|  |  |  |
| --- | --- | --- |
| **January 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** |
| **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 “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 |  |  |
| **Quarterly Compliance Meeting with Management:** Review any compliance matters that have arisen since the last regular meeting. |  |  |
| **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. |  |  |
| **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. |  |  |
| **Frequency: Annually** |
| **Distribute Compliance Manual & Code of Ethics:** Due annually by all |  |  |
| **Review Final Renewal Statement on IARD System:** Review IARD Final Renewal Statement for annual state/individual registrations; CRP will send a copy for review; fund any balance due. |  |  |
| **Review Form ADV Part 1, Part 2A Brochure, Wrap Fee Brochure (if applicable) and Part 2B Brochure Supplements:** Required annually by CCO.  |  |  |
| **Annual Amendment Updating:** Please complete the attached ADV Questionnaire and send to your CRP representative. In addition, please add funds to your Flex Account to cover the filing fees. \*SEC Advisers\* $225 SEC filing fees. \*State Advisers\*, fees vary for each state. |  |  |
| **Annual IAR Review & Attestations**: Please see the CRP template and tailor to your firm. CCO will distribute to IARs for completion. Upon completion by IAR, CCO will review. |  |  |
| **Review definition of Regulatory Assets under Management:** Determine Firm's AUM as of 12/31. Retain documentation in file with appropriate back up of AUM numbers. |  |  |
| **Cybersecurity Review and Test:** Review and test cybersecurity policies for employee education, phishing, penetration testing, new vendor due diligence, update incident response plan. |  |  |
| **Review Firm Privacy Policy:** Ensure the sharing of client data is accurately reflected. Add any affiliations that may share client information. |  |  |