

Capital Acquisition Brokers Written Supervisory Procedures Checklist

Overview – The Capital Acquisition Broker (“CAB”) Written Supervisory Procedures Checklist (“WSP Checklist”) is an outline of selected key topics representative of the business activities typically engaged in by CAB members and permissible under FINRA’s CAB Rules. A complete copy of the CAB Rules can be found here: <https://www.finra.org/rules-guidance/rulebooks/capital-acquisition-broker-rules>

FINRA Compliance Tools Disclaimer -- This optional tool is provided to assist member firms in fulfilling their regulatory obligations. This tool is provided as a starting point and you must tailor this tool to reflect the size and needs of your firm. Using this tool does not guarantee compliance with or create any safe harbor with respect to FINRA rules, the federal securities laws or state laws, or other applicable federal or state regulatory requirements. This tool does not create any new legal or regulatory obligations for firms or other entities.

Updates – This tool was last reviewed, and updated as needed, on February 22, 2024. This tool does not reflect any regulatory changes since that date. FINRA periodically reviews and update these tools. FINRA reminds member firms to stay apprised of new or amended laws, rules and regulations, and update their WSPs and compliance programs on an ongoing basis.

Member firms seeking additional guidance on certain regulatory obligations should review the relevant FINRA Topic Pages.

Staff Contact(s) – FINRA’s Office of General Counsel (OGC) staff provides broker-dealers, attorneys, registered representatives, investors and other interested parties with interpretative guidance relating to FINRA’s rules. Please see Interpreting the Rules for more information.

OGC staff contacts:

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Section	Topic	Item(s) Required to be Addressed	Reference(s)	Applicable to Business?	Date Last Reviewed?
I. GENERAL ADMINISTRATION					
General Administration	Form Filings	Form BD amendments	CAB Rule 014 (“Application of the By-Laws and the Capital Acquisition Broker Rules”); FINRA By-Laws, Art. IV, Section 1 (“Application for Membership”).		
General Administration	Form Filings	Form U4/Form US	CAB Rule 014 (“Application of the By-Laws and the Capital Acquisition Broker Rules”); CAB Rule 453 (“Reporting Requirements”), which incorporates FINRA Rule 4530; FINRA By Laws, Art. V, Sections 2 (“Application for Registration”) and 3 (“Notification of Termination; Amendments to Notification”).		
General Administration	Form Filings	Fingerprint cards	CAB Rule 101 (“Electronic Filing Requirements for Universal Forms”), which incorporates FINRA Rule 1010(d); Securities Exchange Act of 1934 (“SEA”) Rule 17f-2 (“Fingerprinting of securities industry personnel”).		

General Administration	Form Filings	Designation of principal responsible for supervision of Form filings	CAB Rule 101 ("Electronic Filing Requirements for Universal Forms"), which incorporates FINRA Rule 1010(b).		
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Per CAB Rule 014, "All persons that have been approved for membership in FINRA as a capital acquisition broker and persons associated with capital acquisition brokers shall be subject to the FINRA By-Laws (including the schedules thereto), unless the context requires otherwise, and the Capital Acquisition Broker Rules. Persons associated with a capital acquisition broker shall have the same duties and obligations as a capital acquisition broker under the Capital Acquisition Broker Rules. "

.Id.

Section	Topic	Item(s) Required to be Addressed	Reference(s)	Applicable to Business?	Date Last Reviewed?
Firm Supervision and Oversight	Designation of Supervisors	Designation of executive representative	CAB Rule 014 ("Application of the By-Laws and the Capital Acquisition Broker Rules"); CAB Rule 454 ("Member Filing and Contact Information Requirements"), which incorporates FINRA Rule 4517; FINRA By-Laws, Art. IV, Section 3 ("Executive Representative").		
Firm Supervision and Oversight	Designation of Supervisors	Updates to FINRA contact system	CAB Rule 454 ("Member Filing and Contact Information Requirements"), which incorporates FINRA Rule 4517.		
General Administration	Regulatory Fees	FINRA fees and assessments	CAB Rule 014 ("Application of the By-Laws and the Capital Acquisition Broker Rules"); FINRA By-Laws, Schedule A.		

