2019 Investment Adviser Written Examination

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

Phone Number: *

Contact Person: *

Contact Person Email Address: * ex: myname@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

If Yes, provide the following:

   a. % of your advisory firm’s 2018 revenues from solicitation of business for other investment advisers: *

   b. Number of clients referred for whom you received compensation during 2018: *

   c. 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):

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

If Yes, provide the following:

a. % of your advisory firm’s 2018 revenues from financial planning services:  
0-100%

b. Number of financial planning clients in 2018:  
#

4. Does your advisory 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

a. If Yes, provide the number of investment adviser firm clients to whom any such products were sold during 2018:  
#

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, 2018 in USD:  
$USD

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

b. % of your advisory firm’s 2018 revenues from asset management services:  
0-100%
c. % of your client’s AUM in the following types of investments as of December 31, 2018:

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
   - 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)
<table>
<thead>
<tr>
<th>Category</th>
<th>Percentage Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Natural Resources and Precious Metals</td>
<td>0%, 1-10%, 11-25%, 26-50%, 51-100%</td>
</tr>
<tr>
<td>10. Viatical Settlements</td>
<td>0%, 1-10%, 11-25%, 26-50%, 51-100%</td>
</tr>
<tr>
<td>11. Gold Bullion</td>
<td>0%, 1-10%, 11-25%, 26-50%, 51-100%</td>
</tr>
<tr>
<td>12. Foreign Currencies</td>
<td>0%, 1-10%, 11-25%, 26-50%, 51-100%</td>
</tr>
<tr>
<td>13. Privately Placed and/or Unregistered Securities (including those for which no secondary market exists or that are restricted from being resold)</td>
<td>0%, 1-10%, 11-25%, 26-50%, 51-100%</td>
</tr>
<tr>
<td>14. Entertainment Investments (including films, theater productions, infomercials, and web-based entertainment providers)</td>
<td>0%, 1-10%, 11-25%, 26-50%, 51-100%</td>
</tr>
<tr>
<td>15. 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</td>
<td>0%, 1-10%, 11-25%, 26-50%, 51-100%</td>
</tr>
<tr>
<td>16. Asset-Backed Securities (including collateralized mortgage obligations) and/or Insured or Guaranteed Promissory Notes</td>
<td>0%, 1-10%, 11-25%, 26-50%, 51-100%</td>
</tr>
</tbody>
</table>
17. Church Bonds *
- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

18. Derivative or Market-Linked Certificates of Deposit *
- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

19. Cryptocurrencies, Initial Coin offerings, or other digital assets using cryptography, blockchain or similar technologies to create currency products or trading platforms. *
- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

20. Other *
- 0%
- 1-10%
- 11-25%
- 26-50%
- 51-100%

d. Please specify the following client information:

i. Number of clients between ages 55 and 64: *
- #

ii. Number of clients between ages 65 and 74: *
- #

iii. Number of clients 75 or older: *
- #

iv. Does your advisory firm use a trusted contact form with clients that identifies a trusted person to contact for administering the account or in the event of 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?: *


e. If any of your firm’s investment adviser representatives also act as broker-dealer agents on an asset management client’s account, please provide the number of trades for the five most actively traded accounts of all such investment adviser representatives for calendar year 2018:

1
- #

2
- #

3
- #
f. 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, 2018. USD *

2. As of December 31, 2017. USD *

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

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

1. As of December 31, 2018. USD. *

2. As of December 31, 2017. USD. *

iii. Number of discretionary accounts as of December 31, 2018:

iv. Number of discretionary accounts for New Jersey clients as of December 31, 2018:

v. Since December 31, 2017, 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? ex: 23

---

6. 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:

---

7. Does your advisory firm execute trades on behalf of clients in an omnibus account? *

Yes  
No
7(a). If Yes, describe how and when your advisory firm allocates trades in an omnibus account among clients and, if relevant, accounts for which individuals associated with the firm are the beneficial owner.

