**MSRB/FINRA Compliance Update**

**Friday, October 4: 11:35 – 12:25**

Gail Marshall, Chief Compliance Officer, MSRB

Bonnie Bowes, Director, Fixed Income Regulation/Member Supervision, FINRA

Moderator: Leo Karwejna, Chief Compliance Officer, PFM

I. Introductions

 A. Speakers

 B. Topics

II. MSRB Update

 A. Series 54 Exam

 B. MSRB Rule G-40

 C. Supervisory Procedures – Paper vs Practice

 D. Books and Records

 E. Retrospective Rule Review

III. FINRA Update

 A. FINRA Notice: Broker-Dealers Registering as MAs

 B. General Exam Findings and Priorities

 C. Other FINRA Initiatives

IV. Discussion Topics

 A. Determining and Documenting MA vs non-MA Services

 B. Agreements and contracts with clients

 C. Who is Your Client – Municipal Entity or Obligor?

 D. Role Switching: G-17 and G-23

V. Resources

 A. NAMA

 1. Advertising for MAs/Rule G-40, <https://nama2.memberclicks.net/assets/G40resource.pdf>

 2. Annual Compliance Review Matrix

 <https://nama2.memberclicks.net/assets/annualcompliancereview.pdf>

 3. CEO Certification Model Certificate, <https://nama2.memberclicks.net/assets/CEOmodelcertificate.pdf>

 4. Snapshot: MA Compliance Reminders <https://nama2.memberclicks.net/assets/compliancechecklistJuly2018.pdf>

 5. CE Model Needs Assessment, <https://nama2.memberclicks.net/assets/CEneedsassessment.pdf>

 6. CE Model Training Plan, <https://nama2.memberclicks.net/assets/modeltrainingplan.pdf>

 7. Rule G-10/Customer Complaints, <https://nama2.memberclicks.net/assets/customercomplaintSeptember2017FINAL.pdf>

 8. Political Contributions/Rule G-37, <https://nama2.memberclicks.net/assets/NAMAG37DOCUMENTJULY2018.pdf>

 9. G-42 Overview, <https://nama2.memberclicks.net/assets/g42document.pdf>

 10. G-42 Checklist, <https://nama2.memberclicks.net/assets/g42checklist.pdf>

 B. MSRB

 1. Supervision <http://www.msrb.org/msrb1/pdfs/MSRB-Rule-G-44-Considerations.pdf>

 2. WSP Template and Checklist

 <http://msrb.org/Regulated-Entities/~/media/08C04C924B614C05AF63C04E672686C8.ashx>?

 3. MA Compliance Advisories

 2018 <http://msrb.org/Regulated-Entities/~/media/DC472EEF842849A4A6B6AE2769F483B2.ashx>?

 2017 <http://www.msrb.org/Regulated-Entities/~/media/062FFCC430B74677859F196035BEC172.ashx>?

 2016 <http://www.msrb.org/msrb1/pdfs/Municipal-Advisor-2016-Compliance-Advisory.pdf>

 4. Advertising

 [http://msrb.org/Regulated-Entities/~/media/3B91738075AD46B6BA7D4B2754EFE61B.ashx?](http://msrb.org/Regulated-Entities/~/media/3B91738075AD46B6BA7D4B2754EFE61B.ashx)

 5. G-8 Complaints Log

 [http://msrb.org/Regulated-Entities/~/media/5EDE12D05038461180DF9A1F3278F5BD.ashx?](http://msrb.org/Regulated-Entities/~/media/5EDE12D05038461180DF9A1F3278F5BD.ashx)

 <http://msrb.org/Regulated-Entities/~/media/46469FB6D8444F81B63519678133ABB3.ashx>?

 6. MSRB Rulemaking Process

 <http://www.msrb.org/msrb1/pdfs/Municipal-Advisor_Introduction-to-MSRB-Rules.pdf>

 C. FINRA

1. FINRA Notice 98-96: NASD Elaborates on Member Firms’ Supervision

 Responsibilities for Trade Reporting and Market-Making Activities <https://www.finra.org/rules-guidance/notices/98-96>

1. FINRA Notice 99-45: NASD Provides Guidance on Supervisory

 Responsibilities, <https://www.finra.org/rules-guidance/notices/99-45>

3. FINRA Notice 19-28: Guidance Regarding Member Firms’ Supervisory Obligations when Participating in Investment-Related Activities with Municipal Clients, <https://www.finra.org/rules-guidance/notices/19-28>