.Id.

.Id.

Section	Topic	Item(s) Required to be Addressed	Reference(s)	Applicable to Business?	Date Last Reviewed?
II. PERSONNEL					
A. Hiring Practices, Registration and Qualifications					
Personnel	Hiring Practices	Investigation of background and qualifications	CAB Rule 311(a) ("Capital Acquisition Broker Compliance and Supervision"), which incorporates FINRA Rule 3110(a)(6) and FINRA Rule 3110(e).		
Personnel	Hiring Practices	Screening for statutorily disqualified persons hired in clerical or ministerial positions	CAB Rule 014 ("Application of the By-Laws and the Capital Acquisition Broker Rules"); FINRA By-Laws, Art. III ("Qualifications of Members and Associated Person").		

Personnel	Qualification and Registration	Determine qualifications of supervisory personnel	CAB Rule 311(a) (“Capital Acquisition Broker Compliance and Supervision”), which incorporates FINRA Rule 3110(a)(6) and FINRA Rule 3110(e). <i>See also</i> Notice to Members 99-45.		
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.Id.
.Id.

Section	Topic	Item(s) Required to be Addressed	Reference(s)	Applicable to Business?	Date Last Reviewed?
Personnel	Qualification and Registration	All Associated Persons are properly registered	CAB Rule 014 (“Application of the By-Laws and the Capital Acquisition Broker Rules”); CAB Rule 121 (“Registration Requirements”), which incorporates FINRA Rule 1210; CAB Rule 122 (“Registration Categories”), which incorporates FINRA Rule 1220; CAB Rule 123 (“Associated Persons Exempt from Registration”), which incorporates FINRA Rule 1230; FINRA By-Laws, Art. III, Sec. 2.		
Recordkeeping	Associated Persons Records	Records for all Associated Persons	CAB Rule 451(a) (“Books and Records”), which incorporates FINRA Rule 4511; SEA Rule 17a-3(a)(12) (“Records to be Maintained by Certain Exchange Members, Brokers and Dealers”). <i>See also</i> Notice to Members 01-80.		

B. Continuing Education

Personnel	Continuing Education	CE contact person; Person responsible for Firm’s continuing education program	CAB Rule 124 (“Continuing Education Requirements”), which incorporates FINRA Rule 1240; CAB Rule 454 (“Member Filing and Contact Information Requirements”), which incorporates FINRA Rule 4517.		
Personnel	Continuing Education	Monitor compliance with the Regulatory Element of continuing education	CAB Rule 124 (“Continuing Education Requirements”), which incorporates FINRA Rule 1240.		

.Id.

Section	Topic	Item(s) Required to be Addressed	Reference(s)	Applicable to Business?	Date Last Reviewed?
Personnel	Continuing Education	Firm Element of continuing education	CAB Rule 124 (“Continuing Education Requirements”), which incorporates FINRA Rule 1240.		

III. Firm Supervision and Oversight
A. Supervisory System

Firm Supervision and Oversight	Designation of Supervisors	Designation of supervisors and supervisory duties	CAB Rule 311(a) (“Capital Acquisition Broker Compliance and Supervision”), which incorporates FINRA Rules 3110(a)(2) and (a)(3). <i>See also</i> Notice to Members 99-45.		
Firm Supervision and Oversight	General Supervisory Obligations	Assign each registered rep to a supervisor and create a record of all reps supervised by a supervisor	CAB Rule 311(a) (“Capital Acquisition Broker Compliance and Supervision”), which incorporates FINRA Rule 3110(a)(5).		

