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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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