8. Does your advisory firm's custodian broker-dealer automatically deduct your firm's investment advisory fees from client accounts?  
   - Yes
   - No

8(a). If Yes to 8, does your advisory firm's custodian broker-dealer household client accounts?  
   - Yes
   - No

8(b). If Yes to 8, does your advisory firm's custodian broker-dealer adjust your fees for breakpoint discounts?  
   - Yes
   - No

9. Have your advisory firm's investment advisory contract(s), including contracts used for financial planning and solicitation services, changed in 2018?  
   - Yes
   - No

If Yes, upload all changes to your advisory firm's investment advisory contracts(s), including contracts used for financial planning and solicitation services, in 2018:  
   - Choose File
     - No file chosen

10. Have all of your clients signed your advisory firm's most recent investment advisory contract?  
   - Yes
   - No

11(a). Is all of the information on your advisory firm's most recently filed ADV, including Part 1, Part 2A, and Part 2B, accurate?  
   - Yes
   - No

11(b). 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)

11(c). Have you provided clients this year 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

12. Does your advisory firm have a written policies and procedures manual(s)?  
   - Yes
   - No
13. Does your advisory firm have a written code of ethics, conflicts of interest policy, or insider trading policy or procedure? *

- Yes
- No

14. Does your advisory firm have written policies and procedures on how to protect and safeguard client’s personal information? *

- Yes
- No

15. Does your advisory firm have a written privacy policy on how to protect and safeguard client’s personal information? *

- Yes
- No

16. Does your advisory firm use proprietary email addresses? *

- Yes
- No

17. Does your advisory firm use web-based email addresses? *

- Yes
- No

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

- Yes
- No

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

- Yes
- No

If Yes, provide the following:

a. How often are these forms reviewed and updated? Please describe the frequency in terms of months or years. *

b. Does your advisory firm document the review of these forms and any updates that are made? *

- Yes
- No

c. How often does your advisory firm review and update client suitability, profile and objectives information for clients 65 years of age or older? Please describe the frequency in terms of months or years. *

20. Does your advisory firm have a business continuity plan? *

- Yes
- No

If Yes, provide the following:

a. Does your business continuity plan include a disaster recovery plan?

- Yes
- No

b. If your advisory firm has a single investment adviser representative or is a sole proprietorship, does your continuity plan include a business succession plan that designates an individual to notify clients, vendors, institutions, and regulatory bodies, including filing Form ADV-W on FINRA's...
21. 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
- Not applicable because firm is not located in New Jersey.

See Bureau Regulation 13:47A-2.6

22. If your advisory firm is located in New Jersey and you answered "No" to any of questions 10, 11, 12, 13, 14 or 15, what is your firm's anticipated date for compliance with the pertinent requirements of Bureau Regulation 13:47A-2.6 regarding Maintenance of Books and Records and Bureau Regulation 13:47A-2.12 regarding Investment Adviser Supervision (which addresses the need for various written policies and procedures, safeguarding of client information, back-up of certain records, and a business continuity and succession plan)?

- Not applicable because firm is not located in New Jersey.
- Not applicable because firm is in compliance.

Anticipated date for compliance: *

Month - Day - Year


23. If your advisory firm is not located in New Jersey, is your advisory firm in compliance with the requirements for net capital and books and records of the state in which it is located?

- Yes
- No
- Not sure
- Not applicable because firm is located in New Jersey.

Personnel, Associated Persons and Other Activities

24. 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.

No file chosen

Choose File

Indicate any dual affiliations or registrations as a broker-dealer agent or investment adviser representative that any of your investment adviser representatives have with any other broker-dealer or investment advisory firm. Indicate which if any of your investment adviser representatives is licensed as an insurance provider.

25. Was any investment adviser representative of your advisory firm a registered agent of a broker-dealer prior to becoming associated with your firm?

- Yes
- No
If Yes, upload a list of the names and CRD#s for each such individual, and the name and CRD# of their previous broker-dealer if known.

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>26. Is any investment adviser representative of your advisory firm the subject of an outstanding lien or judgment, including but not limited to a tax lien or judgment?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>27. Does your advisory firm employ non-registered personnel?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If Yes, upload a list of all non-registered personnel compensated by or otherwise working for your advisory firm, indicating their job title and any professional designations that they use.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>28. Is any investment adviser representative of your advisory firm involved in wrap and/or referral accounts with a broker-dealer firm?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If Yes, indicate the relevant investment adviser representative and the wrap program they are involved with:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>29. 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?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If Yes, provide any DBA name(s) used by each representative and state whether or not their DBA is disclosed on the CRD/IARD.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>30. Provide the name of each individual whose employment or other work relationship with your advisory firm has ceased in 2018, and their reason for leaving the firm:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>31. 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?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
32. 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.

