

Mark Vilardo

Div of
Corporate
Finance

Can do what I'm doing
consistent w/ it?

Gov. under
registered BD

- SEC regulations
- Finra regulations

4(a)3
or
4(a)4

must also be under
4(a)1

to you &
144

144 txns usn
via broker in
regulated medium

If not BD,

cannot comply w/

Rule 144 number of exchange

ATK or Exempt.

role in "effectuating a trade"

Securities in hands of

Doing
as non broker

comfy w/ neither & BD manner
gatekeeping
in manner
centralized exchanges
of 11 here
in
Form 144
needed Corp.
1% threshold Fin

Manner of
Sale must be
BD to
comply w/ 144

transfers
must be
under
safe harbor

all
transfers
must
be
under
safe
harbor

win scope
202 SS1 5777
notice to TQM

Receiving
Security
prior

144
just to
comfy
not

affiliated

IF
all
conditions

very common
from one
get accredited investor
to another
but you're acc. investor
in underwriter

in & accredited

Control
committee

Securities in hands

Purchaser are
unrestricted

TRM

2 types of trading
used by platforms
BDs
are exchanges & ATS

as non broker
/ non-dealer
will not
comply
Manner
unless

w/
of sale
through
exempt
provision
exchange or
trading platform
ATS

condition
in →

Rule
144
complied
w/

Securities