Firm Supervision and Oversight	Designation of Supervisors	Designation of branch supervisor	CAB Rule 311(a) ("Capital Acquisition Broker Compliance and Supervision"), which incorporates FINRA Rule 3110(a)(4).		
Firm Supervision and Oversight	General Supervisory Obligations	Distribution of procedures and amendments	CAB Rule 311(a) ("Capital Acquisition Broker Compliance and Supervision"), which incorporates FINRA Rule 3110(b)(7).		
B. General Supervisory Obligations					
Firm Supervision and Oversight	General Supervisory Obligations	Payments to unregistered persons	CAB Rule 204 ("Payments to Unregistered Persons"), which incorporates FINRA Rule 2040.		
Firm Supervision and Oversight	General Supervisory Obligations	Review of firm activities	CAB Rule 240 ("Engaging in Impermissible Activities"), which references CAB Rule 016(c).		
Firm Supervision and Oversight	Employee Supervision	Gifts and gratuities	CAB Rule 322 ("Influencing or Rewarding Employees of Others"), which incorporates FINRA Rule 3220.		
Firm Supervision and Oversight	Employee Supervision	Borrowing and lending between associated persons and customers	CAB Rule 324 ("Borrowing or Lending to Customers"), which incorporates FINRA Rule 3240; CAB Rule 311 ("Capital Acquisition Broker Compliance and Supervision").		
Firm Supervision and Oversight	Employee Supervision	Outside business activities	CAB Rule 327 ("Outside Business Activities of Registered Persons"), which incorporates FINRA Rule 3270.		
Firm Supervision and Oversight	Employee Supervision	Private securities transactions	CAB Rule 328 ("Private Securities Transactions of an Associated Person"), which prohibits associated persons of CABs from participating in any manner in private securities transactions as defined in FINRA Rule 3280(e).		
Firm Supervision and Oversight	General Supervisory Obligations	Supervision of outsourcing arrangements	CAB Rule 311 ("Capital Acquisition Broker Compliance and Supervision"). <i>See also</i> Notice to Members 05-48.		
Firm Supervision and Oversight	Employee Supervision	Heightened supervision (including registered persons from a disciplined firm)	CAB Rule 311 ("Capital Acquisition Broker Compliance and Supervision"). <i>See also</i> Notice to Members 97-19.		
Firm Supervision and Oversight	Employee Supervision	Supervision of statutorily disqualified individuals	CAB Rule 014 ("Application of the By-Laws and the Capital Acquisition Broker Rules"); CAB Rule 311 ("Capital Acquisition Broker Compliance and Supervision"); CAB Rule 453 ("Reporting Requirements"), which incorporates FINRA Rule 4530; FINRA By-Laws, Art. III, Sec. 3 and 4; Form MC-400.		
C. Review of Accounts and Correspondence					
Firm Supervision and Oversight	Correspondence Review	Correspondence: incoming, outgoing, including facsimiles and electronic messages (email, instant messages, etc.)	CAB Rule 311(a) ("Capital Acquisition Broker Compliance and Supervision"), which incorporates FINRA Rule 3110(b)(4).		

Firm Supervision and Oversight	General Supervisory Obligations	Transactions involving FINRA employees	CAB Rule 207 (“Transactions Involving FINRA Employees”), which incorporates FINRA Rule 2070.		
Firm Supervision and Oversight	Branch Supervision and Inspections	Designation of Offices of Supervisory Jurisdiction (OSJ)	CAB Rule 311(a) (“Capital Acquisition Broker Compliance and Supervision”), which incorporates FINRA Rule 3110(a)(3) and (f)(1).		
D. Insider Trading					
Firm Supervision and Oversight	Monitoring for Insider Trading	Periodically reviewing employee trading	CAB Rule 201 (“Standards of Commercial Honor and Principles of Trade”), which incorporates FINRA Rule 2010; CAB Rule 202 (“Use of Manipulative, Deceptive, or Other Fraudulent Devices”), which incorporates FINRA Rule 2020; SEA Rule 10b-5 (“Employment of Manipulative and Deceptive Devices”).		

