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| **February 2022** | **Date Completed** | **Notes** |
| **Frequency: Weekly** |
| **Review Trade Blotter:** Download Blotter from Custodian and review for any irregular trading patterns, trade errors, trade discrepancies or large amounts of trading in one account. (Or Monthly) |  |  |
| **Correspondence and Email Review**: Review staff correspondence, including email. (Or Monthly) |  |  |
| **Frequency: Monthly** |
| **Review of Company Financials:** The CCO should review the company's accounting records to confirm the company is in compliance with its home state's net capital requirements. If the firm is SEC registered, please make sure the company is solvent at all times. |  |  |
| **Frequency: Quarterly** |
| **Third reminder if not yet completed.** **Review “Rollovers” into the Firm in compliance with PTE 2020-02:** Maintain and update a list of clients/accounts sourced from IRA rollovers and/or transfers. Review each client to ensure a Rollover Analysis form is complete, best interest rationale is documented, Client Acknowledgement and evidence of review and supervision is on file. Quarterly and/or monthly depending on number of rollovers. (Spreadsheet template attached in CRP email). |  |  |
| **Review of Client Portfolios:** Random review of client portfolios for consistency with Client objectives, restrictions and asset allocations and any unusual variances from the benchmark. |  |  |
| **Federal Filings Review--\*\*ONLY SEC Firms with $100m+ Equities and ETFs\*\*:** Review Year-End Holdings Report for Potential 13-H/F/G/D Required Filing. Schedule 13D and certain 13G filings are required to be filed, at any time during the year, within 10 days of the initial triggering transaction and filing requirements remain continuous, not only at year end. Filing dates are usually 45 days after quarter-end. |  |  |
| **New Account Review:** Conduct random sample review of recently opened new client accounts to verify that account has been placed in a model and properly allocated to the portfolio. Compare the account's data to the client's paperwork and ensure the appropriate fee is billed. |  |  |
| **Review Checks Received Blotter:**  Review the checks received/disbursed log for all client checks received by the RIA. The rule state these checks must be made payable to a third party (Custodian), then logged and forwarded to the appropriate third party by following business day. Client securities need to be delivered directly to the custodian by the client. Investment Advisors CANNOT receive securities without taking custody. If a client has securities to be delivered, it is best practice for you to provide an overnight package with a carrier that provides a tracking service (UPS / FedEx) to the appropriate third party. |  |  |
| **Review Quarter-End Client Performance Reports:** Select sample of client files to review quarter end performance reports. Compare these against Custodian statements to ensure accuracy of financial reporting. |  |  |
| **Frequency: Semi-Annually**  |
| **Disciplinary Review of Supervised Persons:** At least semi-annually, the CCO will review the firms disciplinary report for all registered persons on IARD. SEC registered firms must disclose on the Form CRS and ADV 2B Brochure if any person has a reportable disclosure. |  |  |
| **SLOA Custody Review (if applicable) :** Pull SLOA report from custodian. Identify all third-party money movements and maintain records showing that the third-party is not a related party of the investment advisor or located at the same address as the investment advisor. Obtain the annual letter from client's qualified custodian reconfirming the SLOA instructions on file (sent from the Custodian near or around year-end). |  |  |