I thought that I understood Finra Rule 3220 and its original intent. A year ago, we were cited for allowing a retail Rep to give a congratulatory gift to her adult nephew, who also was her client. The same rep was cited for sending a flower arrangement to celebrate a client's opening of a new office.
The firm was cited for allowing three operations staff to receive tickets to a theater production. The tickets were a gift from a life insurance company.
Finally, two registered persons were cited for failing to record the value of two gifts that were ***received*** from others.

Maybe this Rule does need to be revised or at least clarified, and the examination process, including interpretation of the rule and its enforcement, need to be compared to the original intent of the Rule. It seems that the Rule is being interpreted to prevent any giving or receiving of any gift, that exceeds $100 per year, to or from anyone.

In the retail business, most of our clients are in fact our relatives and friends. Finra now says that we cannot exchange gifts with each other because of the client relationship—which is a sad outcome. Just think of birthdays, holidays, weddings, graduations, wedding anniversaries, retirement parties, etc.

Another commentator elsewhere doesn't understand, why a BD is allowed to give cash in excess of $100 to a retail customer when that customer opens a new account—but an individual rep would not be allowed to do the same. I don't understand it either.

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