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| **April 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** |
| **Quarterly Attestation Review including Quarterly Personal Securities Transaction Reports, Political Contributions :**  Refer to the CRP Compliance Questionnaire document. It is to be completed by all Associated Persons each quarter. This is a required document and must be kept on file. |  |  |
| **Quarterly Compliance Meeting with Management:**  Review any compliance matters that have arisen since the last regular meeting |  |  |
| **Review Best Execution Report:** Obtain Best Execution Report from Custodian. Review and document review in file. |  |  |
| **Review Billing Statements/Fee Calculations Report:** Review billing statements/fee calculations report from custodian or billing program; take any necessary corrective action and document review; maintain in books and records. This can be done monthly or quarterly. |  |  |
| **Review of Terminated Accounts :** Obtain a report that allows you to verify that amounts refunded to terminated client accounts are accurate and in accordance with your firm's procedures. |  |  |
| **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.  |  |  |
| **Frequency: Semi-Annually** |
| **Review of Zero Balances:** Obtain Zero Balance Report from custodian and identify all accounts with a zero balance. This information can confirm cancellation of management by client. |  |  |
| **Review of Inactive Accounts for Reverse Churning (APRIL)-What is your firm doing to justify advisory fees if there are no trades on an account or active management?** This internal testing task is for accounts that are still clients but have no trading activity for the last year or 2 and are being billed an advisory fee each quarter. If there is no active management, your firm should have a review process on those accounts to substantiate any compensation and it should be documented in their file. |  |  |
| **Frequency: Annually** |
| **Annual Certification for FINRA Entitlements:** Super Account Administrator (SAA) designation to be completed between April 20th and July 20th. Please contact your CRP representative to confirm who should have account access in Firm Gateway for your firm. |  |  |
| **Form U4 and Part 2B Review**: Distribute Forms U4 and Part 2B brochure supplements to Registered Persons to Confirm Accuracy of Disclosures. Ensure all designations are up to date. |  |  |
| **Review Customer Complaint File:** Remind IARs of reporting all client grievances to Compliance. CCO will review complaints/grievances for potential U4 reporting**.** |  |  |
| **Send Privacy Policy\* & ADV Part 2 (or a list of material changes) to Clients:** ADV Required annually by CCO, 120 days after FYE. Send entire Form ADV Part 2 Brochure (or Item 2 - list of material changes to Form ADV Part 2 Brochure) to Clients. \*Privacy Policy is only required to be sent if material changes are made |  |  |