

Organization CRD/IARD: *

Investment Advisory Firm Name: *

Firm d/b/a/ Name:

Business Address: *

Street Address

Street Address Line 2

City

State / Province

Postal / Zip Code

Country

Phone Number: *

Contact Person: *

Contact Person Email Address: *

example@example.com

Business

1. Does your advisory firm engage in the solicitation of business for other investment advisers, whether or not compensation is received? *

Yes

No

a. Investment Advisers on whose behalf you solicit clients (please provide the name(s) and CRD/IARD number(s), if applicable): *

2(a). Does your advisory firm engage other individuals or firms to solicit on your firm's behalf? *

Yes

No

If Yes, provide the name of the individual(s)/firm(s) who solicit on your advisory firm's behalf (please provide the name(s) of the individual or firm and the corresponding CRD/IARD number(s), if applicable) and how compensation, if any, is calculated. *

2(b). Does your advisory firm use any robo-adviser or similar technology tools on behalf of your clients? *

Yes

No

If Yes, provide the name of the robo-adviser or similar technology tools: *

3. Does your advisory firm offer financial planning services? *

Yes

No

4. Does your firm or any affiliated person, including any investment adviser representative, principal or other entity under common control, sell life insurance or any type of annuity product? *

Yes

No

5. Does your advisory firm offer asset management services? *

Yes

No

If Yes, provide the following:

a. Total value of "assets under management" as of December 31, 2022 in USD: *

"Assets Under Management" is a defined term. [See glossary.](#)

b. % of your advisory firm's 2022 revenues from asset management services: *

c. % of your client's AUM in the following types of investments as of December 31, 2022:

1. Equities *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

2. Bonds *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

3. Mutual funds (other than money market funds) *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

4. Money Market Mutual funds, cash or similar liquid cash equivalents *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

5. Exchange Traded Funds (ETFs), excluding non-traditional ETFs like leveraged, inverse, and volatility products *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

6. Leveraged, Inverted, and/or Volatility ETFs *

0%
1-10%
11-25%
26-50%
51-100%

7. Options, including Binary Options *

0%
1-10%
11-25%
26-50%
51-100%

8. Microcap Stocks (i.e., "Penny" Stocks) *

0%
1-10%
11-25%
26-50%
51-100%

9. Natural Resources and Precious Metals (including Gold Bullion) *

0%
1-10%
11-25%
26-50%
51-100%

10. Viatical Settlements *

0%
1-10%
11-25%
26-50%
51-100%

11. Foreign Currencies *

0%
1-10%
11-25%
26-50%
51-100%

12. Privately Placed and/or Unregistered Securities (including those for which no secondary market exists or that are restricted from being resold). *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

13. Non-publicly traded alternative investments including REITs, business development companies, oil and gas programs, equipment leasing programs, commodity pools or similar direct investment programs but excluding federally and state exempt private offerings. *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

14. Asset-Backed Securities (including collateralized mortgage obligations) and/or Insured or Guaranteed Promissory Notes. *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

15. Derivative or Market-Linked (i.e. broker-traded) Certificates of Deposit *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

16. Cryptocurrencies, Initial Coin offerings, or other digital assets using cryptography, blockchain, Artificial Intelligence (AI) or similar technologies to create currency products or trading platforms. *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

17. Non-Fungible Tokens (NFTs) *

- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

d. Do you manage investor assets with discretion? *

- Yes
- No

If Yes, provide the following:

i. Discretionary "assets under management":

"*Assets Under Management*" is a defined term. [See glossary.](#)

1. As of December 31, 2022. USD *

2. As of December 31, 2021. USD *

ii. Discretionary "assets under management" for New Jersey clients:

"*Assets Under Management*" is a defined term. See glossary.

