

CCO Checklist

September 2021		Date Completed
Form U4 and Part 2B Review- Distribute Forms U4 and Part 2B brochure supplements to registered persons to confirm accuracy of disclosures. Remember, Texas requires individual IARs to be personally registered when 1 or more clients are present. - <i>Annually</i>	<input type="checkbox"/>	
Review Part 2A and Client Agreements- Review of Part 2A and client agreements for accuracy and consistency between documents. - <i>Annually</i>		
Review of Solicitors- Review of solicitor relationships, agreements and ensure client disclosure statements are being reviewed and retained. - <i>Annually</i>	<input type="checkbox"/>	
Verify E & O Coverage- Confirm E & O coverage is appropriate for the services provided and the current registered personnel. - <i>Annually</i>	<input type="checkbox"/>	
Supervised Person Review- CCO should maintain an up to date list of access persons pursuant to the firm's Code of Ethics. This list/roster of access persons should be reviewed semi annually. - <i>Semi-Annually</i>	<input type="checkbox"/>	
Review Cash Balance Report- Review cash balance report to determine if there is enough cash for fees or if there is too much cash and funds need to be invested. Be mindful of scheduled distributions. Perform random performance review and take note and action on any abnormal or unusual balances .- <i>Quarterly</i>	<input type="checkbox"/>	
Quarterly Review of States – Is the Firm properly notice filed? You will need to be notice filed in any state where you have more than 5 households. The exceptions to this rule are the following states: Texas, Louisiana, New Hampshire, and Nebraska. Each of these states require notice filing when 1 household is present. Send a list of states that require notice filing to CRP so they can update your ADV accordingly. - <i>Quarterly</i>	<input type="checkbox"/>	
Mutual Fund Share Class Review- Are your mutual fund holdings in the lowest available share class? If not, be sure there is documentation on the rationale for holding the higher share class. - <i>Quarterly</i>	<input type="checkbox"/>	
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. - <i>Monthly</i>	<input type="checkbox"/>	
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. - <i>Monthly</i>	<input type="checkbox"/>	
Correspondence and Email Review- Review staff correspondence, including email. - <i>Monthly</i>	<input type="checkbox"/>	