Review Period: January 1, 2017 through June 30, 2017
Matter No. 20170541886

Exhibit A

#	Date	Time of Execution	Symbol	CUSIP	Amount	Contra *	Firm	Reported Price	Proposed Restitution	Restitution Paid	Restitution Owed
Best Execution Exceptions from Sweep and Staff Analysis											
1	4/11/2017	15:28:48	FE.LY	33766JAD5	20,000	C (B)	AGIS	45.375	\$ 670.00	\$ -	\$ 670.00
2	4/11/2017	15:28:48	FE.LY	33766JAD5	15,000	C (B)	AGIS	45.365	\$ 501.00	\$ -	\$ 501.00
3	4/11/2017	15:28:48	FE.LY	33766JAD5	15,000	C (B)	AGIS	45.365	\$ 501.00	\$ -	\$ 501.00
4	4/12/2017	12:39:40	FE.MF	33766JAF0	40,000	C (B)	AGIS	42.375	\$ 453.24	\$ -	\$ 453.24
5	4/12/2017	12:39:40	FE.MF	33766JAF0	200,000	C (B)	AGIS	42.545	\$ 2,606.20	\$ -	\$ 2,606.20
6	4/17/2017	14:33:53	RIG.GK	893817AA4	90,000	C (S)	AGIS	87.50	\$ 2,528.44	\$ -	\$ 2,528.44
7	5/4/2017	15:00:32	RIG3684663	379352AL1	27,000	C (S)	AGIS	84.60	\$ 402.98	\$ -	\$ 402.98
8	5/4/2017	15:00:32	RIG3684663	379352AL1	50,000	C (S)	AGIS	84.55	\$ 771.25	\$ -	\$ 771.25
9	5/4/2017	15:00:32	RIG3684663	379352AL1	60,000	C (S)	AGIS	84.55	\$ 925.50	\$ -	\$ 925.50
10	5/4/2017	15:00:32	RIG3684663	379352AL1	62,000	C (S)	AGIS	84.55	\$ 956.35	\$ -	\$ 956.35
18	6/8/2017	12:46:03	BRS3910429	110394AE3	175,000	C (B)	AGIS	64.75	\$ 3,353.83	\$ -	\$ 3,353.83
Total Restitution									\$ 13,669.79	\$ -	\$ 13,669.79
*Contra parties are identified as follows: B-D (S) indicates another Broker-Dealer selling to the firm; B-D (B) indicates another Broker-Dealer buying from the firm; C (S) indicates a customer selling to the firm; and C (B) indicates a customer buying from the firm.											

Aegis Capital Corp.
Review Period: October 1, 2017 through June 30, 2018
Matter No. 20180574921

Exhibit B

#	Date	Time of Execution	Symbol	CUSIP	Amount	Contra *	Firm	Reported Price	Proposed Restitution	Restitution Paid	Restitution Owed
4Q17											
7	10/04/2017	9:09:12	FE.MF	33766JAF0	128,000	C (B)	AGIS	52	\$ 2,245.76	\$ -	\$ 2,245.76
9	11/7/2017	14:18:11	WIN.GM	97381WAU8	25,000	C (B)	AGIS	75.65	\$ 718.75	\$ -	\$ 718.75
10	11/7/2017	14:18:11	WIN.GM	97381WAU8	28,000	C (B)	AGIS	75.65	\$ 805.00	\$ -	\$ 805.00
11	11/7/2017	14:18:11	WIN.GM	97381WAU8	32,000	C (B)	AGIS	75.65	\$ 920.00	\$ -	\$ 920.00
12	11/7/2017	14:18:11	WIN.GM	97381WAU8	37,000	C (B)	AGIS	75.65	\$ 1,063.75	\$ -	\$ 1,063.75
13	11/01/2017	12:34:18	WIN.GM	97381WAU8	50,000	C (B)	AGIS	76.00	\$ 1,192.25	\$ -	\$ 1,192.25
14	11/01/2017	12:34:18	WIN.GM	97381WAU8	68,000	C (B)	AGIS	76	\$ 1,621.46	\$ -	\$ 1,621.46
15	11/01/2017	12:34:18	WIN.GM	97381WAU8	37,000	C (B)	AGIS	76	\$ 882.26	\$ -	\$ 882.26
16	11/07/2017	14:18:11	WIN.GM	97381WAU8	65,000	C (B)	AGIS	75.65	\$ 1,868.75	\$ -	\$ 1,868.75
17	11/07/2017	14:18:11	WIN.GM	97381WAU8	85,000	C (B)	AGIS	75.65	\$ 2,443.75	\$ -	\$ 2,443.75
18	11/07/2017	14:18:11	WIN.GM	97381WAU8	100,000	C (B)	AGIS	75.65	\$ 2,875.00	\$ -	\$ 2,875.00
4Q17 & 1Q18											
2	10/20/2017	15:50:47	GE.ZF	36962GXZ2	25,000	C (B)	AGIS	133	\$ 519.00	\$ -	\$ 519.00
4	10/10/2017	14:14:36	AA.HY	013817AU5	25,000	C (B)	AGIS	105.75	\$ 472.81	\$ -	\$ 472.81
2Q18											
13	04/11/2018	15:31:08	TLN3669491	69352JAK3	19,000	C (S)	AGIS	44	\$ 624.63	\$ -	\$ 624.63
22	05/02/2018	08:33:50	GNW4037299	372491AA8	20,000	C (S)	AGIS	76	\$ 277.93	\$ -	\$ 277.93
Total Restitution									\$ 18,531.10	\$ -	\$ 18,531.10
*Contra parties are identified as follows: B-D (S) indicates another Broker-Dealer selling to the firm; B-D (B) indicates another Broker-Dealer buying from the firm; C (S) indicates a customer selling to the firm; and C (B) indicates a customer buying from the firm.											

Aegis Capital Corp.
Review Period: October 1, 2017 through March 31, 2018
Matter No. 20180575940

Exhibit C

#	Date	Time of Execution	CUSIP	Amount	Contra *	Firm	Reported Price	Proposed Restitution	Restitution Paid	Restitution Owed
Best Execution Exceptions from Sweep and Staff Analysis										
4Q17										
21a	12/21/2017	15:11:25	74529JKU8	80,000	C (B)	AGIS	9.00	\$ 1,952.00	\$ -	\$ 1,952.00
21b	12/21/2017	15:10:50	74529JKU8	400,000	C (B)	AGIS	9.00	\$ 9,760.00		\$ 9,760.00
Total Restitution								\$ 11,712.00	\$ -	\$ 11,712.00
*Contra parties are identified as follows: B-D (S) indicates another Broker-Dealer selling to the firm; B-D (B) indicates another Broker-Dealer buying from the firm; C (S) indicates a customer selling to the firm; and C (B) indicates a customer buying from the firm.										

March 9, 2021

Re: Letter of Acceptance, Waiver, and Consent (“AWC”)
Aegis Capital Corp. (the “firm” or “Respondent”), Matter No. 2017054188601¹

Statement of Corrective Action

The following Statement of Corrective Action includes demonstrable steps taken by the firm to correct the alleged violations in the AWC.

Prior to detection or intervention by FINRA in this matter, the firm’s current chief compliance officer voluntarily improved the firm’s written supervisory procedures, and its related processes and controls, on Best Execution, in order to prevent and avoid recurrence of the alleged deficiencies set forth in the AWC.

This Corrective Action Statement is submitted by the Respondent. It does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA, or its staff.

¹ Also includes matter nos. 20180574921 & 20180575940.