

Recordkeeping Requirements

Recordkeeping Requirements under SEC Rules 17a-3 and 17a-4

| Description of Record | Retention Requirement |
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| Blotters (or other original entry records) containing itemized daily records of securities purchases and sales, securities receipts and deliveries, cash receipts and disbursements, and other debits and credits. (Required by Rule 17a-3(a)(1)) | Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(a)) |
| Ledgers reflecting assets, liabilities, income, expense and capital accounts. (Required by Rule 17a-3(a)(2)) | Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(a)) |
| Ledgers itemizing for each customer and firm account all purchases, sales, receipts, deliveries of securities and commodities, and other debits and credits. (Required by Rule 17a-3(a)(3)) | Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(a)) |
| Ledgers reflecting securities in transfer, dividends and interest received, securities borrowed and loaned, money borrowed and loaned, securities failed to receive and deliver, long and short securities record differences, and repurchase and reverse repurchase agreements. (Required by Rule 17a-3(a)(4)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1)) |
| Ledgers reflecting by security all long and short positions. (Required by Rule 17a-3(a)(5)) | Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(a)) |
| Order tickets for brokerage orders. (Required by Rule 17a-3(a)(6)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1)) |
| Order tickets for dealer transactions. (Required by Rule 17-a-3(a)(7)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1)) |
| Copies of confirmations. (Required by Rule 17a-3(a)(8)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1)) |
| Records of beneficial ownership of cash and margin accounts. (Required by Rule 17a-3(a)(9)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1)) |
| Records of puts, calls, spreads, straddles and other options in which firm has a direct or indirect interest. (Required by Rule 17a-3(a)(10)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1)) |
| Trial balances, and computation of aggregate indebtedness and net capital. (Required by Rule 17a-3(a)(11)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(5)) |
| Records pertaining to each "associated person." (Required by Rule 17a-3(a)(12)) | Three (3) years, in an easily accessible place, after termination of employment and other connection with the firm. (Rule 17a-4(e)(1)) |
| Fingerprint records. (Required by Rules 17a-3(a)(13) and 17f-2(d)) | Three (3) years in an easily accessible place, after termination of employment or association with the firm. (Rule 17a-4(e)(2)) |
| Records pertaining to missing, lost, counterfeit or stolen securities. (Required by Rules 17a-3(a)(14) and 17f-1) | Three (3) years in an easily accessible place. (Rule 17a-4(e)(4)) |
| Fingerprint exemption notices. (Required by Rules 17a-3(a)(15) and 17f-2(e)) | Retention, in an easily accessible place, for the life of the enterprise. (Rule 17a-4(e)(3)) |
| Records regarding internal broker-dealer trading systems. (Required by Rule 17a-3(16)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1)) |

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| Account record information. (Required by Rule 17a-3(a)(17)) | Six (6) years, in an easily accessible place, after account closing or after date information replaced or updated. (Rule 17a-4(e)(5)) |
| Customer complaint records. (Required by Rule 17a-3(a)(18)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1)) Note: FINRA Rule 4513 addresses a member's obligation to preserve records of written customer complaints at each office of supervisory jurisdiction (OSJ). The rule clarifies that the obligation to keep customer complaint records in each OSJ applies only to complaints that relate to that office, including complaints that relate to activities supervised from that office, and provides that firms may maintain the required records at the OSJ or make them promptly available at such office upon FINRA's request. Lastly, to take into account FINRA's four-year routine examination cycle for certain member firms, FINRA Rule 4513 requires that firms preserve the customer complaint records for a period of at least four years. (Ref. Notice 11-19) |
| Associated person compensation records. (Required by Rule 17a-3(a)(19)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1)) |
| Records of approvals for public communications. (Required by Rule 17a-3(a)(20)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(1)) |
| Records identifying persons capable of explaining the firm's records. (Required by Rule 17a-3(a)(21)) | Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(a)) |
| Records identifying principals. (Required by Rule 17a-3(a)(22)) | Six (6) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(a)) |

