Examination Information Request

("Adviser")

Examination Period

Information is requested for the period of **through** (the "Examination Period") unless otherwise noted.

Organizing the Information to be Provided

Please provide the requested information by 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).

Please provide the information requested below and hereafter during the examination in electronic format, and please ensure that all electronic information provided is "read-only." If the files are less than 10 MB, we request electronic records be sent to us through our secure email system. If larger than 10 MB, please send the files through Accellion, our secure file transfer system, for which we will send you a link.

Requests

- 1. Copy of the Adviser's organization chart showing ownership percentages of the Adviser and control persons.
- 2. A schedule or chart of all affiliated entities. Include all entities that are commonly controlled by, or under common control with, the Adviser, its control persons or key employees.
- 3. List of current employees, partners, officers, and/or directors and their respective titles, office location, and hire date.
- 4. List of any of the Adviser's employees, partners, officers, and/or directors who resigned or were terminated during the Examination Period and information regarding the reason(s) for their departure.
- 5. Any threatened, pending, adjudicated, or settled litigation, arbitration, or administrative proceeding involving the Adviser or any "supervised person" (if the matter relates to the supervised person's association with the Adviser 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.

- 6. Spreadsheet (preferably in Excel) of current client accounts. For each account, include:
 - A. the name, account number, and custodian;
 - B. whether the client pays its advisory fee in advance or in arrears;
 - C. the account balance at the end of each billing period in the Examination Period;
 - D. the account balance that was used for purposes of calculating the advisory fee for each billing period in the Examination period;
 - E. the advisory fees for each billing period in the Examination Period.
 - F. whether advisory fees are paid directly from the client's custodial account;
 - G. whether the account is a proprietary account;
 - H. whether the account owner is a related or affiliated person;
 - I. the type of account (*e.g.*, individual, pension plan, profit sharing plan, registered fund, or unregistered fund, etc.);
 - J. for individual accounts, the date of birth of the account holder(s);
 - K. whether the account is a wrap account;
 - L. whether the custodian sends periodic account statements directly to the client;
 - M. whether the Adviser has discretionary authority;
 - N. whether the Adviser, an officer, an employee, or an affiliate acts as trustee, cotrustee, or successor trustee or has full power of attorney for the account;
 - O. whether the Adviser or related persons are deemed to have custody of, possession of, or access to the account assets;
 - P. the account's investment strategy (*e.g.*, global equity, high-yield, aggressive growth, long-short, or statistical arbitrage);
 - Q. the name of the account portfolio manager(s);
 - R. whether the client pays a performance fee and the most recent account performance figures;
 - S. account inception date; and
 - T. which other account(s), if any, the account is billed together with.
- 7. Names of any financial planning, pension consulting, or other advisory clients not named above.
- 8. Names of advisory clients terminated during the Examination Period, including the reason, method that termination was communicated, termination date, and asset value at termination.
- 9. All forms of client advisory contracts or agreements that were in effect during the Examination Period.
- 10. Adviser's balance sheet, trial balance, income statement, and cash flow statement as of the end of the two most recently completed fiscal years.
- 11. All versions of Part 2A and Part 2B of Form ADV (the "Brochure" and the "Brochure Supplement") utilized during the Examination Period and any disclosure document used in conjunction with the Brochure and the Brochure Supplement.

- 12. Names of any joint ventures or any other businesses in which the Adviser or any officer, director, or employee participates or has any interest (other than their employment with the Adviser), including a description of each relationship.
- 13. Current fee schedule, if not otherwise stated in advisory contracts or in Form ADV, Part 2A.
- 14. Compliance and operational policies and procedures in effect during the Examination Period for the Adviser and its affiliates. Please be sure to also include the Adviser's code of ethics.
- 15. List of all client or investor complaints and information about the process used for monitoring client/investor correspondence and/or complaints.
- 16. Any written or annual compliance reviews, internal or external control analyses (including any reports prepared by third party compliance consultants), and forensic or transactions tests. Include any significant findings, both positive and negative, and any information about corrective or remedial actions taken regarding these findings.
- 17. Records of any breaches with the Adviser's compliance policies and procedures during the Examination Period and of any action taken as a result of such non-compliance.
- 18. Description of any material changes to the Adviser's business within the past three years.
- 19. A trade blotter (*i.e.*, purchases and sales journal) that lists transactions (including all trade errors, cancellations, re-bills, and reallocations) in securities and other financial instruments (including privately offered funds) for: current and former clients; proprietary and/or trading accounts and access persons. The preferred format for this information is to provide it in Excel as indicated in Exhibit 1.
- 20. Securities held in all client portfolios (aggregate position totals for all instruments) as of and including:
 - a. security name;
 - b. CUSIP (or other identifier);
 - c. client name;
 - d. client account number;
 - e. quantity or principal/notional amount owned by each client;
 - f. cost basis:
 - g. indication of whether the value of the position was readily available and, if not readily available, whether the fair value was determined by the Adviser or by a thirdparty; and
 - h. market value of the position.

The preferred format for this information is in Excel.

- 21. All pitch books, one-on-one presentations, pamphlets, brochures, and any other promotional and/or marketing materials furnished to existing and/or prospective clients for each investment strategy and/or mandate during the last 12 months.
- 22. All advertisements used to inform or solicit clients during the last 12 months. If information on services and investments is available on the Internet, such as websites and blogs, make all versions available as either printouts or electronic archives.
- 23. Any written procedures for calculating and billing fees.
- 24. A description of the fee-billing process, including: identifying the person(s) who calculates advisory fees, sends the invoice to the custodian, and tests advisory fee calculations; identifying any software programs or systems that are used in calculating fees; and, identifying any reconciliation processes that are completed.
- 25. Advisory fee calculations for the Examination Period, including for each advisory client, the billing rate, market value used to calculate the advisory fee, and total fee billed. Please also identify which accounts, if any, are grouped together for feebilling purposes, and from which account the fee is paid.
- 26. Provide a list of securities in client portfolios for which you received a commission, if any.
- 27. Provide a list of security or account types that, as a matter of policy or practice, you do not charge a fee on.

Advisers to Registered Investment Companies ("RIC" or "Fund")

- 28. A chart listing all Funds with the following information as of
 - a. fund/portfolio name;
 - b. share class:
 - c. registration number;
 - d. net asset value;
 - e. total shares outstanding;
 - f. number of shareholder accounts;
 - g. maximum sales load;
 - h. investment objective;
 - i. portfolio turnover rate for last 2 years;
 - j. commencement date of operations; and
 - k. whether the Fund was classified as aggressive capital appreciation, balanced, capital appreciation, growth and income, foreign issuer, growth, income, long term debt (taxable), long term debt (tax-free), money market (taxable), money market (tax-free), precious metals, index, or other.
- 29. All advisory or sub-advisory contracts (engaging the Adviser) that were in force during the Examination Period.