

MSRB Rule G-37: Rule Overview and Making Submissions



**National Association of Municipal Advisors
April 29, 2019**

Speakers

- Dave Sanchez, Senior Counsel, Norton Rose Fulbright
- Gail Marshall, Chief Compliance Officer, MSRB
- Tasha Mosley, Product Solutions and Operations, MSRB

Objectives

- Provide an overview and discussion of MSRB Rule G-37, related to the identification and disclosure of political contributions
- Provide considerations for firm Compliance and Supervisory policies and procedures Related to Rule G-37
- Provide an Overview of the G-37 Submission Process

MSRB RULE G-37: General Overview

- The purpose and intent of this rule are to ensure that the high standards and integrity of the municipal securities market are maintained, to prevent fraudulent and manipulative acts and practices, to promote just and equitable principles of trade, to perfect a free and open market and to protect investors, municipal entities, obligated persons and the public interest by:
 - (i) prohibiting brokers, dealers and municipal securities dealers (collectively, “dealers”) from engaging in municipal securities business and municipal advisors from engaging in municipal advisory business with municipal entities if certain political contributions have been made to officials of such municipal entities; and
 - (ii) requiring dealers and municipal advisors to disclose certain political contributions, as well as other information, to allow public scrutiny of such political contributions, the municipal securities business of dealers and the municipal advisory business of municipal advisors.

MSRB RULE G-37: General Overview

- Rule Applies To:
 - Municipal Advisors (Independent and Broker/Dealer)
 - Municipal Advisor Professionals
 - Municipal Advisor or Broker-Dealer Third-Party Solicitor
 - PAC Controlled by Municipal Advisor or Broker-Dealer
 - Broker-Dealers
 - Among Others
- For Contributions Which Are Defined As:
 - Any gift, subscription, loan, advance or deposit of money or anything of value made to an official of a municipal entity:
 - for the purpose of influencing any election for federal*, state or local office;
 - for the payment of debt incurred in connection with any such election; or
 - for transition or inaugural expenses incurred by the successful candidate for state or local office.

MSRB RULE G-37: General Overview

- Contributions Given to “An Official of a Municipal Entity”:
 - A municipal entity official with dealer selection influence;
 - A municipal entity official with municipal advisor selection influence; and
 - A municipal entity official with investment adviser selection influence
- “Official of a municipal entity with municipal advisor selection influence” or “official of such municipal entity with municipal advisor selection influence” means any person (including any election committee for such person) who was, at the time of the contribution, an incumbent, candidate or successful candidate: (1) for elective office of the municipal entity which office is directly or indirectly responsible for, or can influence the outcome of, the hiring by the municipal entity of a municipal advisor for municipal advisory business; or (2) for any elective office of a state or of any political subdivision, which office has authority to appoint any person who is directly or indirectly responsible for, or can influence the outcome of, the hiring by a municipal entity of a municipal advisor for municipal advisory business.

MSRB RULE G-37: General Overview

- To File:
 - Quarterly
 - January 31
 - April 30
 - July 31
 - October 31
 - With the Following Information
 - Contributions
 - Payments to state and local political parties
 - Contributions to bond ballot campaigns
 - Information regarding municipal securities business and municipal advisory business with municipal entities
- Filing Form G-37 quarterly is required if the regulated entity has any information to report on the form, even if there are no reportable political contributions made during the relevant quarter

MSRB RULE G-37: Allowable/Non-Allowable Contributions

Action	Contribution* Allowed Without Triggering Ban on Business	Limit Without Triggering Ban on Business	Disclosure Requirement
Contribution by MA or MA-controlled PAC to Candidate (Issuer Official with MA Selection Influence)			
Jurisdiction Where MA Can Vote Including Client or Potential Client	YES	\$250/election*	No, if under \$250
Jurisdiction Where MA Can NOT Vote Including Client or Potential Client	NO	NONE ALLOWED	YES regardless of amount
Jurisdiction Where MA Can NOT Vote and Is NOT Client or Potential Client	NO, But Ban is Irrelevant if Not/Never Will be A Client	NONE ALLOWED, But Ban on Business is Irrelevant	YES, regardless of amount

MSRB RULE G-37: Allowable/Non-Allowable Contributions

Contribution by MA or MA-controlled PAC to State or Local Political Party (Need to determine ultimate beneficiary -- if not benefitting particular issuer officials then only the disclosure rules apply)			
Benefitting Candidate in Jurisdiction Where MA Can Vote Including Client or Potential Client	YES	\$250/year	No, if under \$250
Benefitting Candidate in Jurisdiction Where MA Can NOT Vote Including Client or Potential Client	NO	NONE ALLOWED	YES regardless of amount
Benefitting Candidate in Jurisdiction Where MA Can NOT Vote But No Client or Potential Client	NO, But Ban is Irrelevant if Not/Never Will be A Client	NONE ALLOWED, But Ban on Business is Irrelevant	YES regardless of amount
Not Benefitting Candidate	YES	No Limit	No, if under \$250 in jurisdiction where MA can vote

