



SECURITIES AND EXCHANGE COMMISSION

WASHINGTON, D.C. 20549

SEC Letter to Invemed Associates Inc., April 10, 1979
Rule 15c3-1(a)(6)(ii)/01

DIVISION OF
MARKET REGULATION

APR 10 1979

Mr. Kenneth G. Langone
President
Invemed Associates, Inc.
375 Park Avenue
New York, New York 10022

Dear Mr. Langone:

This is in response to your letter of February 23, 1979, on behalf of Invemed Associates, Inc. ("Invemed"), requesting permission to operate under the provision for Market Makers, Specialists and Certain Other Dealers, provided for in paragraph (a)(6) of Rule 15c3-1 (17 CFR 240.15c3-1 (a)(6)) of the Securities Exchange Act of 1934.

I understand the pertinent facts to be as follows: Invemed is a non-clearing broker who introduces customers to another broker on a fully disclosed basis and does not receive or deliver securities. Invemed is in the process of becoming a market maker in options on the American Stock Exchange and would like to operate under paragraph (a)(6) of Rule 15c3-1. Paragraph (a)(6)(ii) states "This paragraph (a)(6) shall be available to a dealer who does not effect transactions with other than brokers or dealers, who does not carry customer accounts, who does not effect transactions in options not listed on a registered national securities exchange or facility of a registered national securities association, and whose market maker or specialist transactions are effected through and carried in a market maker or specialist account cleared by another broker or dealer as provided in paragraph (a)(6)(iv) of this section."

The Division of Market Regulation will recommend no action to the Commission if Invemed elects to operate under paragraph (a)(6) of the rule in regards to its market maker activities, even though it continues to act as an introducing broker in other areas.

Sincerely,

Nelson S. Kibler
Assistant Director

cc: Maurice Minen