Supra at Note 1. Per CAB Rule 014, “All persons that have been approved for membership in FINRA as a capital acquisition broker and persons associated with capital acquisition brokers shall be subject to the FINRA By-Laws (including the schedules thereto), unless the context requires otherwise, and the Capital Acquisition Broker Rules. Persons associated with a capital acquisition broker shall have the same duties and obligations as a capital acquisition broker under the Capital Acquisition Broker Rules.”

Firm Supervision and Oversight	Monitoring for Insider Trading	Criteria for investigating suspect trades	SEA Section 15(g) (“Prevention of Misuse of Material, Nonpublic Information”). <i>See also</i> Notice to Members 91-45.		
Firm Supervision and Oversight	Monitoring for Insider Trading	Require employees to sign attestation	SEA Section 15(g) (“Prevention of Misuse of Material, Nonpublic Information”). <i>See also</i> Notice to Members 91-45.		
Firm Supervision and Oversight	Monitoring for Insider Trading	Update employees on new or revised insider trading rules and regulations	SEA Section 15(g) (“Prevention of Misuse of Material, Nonpublic Information”).		
Firm Supervision and Oversight	Monitoring for Insider Trading	Definition of material, non- public information, insiders, and other relevant terms and prohibitions	CAB Rule 201 (“Standards of Commercial Honor and Principles of Trade”), which incorporates FINRA Rule 2010; CAB Rule 202 (“Use of Manipulative, Deceptive, or Other Fraudulent Devices”), which incorporates FINRA Rule 2020; SEA Rule 10b-5 (“Employment of Manipulative and Deceptive Devices”). <i>See also</i> Notice to Members 89-05.		
Firm Supervision and Oversight	Monitoring for Insider Trading	Policies and procedures on access to utilization of material, non-public information	CAB Rule 311(a) (“Capital Acquisition Broker Compliance and Supervision”); SEA Section 15(g) (“Prevention of Misuse of Material, Nonpublic Information”).		
Firm Supervision and Oversight	Monitoring for Insider Trading	Tools and methods for inhibiting or monitoring transactions in restricted securities	CAB Rule 311 (“Capital Acquisition Broker Compliance and Supervision”); SEA Rule 144 (“Selling Restricted and Control Securities”). <i>See also</i> Notice to Members 09-05.		

Firm Supervision and Oversight	Monitoring for Insider Trading	Information barrier procedures including: 1) method for determining whether firm trading should be restricted; 2) determining and identifying activities that are restricted while security is on list; 3) monitoring associated persons' trading of restricted securities; 4) time period covered and frequency of review; 5) recording details of associated persons' trade in restricted security; and 6) creation and maintenance of documentation to evidence supervisory reviews	CAB Rule 311 ("Capital Acquisition Broker Compliance and Supervision"); SEA Rule 144 ("Selling Restricted and Control Securities"). <i>See also</i> Regulatory Notice 09-05 and Notice to Members 91-45.		
Firm Supervision and Oversight	Monitoring for Insider Trading	Procedures to detect transactions in restricted/control securities, <i>e.g.</i> , compliance, gray, or watch lists, etc.	CAB Rule 311 ("Capital Acquisition Broker Compliance and Supervision"); SEA Rule 144 ("Selling Restricted and Control Securities"). <i>See also</i> Notice to Members 09-05 and Notice to Members 91-45.		
Firm Supervision and Oversight	Monitoring for Insider Trading	Securities transactions for personal and family-related accounts	CAB Rule 201 ("Standards of Commercial Honor and Principles of Trade"), which incorporates FINRA Rule 2010.		
E. Anti-Money Laundering Compliance Program					
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Designate AML contact person	CAB Rule 331(d) ("Anti-Money Laundering Compliance Program").		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Written Anti-Money Laundering compliance program approved in writing by senior management	CAB Rule 331 ("Anti-Money Laundering Compliance Program").		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Establish and implement policies and procedures to detect and cause the reporting of suspicious transactions	CAB Rule 331(a) ("Anti-Money Laundering Compliance Program").		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Bank Secrecy Act policies and procedures	CAB Rule 331(b) ("Anti-Money Laundering Compliance Program"); Bank Secrecy Act (31 U.S.C. §5311 <i>et seq.</i>).		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Independent testing of AML compliance program	CAB Rule 331(c) ("Anti-Money Laundering Compliance Program").		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	On-going training of firm personnel	CAB Rule 331(e) ("Anti-Money Laundering Compliance Program").		

Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Customer Identification Program and verification of customers' identity	CAB Rule 209 ("Know Your Customer"); CAB Rule 331(f) ("Anti-Money Laundering Compliance Program"); USA Patriot Act, Section 326; SEA Rule 17a-8 ("Financial Recordkeeping and Reporting of Currency and Foreign Transactions"). <i>See also</i> Notice to Members 03-34.		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Determine whether customer appears on any list of known terrorists or terrorist organizations, such as those listed on the Treasury's OFAC web site, as well as those on the list of embargoed countries/regions on the OFAC List	CAB Rule 331(f) ("Anti-Money Laundering Compliance Program"); USA Patriot Act, Section 314; Bank Secrecy Act (31 U.S.C. §5311 <i>et seq.</i>).		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Responding to information requests from FinCEN concerning money laundering or terrorist financing, including how the firm will protect the security and confidentiality of the information requests	CAB Rule 331 ("Anti-Money Laundering Compliance Program"); US Patriot Act, Section 314; Bank Secrecy Act (31 U.S.C. §5311 <i>et seq.</i>).		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Sharing information with other financial institutions, if applicable (including requirement to provide annual sharing agreement to FinCEN)	CAB Rule 331 ("Anti-Money Laundering Compliance Program"); USA Patriot Act, Section 314; Bank Secrecy Act (31 U.S.C. §5311 <i>et seq.</i>).		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Determine the identity of the nominal and beneficial account holders and the source of funds deposited into "private banking accounts," and to conduct enhanced scrutiny of accounts of a senior foreign political figure	CAB Rule 331 ("Anti-Money Laundering Compliance Program"); USA Patriot Act, Section 314; Bank Secrecy Act (31 U.S.C. §5311 <i>et seq.</i>).		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Prohibit transactions with persons who are suspected of terrorist activities pursuant to Executive Order #13224 that was issued through OFAC	CAB Rule 331 ("Anti-Money Laundering Compliance Program"); USA Patriot Act, Section 314; Bank Secrecy Act (31 U.S.C. §5311 <i>et seq.</i>). <i>See also</i> Notice to Members 01-67.		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	If the firm prohibits the receipt of currency, procedures and internal controls to detect its receipt	CAB Rule 331(b) ("Anti-Money Laundering Compliance Program").		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Filing reports of international transportation of currency or monetary instruments	CAB Rule 331 ("Anti-Money Laundering Compliance Program").		

Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Filing reports of foreign bank and financial accounts	CAB Rule 331(a) and(b) (“Anti-Money Laundering Compliance Program”); SEA Rule 17a-8 (“Financial Recordkeeping and Reporting of Currency and Foreign Transactions”); Bank Secrecy Act (31 U.S.C. §5311 <i>et seq.</i>).		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Procedures to detect and report suspicious transactions by filing Suspicious Activity Reports (SAR-SF)	CAB Rule 331 (“Anti-Money Laundering Compliance Program”); SEA Rule 17a-8 (“Financial Recordkeeping and Reporting of Currency and Foreign Transactions”); Bank Secrecy Act (31 U.S.C. §5311 <i>et seq.</i>). <i>See also</i> Notice to Members 02-47.		
Firm Supervision and Oversight	Anti-Money Laundering Policies and Procedures	Record keeping requirements (currently a 5-year requirement)	CAB Rule 331 (“Anti-Money Laundering Compliance Program”); SEA Rule 17a-8 (“Financial Recordkeeping and Reporting of Currency and Foreign Transactions”); Bank Secrecy Act (31 U.S.C. §5311 <i>et seq.</i>).		
IV. SALES PRACTICES					
A. Communications with the Public					
Sales Practices	Communications with the Public	Advertising and sales literature (including email and web sites)	CAB Rule 221 (“Communications with the Public”).		
Sales Practices	Communications with the Public	Speaking engagements; scripts; outlines; media participation; chat rooms	CAB Rule 221 (“Communications with the Public”).		
Sales Practices	Communications with the Public	Sales literature review	CAB Rule 221 (“Communications with the Public”); CAB Rule 311 (“Capital Acquisition Broker Compliance and Supervision”).		
B. Disclosures to Customers					
Sales Practices	Customer Information and Disclosures	Material event and customer complaint reporting	CAB Rule 453 (“Reporting Requirements”), which incorporates FINRA Rule 4530.		
Sales Practices	Customer Information and Disclosures	Regulation S-P requirement to provide initial, annual, and revised privacy policy notice; description of how and when distributed to customers; administrative, technical, and physical safeguard of information; testing of firewalls	Regulation S-P (“Privacy of Consumer Financial Information”).		
Sales Practices	Customer Information and Disclosures	Disclosures	SEA Rule 10b-9 (“Prohibited Representations in Connection with Certain Offerings”).		
Firm Supervision and Oversight	General Supervisory Obligations	Conduct and fair dealing; fraud	CAB Rule 202 (“Use of Manipulative, Deceptive or Other Fraudulent Devices”), which incorporates FINRA Rule 2020.		
C. Customer Information Controls					

Sales Practices	Customer Information Controls	Customer records	CAB Rule 211 ("Suitability"); CAB Rule 451 ("Books and Records"); SEA Rule 17a-3 ("Records to be maintained by exchange members, brokers and dealers").		
D. Suitability/Regulation Best Interest (Reg BI)					
Sales Practices	Suitability	Suitability of recommendations to persons other than retail customers as defined in Reg BI	CAB Rule 201 ("Standards of Commercial Honor and Principles of Trade"), which incorporates FINRA Rule 2010; CAB Rule 211 ("Suitability"); CAB Rule 451 ("Books and Records"), which incorporates FINRA Rule 4511.		
Sales Practices	Suitability and Reg BI	Review of subscription agreements	CAB Rule 211 ("Suitability"); SEA Rule 15l-1 (Reg BI).		
Sales Practices	Reg BI	Recommendations of securities transactions or investment strategies involving securities to retail customers as defined in Reg BI	SEA Rule 15l-1 (Reg BI).		
Sales Practices	Reasonable Investigations	Reasonable Investigations of prospective offerings	SEA Rule 10b-5 ("Employment of manipulative and deceptive devices"); SEA Rule 15l-1 (Reg BI). Refer to FINRA Notice 10-22 ("Obligation of Broker-Dealers to Conduct Reasonable Investigations in Regulation D Offerings").		
E. Transaction Review and Handling of Customer Complaints					
Sales Practices	Reviewing Transactions and Handling Customer Complaints	Customer complaints	CAB Rule 453 ("Reporting Requirements"), which incorporates FINRA Rule 4530; CAB Rule 451(c) ("Records of Written Customer Complaints"), which incorporates FINRA Rule 4513.		
V. FINANCIAL AND OPERATIONAL ISSUES					
A. Financial Reporting					
Firm Supervision and Oversight	FinOp Responsibilities	FinOp's duties and responsibilities (including FinOps registered with multiple firms)	CAB Rule 122 ("Registration Categories"), which incorporates FINRA Rule 1220. <i>See also</i> Regulatory Notice 06- 23.		
Financial and Operational	Filing of FOCUS and Related Forms	Financial reporting/backup - Net Capital computation, FOCUS filings	CAB Rule 014 ("Application of the By-Laws and the Capital Acquisition Broker Rules"); CAB Rule 451(a) ("Books and Records – General Requirements"), which incorporates FINRA Rule 4511; CAB Rule 452(b) ("Supplemental FOCUS Information"), which incorporates FINRA Rule 4524; CAB Rule 411 ("Capital Compliance"); FINRA By-Laws, Schedule A; SEA Rule 17a-5 ("Reports to be made by certain brokers and dealers"); SEA Rule 17a-11 ("Notification provisions for brokers and dealers").		
B. Financial and Operational Responsibilities					
Financial and Operational	Net Capital Requirements	Net Capital Rule	SEA Rule 15c3-1 ("Net capital requirements for brokers or dealers"); SEA Rule 17a-11 ("Notification provisions for brokers and dealers").		