33. Does your advisory firm have any other entity which assists, or during 2018 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. *

34. 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: *

35. 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: *

36. Is your advisory firm associated with or does it have a business arrangement with a broker-dealer? *

   Yes  No

If Yes, provide the following:

a. Name and CRD number of each broker-dealer associated with your advising firm: *
b. Was your advisory firm ever examined by the compliance department of the listed firm? *

- Yes
- No

c. Date of the last exam.

- Month
- Day
- Year

Complaints/Litigation/Regulatory Action

37. 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 2018? *

- Yes
- No

If Yes, provide the following:

a. Number of complaints in 2018. *

b. Upload an explanation of each complaint, its current status and indicate the name and CRD # of any representative to whom the complaint pertains. *

38. 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 2018? *

- Yes
- No

If Yes, provide the following:

a. Number of litigations or arbitrations affecting or related to the advisory firm or any person associated with it in 2018. *

b. Upload an explanation of each litigation or arbitration, its current status and indicate the name and CRD # of any representative to whom it pertains. *

39. Has your advisory firm or an associated person been the subject of any regulatory inquiry, investigation or action in 2018? *

- Yes
- No

If Yes, provide the following:

a. Number of regulatory proceedings in 2018? *

b. Upload an explanation of each, its current status and indicate the name and CRD # of any representative to whom it pertains. *
40. 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? *

- Yes
- No

If Yes, provide the following:

a. Number of pending potential or anticipated regulatory inquiries, investigations or actions. *

b. Upload an explanation of each, its current status and indicate the name and CRD # of any representative to whom it pertains. *

Choose File

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

- Yes
- No

42. 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. *

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

- Yes
- No

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

- Yes
- No

If Yes, provide details here, including the location and dates of seminars conducted in 2018, as well as the subject matter of each "seminar" and whether or not a meal was provided. *

45. Does your advisory firm use any performance figures, such as firm-wide 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 2018. *

Alternatively, provide the marketing and/or performance figures used in 2018.

Custody and Financial Condition

46. 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? *

"Custody" is a defined term. See glossary.

a. If your advisory firm is located in New Jersey, upload a certified, audited balance sheet for the advisory firm dated within 60 days of your completion and submission of this questionnaire or an explanation giving rise to your firm having custody of client assets and why no audit of the firm's financial statements has been performed. If located outside New Jersey, explain your home states capital requirement for your firm and confirm you comply. *

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

   □ Yes  □ No

   □ Not applicable because not located in New Jersey.

c. If your advisory firm is located in New Jersey, does your firm maintain a surety bond of at least $35,000? *

   □ Yes  □ No

   □ Not applicable because not located in New Jersey.

47. 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? *

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

   □ Yes  □ No

48. 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
49. Has your advisory firm or any affiliated person under common control at any time in 2018, managed or advised any pooled investment vehicle?

- [ ] Yes
- [x] No

If Yes, upload a copy of each such vehicle's most recent audited financial statements or an explanation as to why no such audit has been performed in 2018.

- [ ] Choose File

50. In addition to any custody that your advisory firm may itself maintain, please list the name, address and CRD/IARD number, if applicable, of all custodian firms who currently or have in 2018, held client assets for your advisory firm or clients of your advisory firm. Please affirmatively state that your firm does not utilize any custodial firms, if that is the case.

51. Is your advisory firm "solvent"?

- [ ] Yes
- [ ] No

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

52. 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

53. 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 a broker-dealer or a commercial bank?

- [ ] Yes
- [ ] No

Acknowledgement and Signature

Is the Preparer the Chief Compliance Officer?

- [ ] Yes
- [ ] No

Full Name of Preparer:

First Name: [ ] Last Name: [ ]

Title/Position: [ ]

Company: [ ]
Date: 

Phone Number: *

E-mail: ex: myname@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. *

Submit