MSRB RULE G-37: Allowable/Non-Allowable Contributions

Action	Contribution* Allowed Without Triggering Ban on Business	Limit Without Triggering Ban on Business	Disclosure Requirement
Contribution by MA or MA-controlled PAC to National Political Party (Need to determine ultimate beneficiary -- if not benefitting particular issuer officials then only the disclosure rules apply)			
Benefitting Candidate in Jurisdiction Where MA Can Vote Including Client or Potential Client	YES	\$250/year	No, if under \$250
Benefitting Candidate in Jurisdiction Where MA Can NOT Vote Including Client or Potential Client	NO	NONE ALLOWED	YES regardless of amount
Benefitting Candidate in Jurisdiction Where MA Can NOT Vote But No Client or Potential Client	NO, But Ban is Irrelevant if Not/Never Will be A Client	NONE ALLOWED, But Ban on Business is Irrelevant	YES regardless of amount
Not Benefitting Candidate	YES	No Limit	NO

MSRB RULE G-37: Allowable/Non-Allowable Contributions

Action	Contribution* Allowed Without Triggering Ban on Business	Limit Without Triggering Ban on Business	Disclosure Requirement
Contribution to Charitable Organization (Even With Ties to Client/Potential Client)	YES, however must be legitimate charity and not a pass through to candidate	NO LIMIT	NO

MSRB RULE G-37: Allowable/Non-Allowable Contributions

Action	Contribution* Allowed Without Triggering Ban on Business	Limit Without Triggering Ban on Business	Disclosure Requirement
Contribution by MA to PACs not controlled by MA (need to determine ultimate beneficiary)			
Benefitting Candidate in Jurisdiction Where MA Can Vote Including Client-Potential Client	YES	\$250/election	No, if under \$250
Benefitting Candidate in Jurisdiction Where MA Can NOT Vote Including Client-Potential Client	NO	NONE ALLOWED	YES regardless of amount
Benefitting Candidate in Jurisdiction Where MA Can NOT Vote But No Client or Potential Client	NO, But Ban is Irrelevant if Not/Never Will be A Client	NONE ALLOWED, But Ban on Business is Irrelevant	YES regardless of amount
Not Benefitting Candidate	YES	No limit	NO

MSRB RULE G-37: Allowable/Non-Allowable Contributions

Action	Contribution* Allowed Without Triggering Ban on Business	Limit Without Triggering Ban on Business	Disclosure Requirement
Contribution by MA or MA controlled PAC to Bond Ballot Initiatives			
In State/Local Jurisdiction Where MA Can Vote	YES	NO LIMIT	NO, if under \$250
In State/Local Jurisdiction Where MA Can NOT Vote	YES	NO LIMIT	YES, regardless of amount

MSRB RULE G-37: Allowable/Non-Allowable Contributions

Action	Contribution* Allowed Without Triggering Ban on Business	Limit Without Triggering Ban on Business	Disclosure Requirement
Contribution by MA or MA controlled PAC to Elected Official's Inaugural Expenses**			
Jurisdiction Where MA Can Vote Including Client or Potential Client	YES	\$250/election*	No, if under \$250
Jurisdiction Where MA Can NOT Vote Including Client or Potential Client	NO	NONE ALLOWED	YES regardless of amount
Jurisdiction Where MA Can NOT Vote and Is NOT Client or Potential Client	NO, But Ban May Be Irrelevant if Not/Never Will be A Client	NONE ALLOWED, But Ban on Business is Irrelevant	YES, regardless of amount

MSRB RULE G-37: Allowable/Non-Allowable Contributions

Action	Contribution* Allowed Without Triggering Ban on Business	Limit Without Triggering Ban on Business	Disclosure Requirement
Candidates for Federal Office (unless candidate is currently serving in state/local capacity as a client)	YES	NO LIMIT	NO
Volunteer Activities During Non-Work Hours Without Incurring Expenses and Does Not Include Fundraising	YES	NA	NO
Soliciting or Coordinating Contributions for PAC, Political Party or Candidate (including as part of volunteer work)			
Benefitting Candidate Who is Client/Potential Client of MA	NO	NONE ALLOWED	YES, regardless of amount

MSRB RULE G-37: Supervisory Considerations

- Process for Gathering Information from Current and Potential Employees
- Ongoing Training
- Verification of Information
 - Third Party Sources - [Opensecrets.org](https://www.opensecrets.org) (not explicitly required by rule)

