|  |  |
| --- | --- |
| ADV CHECKLIST FOR ANNUAL AMENDMENTDecember 31, 2021 | |
| **Within 90 days after the firm’s fiscal year end, firms must file an “ADV Annual Amendment Update.” The annual update reaffirms the information contained in the Part 1 and Part 2A. Using this checklist, you will confirm each section of the Part 1 and Part 2A and identify areas that have changed since the previous annual amendment. CRP will assist with any revisions.** | |
| **FIRM INFORMATION** | | | |
| Name of Firm: | | Date: | |

|  |  |  |  |
| --- | --- | --- | --- |
| **STATE REGISTRATIONS** | | | |
| **Under state laws, SEC-registered advisers may be required to provide to state securities authorities a copy of the Form ADV and any amendments they file with the SEC. These are referred to as notice filings. Please list the number of HOUSEHOLDS (HH) per state to determine whether the firm is accurately notice filed. Please pay special attention to the households highlighted in blue as these states require to be noticed filing with just one (1) household.** | | | |
| **State** | **# of HH** | **State** | **# of HH** |
| Alabama |  | Nebraska |  |
| Alaska |  | Nevada |  |
| Arizona |  | New Hampshire |  |
| Arkansas |  | New Jersey |  |
| California |  | New Mexico |  |
| Colorado |  | New York |  |
| Connecticut |  | North Carolina |  |
| Delaware |  | North Dakota |  |
| District of Columbia |  | Ohio |  |
| Florida |  | Oklahoma |  |
| Georgia |  | Oregon |  |
| Hawaii |  | Pennsylvania |  |
| Idaho |  | Puerto Rico |  |
| Illinois |  | Rhode Island |  |
| Indiana |  | South Carolina |  |
| Iowa |  | South Dakota |  |
| Kansas |  | Tennessee |  |
| Kentucky |  | Texas |  |
| Louisiana |  | Utah |  |
| Maine |  | Vermont |  |
| Maryland |  | Virgin Islands |  |
| Massachusetts |  | Virginia |  |
| Michigan |  | Washington |  |
| Minnesota |  | West Virginia |  |
| Mississippi |  | Wisconsin |  |
| Missouri |  | Wyoming |  |
| Montana |  |  |  |

|  |  |
| --- | --- |
| **INFORMATION ABOUT YOUR ADVISORY BUSINESS - EMPLOYEES, CLIENTS, AND COMPENSATION** | |
| Approximately how many employees do you have?  (Include full- and part-time employees but do not include any clerical workers.) |  |
| Approximately how many of the *employees* reported above perform investment advisory functions (including research)? |  |
| Approximately how many of the employees reported above are registered representatives of a broker-dealer? |  |
| Approximately how many of the employees reported above are registered with one or more state securities authorities as investment adviser representatives? |  |
| Approximately how many of the employees reported above are registered with one or more state securities authorities as investment adviser representatives for an investment adviser other than you? |  |
| Approximately how many of the *employees* reported above are licensed agents of an insurance company or agency? |  |
| Approximately how many firms or other persons solicit advisory clients on your behalf? |  |

|  |
| --- |
| **REGULATORY ASSETS UNDER MANAGEMENT** |
| Indicate the approximate number of your clients and amount of your total regulatory assets (no approximate figures) under management attributable to each of the following type of client. If a client fits into more than one category, select one category that most accurately represents the client to avoid double counting clients and assets.  **THIS WILL BE AS OF DECEMBER 31, 2021.**  The SEC's definition of ***securities portfolios*:**   * **Cash and cash equivalents** are considered securities. * **At least 50% of the total value of the account must consist of securities** for the account to be considered a *securities portfolio*. * **Family accounts, accounts for which you receive no compensation, accounts for non-US persons, and all assets within in a private fund** including any uncalled mandatory commitments must all be counted as securities.   The SEC's definition of ***continuous and regular supervisory or management services*:**   * Firm *has discretion over an account* and your advisory firm provides ongoing supervisory or management services with respect to the account, (or) * Firm *does not have discretion over an account*, but you have an ongoing duty to select or make recommendations based upon the needs of your client andif the client accepts your investment recommendation, you are responsible for arranging or effecting the purchase or sale. * Even if the Firm does not have discretion of the account and the firm is not directly executing the recommended transactions, the Firm may be in a situation which the client's portfolio should NOT be considered regulatory AUM for the purposes of the Form ADV.   Even if the Firm does not have discretion of the account, and the firm is not directly executing the recommended transactions, the Firm may be in a situation which the client's portfolio should NOT be considered regulatory AUM for the purposes of the Form ADV. |

