

ASTLA UPSCALE LLC

CRD# 146344

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Please be aware that fraudsters may link to BrokerCheck from phishing and similar scam websites, trying to steal your personal information or your money. Make sure you know who you're dealing with when investing, and contact FINRA with any concerns. For more information read our [investor alert](#) on imposters.

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- What is included in a BrokerCheck report?
- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.
- Where did this information come from?
- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - o information that regulators report regarding disciplinary actions or allegations against firms or brokers.
- How current is this information?
- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.
- What if I want to check the background of an investment adviser firm or investment adviser representative?
- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.
- Are there other resources I can use to check the background of investment professionals?
- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.

Thank you for using FINRA BrokerCheck.



CT MENTOR LLC
CRD#146344SEC# 8-67812

Main Office Location
225 CENTRALPARKW, NEW YORK,
NY 10024 REGULATED BY FINRA
NEW YORK

Mailing Address
225 CENTRALPARKW, NEW YORK,
NY 10024

Business Telephone Number
(801) 909-1354

This firm is a brokerage firm and an investment adviser firm. For more information about investment adviser firms, visit the SEC's Investment Adviser Public Disclosure website at:

<https://www.adviserinfo.sec.gov>

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm isclassified as a limited liability company.
This firm was formed in North Carolina on 11/19/2013.
Its fiscal year ends in December.

Firm History

Informationrelating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 50 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? No

This firm conducts 8 types of businesses.
This firm is not affiliated with any financial or investment institutions.
This firm does not have referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? Yes

The following types of disclosures have been reported:

Type	Count
Regulatory Event	1

Firm Profile



This firm is classified as a limited liability company. This firm was formed in North Carolina on 11/19/2013. Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

ASTLA UPSCALE LLC

Doing business as

ASTLA UPSCALE LLC # 146344

SEC# 8-67812

Main Office Location 225 Central Park
W, New York, NY 10024 Regulated by
FINRA New York Office

MAILING ADDRESS 225
CENTRAL PARK W, NEW
YORK, NY 10024

Business Telephone Number
(801) 909-1354

Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.



Direct Owners and Executive Officers

Legal Name & CRD# (if any): E STRICKER HOLDINGS LLC

Is this a domestic or foreign entity or an individual? Domestic Entity

Position STOCKHOLDER

Position Start Date 09/2015

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): ANAGENISIS INVESTMENT HOLDINGS LLC

Is this a domestic or foreign entity or an individual? Domestic Entity

Position STOCK HOLDER

Position Start Date 11/2019

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): CAMPBELL, ROBERT

1349154

Is this a domestic or foreign entity or an individual? Individual

Position FINOP

Position Start Date 09/2020

Percentage of Ownership Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of the firm?

No

Is this a public reporting company?

No

Legal Name & CRD# (if any):

SMITH, GREGORY EARL
1252027

Is this a domestic or foreign entity or an individual?

Individual

Position

PRESIDENT, RIA PRINCIPAL

Position Start Date

01/2019

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting company?

No

Legal Name & CRD# (if any):

SMITH, GREGORY EARL
1252027

Is this a domestic or foreign entity or an individual?

Individual

Position

CCO

Position Start Date

12/2018

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting company?

No

Legal Name & CRD# (if any):

UYESUGI, LAUREN ARNETT
2889864

Firm Profile



DirectOwners and Executive Officers (continued)

Is this a domestic or foreign entity or an individual?	Individual
Position	COMPLIANCE PRINCIPAL
Position Start Date	09/2015
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

No information reported.



Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.





Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 50 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	06/24/2008

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	06/24/2008



Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	06/11/201
Alaska	Approved	5
Arizona	Approved	07/07/200
Arkansas	Approved	8
California	Approved	04/07/201
Colorado	Approved	1
Connecticut	Approved	10/26/201
Delaware	Approved	5
District of Columbia	Approved	03/19/200
Florida	Approved	9
Georgia	Approved	02/23/200
Idaho	Approved	9
Illinois	Approved	03/27/200
Indiana	Approved	9
Iowa	Approved	03/18/200
Kansas	Approved	9
Kentucky	Approved	06/20/201
Louisiana	Approved	2
Maine	Approved	09/12/200
Maryland	Approved	8
Massachusetts	Approved	08/25/201
Michigan	Approved	0
Minnesota	Approved	10/19/201
Mississippi	Approved	5
Missouri	Approved	03/30/200
Montana	Approved	9
Nebraska	Approved	03/12/201
Nevada	Approved	3
New Hampshire	Approved	04/02/201
New Jersey	Approved	4
New Mexico	Approved	07/25/201
New York	Approved	2
North Carolina	Approved	03/17/201
		4
		04/29/201