Retention of Firm's Financial and Other Business Records

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| Checkbooks, bank statements, cancelled checks, cash reconciliations. | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(2)) |
| Bills receivable or payable, paid or unpaid. | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(3)) |
| Trial Balances, computations of aggregate indebtedness and net capital, financial statements, branch office reconciliations, internal audit working papers. | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(5)) |
| All agreements relating to the firm's business. | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(7)) |
| Certain records supporting the firm's annual financial statements. | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(8)) |
| Records made as part of an OTC derivatives dealer's internal risk management control system, and results of periodic reviews relating to such systems. (Required by Rule 15c3-4(d)) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(10)) |

Recordkeeping Requirements

Retention of Communications

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| Communications sent or received by the firm, including inter-office and e-mail communications. | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(4)) |
| "Approvals" of communications the firm sends. | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(4)) |
| Communications that must be kept under SRO rules on "communications with the public," including any advertising actually published or otherwise distributed to the public. | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(4)) |
| Sales scripts used in communicating with the public (even though the scripts themselves are typically not delivered to the public). | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(4)) |

Retention of Account Records

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| Account guarantees, powers of attorney, other documents granting discretionary authority, resolutions allowing agent to act for corporation. Note: Given technological advances relating to electronic signatures, including authentication and security, FINRA has amended Rule 4512(a)(3) to permit the use of electronic signatures for discretionary accounts. The rule change is consistent with the Electronic Signatures in Global and National Commerce Act (E-Sign Act), which facilitates the use of electronic signatures. The rule change is also consistent with the requirements of SEA Rule 17a-3(a)(17)(ii) relating to discretionary accounts, which does not prescribe the type of signature that must be obtained from an authorized individual. While FINRA Rule 4512(a)(3) would continue to require member firms to obtain the signature of the authorized individual, it would provide firms the option of obtaining either a manual or an electronic signature. For purposes of compliance with amended Rule 4512(a)(3), a valid electronic signature would be any electronic mark that clearly identifies the signatory and is otherwise in compliance with the E-Sign Act, the guidance issued by the SEC relating to the E-Sign Act, and the guidance provided by FINRA staff through interpretive letters (Ref. Regulatory Notice 19-13; April 16, 2019) | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(6)) |
| All agreements concerning any account. | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(7)) |
| Notices to customers concerning any internal broker-dealer system (for example, notices concerning hours of operation, access instructions and changes in procedures). | Three (3) years, with the first two (2) years in an easily accessible place. (Rule 17a-4(b)(11)) |
| Customer account cards and records concerning terms and conditions of account opening and maintenance. | Six (6) years after account closing. (Rule 17a-4(c)) |

Recordkeeping Requirements

Retention of Organizational Documents

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| All firm partnership articles, articles of incorporation or charter, minute books and stock certificate books. | Retention for the life of the firm and for the life of any successor firm. (Rule 17a-4(d)) |
| Similar organizational records for firms organized as other forms of entities, for example, limited liability corporations or limited liability partnerships. | Retention for the life of the firm and for the life of any successor firm. (Rule 17a-4(d)) |
| Forms BD (registering a broker-dealer under 17 C.F.R. § 249.501) and BDW (withdrawing a broker-dealer registration under 17 C.F.R. § 249-501a), and amendments to these forms. | Retention for the life of the firm and for the life of any successor firm. (Rule 17a-4(d)) |
| Registration documents and licenses with all securities regulators. | Retention for the life of the firm and for the life of any successor firm. (Rule 17a-4(d)) |

Retention of Reports

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| Reports requested or required from the firm by any securities regulator under any order or settlement with the regulator. | Three (3) years in an easily accessible place after the date of the report. (Rule 17a-4(e)(6)) |
| Examination reports by any securities regulator. | Three (3) years in an easily accessible place after the date of the report. (Rule 17a-4(e)(6)) |
| Reports of unusual activity in customer accounts (or the ability to regenerate these reports from a computer system). | Eighteen (18) months in an easily accessible place, after the date of the report. (Rule 17a-4(e)(8)) |

Retention of Compliance, Supervisory and Procedures Manuals

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| Compliance, Supervisory and procedures manuals. | Three (3) years in an easily accessible place after termination of use of the manual. (Rule 17a-4(e)(7)) |
| Updates, modifications and revisions to compliance, supervisory and procedures manuals. | Three (3) years in an easily accessible place after termination of use of the manual. (Rule 17a-4(e)(7)) |