MSRB RULE G-37: Compliance Considerations

- Recordkeeping
 - Internal
 - G-37 Submissions
- Client Lists
- Examiners Can Easily Review the Filings (or non Filings)



Municipal Securities Rulemaking Board

MSRB Rule G-37: Submitting Electronic Form G-37

Hosted by the National Association of Municipal Advisors | April 29, 2019

Disclaimer

This document does not describe all applicable provisions of MSRB rules and interpretations, nor does it include all exceptions from general MSRB requirements. The MSRB may amend any such rules or interpretations, or may adopt additional rules or interpretations, from time to time. The complete text of specific rules and interpretations, and related definitions, is available at <http://msrb.org/Rules-and-Interpretations/MSRB-Rules.aspx>.

April 29, 2019

Presenters

Tangie Davis

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Solutions and Operations

Gail Marshall

Chief Compliance Officer

Tasha Mosley

Business Analyst

MSRB Rule G-37: Reporting Requirements

- Quarterly disclosures filed with MSRB on Form G-37 are made available for public dissemination on the EMMA website
- Filing Form G-37 quarterly is required if the regulated entity has any information to report on the form, even if there are no reportable political contributions made during the relevant quarter

MSRB Rule G-37: Reporting Requirements *(continued)*

- A regulated entity is not required to file a Form G-37 with the MSRB for any calendar quarter in which either:
 - It has no information that is required to be reported; or
 - It has not engaged in municipal securities or advisory business during seven consecutive calendar quarters preceding; and
 - It has submitted a completed Form G-37x to the MSRB

How Do I Submit Form G-37

- There are two ways to submit Form G-37:
 1. Login to MSRB Gateway:
 - <http://www.msrb.org>
 2. Login to EMMA Dataport:
 - <http://emma.msrb.org>

Enter User ID and Password – Click Login to Access MSRB Gateway

ABOUT MSRB | EMMA® | MUNIEDPRO® | **LOGIN** | REGISTER

MSRB
Municipal Securities Rulemaking Board

Rules and Guidance | Compliance Center | Transparency | Education Center | Policy and Analysis | News and Events

MSRB Town Hall
Join us in Chicago on Monday, October 10, 2017, at 10:00 AM EDT for a virtual town hall on municipal market structure and support initiative and more.

MSRB Home | Contact and Support

Log into MSRB Gateway



User ID

Password

[Forgot password?](#)

Login

Don't have an account? [Register](#)

[MSRB Gateway Manual](#)

Welcome to MSRB Gateway, the secure access point for all MSRB applications including EMMA. Click [here](#) for guidance on user account management and information about the MSRB Gateway.

To return to MSRB.org from within the MSRB Gateway application, click on the MSRB Home link at the top right corner of the page.

If you are experiencing login or other system related problems, please check the [Systems Status Page](#) for more information. If you need additional help, please contact the MSRB via email at GatewaySupport@msrb.org or by phone at 202-838-1330

 [Access Online Training about Submitting to EMMA](#)

The MSRB recommends not bookmarking this page.

Log into MSRB Gateway

From Main Menu, Click EMMA Dataport

The screenshot shows the EMMA Dataport website. At the top left is the EMMA 10 YEARS logo with the tagline "Providing Market Transparency Since 2008". At the top right are links for "EMMA Dataport" and "Contact Us". A dark blue navigation bar contains the following menu items: "Advanced Search", "Browse Issuers", "Tools and Resources", "Market Activity" (with a dropdown arrow), and "EMMA Help". Below the navigation bar, the "EMMA Dataport" section is visible. On the left is a sidebar menu with options: "Overview", "Submissions by Dealers", "Submissions by Municipal Advisors", "Submissions by Issuers", "Submissions by Obligated Persons", "MSRB Subscription Services", and "MSRB System Status". The main content area features a "Document Submission" section with a green header and text explaining that municipal securities dealers and their agents provide documents to the MSRB through EMMA Dataport. A red box highlights the "Login to MSRB Gateway" button in a callout box on the right side of the page.

The screenshot shows the MSRB Gateway Main Menu. It starts with a welcome message: "Welcome to MSRB Gateway! Your User Account has the following access rights:". Below this is the "Market Transparency Systems" section, which includes a description and a list of systems: Dealer System Outage Reporting, SHORT System Web User Interface – Data Submissions, SHORT System Web User Interface – Data Submissions Test Environment, RTRS Web Interface - Test System, Rule G-37 Submission, and EMMA Dataport. A red arrow points to the "EMMA Dataport" item. Below this is the "Dealer Feedback System" section, which includes the "Transaction Data Request Form".