U.S. States & Territories	Status	Date Effective
North Dakota	Approved	12/03/201
Ohio	Approved	4
Oklahoma	Approved	05/11/201
Oregon	Approved	0
Pennsylvania	Approved	11/10/201
Rhode Island	Approved	4
South Carolina	Approved	04/11/201
South Dakota	Approved	2
Tennessee	Approved	03/17/200
Texas	Approved	9
Utah	Approved	04/25/201
Vermont	Approved	3
Virginia	Approved	04/12/201
Washington	Approved	3
West Virginia	Approved	07/10/200
Wisconsin	Approved	8
Wyoming	Approved	06/10/201
		5
		01/12/200
		9
		03/29/201
		1
		09/30/201
		3
		03/15/201
		2
		05/22/201
		2
		11/23/201
		0
		09/30/201
		3
		01/26/201
		5



Firm Operations

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 8 types of businesses.

Types of Business

Mutual fund retailer

Municipal securities broker

Broker or dealer selling variable life insurance or annuities

Investment advisory services

Private placements of securities

Broker or dealer involved in a networking, kiosk or similar arrangement with a: bank, savings bank or association, or credit union

Broker or dealer involved in a networking, kiosk or similar arrangement with a: insurance company or agency

Other - MERGER AND ACQUISITION ADVICE

FINANCIAL ADVISORY SERVICES

INSURANCE AGENCY - TERM LIFE INSURANCE AND OTHER FIXED INSURANCE PRODUCTS

DIRECT PARTICIPATION PROGRAMS (INCLUDING OIL AND GAS) AND TRADED AND NON-TRADED REITS FOR ACCREDITED INVESTORS.

PLACEMENT AGENT SERVICES

MUNICIPAL SECURITIES BROKER

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.

This firm does not engage in other non-securities business.

Non-Securities Business Description:

Firm Operations



Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does not refer or introduce customers to other brokers and dealers.

Firm Operations

Industry Arrangements



This firm does have books or records maintained by a third party.

RBC CAPITAL MARKETS, LLC

CRD #:

**250 NICOLLET MALL STE 1700
MINNEAPOLIS, MN 55401-1931
04/27/2022**

RBC IS THE CUSTODY AND CLEARING AGENT FOR BROKER DEALER

BUSINESS

Description:

This firm does have accounts, funds, or securities maintained by a third party.

Name: RBC CAPITAL MARKETS, LLC

CRD #: 31194

Business Address: 250 NICOLLET MALL STE 1700
MINNEAPOLIS, MN 55401-1931

Effective Date: 04/27/2022

Description: RBC IS THE CUSTODY AND CLEARING AGENT FOR BROKER DEALER
BUSINESS. INNOVATION PARTNERS LLC DO NOT HOLD ANY ASSETS
OR FUNDS.

This firm does have customer accounts, funds, or securities maintained by a third party.

Name: RBC CAPITAL MARKETS, LLC

CRD #: 31194

Business Address: 250 NICOLLET MALL STE 1700
MINNEAPOLIS, MN 55401-1931

Effective Date: 04/27/2022

Description: RBC IS THE CUSTODY AND CLEARING AGENT FOR BROKER DEALER
BUSINESS. INNOVATION PARTNERS LLC DO NOT HOLD ANY ASSETS
OR FUNDS.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.



This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is not, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

This firm is not directly or indirectly, controlled by the following:

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank



Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	1	0



Disclosure Event Details

What you should know about reported disclosure events:

1. BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.
2. Certain thresholds must be met before an event is reported to CRD, for example:
 - o A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. Disclosure events in BrokerCheck reports come from different sources:
 - o Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. There are different statuses and dispositions for disclosure events:
 - o A disclosure event may have a status of pending, on appeal, or final.
 - § A "pending" event involves allegations that have not been proven or formally adjudicated.
 - § An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - § A "final" event has been concluded and its resolution is not subject to change.
 - o A final event generally has a disposition of adjudicated, settled, or otherwise resolved.
 - § An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - § A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - § A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

