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December 2024

FINRA RULE 5320

FINRA Rule 5320 generally provides that a broker-dealer handling a customer order in an equity security is prohibited from trading that security for its own account at a price that would satisfy the customer order, unless either that broker-dealer immediately executes the customer order up to the size of its own order at the same price or better, or that broker dealer utilizes one of the exceptions to the rule.

CGMI relies on the “No-Knowledge” exception available under FINRA Rule 5320. This means that Citi’s business lines or “trading units” (the term used in the Rule), such as cash equities - sales and trading maintain internal controls known as information barriers between business lines consistent with that exception. The information barriers are designed to prevent one trading unit from having knowledge of customer orders held by a different trading unit. With these barriers in place, one trading unit may hold an executable customer order while another trading unit executes an order for a Firm account that would satisfy the customer order.

If you have any questions related to FINRA Rule 5320, please contact your Citi representative.

This information is also available at the following link: [Regulatory Disclosures | Citi](#)