Alternatively Access EMMA at MSR.B.org

Click on EMMA Dataport

The screenshot shows the MSR.B.org website interface. At the top, the MSR.B logo and 'Municipal Securities Rulemaking Board' are visible. Navigation links include 'ABOUT MSR.B', 'EMMA®' (highlighted with a red box), 'MUNIEDPRO®', 'LOGIN', and 'REGISTER'. A search bar is present below the navigation. A horizontal menu contains 'Rules and Guidance', 'Compliance Center', 'Transparency', 'Education Center', 'Policy and Analysis', and 'News and Events'. On the left, there is a 'MSRB Town Hall' announcement and a 'MuniEdPro' section for market education, including an 'Investor Brochure' PDF link. The main content area features the EMMA 10 YEARS logo and 'Providing Market Transparency Since 2008'. A search bar prompts users to 'Search by CUSIP, Description, State, etc.'. Below this is a dark blue navigation bar with 'Advanced Search', 'Browse Issues', 'Tools and Resources', 'Market Activity', 'EMMA Help', and 'A- 100% A+'. The main heading reads 'The official source for municipal securities data and documents', provided by the MSR.B. A map of the United States is displayed with the instruction 'Click on a state to start your search'. A vertical list of state abbreviations (NH, VT, MA, RI, CT, NJ, DE, MD, DC) is on the right. Three call-to-action buttons are on the right: 'Learn' (New to EMMA? Find out more.), 'Evaluate' (Access New Issue Calendar and other market tools.), and 'Monitor' (Sign up for MyEMMA). The 'EMMA Dataport' link in the top navigation is highlighted with a red box.

From EMMA Dataport Submission Portal Click the Political Contributions Tab

EMMA Dataport | MSRB Gateway | Contact | Logout

EMMA[®]
Electronic Municipal Market Access
A service of the MSRB

for assistance call: 202-838-1330

EMMA Dataport Submission Portal

MSRB
GATEWAY

You are currently acting on behalf of: MSRB4

Primary Market (Rule G-32) **Political Contributions (Rule G-37)**

Electronic Form G-37 Submission **CREATE** UPDATE

Electronic Form G-37x Submission CREATE

Form G-37 must be submitted for a calendar quarter if the regulated entity has ANY information to report on Form G-37 UNLESS the regulated entity has an effective Form G-37x on file with the MSRB. For example, even if a regulated entity did not make any reportable contributions, payments to political parties or contributions to bond ballot campaigns during the relevant calendar quarter, a Form G-37 submission still must be submitted if the regulated entity engaged in any municipal securities business or municipal advisory business, as applicable, with a municipal entity during the relevant calendar quarter.

A regulated entity may file a Form G-37x if the regulated entity has not engaged in municipal securities business or municipal advisory business, as applicable, during the seven consecutive calendar quarters immediately preceding the relevant calendar quarter. Once filed, the regulated entity is not required to make subsequent quarterly Form G-37 submissions unless it engages in municipal securities business or municipal advisory business, as applicable, after filing the Form G-37x.

Saved/Unpublished Forms Most Recent Submissions

There are no saved submissions to view.

- The page contains tabs for “Saved/Unpublished Forms” and “Most Recent Submissions”
- Click the “**Create**” button to start a submission

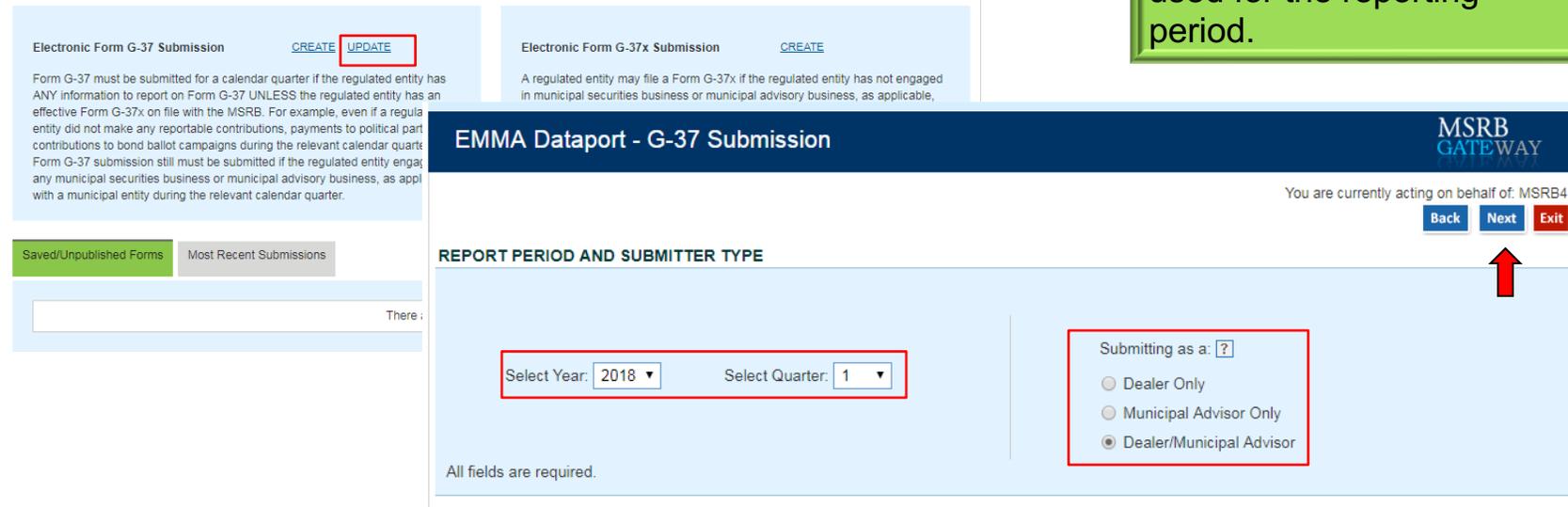
EMMA Dataport G-37 Submission - Political Contributions

