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| **November 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. This can be done weekly or monthly.  |  | Use Trade Blotter Review Form. |
| **Correspondence and Email Review** **-** Review staff correspondence, including email. This can be done weekly 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 Quarter-End Client Performance Reports -** Select sample of client files to review quarter end performance reports. Compare these against Custodian statements to ensure accuracy of financial reporting. |  |  |
| **Review of Client Portfolios -** Random review of client portfolios for consistency with Client objectives, restrictions and asset allocations and any unusual variances from the benchmark. |  |  |
| **Review Checks Received Blotter -** Review the checks received/disbursed log for all client checks received by the RIA. The rule state these checks must be made payable to a third party (Custodian), then logged and forwarded to the appropriate third party by following business day. Client securities need to be delivered directly to the custodian by the client. Investment Advisors CANNOT receive securities without taking custody. If a client has securities to be delivered, it is best practice for you to provide an overnight package with a carrier that provides a tracking service (UPS / FedEx) to the appropriate third party. |  |   |
| **New Account Review -** Conduct random sample review of recently opened new client accounts to verify that account has been placed in a model and properly allocated to the portfolio. Compare the account's data to the client's paperwork and ensure the appropriate fee is billed |  |  |
| **Federal Filings Review--\*\*ONLY SEC Firms with $100m+ Equities and ETFs\*\*** Holdings Report for 13-H/F/G/D Filings. 13D and certain 13G are required to be filed, at any time during the year, within 10 days of the initial triggering transaction, not only at year end. 13F filings are required 45 days after quarter-end.13H filings are filed when the minimum threshold has been met and yearly thereafter.  |  |  |
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| **Frequency: Annually** |
| **ADV Annual Amendment Preparation (Review Item 4 Advisory Services & Item 5 Fees and Compensation) -** (Review Part 2A Item 4 Advisory Services & Item 5 Fees and Compensation)- Review Items 4 and 5 of your Part 2A Brochure in preparation of the Firm’s Annual Amendment filing in Q1 2022. If changes are warranted, contact CRP to work through revisions. |  |  |
| **Download Preliminary Renewal Statement from IARD -** Required annually by CCO. CRP to send Renewal Statements when available. Available beginning November 7, 2022. |  |  |
| **Notice Filing Review of States- Review number of households in each state. (November) -** Most states follow the de minimis rule which allows SEC and state advisors to have up to 5 clients before requiring notice filing or registration. Some states require notice filing/registration when 1 client is present. These states are: Texas, Louisiana, New Hampshire and Nebraska. Notify CRP of any additional notice filings/registrations needed for your Firm. |  |   |
| **Schedule Annual Compliance Meeting to take place in December.** Invite all supervised persons. See CRP for sample PowerPoint presentation to tailor to Firm (Refer to TMIC October 2022). |  |  Use CRP Compliance Meeting PowerPoint |
| **Review and Update Compliance Manual -** Please see the CRP list of suggested Compliance Manual updates (See Template Resource Library: Compliance Manual Template HIGHLIGHTED CHANGES). Be sure to update your current manual before the new advertising and marketing rule implementation deadline occurs (November 4, 2022). |  |  |