

Information Request List

Examination Information Request List for **Company Name**
File Number **801-XXXXX**

Examination Period

Information is requested as of **2018** unless otherwise noted.

Organizing the Information Requested

Please organize your information so that it corresponds to the item number in the request list. If information provided is responsive to more than one request item, you may provide it only once and refer to it when responding to the other request item numbers. If any request item does not apply to your business, please indicate "N/A" (not applicable).

Requests

1. Copy of the Registrant's organization chart. Include all entities that are commonly controlled by, or under common control with, the Registrant.
2. A schedule or chart showing ownership percentages of the Registrant and control persons, as well as all affiliated entities.
3. List of current employees, partners, officers and/or directors and their respective titles, office location, and hire date.
4. Any threatened, pending, adjudicated, or settled litigation, arbitration, or administrative proceeding involving the Registrant or any "supervised person" (if the matter relates to the supervised person's association with the Registrant or a securities-related matter) including a description of the allegations, the status, and a brief description of any "out of court" or informal settlement. Note that "supervised person" is any partner, officer, director (or other person occupying a similar status or performing similar functions), or employee of an investment adviser, or other person who provides investment advice on behalf of the investment adviser and is subject to the supervision and control of the investment adviser (defined in Section 202(a) (25) of the Advisers Act). If none, please provide a written statement to that effect.
5. Registrant's balance sheet and income statement, as of the end of its most recent fiscal year.
6. Registrant's balance sheet and income statement, as of **2018**.
7. For each custodian that maintains client assets, please list all Master account numbers, representative codes, or other identifying information used to identify your firm at the custodian.

For items #8 through 11, please refer to the provided Information Request Template for the requested data format. Sample data is included for illustrative purposes. Please do not include sample data in your submission.

8. Spreadsheet (in Excel format) of current investment advisory clients to whom you provide continuous and regular supervisory or management services.¹ If a client has multiple accounts, each account should be shown on a separate row. For each client account, please include the following:
 - A. internal account number;
 - B. the client's account number at the custodian;
 - C. master account number, representative code, or other identifying characters that associate the registrant with the custodian, for this account;
 - D. the account name;
 - E. the client name;
 - F. the client contact information (mailing address, phone number, e-mail address);
 - G. current securities balance, gross of margin, for each account as of **2018**;
 - H. current securities balance, net of margin, for each account as of **2018**;
 - I. net market value of securities that are pending trade settlement as of **2018** (when securities are being sold, this value should be negative; when securities are being purchased, this value should be positive);
 - J. Cash and Cash Equivalents Balance in the Account as of **2018** (for Negative Cash Balances (Margin), Please Mark the Account Balance as Negative);
 - K. whether the client is a related person², affiliated person³, or a proprietary account⁴;
 - L. the type of account (e.g., individual, defined benefit retirement plan, registered fund, or unregistered fund);
 - M. the account custodian and location;
 - N. whether or not the Registrant has discretionary authority;
 - O. whether the Registrant, an officer, an employee, or an affiliate acts as trustee, co-trustee, or successor trustee or has full power of attorney for the account;
 - P. whether the Registrant or related persons are deemed to have custody of, possession of or access to the client's assets;
 - Q. whether or not the custodian sends periodic account statements directly to the client;

¹ This generally will include those accounts for which registrant provides portfolio management or similar services. These accounts are the accounts that registrant includes when calculating its regulatory assets under management (RAUM).

² A related person is any advisory affiliate and any person that is under common control with your firm.

³ An affiliated person is any person or entity (1) that directly or indirectly, alone or in concert with others, owns or controls 25% or more of the Adviser, (2) that is under common control with the Adviser based on the same standard, or (3) that serves as an officer or director of the Adviser.

⁴ A proprietary account is an account in which your firm holds securities on its own behalf (as opposed to those securities it is holding on behalf of its customers).

- R. whether or not the registrant sends periodic account statements directly to the client;
 - i. If yes, and if sent to an address different than the client address provided in (8.f), provide the alternative address.
- S. the account inception date.

Please refer to the first tab in the provided Information Request Template for Request Item #8.