- Click **“Update”** to amend a previous submission.
- Select the year and quarter for which Form G-37 is being submitted.
- Select the role and click **“Next.”**



Note: You may only select a report period prior to the current reporting quarter.

Calendar quarter must be used for the reporting period.



G-37 Submission - Political Contributions

New Data Import Function

EMMA Dataport - G-37 Submission MSRB GATEWAY

Submission Status: Saved You are currently acting on behalf of: MSRB4

[Back](#) [Preview](#) [Exit](#)

REPORT PERIOD AND SUBMITTER TYPE - FIRST QUARTER, 2018, DEALER/MUNICIPAL ADVISOR
For a complete Form G-37 submission, all four sections below must be completed. Users have the option to save a Form G-37 and have another user with Form G-37 access rights to retrieve the saved Form G-37 and submit it. Final submissions must be made by an officer for the regulated entity. Refer to [MSRB Rule G-37](#) for required information and the [Submission Manual](#). Please refer to the definitions provided below by hovering over the [?](#) symbols as well MSRB Rule G-37 for additional information.

I. CONTRIBUTIONS made to officials of a municipal entity [?](#)
Select one of the options below
[Add New Information](#) Pre-populate from previous quarter. Check here if none.

II. PAYMENTS made to political parties of states or political subdivisions [?](#)
Select one of the options below
[Add New Information](#) Pre-populate from previous quarter. Check here if none.

III. CONTRIBUTIONS made to bond ballot campaigns [?](#)
A. Contributions
Select one of the options below
[Add New Information](#) Pre-populate from previous quarter. Check here if none.
B. Reimbursement for Contributions
Select one of the options below
[Add New Information](#) Pre-populate from previous quarter. Check here if none.

IV. MUNICIPAL ENTITIES with which the regulated entity has engaged in municipal securities business or municipal advisory business
A. Municipal Securities Business [?](#)
Select one of the options below
[Add New Information](#) Pre-populate from previous quarter. [Import Excel or CSV Data File Information](#) Check here if none. [?](#)
B. Municipal Advisory Business [?](#)
Select one of the options below
[Add New Information](#) Pre-populate from previous quarter. [Import Excel or CSV Data File Information](#) Check here if none. [?](#)
C. Ballot-Approved Offerings

- Prepopulate from previous quarter.
- Add new information into an electronic Form G-37.
- Users now also have the ability to import data into Section IV, “Municipal Securities Business or Municipal Advisory Business”.
- If there are no contributions required to be reported, check **“Click here if none”** in the relevant section(s).

G-37 Submission - Political Contributions Made to Municipal Entity Officials

- For reportable contributions to municipal entity officials during the calendar quarter, click **“Add New Information”**.
- After reporting all information, click **“Continue”** and a summary of the contribution information will appear on the screen.

EMMA Dataport - G-37 Submission MSRB GATEWAY

Submission Status: Saved You are currently acting on behalf of: [Back](#) [Preview](#) [Exit](#)

I. CONTRIBUTIONS made to officials of a municipal entity

Please provide the following details. All fields are required.

