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| **August 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. This can be done weekly or monthly. |  | Use Trade Blotter Review Form. |
| **Correspondence and Email Review**: Review staff correspondence, including email. This can be done weekly 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. |  |  |
| **Begin Implementing the New Marketing Rule -** Implementation of new Marketing Rule is required prior to November 4, 2022.  **COMPLIANCE MANUAL UPDATES APPLY TO ALL FIRMS**  Tailor the SAMPLE Marketing policies and procedures (“P&P”) – Word version of sample procedures included in August TMIC |  | Use: Marketing & Advertising Implementation Checklist, Sample P&P language for tailoring in WORD version |
| **Frequency: Quarterly** | | |
| **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 –Quarterly |  |  |
| **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. -Quarterly |  |  |
| **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. |  |  |
| **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. -Quarterly |  | Use: Sample Checks Received Log |
| **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. - Quarterly |  | Use: Client Annual Review Certification Form |
| **Frequency: Annually** | | |
| **Review And Test Disaster Recovery Plan-** Test your Firm's disaster recovery plan and document results in file. Please use the attached resource to assist with the testing |  | Stay tuned for this month’s TMR. |
| **Complete Firm’s Annual Risk Assessment**- Ensure each topic on the Risk Matrix has been reviewed and documented. Address all high-risk areas and review your policies and procedures for this topic. Update the Compliance Manual, as necessary. Save the completed assessment in your compliance files. This is an actual request from examiners when a firm is examined. |  | Use: Risk Assessment 2022 version |
| **Audit Terminated IAR Access-** For all advisors no longer at your firm, complete an audit of previously managed accounts. Ensure each account has been “de-linked” and the advisor no longer has access. If your firm currently does not have an established process for this, please refer to CRP’s IAR Termination Checklist. |  | Use: Terminated SP Checklist |
| **FORM CRS FILES –** Review current Form CRS is posted to the website, communication has been made to clients if an updated Form CRS has been filed on IARD. Copies of all communication to clients is maintained in Compliance Files. |  |  |
| **Alternative/Complex Exchange Traded Products-** Does your Firm recommend Alternative or Complex Products to Clients? Are Risks disclosed in ADV? Are Policies and Procedures updated to allow for use? Is the firm using the Alternative Investments Acknowledgement Form with clients to document review of Risks, Liquidity, Suitability? **Review listing of complex products used with clients and review client list of those who hold such products.** Are the current Risk Profiles in line with use of such products. |  | Use: Alternative Investment Acknowledgement Form |
| **Disciplinary Review of Supervised Person-**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 Brochures if firm has a reportable disclosure. |  |  |