

November 1, 2022

## **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 in the Rule and maintains internal controls known as information barriers between its trading units 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 Equities Sales Trader.

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