Name of Municipal Entity Official:	<input type="text" value="example: John Doe"/>
Title of Municipal Entity Official:	<input type="text" value="example: Governor of XYZ"/>
State:	<input type="text" value=""/>
City:	<input type="text" value="example: City of XYZ"/> <input type="checkbox"/> N/A
County:	<input type="text" value="example: County of XYZ"/> <input type="checkbox"/> N/A
Other Political Subdivision:	<input type="text" value="example: XYZ Housing Auth"/> <input type="checkbox"/> N/A

Contribution Amount: (\$)

Select Contributor Category (Please select all that apply) [?](#)

- Dealer
- Municipal finance professional
- PAC controlled by the dealer
- PAC controlled by a municipal finance professional
- Non-MFP executive officer
- Municipal advisor
- Municipal advisor professional
- PAC controlled by a municipal advisor
- PAC controlled by a municipal advisor professional
- Non-MAP executive officer

For use in connection with automatic exemption from ban on municipal securities business or municipal advisory business only.
If this contribution is the subject of an automatic exemption pursuant to Rule G-37(j), check the following Exempted box and provide the date of such automatic exemption:

Exempted Date of exemption: (mm/dd/yyyy)

[Continue](#) [Cancel](#)

Do not include the name of the city, county, state or other political subdivision of the office held or sought by the individual.

For a contribution to one official running for a position in another municipal entity, titles for both offices must be included.

In all other cases, the title of the office currently held or of the office sought must be included.

G-37 Submission - Political Contributions Made to Political Parties or Subdivisions

EMMA Dataport - G-37 Submission MSRB GATEWAY

Submission Status: Saved You are currently acting on behalf of: MSRB4

Back Preview Exit

II. PAYMENTS made to political parties of states or political subdivisions

Please provide the following details. All fields are required.

State:

Political Party:

Payment Amount (\$):

Select Contributor Category (Please select all that apply) ?

- Dealer
- Municipal finance professional
- PAC controlled by the dealer
- PAC controlled by a municipal finance professional
- Non-MFP executive officer
- Municipal advisor
- Municipal advisor professional
- PAC controlled by a municipal advisor
- PAC controlled by a municipal advisor professional
- Non-MAP executive officer

Continue Cancel

Click **“Continue”** for a summary of reported payment information

EMMA Dataport - G-37 Submission MSRB GATEWAY

Submission Status: Saved You are currently acting on behalf of: MSRB4

Back Preview Exit

REPORT PERIOD AND SUBMITTER TYPE - FIRST QUARTER, 2018, DEALER/MUNICIPAL ADVISOR

For a complete Form G-37 submission, all four sections below must be completed. Users have the option to save a Form G-37 and have another user with Form G-37 access rights to retrieve the saved Form G-37 and submit it. Final submissions must be made by an officer for the regulated entity. Refer to [MSRB Rule G-37](#) for required information and the [Submission Manual](#). Please refer to the definitions provided below by hovering over the ? symbols as well MSRB Rule G-37 for additional information.

I. CONTRIBUTIONS made to officials of a municipal entity ?

Select one of the options below

Add New Information Pre-populate from previous quarter. Check here if none.

II. PAYMENTS made to political parties of states or political subdivisions ?

State	Political Party	Payment Amount(\$)	Contributor Category	
AK	Political Party ABC	\$500.00	Municipal finance professional	<a>Edit <a>Delete

Select one of the options below

Add New Information Pre-populate from previous quarter. Check here if none.

G-37 Submission - Political Contributions Made to Bond Ballot Campaigns

III. CONTRIBUTIONS made to bond ballot campaigns [?](#)

A. Contributions
Select one of the options below
[Add New Information](#) Pre-populate from previous quarter. Check here if none.

B. Reimbursement for Contributions
Select one of the options below
[Add New Information](#) Pre-populate from previous quarter. Check here if none.

Submission Status: Saved

III. CONTRIBUTIONS made to bond ballot campaigns

A. Contributions

Please provide the following details about the contribution. All fields are required.

Name of Bond Ballot Campaign:

State: N/A

City: N/A

County: N/A

Other Political Subdivision: N/A

Name of Issuing Municipal Entity:

Contribution Amount (\$)

Select Contributor Category (Please select all that apply) [?](#)

Dealer

Municipal finance professional

PAC controlled by the dealer

PAC controlled by a municipal finance professional

Non-MFP executive officer

Municipal advisor

Municipal advisor professional

PAC controlled by a municipal advisor

PAC controlled by a municipal advisor professional

Non-MAP executive officer

Contribution Date: (mm/dd/yyyy)

Submission Status: Saved

You are currently acting on behalf of:

III. CONTRIBUTIONS made to bond ballot campaigns

B. Reimbursement for Contributions

List below any payments or reimbursements, related to any disclosed bond ballot contribution, received by each dealer, municipal finance professional, non-MFP executive officer, municipal advisor, municipal advisor professional, or non-MAP executive officer from any third party, including the amount paid and the name of the third party making such payments or reimbursements.