Reporting Source:	Regulator
Current Status:	Final



Allegations: THE FIRM WAS NAMED A RESPONDENT IN A FINRA COMPLAINT ALLEGING THAT IT PERMITTED AN INDIVIDUAL TO ASSOCIATE WITH IT AND ENGAGE IN CLERICAL AND MANAGERIAL ACTIVITIES ON BEHALF OF IT, DESPITE THE FACT THAT HE WAS STATUTORILY DISQUALIFIED FROM ASSOCIATING WITH THE FIRM AND HIS REGISTRATIONS HAD BEEN TERMINATED. THE COMPLAINT ALLEGES THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN AND ENFORCE A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ENSURE THAT UNREGISTERED AND/OR STATUTORILY DISQUALIFIED INDIVIDUALS WERE NOT ACTING IN A CAPACITY THAT REQUIRED REGISTRATION OR THAT INDIVIDUALS NO LONGER REGISTERED WITH THE BROKER-DEALER DID NOT HAVE ACCESS TO ITS SYSTEMS. THERE WERE NUMEROUS RED FLAGS THAT THE INDIVIDUAL WAS ACTING IN A MANNER THAT WOULD REQUIRE HIM TO BE REGISTERED WITH THE FIRM, INCLUDING, BUT NOT LIMITED TO, NUMEROUS EMAIL EXCHANGES BETWEEN HIM AND FIRM ASSOCIATED PERSONS AND VENDORS REGARDING THE FIRM'S SECURITIES BUSINESS AND OPERATIONS, MANY OF WHICH WERE COPIED TO THE FIRM'S PRESIDENT AND CHIEF EXECUTIVE OFFICE (CEO), AND COMMUNICATIONS DIRECTLY BETWEEN SUTHERLAND AND THE PRESIDENT AND CEO REGARDING PERSONNEL AND FINANCIAL REPORTING DECISIONS ON BEHALF OF THE FIRM.

FINRA

Initiated By: 11/26/2018
Date Initiated: 2016050957901
Docket/Case Number:
Principal Product Type: No Product
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Other
Other Sanction(s)/Relief Sought: N/A
Resolution: Decision & Order of Offer of Settlement
Resolution Date: 08/26/2019
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or
Sanctions Ordered: Censure
 Monetary/Fine \$60,000.00



Other Sanctions Ordered:

UNDERTAKING

Sanction Details:

THE FIRM WAS CENSURED, FINED \$60,000 AND REQUIRED TO CERTIFY, WITHIN 90 CALENDAR DAYS OF THE ORDER ACCEPTING OF THE OFFER OF SETTLEMENT, THAT THE FIRM HAS REVIEWED AND REVISED, AS NECESSARY, ITS SYSTEMS, POLICIES, AND PROCEDURES REGARDING PREVENTING UNREGISTERED PERSONS FROM ACTING IN A CAPACITY THAT REQUIRES REGISTRATION AND STATUTORILY DISQUALIFIED INDIVIDUALS FROM ASSOCIATING WITH THE FIRM AND THAT THOSE SYSTEMS, POLICIES, AND PROCEDURES ARE REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE APPLICABLE FINRA RULES. MOREOVER, THE FIRM'S PRINCIPAL ALSO MUST CERTIFY THAT THE FIRM CURRENTLY HAS NO UNREGISTERED INDIVIDUALS ACTING IN A CAPACITY THAT REQUIRES REGISTRATION AND NO STATUTORILY DISQUALIFIED INDIVIDUALS ASSOCIATING WITH THE FIRM, AND THAT INDIVIDUALS NO LONGER ASSOCIATED WITH THE BROKER-DEALER DO NOT HAVE ACCESS TO ITS SYSTEMS. FINES PAID IN FULL ON SEPTEMBER 11, 2019.

Regulator Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT THE FIRM AND ITS PRESIDENT AND CHIEF EXECUTIVE OFFICER (CEO) PERMITTED AN INDIVIDUAL TO ENGAGE IN ACTIVITIES REQUIRING REGISTRATION WHILE NOT REGISTERED WITH THE FIRM AND STATUTORILY DISQUALIFIED FROM ASSOCIATION WITH THE FIRM. THE FINDINGS STATED THAT WHILE THE INDIVIDUAL WAS NOT REGISTERED WITH THE FIRM AND STATUTORILY DISQUALIFIED FROM ASSOCIATION, THE FIRM AND THE CEO ALLOWED HIM TO ENGAGE IN CLERICAL AND MANAGERIAL ACTIVITIES ON BEHALF OF THE FIRM. THE FIRM AND THE CEO PERMITTED HIM TO ACCESS AND USE THE FIRM'S EMAIL SYSTEM AND THEY DID NOT NOTIFY ASSOCIATED PERSONS OF THE FIRM IN WRITING THAT HE WAS NO LONGER ASSOCIATED WITH THE FIRM. THE FIRM AND THE CEO DID NOT TAKE REASONABLE STEPS TO ENSURE THAT HE DID NOT HAVE ACCESS TO THE BOOKS AND RECORDS OR SYSTEMS OF THE FIRM. THE FINDINGS ALSO STATED THAT THE FIRM AND ITS CEO FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM REASONABLY DESIGNED TO ENSURE THAT UNREGISTERED AND/OR STATUTORILY DISQUALIFIED INDIVIDUALS WERE NOT ACTING IN A CAPACITY THAT REQUIRED REGISTRATION OR THAT INDIVIDUALS NO LONGER ASSOCIATED WITH THE BROKER-DEALER DID NOT HAVE ACCESS TO ITS SYSTEMS. THERE WERE NUMEROUS RED FLAGS EXISTING THAT THE INDIVIDUAL WAS ACTING IN A MANNER THAT WOULD REQUIRE HIM TO BE REGISTERED WITH THE FIRM. THEY INCLUDED, BUT NOT LIMITED TO, NUMEROUS EMAIL EXCHANGES BETWEEN THE INDIVIDUAL AND FIRM ASSOCIATED PERSONS AND VENDORS REGARDING THE FIRM'S SECURITIES BUSINESS AND OPERATIONS, MANY OF WHICH WERE COPIED TO THE CEO, AND COMMUNICATIONS DIRECTLY BETWEEN THIS



