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## **The Broker-Dealer Exemption Report**

**Making Sense of the Requirements of the SEC  
and the PCAOB**

**Sponsored by:**



**MICHAEL COGLIANESE CPA, P.C.**  
ALTERNATIVE INVESTMENT ACCOUNTANTS

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Introductions

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## Course Objectives

At the completion of this training workshop, you will:

- Understand the exemption provisions of *Securities Exchange Act Rule 15c3-3(k)*;
- Understand the requirements of SEA Rule 17a-5 (d);
- Understand the requirements of *PCAOB Attestation Standard No. 2 (“AT 2”)*;

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# Workshop Agenda

## Introductions

Michael Coglianese – Audit Partner

Michael Coglianese CPA, P.C.

Harley Aronoff – Managing Partner

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## Section 1 – The Exemption Report

- Why is there confusion surrounding the exemption report?
- SEA Rule 17a-5
- PCAOB Attestation Standard No. 2

## Section 2 – Understanding the Exemptions from 15c3-3

- SEA Rule 15c3-3(k)

## Section 3 – Regulators' Expectations

- Expectations of:
  - SEC
  - PCAOB
  - FINRA

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Section 1  
The Exemption Report

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Which rule requires that a broker-dealer issue an exemption report as part of their financial report?

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- A) Securities Exchange Act Rule 15c3-1
- B) Securities Exchange Act Rule 17a-5
- C) Attestation Standard No. 2
- D) Securities Exchange Act Rule 15c3-3

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~~D. Securities Exchange Act Rule 15c3-3~~

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~~A. Securities Exchange Act Rule 15c3-1~~

~~D. Securities Exchange Act Rule 15c3-3~~

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~~A. Securities Exchange Act Rule 15c3-1~~

~~C. Attestation Standard No. 2~~

~~D. Securities Exchange Act Rule 15c3-3~~

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~~A) Securities Exchange Act Rule 15c3-1~~

**B) Securities Exchange Act Rule 17a-5**

~~C) Attestation Standard No. 2~~

~~D) Securities Exchange Act Rule 15c3-3~~

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Securities Exchange Act Rule 17a-5(d)

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Securities Exchange Act Rule 17a-5(d)(2) –

If the broker or dealer did claim that it was exempt from §240.15c3-3 throughout the most recent fiscal year, an exemption report as described in paragraph (d)(4) of this section executed by the person who makes the oath or affirmation under paragraph (e)(2) of this section;

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## Securities Exchange Act Rule 17a-5 (d)(4) -

The exemption report must contain the following statements made to the best knowledge and belief of the broker or dealer:

- (i) A statement that identifies the provisions in § 240.15c3-3(k) under which the broker or dealer claimed an exemption from § 240.15c3-3;
- (ii) A statement that the broker or dealer met the identified exemption provisions in § 240.15c3-3(k) throughout the most recent fiscal year without exception or that it met the identified exemption provisions in § 240.15c3-3(k) throughout the most recent fiscal year except as described under paragraph (d)(4)(iii) of this section; and
- (iii) If applicable, a statement that identifies each exception during the most recent fiscal year in meeting the identified exemption provisions in § 240.15c3-3(k) and that briefly describes the nature of each exception and the approximate date(s) on which the exception existed.

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*PCAOB Attestation Standard No. 2 –*

*Review of the Exemption Report*

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Are Auditors of Broker-Dealers Required to Audit  
the Exemption Report?

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- A. Yes
- B. No
- C. It Depends

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~~A. Yes~~

**B. No**

~~C. It Depends~~

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## *Objective of AT 2*

¶ 3. When performing a review of the statements (hereinafter referred to as "assertions") made by a broker or dealer in an exemption report (a "review engagement"), the auditor's objective is to state whether, based upon the results of the review procedures, the auditor is aware of any material modifications that should be made to the broker's or dealer's assertions for the assertions to be fairly stated, in all material respects.