Name of Third Party Making Payments or Reimbursements:

Reimbursement Amount (\$):

Click "Continue"

G-37 Submission – New Data Import Function Municipal Securities/Municipal Advisory Business

- Users now have the ability to import an Excel or CVS/Data file into Section IV, “Municipal Securities Business or Municipal Advisory Business”
- Dealer-municipal advisors that wish to import municipal securities and municipal advisory business information must import separate files for each

The image shows a screenshot of a web application interface for submitting information. On the left, there is a summary panel with three sections: A. Municipal Securities Business, B. Municipal Advisory Business, and C. Ballot-Approved Offerings. Each section has a link for 'Add New Information', a checkbox for 'Pre-populate from previous quarter', and a link for 'Import Excel or CSV Data File Information'. A red arrow points to the 'Import Excel or CSV Data File Information' link in section B. On the right, there is a detailed data entry form for 'Municipal Advisory Business'. It includes fields for State, Municipal Entity Name, City, and County, each with a dropdown menu and a 'N/A' checkbox. There are also checkboxes for 'Type of Municipal Advisory Business' (Advice and Solicitation) and 'Name of Third Party on Behalf of which Business was Solicited'. At the bottom, there are 'Continue' and 'Cancel' buttons.

G-37 Submission – New Data Import Function

- From an Excel or CSV formatted spreadsheet, information can be imported by clicking on “Import Excel or CSV Data File Information” and the import screen will appear.
- **To import**, either drag or select the appropriately formatted file.
- Upon upload, the data in the file will appear and any errors will be denoted by a red box.
- Users may fix the errors directly on the import results screen or you may choose to cancel and upload a corrected file.
- By using the “Next Error” tab, users can tab to each error that requires an action

EMMA Dataport - G-37 Submission

MSRB GATEWAY

Municipal Advisory Business
For instructions on completing your excel or csv file, click here. To view an example click here.

Choose file or drag it here.

EMMA Dataport - G-37 Submission

MSRB GATEWAY

Municipal Advisory Business
For instructions on completing your excel or csv file, click here. To view an example click here.

Choose file or drag it here.

Total Rows:27
Total Errors:3

Next Error Cancel

#	Name of Municipal Entity	State	City	County	Type of Municip...	Name of Third P...	Nature of the Sol...
1	XYX Highway Finance Authority	AL	NA	NA	Advice		
2	Tri-County Metropolitan Transit District of XYZ	OR	NA	County of Multn...	Advice		
3	XYZ Housing Finance Corporation	FL		County of Leon	Solicitation		Investment advis...
4	XYX Highway Finance Authority	AL	NA	NA	Advice		
5	Tri-County Metropolitan Transit District of XYZ	OR	NA	County of Multn...	Advice		
6	XYZ Housing Finance Corporation	FL	City of Tallahassee	County of Leon	Solicitation	XYZ Partners, LLC	Investment advis...
7		AL	NA	NA	Advice		
8	Tri-County Metropolitan Transit District of XYZ	OR	NA	County of Multn...	Advice		
9	XYX Highway Finance Authority	AL	NA	NA	Advice		
10	XYX Highway Finance Authority	AL	NA	NA	Advice		
11	Tri-County Metropolitan Transit District of XYZ	OR	NA	County of Multn...	Advice		
12	XYZ Housing Finance Corporation	FL	City of Tallahassee	County of Leon	Solicitation	XYZ Partners, LLC	Investment advis...

G-37 Submission – Bond Ballot Approved Offerings

- “**Add New Information**” link, or, if no business related to ballot-approved offerings required to be reported, click “**Check here if none**”.

IV. MUNICIPAL ENTITIES with which the regulated entity has engaged in municipal securities business or municipal advisory business

A. Municipal Securities Business ?

Select one of the options below

[Add New Information](#) Pre-populate from previous quarter. [Import Excel or CSV Data File Information](#) Check here if none ?

B. Municipal Advisory Business ?

Select one of the options below

[Add New Information](#) Pre-populate from previous quarter. [Import Excel or CSV Data File Information](#) Check here if none ?

C. Ballot-Approved Offerings

Select one of the options below

[Add New Information](#) Pre-populate from previous quarter. Check here if none.

Submission Status: Saved You are currently acting on behalf of: [Back](#) [Preview](#) [Exit](#)

IV. MUNICIPAL ENTITIES with which the regulated entity has engaged in municipal securities business or municipal advisory business

C. Ballot-Approved Offerings

Please provide the full name of the municipal entity and full issue description of any primary offering resulting from the bond ballot campaign to which each contributor category has made a contribution and the reportable date of selection on which the regulated entity was selected to engage in the municipal securities business or municipal advisory business.