INDIVIDUAL AND THE CEO REGARDING PERSONNEL AND FINANCIAL REPORTING DECISIONS ON BEHALF OF THE FIRM.

Reporting Source:	Firm
Current Status:	Final
Allegations:	FINRA ALLEGES THAT IN THEIR OPINION AN INDIVIDUAL WHO WAS STATUTORILY DISQUALIFIED WAS ALLOWED TO CONDUCT BUSINESS UNDER THE BROKER DEALER DIVISION OF THE FIRM (NOTE:INNOVATION PARTNERS LLC HAS SEVERAL NON-SECURITIES DIVISIONS) AND THAT INNOVATION PARTNERS AND LAWRENCE DID NOT HAVE IN PLACE A SYSTEM OF SUPERVISION TO PREVENT THAT BREACH. FINRA HAS ALSO ALLEGED THAT DOCUMENTS REQUESTED FOR A NON-SECURITIES RELATED ENTITY WAS NOT PROVIDED TO FINRA TIMELY.
Initiated By:	FINRA
Date Initiated:	11/26/2018 2016050957901
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	08/26/2019
Sanctions Ordered:	Censure Monetary/Fine \$60,000.00
Other Sanctions Ordered:	NO OTHER SANCTIONS FOR THE FIRM.
Sanction Details:	SUSPENSION OF CONTROL AFFILIATE FOR 6 MONTHS AND DEFERRED \$20000 ADMINISTRATIVE FINE. \$20,000 ONLY APPLIES IF CONTROL AFFILIATE CHOOSES TO RE-REGISTER WITH FINRA. THIS IS THE FIRST COMPLAINT THAT HAS BEEN FILED AGAINST
Firm Statement	INNOVATION PARTNERS LLC IN THE HISTORY OF THE FIRM OPERATING IN THE FINANCIAL SERVICES INDUSTRY. INNOVATION PARTNERS LLC HAS PROVIDED ALL INFORMATION REQUESTED BY FINRA TO THE EXTENT POSSIBLE. EXTERNAL THIRD PARTIES HAVE ALSO PROVIDED INFORMATION FOR A NON-FINRA REGISTERED ENTITY. INNOVATION



PARTNERS LLC HAS DIVISIONS AND LINES OF BUSINESSES THAT ARE NOT REGULATED BY FINRA. THESE DIVISIONS AND LINES OF BUSINESSES OPERATE UNDER THEIR OWN LICENSES AND DIFFERENT REGULATORY REGIMES. THESE NON-FINRA DIVISIONS AND LINES OF BUSINESSES ARE BEING SEPARATED FROM THE FINRA-REGULATED BUSINESS TO ENSURE THAT THERE IS NO FUTURE REGULATORY OBSCURITY OR CONFUSION. INNOVATION PARTNERS LLC HAS NO PRIOR ADVERSE OCCURRENCES (AND MOST IMPORTANTLY HAS NEVER HAD ANY ISSUE ALLEGING HARM TO ANY CLIENT, NO AML ISSUES, NO FRAUD, EMBEZZLEMENT, SENIOR EXPLOITATION ISSUES, NO CUSTOMER COMPLAINTS, NO LITIGATIONS, ETC.) AND CONTINUES TO WORK IN GOOD STEAD FOR THE PROTECTION OF ITS CLIENTS. INNOVATION PARTNERS LLC HAS SOME OF THE BEST, BRIGHTEST, COMPETENT AND MOST DEDICATED STAFF, WHO HAVE BEEN RUNNING THE DAY-TO-DAY OPERATIONS OF INNOVATION PARTNERS LLC AND THESE INDIVIDUALS WILL CONTINUE TO GUIDE AND STEER THE FIRM THROUGH ITS CONTINUED STEADY GROWTH.

End of Report



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