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## *Objective of AT 2*

¶ 4. The auditor must plan and perform the review engagement to obtain appropriate evidence that is sufficient to obtain **moderate assurance** about whether one or more conditions exist that would cause one or more of the broker's or dealer's assertions not to be fairly stated, in all material respects. Such conditions include:

- a) The broker's or dealer's assertion that identifies the provisions in paragraph (k) of SEC Rule 15c3-3 under which the broker or dealer claimed an exemption for SEC Rule 15c3-3 is inaccurate;
- b) The broker or dealer asserts that it met the identified exemption provisions in paragraph (k) of SEC Rule 15c3-3 without exception when the auditor is aware of exceptions in meeting the exemption provisions;  
or
- c) The broker's or dealer's assertion that identifies and describes each exception during the most recent fiscal year in meeting the identified exemption provisions in paragraph (k) of SEC Rule 15c3-3 is inaccurate or incomplete.

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## *Performing the Review Engagement*

### *Review Procedures*

- ¶ 10. The auditor should perform procedures to identify exceptions to the exemption provisions, including the following:
- a. Compare identified exceptions to the exemption provisions claimed and compare them to those disclosed in the broker-dealer's exemption report

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## *Performing the Review Engagement*

### *Review Procedures*

¶ 10. The auditor should perform procedures to identify exceptions to the exemption provisions, including the following:

- b. Inquire of management and others with relevant knowledge regarding:
  - 1) Whether the broker-dealer was in compliance with claimed exemption throughout the year;
  - 2) Regulatory examinations and correspondence between the SEC or designated examining authority relevant to compliance with claimed exemption; and
  - 3) Subsequent events that might have material effect on broker-dealer's assertions

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## *Performing the Review Engagement*

### *Review Procedures*

- ¶ 10. The auditor should perform procedures to identify exceptions to the exemption provisions, including the following:
- c. Inquire of individuals at the broker or dealer who have relevant knowledge of controls relevant to the broker's or dealer's compliance with the exemption provisions regarding:
    - 1) The controls that are in place to maintain compliance with the exemption provisions including the nature of the controls and their frequency of operation. Note: The auditor should take into account procedures performed during the audit of the financial statements and the audit procedures performed on supplemental information in obtaining an understanding of controls or other activities relevant to the broker's or dealer's compliance with the exemption provisions.

Note: The auditor should take into account procedures performed during the audit of the financial statements and the audit procedures performed on supplemental information in obtaining an understanding of controls or other activities relevant to the broker's or dealer's compliance with the exemption provisions.

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## *Performing the Review Engagement*

### *Review Procedures*

¶ 10. The auditor should perform procedures to identify exceptions to the exemption provisions, including the following:

- c. Inquire of individuals at the broker or dealer who have relevant knowledge of controls relevant to the broker's or dealer's compliance with the exemption provisions regarding:

Whether the individual is aware of:

- i. Any exceptions to the exemption provisions and, if so, the nature, frequency, timing, and cause (if known) of the exceptions to the exemption provisions, during the year under review.
- ii. Any deficiencies in controls over compliance with the exemption provisions and, if so, the nature, frequency, and cause (if known) of the control deficiencies during the year under review.

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## *Performing the Review Engagement*

### *Review Procedures*

¶ 10. The auditor should perform procedures to identify exceptions to the exemption provisions, including the following:

- d. Inquire of individual responsible for monitoring compliance with claimed exemption or the controls over compliance regarding:
  - 1. Nature and frequency of monitoring activities.
  - 2. Results of monitoring activities.
  - 3. Customer complaints relevant to compliance with claimed exemption.

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## *Performing the Review Engagement*

### *Review Procedures*

¶ 10. The auditor should perform procedures to identify exceptions to the exemption provisions, including the following:

- e. Read internal audit reports for info relevant to compliance with claimed exemption.
- f. Read regulatory filings for info relevant to compliance with claimed exemption.
- g. Evaluate whether evidence obtained and results of audit of financial statements or supplemental info corroborate or contradict broker-dealer's assertions regarding compliance with claimed exemption.

