

CCO Checklist

May 2021		Date Completed
<p>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 is 45 days after quarter-end.</p>	<input type="checkbox"/>	
<p>Notice Filing Review of States- Review number of households in each state- Most states follow the de minimus rule which allows SEC and state advisors to have up to 5 clients before requiring notice filing or registration. Some states require notice filing/registration when 1 client is present. These states are: Texas, Louisiana, New Hampshire and Nebraska. Notify CRP of any additional notice filings/registrations needed for your Firm. -Semi-Annually</p>	<input type="checkbox"/>	
<p>If Sponsoring a Wrap Fee Program- Is it in the best interest for the client to be in Wrap Program? Review the custodian report that shows what your clients are being charged against what they would be charged if not in the Wrap Program. This would include advisory fees plus transaction fees. Document the rationale for keeping your client in the wrap program. -Annually</p>	<input type="checkbox"/>	
<p>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</p>	<input type="checkbox"/>	
<p>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. -Monthly</p>	<input type="checkbox"/>	
<p>Review Quarter-End Client Reports/Statements-Perform random spot check for discrepancies in client reports, accounts, & fees. Keep track of which accounts you randomly reviewed and save in your compliance files.-Quarterly</p>	<input type="checkbox"/>	
<p>Review Client Files for Completeness- Spot check a random sampling of client files-See CRP checklist for client files. Annually</p>	<input type="checkbox"/>	
<p>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</p>	<input type="checkbox"/>	
<p>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. - Monthly</p>	<input type="checkbox"/>	
<p>Review Checks Received Blotter-Review the checks received/dispensed 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</p>	<input type="checkbox"/>	
<p>Review And Test Disaster Recovery Plan-Test Disaster Recovery Plan and document results in file-Annually</p>	<input type="checkbox"/>	
<p>Correspondence and Email Review- Review staff correspondence, including email. - Monthly</p>	<input type="checkbox"/>	