-Supra at Note 1. All CABs and their associated persons shall be subject to the FINRA By-Laws (including the schedules thereto) unless the context requires otherwise.					
C. Capital and Credit Regulation					
Financial and Operational	Capital & Credit Regulation	Disclosure of firm balance sheets upon customer request	SEA Rule 17a-5 ("Reports to be made by certain brokers and dealers").		
VI. RECORDKEEPING					
Recordkeeping	Maintenance of Books and Records	Maintenance of books and records (main office; other offices; and update customer account information)	CAB Rule 451(a) ("Books and Records – General Requirements"), which incorporates FINRA Rule 4511.		
Recordkeeping	Electronic Communications	Instant messaging	CAB Rule 311 ("Capital Acquisition Broker Compliance and Supervision"), which incorporates FINRA Rule 3110(b)(1)(4) and .06 ("Supervision"); CAB Rule 451(a) ("Books and Records – General Requirements"), which incorporates FINRA Rule 4511. <i>See also</i> Regulatory Notice 11-39, Regulatory Notice 07-59 and Notice to Members 03-33.		
Recordkeeping	Electronic Communications	Conditions and notification requirements	SEA Rule 17a-4(f) ("Records to be preserved by certain exchange members, broker and dealers").		
VII. INTERNAL CONTROLS					
Internal Controls	Systems and Operations Controls	Information security measures (e.g., securing equipment, controls on system entitlements, limits on password sharing, administrative procedures to change passwords, audit trail for tracking changes in entitlements, etc.)	Regulation S-P, 17 CFR 248.30 ("Procedures to safeguard customer records and information; disposal of consumer report information").		
VIII. FIXED INCOME SECURITIES					
Municipal Securities	Municipal Securities	Solicitation of municipal securities business	CAB Rule 203 ("Engaging in Distribution and Solicitation Activities with Government Entities"), which incorporates FINRA Rule 2030. CAB Rule 458 ("Books and Records Requirements for Government Distribution and Solicitation Activities").		
IX. PRIVATE PLACEMENTS					
Private Placements	Advising on Offerings	Exemptions from registration	CAB Rule 512 ("Private Placements of Securities Issued by Members"), which incorporates FINRA Rule 5122; See also Securities Act Regulation A ("Conditional Small Issues Exemption"); Securities Act Regulation D ("Rules Governing the Limited Offer and Sale of Securities Without Registration Under the Securities Act of 1933").		

Private Placements	Advising on Securities Registration	Public offerings (securities registration)	Securities Act of 1933, Section 5 (“Prohibitions Relating to Interstate Commerce and the Mails”).		
Private Placements	Advising on Securities Registration	Misrepresentations as to registration	SEA Rule 15c1-3 (“Misrepresentation by brokers, dealers, and municipal securities dealers as to registration”).		
Private Placements	Advising on Offerings	Regulation M - Rules 101 - 105	Securities Act Regulation M (“Anti-Manipulation Rules Concerning Securities Offerings”).		