9. Spreadsheet (in Excel format) of current clients who do not receive regular and continuous supervisory services but who are provided financial planning, pension consulting, non-managed/accommodation services. Include any advisory clients not identified in Item #8.⁵ For each of these client accounts, please provide the following:
 - A. internal account number;
 - B. the client's account number at the custodian;
 - C. master account number, representative code, or other identifying characters that associate the registrant with the custodian, for this account;
 - D. the account name;
 - E. the client name;
 - F. the client contact information (mailing address, phone number, e-mail address);
 - G. current securities balance, gross of margin, for each account as of **2018**;
 - H. current securities balance, net of margin, for each account as of **2018**;
 - I. net market value of securities that are pending trade settlement as of **2018** (when securities are being sold, this value should be negative; when securities are being purchased, this value should be positive);
 - J. Cash and Cash Equivalents Balance in the Account as of **2018** (for Negative Cash Balances (Margin), Please Mark the Account Balance as Negative);
 - K. whether the client is a related person, affiliated person, or a proprietary account;
 - L. the type of account (e.g., financial planning, pension consulting, non-managed/accommodation, project-based, etc.);
 - M. the account custodian and location;
 - N. whether or not the Registrant has discretionary authority;
 - O. whether the Registrant, an officer, an employee, or an affiliate acts as trustee, co-trustee, successor trustee or has full power of attorney for the account;
 - P. whether the Registrant or related persons are deemed to have custody of, possession of or access to the client's assets;
 - Q. whether or not the custodian sends periodic account statements directly to the client;
 - R. whether or not the registrant sends periodic account statements directly to the client;

⁵ Include clients for which registrant automatically deducts fees from account, has discretionary authority of account, or maintains custody of assets in account. This includes advisory accounts that are not charged advisory fees. Also, include accounts established (or transferred) under your agreement with the custodian so that investments and portfolio values can be monitored by registrant.

- i. If yes, and if sent to an address different than the client address provided in (9.f), provide the alternative address.
- S. account inception date;
- T. date of last service provided (if financial planning client or project-based client).

Please refer to the second tab in the provided Information Request Template for Request Item #9.

10. Spreadsheet (in Excel format) of all clients that have closed an account or otherwise terminated their relationship with your firm during the period .
- 2018.**⁶ For each client account, please include the following:
- A. internal account number;
 - B. the client's account number at the custodian;
 - C. master account number, representative code, or other identifying characters that associate the registrant with the custodian, for this account;
 - D. the account's inception date
 - E. the account name;
 - F. the client name;
 - G. date of termination;
 - H. reason for termination;
 - I. account balance, gross of margin, at the time of termination;
 - J. account balance, net of margin, at the time of termination;
 - K. the account custodian and location.

Please refer to the third tab in the provided Information Request Template for Request Item #10.

11. Spreadsheet, in Excel, with the following information associated with the accounts identified in Request Item #8:
- A. Names of securities held in all client portfolios (aggregate position totals for all instruments, including cash and cash equivalents) as of **2018**. For each instrument, include:
 - i. client account number;
 - ii. ticker symbol;
 - iii. CUSIP (or other identifier);
 - iv. security name;
 - v. number of shares or units held by each client;
 - vi. market value of each security held by each client;
 - vii. market value of total position held by each client;
 - viii. number of shares or units pending trade settlement;
 - ix. average market value of each security pending trade settlement;

⁶ Include clients deceased during this period in this request.

- x. market value of total position pending trade settlement as of **2018**
(when securities are being sold, mark as negative; when securities are being purchased, mark as positive);
 - xi. whether the position is fair valued.⁷
- B. Other assets in the client account, and held at the custodian, that hasn't been identified in 11.A, such as real estate or commodities investments.

Please refer to the fourth tab in the provided Information Request Template for Request Item #11.A, and the fifth tab in the provided Information Request Template for Request Item #11.B.

12. Please describe the source(s) of the data used to develop responses for items #8 through 10.
13. Please provide documentation evidencing the Registrant's calculation of RAUM for purposes of its most recent annual updating amendment to Form ADV, Part 1.
14. Identify your portfolio accounting system.
15. Please provide any written procedures for conducting reconciliation of client accounts to custodial accounts.

⁷ In the fourth tab, column L, titled "Whether the Position Is Fair Valued", a security would most likely be marked "Yes" when market pricing isn't available and is estimated, rather than market priced. If the price of a security has to be discovered or set outside of normal markets, then it would most likely be "fair valued" and marked "Yes" in column L. Most equity securities will be marked "No" in this column, assuming their price is set by the market.