|  |  |  |  |
| --- | --- | --- | --- |
| **WRAP PROGRAM** | | **YES** | **NO** |
| Do you participate in a wrap fee program? | |  |  |
| If so, what is the amount of your regulatory assets under management attributable to: | **End of Year $** | |
| Sponsor of wrap fee program | | $ | |
| Portfolio manager for a wrap fee program | | $ | |
| Sponsor of and portfolio manager for the same wrap fee program | | $ | |

|  |  |  |  |
| --- | --- | --- | --- |
| **ASSETS UNDER ADVISEMENT** | | **YES** | **NO** |
| Do you currently have assets under advisement?  Assets under advisement refer to assets on which your firm provides advice or consultation but for which your firm does either does not have discretionary authority or does not arrange or execute the transaction. Advisement services would include consulting services where the assets are used for the informational purpose of gaining a full perspective of the client’s financial situation, but you are not actually placing the trade. | |  |  |
| If so, what is the amount of your assets under advisement attributable to: | **End of Year $** | |
| Assets under advisement | | $ | |

|  |  |  |  |
| --- | --- | --- | --- |
| **INFORMATION ABOUT REGULATORY ASSETS UNDER MANAGEMENT (RAUM)** | | | |
|  | **YES** | **NO** |
| Do you provide continuous and regular supervisory or management services to advisory clients? | |  |  |

|  |  |  |
| --- | --- | --- |
| **List the amount of assets with the following management authority:**  **(Refer to our RAUM definition above)** | **# of Client Accounts**  **(as of 12/31/2021)**  **(not # of Households)** | **$ of Regulatory Assets Under Management**  **(as of 12/31/2021)** |
| Discretionary |  | $ |
| Non-Discretionary |  | $ |
| **TOTAL: $ totals must match $ totals of**  **Regulatory Assets Under Management Total listed above on Page 2** | **# of Clients:** | **$** |

|  |  |  |
| --- | --- | --- |
| **Please complete the information for each custodian that holds ten percent (10%)**  **or more of your aggregate**  **separately managed account**  **regulatory assets under management.** | **Assets Held at Custodian**  **(as 12/31/2021)** | |
| * Charles Schwab | $ |
| * T.D. Ameritrade | $ |
| * Fidelity | $ |
| * LPL | $ |
| * Other (List Custodian): | $ |

|  |  |  |  |
| --- | --- | --- | --- |
| **TYPES OF CLIENT INFORMATION** | | | |
| **Type of Client** | **# of Households** | **Fewer than 5 Households?**  **(Yes or No)** | **Amount of Regulatory Assets Under Management**  **(as of 12/31/2021)** |
| **\*High Net Worth Individuals**  A natural person that has either: 1) At least $1 million under management with the Adviser immediately after entering into the contract; or 2) Has a net worth of $2,100,000 at the time the contract is entered into. Net worth is exclusive of the value of its primary residence and debt secured by the residence; or 1) a person with not less than $5 million in investments; 2) a company with not less than $5 million in investments owned by close family members; 3) a trust, not formed for the investment, with not less than $5 million in investments; 4) an investment manager with not less than $25 million under management; or 5) a company with not less than $25 million of investments. | | | |
| Individuals (other than \*high net worth individuals; includes trusts, estates and 401(k) plans, IRAs of individuals but not sole proprietorships) |  |  | $ |
| \*High net worth individuals (Definition below) |  |  | $ |
| Banking or thrift institutions |  |  | $ |
| Investment companies |  |  | $ |
| Business development companies |  | $ |
| Pooled investment vehicles (other than investment companies and business development companies) |  | $ |
| Pension and profit-sharing plans (but not the plan participants or government pension plans) |  |  | $ |
| Charitable organizations |  |  | $ |
| State or municipal government entities (including government pension plans) |  |  | $ |
| Other investment advisers |  |  | $ |
| Insurance companies |  |  | $ |
| Sovereign wealth funds and foreign official institutions |  |  | $ |
| Corporations or other businesses not listed above |  |  | $ |
| Other: |  |  | $ |
| **TOTAL: $ totals must match $ totals of**  **Regulatory Assets Under Management Total listed below on Page 3** | **# of Households:** |  | **$** |

|  |  |
| --- | --- |
| **RAUM BREAKDOWN** | **(%) of RAUM** |
| Exchange-Traded Equity Securities (Equities, ETFs) | % |
| Non-Exchange-Traded Equity Securities | % |
| U.S. Government/Agency Bonds | % |
| U.S. State and Local Bonds | % |
| Sovereign Bonds | % |
| Investment Grade Corporate Bonds | % |
| Non-Investment Grade Corporate Bonds | % |
| Derivatives (including options) | % |
| Securities Issued by Registered Investment Companies or Business Development Companies (Mutual Funds) | % |
| Securities Issued by Pooled Investment Vehicles  (other than Registered Investment Companies or Business Development Companies) | % |
| Cash and Cash Equivalents | % |
| Other (please describe type of assets: (REITS, Private Placements, VA’s, CD’s) | % |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **CUSTODY** | | | | | |
| **Does the firm retain the following authority?** | | | | **YES** | **NO** |
| **Standing Letter of Authorization to Move-Money to Third Party Accounts**  The adviser has standing instructions on file with Custodian to transfer money out of a client’s account to a third-party account.  (*Think not like-titled accounts or un!*). | | | |  |  |
| If so, complete: | #\_\_\_\_\_\_\_\_\_ of accounts with 3rd SLOA | $ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | | |

|  |  |  |
| --- | --- | --- |
| **Does the firm retain other authority that may impute custody?**  (Related Persons, Bill Paying Services, Client Username or Passwords, General Partner, Physical Possession?) | **YES** | **NO** |
| The adviser’s personnel or a “related person” serve as trustee or have been granted power of attorney for client accounts. |  |  |
| The adviser or related person provides bill-paying services for clients and, therefore, is authorized to withdraw funds or securities from the client’s account. |  |  |
| The adviser or related person manages portfolios by directly accessing online accounts using clients’ personal usernames and passwords without restrictions and, therefore, has the ability to withdraw funds and securities from the clients’ accounts. |  |  |
| The adviser or related person serves as the general partner of a limited partnership or holds a comparable position for a different type of pooled investment vehicle. |  |  |
| The adviser or related person has physical possession of client assets, such as securities certificates. |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| **MARKETING ACTIVITIES –**  **(CRP will send updated policies and procedures to adopt new Marketing Rule in Q2/Q3 of 2022- Stay tuned for information in CRP’s TMIC and TMR!)** | | | |
| **Do any of your advertisements include:** | | **YES** | **NO** |
| Performance results? | |  |  |
| A reference to specific investment advice provided by you? | |  |  |
| Testimonials? | |  |  |
| Endorsements? | |  |  |
| Third Party Rankings? | |  |  |
| If you answer "yes" to above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of testimonials, endorsements, or third-party ratings? |  |  |
| Do any of your advertisements include hypothetical performance? | |  |  |
| Do any of your advertisements include past performance? | |  |  |

|  |  |  |
| --- | --- | --- |
| **DOL PTE ROLLOVER RULE - TITLE 1 OF ERISA, FIDUCIARY DUTY, IRS CODE, & THE IMPARTIAL CARE STANDARDS** | | |
| **For implementation of the new DOL - PTE Rule, does you firm currently review and disclose the following for client retirement account transfers or rollovers:** | **YES** | **NO** |
| Review all possible options for retirement account(s)? (including alternatives options to a rollover or transfer) |  |  |
| Review the features and fees of the current plan or IRA? |  |  |
| Discuss and compare all considerations and options with the client? |  |  |
| Document the analysis and discussion with the client? |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| **THE FIRM ATTESTS THE FOLLOWING HAS BEEN REVIEWED:** | | **ACCURATELY DESCRIBES FIRM ACTIVITIES (Yes / No)** | **REVISIONS**  **REQUIRED** |
| ADV Part 1 | |  |  |
| ADV Part 2A Services, Compensation, and Disclosures | |  |  |
| Item 4 – Description of Services |  |  |
| Item 5 – Fees & Compensation |  |  |
| Item 7 – Types of Clients |  |  |
| Item 8 – Strategies & Methods of Analysis |  |  |
| Item 9 – Disciplinary Information |  |  |
| Item 10 - Affiliations |  |  |
| Item 17 – Voting Securities |  |  |
| Item 18 – Financial Information (PPP/SBA Loan? Forgiven?) |  |  |
| Form CRS | |  |  |
| Item 2 – Relationships & Services (summarizes language in Part 2A – Item 4) |  |  |
| Item 3 – Fees, Costs & Conflicts (summarizes language in Part 2A – Items 5, 7, 10) |  |  |
| Item 4 – Disciplinary Information (summarizes language in Part 2A – Item 9) |  |  |
| Individual Part 2B’s | |  |  |
| Privacy Policy | |  |  |
| Business Continuity Plan (it should now use the word “pandemic”) | |  |  |
| Client Agreements | |  |  |

|  |  |
| --- | --- |
| **ACKNOWLEDGEMENT: BY SIGNING BELOW, I ACKNOWLEDGE THAT THE INFORMATION I HAVE REPORTED ABOVE IS TRUE AND CORRECT**  **TO THE BEST OF MY KNOWLEDGE AND BELIEF.**  **IF ANY INFORMATION CHANGES, I WILL NOTIFY CRP, AS NEEDED.** | |
| **Reminder for SEC Advisors**  **Fund $225.00 to your E-Flex account.** | |
| CCO Signature & Review Confirmation: | Date: |

|  |
| --- |
| **ADDITIONAL NOTES OR QUESTIONS FOR CRP:** |
|  |