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## *Performing the Review Engagement*

### *Review Procedures*

- ¶ 10. The auditor should perform procedures to identify exceptions to the exemption provisions, including the following:
- h. Perform other procedures deemed necessary to obtain moderate assurance

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## *Performing the Review Engagement*

### *Modifications of the Report*

¶ 19. *If one or more of the broker's or dealer's assertions are not fairly stated, in all material respects, the auditor must modify the review report to describe the reasons assertions are not fairly stated, in all material respects.*

*If a broker's or dealer's assertion is not fairly stated, in all material respects, because of one or more omitted exceptions, the auditor's review report should disclose each omitted exception*

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Section 2 – Understanding The Exemptions from  
15c3-3

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Can a broker-dealer claim they are exempt pursuant to Footnote 74?

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- A) Yes
- B) No
- C) It Depends

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~~A) Yes~~

~~B) No~~

**C) It Depends**

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## Exemptions from Securities Exchange Act Rule 15c3-3

- (k)(1)
- (k)(2)(i)
- (k)(2)(ii)
- (k)(3)

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**(k)(1)**

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## Exemptions from Securities Exchange Act Rule 15c3-3(k)(1) –

The provisions of this rule shall not be applicable to a broker or dealer meeting all of the following conditions:

- i. The broker's or dealer's transactions as dealer (as principal for its own account) are limited to the purchase, sale and redemption of redeemable securities of registered investment companies or of interests or participations in an insurance company separate account, whether or not registered as an investment company; except that a broker or dealer transacting business as a sole proprietor may also effect occasional transactions in other securities for its own account with or through another registered broker or dealer;
- ii. The broker's or dealer's transactions as broker (agent) are limited to: (a) the sale and redemption of redeemable securities of registered investment companies or of interests or participations in an insurance company separate account, whether or not registered as an investment company; (b) the solicitation of share accounts for savings and loan associations insured by an instrumentality of the United States; and (c) the sale of securities for the account of a customer to obtain funds for immediate reinvestment in redeemable securities of registered investment companies; and
- iii. The broker or dealer **promptly transmits** all funds and delivers all securities received in connection with its activities as a broker or dealer, and does not otherwise hold funds or securities for, or owe money or securities to, customers.

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(k)(2)(ii)

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Exemptions from Securities Exchange Act Rule 15c3-3  
(k)(2)(ii) -

Who, as an introducing broker or dealer, clears all transactions with and for customers on a fully disclosed basis with a clearing broker or dealer, and who **promptly transmits** all customer funds and securities to the clearing broker or dealer which carries all of the accounts of such customers and maintains and preserves such books and records pertaining thereto pursuant to the requirements of §§ 240.17a-3 and 240.17a-4 of this chapter, as are customarily made and kept by a clearing broker or dealer.

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## Definition of “Promptly Transmit”

The term “promptly transmit” as used in SEA Rules 15c3-3 (k)(1) and (k)(2)(i) requires a broker-dealer to transmit customer funds and securities by noon of the next business day after receipt or by noon of the next business day following settlement date, whichever is later.

A broker-dealer operating pursuant to the (k)(2)(ii) exemptive provision must transmit customer funds and securities by noon of the next business day following receipt.

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What is the difference between?

Promptly Transmit  
&  
Promptly Forward

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*15c3-1 (a)(2)(iv) /01: Requirements for Introducing Broker-Dealers Who Introduce on a Fully Disclosed Basis*

Firms who introduce their accounts on a fully disclosed basis and wish to maintain their minimum Net Capital requirement pursuant to this paragraph (a)(2)(iv), must meet the following requirements:

1. The introducing firm must maintain a written clearing agreement (signed by the clearing broker-dealer) which states that for purposes of SIPA and SEA Rules 15c3-3, and 15c3-1, the customers are customers of the clearing firm and not the introducing firm;
2. The clearing firm must issue all account statements directly to customers;
3. Account statements must disclose the fact that all customer funds and/or securities are located at the clearing broker-dealer; and
4. Account statements must provide a contact person or department at the clearing firm who can address customer inquiries regarding their account(s).

If the introducing firm fails to meet any of the above requirements, it would be required to comply with the greater minimum net capital requirements of a broker-dealer that carries customer accounts.

The introducing firm should also maintain procedures to prevent their customers from transmitting funds (other than checks made out to appropriate third parties) to the firm (except by error). Procedures should address the actions the broker-dealer will take to advise its customers (in writing) should they send funds to the firm by error.

