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| MARKETING CHECKLIST USE OF TESTIMONIAL AND ENDORSEMENT STATEMENTS |
| NAME OF PERSON OFFERING STATEMENT: |  |
| TITLE OF MARKETING PIECE: |  |
| PROVIDE PROPOSED STATEMENT FOR ENDORSEMENT AND TESTIMONIAL:  |  |

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| **SUBMISSION DETAILS:** | **DATE:** |  |
| [ ]  | Initial Submission | [ ]  | Resubmission (Date of First Submission):  | [ ]  | Approval has expired; requesting renewal |
| **TYPE OF STATEMENT:** |
| [ ]  | **Endorsement**(any statement made by a third-party or made by anyone else other than a current client). | [ ]  | **Testimonial**(any statement by a current client about the client experience with the investment adviser). | [ ]  | Other |
| **ADVERTISEMENT DESCRIPTION:**  |
| [ ]  | Website | [ ]  |  Social Media | [ ]  | Newsletter |
| [ ]  | Oral Statement | [ ]  | Other: |
| MARKETING DUE DILIGENCE: | YES | NO |
| Conducted reasonable due diligence to confirm person not subject to any applicable disqualification events? |  |  |
| Is there compensation for said “statement” over the last 12 months? |  |  |
| Ongoing compensation? ($1000 cash/non-cash compensation requires an agreement.) |  |  |
| Is this subject to written “Promotor Agreement”? |  |  |
| Includes direct or indirect (gifts, entertainment, fee discount)? |  |  |
| Compliance Verified on look back of Gift & Entertainment log? |  |  |
| PROHIBITIONS: | CONFIRMED |
| Does not contain any material untrue or misleading statements. |  |
| All figures and factual statements can be substantiated. |  |
| Does not include any actual or model portfolio performance. |  |
| No misleading professional designations, titles, or representations about the firm. |  |
| Disclosures: |
| **DISCLOSURES AND DISCLAIMERS HAVE BEEN MADE WITH SUFFICIENT PROMINENCE AND DETAIL - NEEDS TO BE IN SAME FONT SIZE**1. *[Name of Person Providing Endorsement/Testimonial] [is / is not] a client of [Firm Name] and [is / is not] being compensated for sharing their opinion and experience with our firm. Any compensation creates a conflict of interest and [Name of Person’s] comments may not be representative of any other person's experience with the firm.*
2. *EXAMPLE: [Name of Person Providing Endorsement/Testimonial] is a current client of [Firm Name] OR [Name of Person Providing Endorsement/Testimonial] is not a current client of [Firm Name] and received [cash compensation] [non-cash compensation] [OR: did not receive compensation] for providing this testimonial. [Briefly describe additional material conflicts of interest resulting from [firm]’s relationship with the client; for example: Mr. Smith works at an affiliate of [Firm Name].*
3. *EXAMPLE: [Name of Person Providing Endorsement/Testimonial] is incentivized to recommend [firm] due to receiving compensation for providing the testimonial and because [NAME] also works at a [Name of Firm] affiliate, which may benefit from a favorable review of [Name of Person Providing Endorsement/Testimonial]. These present material conflicts of interest for [Name of Person Providing Endorsement/Testimonial] in giving the testimonial.*

***IF COMPENSATED*** *– AN ORAL testimonial should read the following scripted disclosure prior to speaking with or about the Firm. “Before we begin, I must disclose that I [am / am not] a client of [Firm Name]. I am being compensated by [Firm Name] which represents a conflict of interest.”* |
| [ ]  **Approved**  | [ ]  **Denied**  | **CCO SIGNATURE** | **DATE** |
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