Full Name of Municipal Entity: Reportable Date of Selection:

Full Issue Description:

[Continue](#) [Cancel](#)

- Click the Ballot-Approved Offerings
- On the Ballot-Approved Offerings screen, complete the following fields:
 - Full Name of Municipal Entity
 - Full Issue Description
 - Reportable Date of Selection
- Must be reported in calendar quarter in which closing date for issuance occurred
- Click “**Continue**”

G-37 Submission – Preview Information

EMMA Dataport - G-37 Submission

Submission Status: Saved

You are currently acting on behalf of: MSRB4

[Back](#) [Preview](#) [Exit](#)

REPORT PERIOD AND SUBMITTER TYPE - THIRD QUARTER, 2017, DEALER/MUNICIPAL ADVISOR

For a complete Form G-37 submission, all four sections below must be completed. Users have the option to save a Form G-37 and have another user with Full G-37 access rights to retrieve the saved Form G-37 and submit it. Final submissions must be made by an officer for the regulated entity. Refer to [MSRB Rule G-37](#) for required information and the [Submission Manual](#). Please refer to the definitions provided below by hovering over the [?](#) symbols as well MSRB Rule G-37 for additional information.

I. CONTRIBUTIONS made to officials of a municipal entity

State	Municipal Entity Official	Contribution Amount(\$)	City/County/State or Other Political Subdivision	Contributor Category	
IN	John Doe, Governor of XYZ	\$500.25	City of XYZ/County of ABC/IN/XY Housing Authority	Dealer	Edit Delete

Select one of the options below

[Add New Information](#) Pre-populate from previous quarter. Check here if none.

II. PAYMENTS made to political parties of states or political subdivisions

State	Political Party	Payment Amount
IA	Independent Party of HB	\$1,000.00

Select one of the options below

[Add New Information](#) Pre-populate from previous quarter. Check here if none.

III. CONTRIBUTIONS made to bond ballot campaigns

A. Contributions

State	Name of Bond Ballot Campaign	City/County/State or Other Political Subdivision	Name of Municipality
HI	XYZ Bond Ballot Campaign	City of ABC/County of XYZ/HI/XYZ Housing Authority	XYZ County

Select one of the options below

[Add New Information](#) Pre-populate from previous quarter. Check here if none.

B. Reimbursement for Contributions

Third Party Name	Third Party Reimbursement
	\$

- Click **“Preview”**
- If information on the previous screen needs to be changed, click **“Edit”**
 - Once a submission is published, that particular submission cannot be edited
 - A previous submission may be updated or corrected by creating a separate submission that will be reflected as an amendment to the prior submission
- Select the **“Update”** option at the EMMA Dataport Submission Portal screen

G-37 Submission – Publish and Submit

- Click **“Publish”** to submit this form to the MSRB
- Click **“Yes”** and confirmation screen appears. The submission is automatically published on EMMA

Submission Status: Saved You are currently acting on behalf of: MSRB4

BY CLICKING THE PUBLISH BUTTON, YOU WILL BE SUBMITTING THIS FORM TO THE MSRB.

PREVIEW

G-37 Contributions Summary
Report Period and Role - Third Quarter, 2017, DEALER/MUNICIPAL ADVISOR

I. CONTRIBUTIONS made to officials of a municipal entity

State	Municipal Entity Official	Contribution Amount(\$)	City/County/State or Other Political Subdivision	Contributor Category
IN	John Doe, Governor of XYZ	\$500.25	City of XYZ/County of ABC/IN/XYZ Housing Authority	Dealer

II. PAYMENTS made to political parties of states or political subdivisions

State	Political Party	Payment Amount(\$)	Contributor Category
IA	Independent Party of HB	\$1,000.00	Municipal advisor

III. CONTRIBUTIONS made to bond ballot campaigns

A. Contributions

State	Name of Bond Ballot Campaign	City/County/State or Other Political Subdivision	Name of Issuing Municipal Entity	Contribution Amount(\$)	Contributor Category	Contribution Date
HI	XYZ Bond Ballot Campaign	City of ABC/County of XYZ/HI/XYZ Housing Authority	XYZ County	\$800.00	Non-MAP executive officer	1/31/2100

B. Reimbursement for Contributions

Third Party Name	Contribution Amount(\$)
Third Party Reimbursement	\$550.75

IV. MUNICIPAL ENTITIES with which the regulated entity has engaged in municipal securities business or municipal business

A. Municipal Securities Business

State	Municipal Entity Name	City/County	Municipal Securities Business Type
IA	XYZ County	City of XYZ/County of DR	Negotiated underwriting, Financial advisor, Remarketing agent, Private plac

Final submissions must be made by an officer for the regulated entity. Are you sure you want to publish?

SUBMISSION ID (Q3495283) SUBMITTED SUCCESSFULLY

A submission confirmation email has been sent to your email address on file. Upon MSRB review of your submission, you will receive an email indicating the submission status.

[Print Submission](#)

MSRB Contact Information

MSRB Online

msrb.org

emma.msrb.org

MSRB Support

202-838-1330

Hours of Operation:

7:30 a.m. - 6:30 p.m. ET

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