



## February 2017 SEC No-Action Letter Related to Third-Party SLOAs

Pershing Advisor Solutions LLC makes the following representations related to the February 21, 2017, Securities and Exchange Commission (“SEC”) No-Action Letter regarding certain standing letters of authorization (SLOAs) or other similar asset transfer authorization arrangements. In these cases, Pershing Advisor Solutions’ process includes the following steps:

- The client provides an instruction to Pershing Advisor Solutions in writing that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed. **(Conditions 1 and 2)**
- Pershing Advisor Solutions performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization and provides a transfer of funds notice to the client promptly after each transfer. **(Condition 3)**
- The client has the ability to terminate or change the instruction to Pershing Advisor Solutions. **(Condition 4)**
- Unless the advisor requests otherwise, the advisor has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client’s instruction. **(Condition 5)**
- Please note that **Condition 6** must be met by the advisor, as it requires that firms maintain records showing that third party recipients are NOT related to their firm.
- Pershing Advisor Solutions sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction. **(Condition 7)**