1. As of December 31, 2022. USD. *

2. As of December 31, 2021. USD. *

iii. Number of discretionary accounts as of December 31, 2022: *

iv. Number of discretionary accounts for New Jersey clients as of December 31, 2022: *

v. Since December 31, 2021, did your firm have any clients who transferred funds from an employer benefit plan to an IRA or other account managed by you? *

Yes

No

If Yes, for how many clients? *

6. For any of your clients, are environmental, social and/or governance (“ESG”) related considerations taken into account when providing them investment advice? *

Yes

No

If yes, for how many clients are ESG considerations taken into account when you provide them investment advice? *

If yes, please explain how ESG is incorporated into your advice. *

Fees (Responses referencing your firm's ADV or other document are not sufficient.)

7. Describe your fee calculation (percentage range or fixed percent, flat amount fee, hourly rate, any excluded assets, pro rata for less than full periods), and describe any fee charged besides a percentage of “assets under management”(“AUM”), for example, subscription fees. *

8. Are fees adjusted for breakpoint discounts (fee rate decreases as AUM increases)? *

Yes

No

9. Does your advisory firm charge clients fees of more than \$500 more than six months in advance? *

Yes

No

10. Does your advisory firm or any of its representatives charge a performance fee defined under Bureau Regulation 13:47A-2.10? *

Yes

No

See Bureau Regulation 13:47A-2.10

If Yes, enter a description or schedule if not stated in the sample advisory contract(s) you've submitted to the Bureau, and note if the fee is calculated with or without a high water mark. *

11. Does your advisory firm execute trades on behalf of clients in an omnibus or average price account? *

Yes

No

(a). If Yes, describe how and when your advisory firm aggregates and allocates trades executed in an omnibus or average price account among clients and, if relevant, accounts for which individuals associated with the firm are the beneficial owner. Please include your procedure for incompletely filled/executed orders. *

12. Have your advisory firm's investment advisory contract(s), including contracts used for financial planning and solicitation services, changed in 2022? *

- Yes
- No

(a). Have you provided clients with a copy of your brochure at or prior to entering into a contract and annually (or a summary of changes) as required by Bureau Regulation 13:47A-2.13(c)(1) and (2)? *

- Yes
- No

See Bureau Regulation 13:47A-2.13(c)(1) and (2)

(b). In 2022, did you provide clients the Investor Protection Information Form required by Bureau Regulation 13:47A-2.14? *

- Yes
- No

See Bureau Regulation 13:47A-2.14

Policies and Procedures

13. Indicate if your advisory firm has the following: *

- A written policies and procedures manual(s)
- A written code of ethics
- Conflicts of interest policy
- Personal securities transactions policy or procedure
- Insider trading policy or procedure
- Written policies or procedures on cybersecurity
- Written privacy policy and procedures on how to protect and safeguard clients' personal information

14. Please provide the date of the most recent version of the written policies & procedures manual(s): *

Month Day Year

15. Does your advisory firm use proprietary email addresses? (ex : @firmname.com) *

- Yes
- No

16. Does your advisory firm use web-based email addresses? (ex : @gmail.com) *

- Yes
- No

17. Does your advisory firm encrypt emails or attachments that contain clients' personal identifiable information and other client account information? *

- Yes
- No

18. Does your advisory firm complete a written suitability and risk tolerance questionnaire or other customer profile and objectives form to determine new clients' investment experience or objectives? *

- Yes
- No

If Yes, provide the date of the most recent update and how frequently the questionnaire and risk tolerance form is distributed to clients. *

19. If your advisory firm is located in New Jersey, does your advisory firm create and maintain the books and records required by Bureau Regulation 13:47A-2.6? *

- Yes
- No
- N/A (not in NJ)

20. Does your advisory firm have a business continuity plan ("BCP")? *

- Yes
- No

If Yes, provide the following:

a. Does your BCP include a disaster recovery plan? *

- Yes
- No

b. If your advisory firm has fewer than three investment adviser representatives, does your continuity plan include a business succession plan that designates an individual to notify clients, vendors, institutions, and regulatory bodies (including making any regulatory filings), in the event of an investment adviser representative's incapacity or death? *

- Yes
- No
- N/A

SAFEGUARDING AGAINST FINANCIAL EXPLOITATION ACT ("SAFE")

