



2016 FINRA RENEWAL PROGRAM

Date: 11/02/15

In order for firms to maintain active registrations and/or notice filing status with jurisdictions and/or states, they must pay applicable renewal fees annually. The FINRA renewal program facilitates the registration renewal process for investment advisers, broker-dealers and their agents with participating regulators, and simplifies the process by providing for the payment of one amount to FINRA (which administers the IARD and Web CRD systems). Failure to pay renewal fees in time may result in deregistration of a firm and/or its representatives, and termination of applicable notice filings.

Key Dates and Events

FINRA has recently published guidance with respect to the 2016 Renewal Program. Summarized below are certain key dates and events.

- **November 16, 2015** – Preliminary Renewal Statements will be available online through Web CRD and IARD (“[Web CRD/IARD](#)”) for viewing and printing and will indicate the fees required to be paid in order to renew existing registrations and notice filings.
- **December 18, 2015** – Deadline for receipt of Preliminary Renewal Statement payments. Electronic payments (*i.e.*, wire transfers and ACH bank transfers) should be made sufficiently in advance (at least two business days for wire transfers and longer for ACH bank transfers) to ensure they are processed by the December 18, 2015 deadline. If you make payment by check, be sure to account for U.S. mail processing time. Firms submitting their payments after this date will be subject to a late fee.
- **December 28, 2015** – Last day to submit filings prior to year-end. Any electronic form filing submitted through Web CRD/IARD that you wish to be processed by year-end must be submitted by 6 p.m. Eastern Time.
- **December 29-31, 2015** – Web CRD/IARD system will be unavailable for submission of form filings.
- **January 4, 2016** – Final Renewal Statements will be available online and should be reviewed promptly. These statements will reflect the final status of firm, branch and agent registrations as of December 31, 2015; will reflect any updates resulting from changes between the date of the Preliminary Renewal Statement and year-end; and will reflect any overpayments or underpayments of fees. Any discrepancies noted in a Final Renewal Statement should be reported to FINRA, in writing, no later than January 15, 2016.

- **January 15, 2016** – Deadline for payment of any amounts shown as due on Final Renewal Statement payments and for reporting any renewal discrepancies. As noted above, if a payment is due on this date, be sure to allow sufficient time for processing.

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If you have questions concerning the above, or would like more detailed information, please do not hesitate to reach out to your regular contacts at Finn Dixon & Herling LLP.

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