OTC Markets Quotation and Reporting Checklist

This OTC Markets checklist helps companies plan initial quotation and continuing compliance for the intended market tier. Determine the issuer's SEC, Regulation A, international or alternative-reporting framework separately from its quotation and market-tier requirements.

How to use this checklist: identify the supporting record and responsible person for each item. Mark an item complete only after the relevant records and analysis have been reviewed. Note unresolved matters for counsel.

Confirm the route and tier

- ☐ Identify the intended market tier, issuer type and applicable current eligibility and reporting standards.
- ☐ Analyze the applicable Rule 15c2-11 quotation path, including broker-dealer or qualified quotation-system involvement and any available exemption.
- ☐ Confirm that market-maker participation, reporting-company status, quotation and OTC market-tier admission are distinct requirements.

Assemble current disclosure

- ☐ Prepare the required financial statements and business, management, ownership, capitalization, debt and related-party disclosures.
- ☐ Confirm whether an audit, attorney letter, management certification or international issuer certification is required for the applicable standard.
- ☐ Reconcile the company profile, public disclosures, transfer-agent records and corporate records.

Resolve transaction and market issues

- ☐ Review shell history, prior issuances, convertible securities, promotional activity, regulatory history and outstanding disclosure issues.
- ☐ Confirm transfer-agent, settlement, CUSIP and operational arrangements, and any relevant public-float or holder evidence.
- ☐ Coordinate FINRA corporate actions, name or symbol changes, reverse splits and related notifications with the quotation work.

Maintain the market

- ☐ Calendar reports, certifications, profile verification, tier fees and other continuing requirements applicable to the issuer.
- ☐ Assign responsibility for monitoring designations, inquiries, disclosure deficiencies and changes affecting eligibility.
- ☐ Preserve complete application and disclosure records; address trading-market questions with counsel without promising quotation or liquidity.

Want to discuss your company's OTC quotation or reporting needs? Call 561-416-8956 or email Hamilton & Associates Law Group, P.A. at info@securitieslawyer101.com.