On January 13, 2020, the SAFE act was enacted in New Jersey. The SAFE Act provides, in part, that qualified individuals, defined as broker-dealers and investment advisers, who believe that financial exploitation of a vulnerable adult may have occurred or been attempted, or is being attempted, shall promptly notify the Bureau and adult protective services. Further, the broker-dealer or investment adviser may delay transactions and disbursements from accounts related to the vulnerable adult when they believe that financial exploitation may be occurring or will occur, and has been properly reported. The SAFE Act became effective on April 12, 2020. See: <https://www.njconsumeraffairs.gov/bos/Pages/SAFE.aspx>

21. What percentage of your clients are over 65 or a person subject to the "Adult Protective Services Act," P.L. 1993, c.249 (C.52:27D406 et seq.) *

22. Have you read SAFE? *

- Yes
- No

23. Does your firm have written policies and procedures related to SAFE? *

- Yes
- No

If no, please see above link and be sure you are in compliance.

24. Does your advisory firm use a trusted contact form with clients that identifies a trusted person to serve as resource for your firm in administering the account, protecting assets, and responding to possible financial exploitation concerns? *

- Yes
- No

If yes, do you seek to do so for all clients or just certain clients such as seniors, vulnerable adults or those with diminished capacity?: *

Personnel, Associated Persons, and Other Activities

25. Upload a list of all current investment adviser representatives of your advisory firm as an attachment, including their accompanying CRD number(s) and any professional designations they use. Also indicate any dual affiliations or registrations as a broker-dealer agent or investment adviser representative with any other broker-dealer or investment advisory firm, and the name and CRD# for each of the other firms. Indicate which, if any, of your investment adviser representatives are licensed as an insurance provider. Please indicate if any investment adviser representatives are subject to a Heightened Supervision Agreement by your firm or any regulator.

25a. Upload a list of the last time (most recent) your advisory firm was examined by the compliance department of any firm listed in 25 above, and indicate whether the exam was virtual or on site/in person.

26. Does any investment adviser representative of your advisory firm have a “doing business as” (DBA) name that is different from your advisory firm’s name? *

Yes

No

If Yes, provide any DBA name(s) used by each representative and state whether or not their DBA is disclosed on the CRD/IARD. *

27. Does your advisory firm employ any non-registered personnel? *

Yes

No

If Yes, list job titles, any professional designations, and any DBA names. *

28. Is your advisory firm's Chief Compliance Officer ("CCO") the same as listed in your advisory firm's response to Item 1, part J, of the identifying information section of your most recent Form ADV? *

Yes

No

If Not, provide the name and contact information of your advisory firm's CCO, as well as an explanation for why your response to Item 1, part J, for your Form ADV does not reflect this information. *

29. If your advisory firm does not have a CCO, indicate the designated regulatory contact for your advisory firm, with that individual's title and contact information. *

30. Does your advisory firm have any other entity which assists, or during 2022 assisted, your firm in completing and submitting any forms filed with the IARD or directly with the Bureau? *

- Yes
- No

If Yes, provide a list of name(s), address(es) and any other contact information for each such entity. *

31. Are there any other business activities or joint ventures conducted on your premises, such as office sharing, accounting, tax services, mortgage-related services, insurance, real estate, pension or retirement plan administration, other business advisory or consulting services, etc.? *

- Yes
- No

If Yes, provide a list of the services provided here: *

32. Is your advisory firm under common control or ownership with another investment adviser? *

- Yes
- No

If Yes, list the firm name(s) and CRD/IARD number(s), if applicable: *

Complaints/Litigation/Regulatory Action/Risk Management

33. Has your advisory firm or any person associated with it received any client complaints, including but not limited to, any client complaints that became or are the subject of an arbitration or litigation in 2022, whether or not disclosed on your advisory firm's ADV? *

Yes

No

34. Has your advisory firm or any person associated with it been subject to any litigation or arbitration affecting or related to the advisory firm or any of its representatives in 2022, whether or not disclosed on your advisory firm's ADV? *

Yes

No

35. Has your advisory firm or any person associated with it been the subject of any regulatory inquiry, investigation or action in 2022, whether or not disclosed on your advisory firm's ADV? *

