

VITAL⁴SRO

The record that disqualifies a financial services hire is published by a regulator — not by a court.

A FINRA bar. An SEC administrative proceeding. An FDIC Section 19 disqualification. A revoked state insurance producer license. **None of these appear in a county criminal record search** — and every one of them can make a candidate ineligible for the role you are hiring them into.

VITAL4SRO delivers the underlying self-regulatory organization data that powers compliant pre-employment screening: enforcement, disciplinary and licensing records sourced primary and direct from the regulators themselves.

FCRA-compliant by design, and delivered by API, SaaS or batch with a structured audit trail. Updates are continuous — in real time where a source publishes in real time, and otherwise on each source's own schedule.

Five regulatory regimes, one data set. Parallel “fit and proper” obligations apply at hiring — and ongoing removal authority applies afterward — across **banking** (FDIC Section 19, NCUA §205(d), and 12 U.S.C. §1818(e) removal authority held by the OCC, Federal Reserve and FDIC), **broker-dealers** (FINRA Rule 3110(e), Form U4/U5, statutory disqualification), **investment advisers** (Advisers Act §203(e)/(f), with parallel state authority), **futures and derivatives** (NFA/CFTC fitness review for associated persons), and **insurance** (state DOI licensing under NAIC model guidance).

THE OBLIGATION

Under FINRA, individuals subject to statutory disqualification may not associate with a member firm. Firms are further required to investigate the good character and business reputation of each applicant before registration.

Securities Exchange Act of 1934 §3(a)(39)
FINRA Rule 3110(e)

SOURCE COVERAGE

100+

primary, direct government and self-regulatory sources

65

distinct regulatory agencies

53

state & territory jurisdictions — all 50 states, DC, Puerto Rico and the U.S. Virgin Islands

SEC 29 sources — enforcement, trading, registration · **FINRA** 21 — sanctions, licensing, disciplinary · **FTC** 15 — penalty offenses, orders, reports · **CFTC** 10 — administrative sanctions, enforcement actions · **NFA** — futures & derivatives registrant actions · **HUD** — Limited Denials of Participation · **Exchanges & market SROs** — Nasdaq, CBOE, ICE, Box Exchange, MIAX · **every state securities regulator**

Features and Benefits of VITAL4SRO



FCRA-Compliant by Design

Built for pre-employment use from the ground up — not a compliance data set repurposed for hiring.



Primary & Direct

Sourced from the regulators and self-regulatory organizations themselves — no aggregator between you and the record.



Every U.S. Jurisdiction

All 50 states, DC, Puerto Rico and the U.S. Virgin Islands — including every state securities regulator.



Continuously Updated

Real time where the source publishes in real time, and otherwise on each source's own schedule.



Five Frameworks Served

Banking, broker-dealer, investment adviser, futures and derivatives, and insurance — one data set.



Examination-Ready

Every result structured, timestamped and documented, with a full audit trail for regulatory inspection.



Complements Criminal Search

Criminal history remains a separate, fingerprint-based component — SRO covers what a court record search cannot.



API, SaaS or Batch

Delivered into your existing screening workflow, with a structured audit trail on every transaction.

The cost of getting it wrong. Penalties for **knowing violations** of FDIC Section 19 reach up to **\$1 million per day** (12 U.S.C. § 1829) — and under 12 U.S.C. § 1818(e), federal banking regulators may remove or permanently bar any institution-affiliated party for misconduct discovered long after the hire.