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*15c3-1 (a)(2)(iv) /02: Introducing Brokers – Receiving Funds*

Any introducing broker that receives customer funds (checks made payable to itself and or cash), except by error, will be subject to the minimum net capital requirements of a broker-dealer that carries customer accounts (See SEA Rule 15c3-1(a)(2)(i))

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(k)(2)(i)

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## Exemptions from Securities Exchange Act Rule 15c3-3

(k)(2)(i) -

Who carries no margin accounts, promptly transmits all customer funds and delivers all securities received in connection with its activities as a broker or dealer, does not otherwise hold funds or securities for, or owe money or securities to, customers and effectuates all financial transactions between the broker or dealer and its customers through one or more bank accounts, each to be designated as **“Special Account for the Exclusive Benefit of Customers of (name of the broker or dealer)”**

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## Special Account for the Exclusive Benefit of Customers

- Is the broker-dealer required to have a special account?
- What is it?
- Can a broker-dealer claim (k)(2)(i) exemption without maintaining a Special Account?

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**The (k)(3) exemption!**

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## Exemptions from Securities Exchange Act Rule 15c3-3 (k)(3) -

Upon written application by a broker or dealer, the Commission may exempt such broker or dealer from the provisions of this section, either unconditionally or on specified terms and conditions, if the Commission finds that the broker or dealer has established safeguards for the protection of funds and securities of customers comparable with those provided for by this rule and that it is not necessary in the public interest or for the protection of investors to subject the particular broker or dealer to the provisions of this section.

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Section 2: Questions & Answers

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Section 2: Quiz

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## Question #1

**A special account for the exclusive benefit of customers is:**

- A. Same as special reserve account for benefit of customers
- B. Always required for BDs claiming a (k)(2)(i) exemption
- C. Optional for all broker-dealers
- D. None of the above

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## Question #1

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## Question #2

**Which exemption should be claimed by an introducing broker-dealer that sells private placements?**

- A. (k)(2)(i)
- B. (k)(2)(ii)
- C. Can't claim an exemption
- D. None of the above

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## Question #2

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### Question #3

**A broker-dealer that began claiming an exemption from Rule 15c3-3 subsequent to Q1 of the current year should...**

- A. Issue exemption report covering last 3 quarters of the year
- B. Issue an exemption report for entire year
- C. Don't issue an exemption report
- D. None of the above

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### Question #3

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Question #4

**“Promptly Transmit” is Defined by Rule 15c3-1  
as:**

- A. Within 24 hours
- B. Immediately
- C. Within a reasonable time period
- D. None of the above.

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Question #4

**“Promptly Transmit” is Defined by Rule 15c3-1  
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Question #5

**Which exemption is often used as a “catch-all” in the broker-dealer industry?**

- A. (k)(1)
- B. (k)(2)(i)
- C. (k)(2)(ii)
- D. (k)(3)

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Question #5

**Which exemption is often used as a “catch-all” in the broker-dealer industry?**

- A. (k)(1)
- B. (k)(2)(i)
- C. (k)(2)(ii)
- ~~D. (k)(3)~~

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Question #5

**Which exemption is often used as a “catch-all” in the broker-dealer industry?**

- A. ~~(k)(1)~~
- B. (k)(2)(i)
- C. (k)(2)(ii)
- D. ~~(k)(3)~~

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Question #5

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- C. ~~(k)(2)(ii)~~
- D. ~~(k)(3)~~

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Question #5

**Which exemption is often used as a “catch-all” in the broker-dealer industry?**

A. ~~(k)(1)~~

**B. (k)(2)(i)**

C. ~~(k)(2)(iii)~~

D. ~~(k)(3)~~

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**Regulators' Expectations**

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Questions & Answers

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## Announcements

- Responses to questions that were not answered will be emailed
- Certificates will be emailed
- Check our website for upcoming workshops
- For more information on Michael Coglianese CPA, PC please visit:
  - [www.cogcpa.com](http://www.cogcpa.com)
  - (630) 351-8942
  - [info@cogcpa.com](mailto:info@cogcpa.com)
- Your feedback is important to us!



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