Yes

No

36. Is your advisory firm aware of any potential or anticipated complaints, litigations, arbitrations, or regulatory inquiries, investigations, or actions involving your firm or any person associated with it, whether or not disclosed on your advisory firm's ADV? *

Yes

No

Advertising and Promotional Activities

37. Does your firm carry errors & omissions insurance? *

Yes

No

38. Does your advisory firm or any of its representatives maintain or use any website or use any social media service? *

Yes

No

39. Please list each web address or handle that your advisory firm and/or any of its representatives uses including social media websites (such as Facebook, LinkedIn, etc.), blogs, Twitter, personal websites, and business websites. Please affirmatively state that your firm does not utilize any websites, if that is the case. *

40. Does your advisory firm have policies and procedures for the use of social media by your firm and its representatives? *

Yes

No

41. Does your advisory firm conduct "seminars"? *

Yes

No

If Yes, provide details here, including the location and dates of seminars conducted in 2022, as well as the subject matter of each "seminar" and whether or not a meal was provided. *

42. Does your advisory firm use any performance figures, such as firm-wide, composite, hypothetical, or specific (whether or not identified) customer performance figures or charts, when marketing its services to existing or prospective clients? *

Yes

No

If Yes, describe circumstances in which marketing and/or performance figures were used in 2022. *

Custody and Financial Condition

43. Does the advisory firm, directly or through a related person, maintain "custody" and possession, or have the authority to take possession of its client's assets in addition to or exclusive of an unrelated custodian other than for purposes of withdrawing your advisory fees when earned and due? *

Yes

No

"*Custody*" is a defined term. [See glossary.](#)

b. If your advisory firm is located in New Jersey, does your firm maintain minimum net capital of \$35,000? *

Yes

No

N/A

c. If your answer to b. is No, does your firm maintain a surety bond of at least \$35,000? *

44. Does the advisory firm, or any of its representatives, have standing letters of authorization, power of attorney or similar arrangements, pursuant to which it may direct disbursements from a client's account to (a) other accounts (eg. bank accounts, credit card accounts, loan accounts, etc.) owned or controlled by the client? *

Yes

No

(b). accounts owned or controlled by any third party not the client? *

Yes

No

45. Does the advisory firm, or any of its representatives, serve as an executor, trustee, general power of attorney, or similar capacity for any client or with respect to any client account? *

Yes

No

46. Has your advisory firm or any affiliated person under common control at any time in 2022, managed or advised any pooled investment vehicle? *

- Yes
- No

47. If applicable, please list the name, address and CRD number of all custodian firms who currently hold (or held in 2022) any assets or accounts for the clients of your advisory firm. Please affirmatively state that your firm does not utilize any custodial firms, if that is the case. *

48. Is your advisory firm "solvent"? *

- Yes
- No

"Solvent" is a defined term. [See glossary.](#)

49. If your advisory firm is located in New Jersey and manages client assets with discretion, does it now have and at all times maintain net capital of at least \$10,000? *

- Yes
- No
- Not applicable because firm is not located in New Jersey.
- Not applicable because firm does not manage assets with discretion.

50. Does your firm or any associated person use any client's own personal login or user ID and password to access the client's account at any custodian such as an employer - sponsored retirement account, a broker-dealer or a commercial bank? *

- Yes
- No

Acknowledgement and Signature

Is the Preparer the Chief Compliance Officer? *

Yes

No

Name of Chief Compliance Officer: *

First Name

Last Name

Phone Number: *

E-mail: *

example@example.com

Under penalties of law, I affirm by my signature or electronic submission that this information contained herein, and attached hereto, is true, complete, and current, and that I am an authorized person to submit it. *

I AFFIRM

Full Name of Preparer: *

First Name

Last Name

Title/Positon: *

Company: *

Phone Number: *

E-mail: *

example@example.com

Under penalties of law, I affirm by my signature or electronic submission that this information contained herein, and attached hereto, is true, complete, and current, and that I am an authorized person to submit it. *

I AFFIRM