

Compliance Monthly News July 2023

Form CRS Delivery Requirements

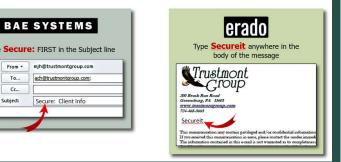
Four instances:

- 1. New or prospective customers before or at the earliest of (a) recommendation of an account type, a securities transaction or an investment strategy involving securities; (b) placing an order for the retail customer; or (c) the opening of a brokerage account for the retail customer.
- 2. Existing customers whom vou recommended that the client: i) open a new account different from their current account(s); ii) roll over assets from a retirement account into a new or existing account or investment; or iii) be provided a new brokerage service or investment that does not necessarily involve the opening of a new account and would not be held in an existing account.
- When completing change of broker dealer form
- Existing customers upon request.

The account cover page is to be used to confirm delivery of Form CRS.









Uniform Transfers to Minors Act

- *The Uniform Transfers to Minors Act (UTMA) allows a minor to receive gifts without the aid of a guardian or trustee.
- *The minor named in the UTMA can avoid tax consequences until they attain legal age for the state in which the account is set up.
- *When the minor beneficiary of an UTMA custodial account reaches the age of majority, the custodianship is over, and they get legal control over the account. *It's important to note that the age of majority is slightly different in each state. In most cases, it's either 18 or 21.



OFFICE CHECK-UP

- *all marketing materials submitted for approval
- *office personnel disclosed
- *electronic device list up-to-date
- *voicemail disclosure added to all phones used for business
- *all personal accounts disclosed
- *pre-clearances submitted
- *monthly/quarterly logs completed
- *quarterly political contributions loas submitted
- *OBAs approved
- *copy of all reports submitted
- *use of online meetings approved
- *professional designations up-to-date and maintained
- *social media/website approved
- *U4 up-to-date

(https://finpro.finra.org)

- *all customer complaints submitted (written or oral)
- *IS YOUR CE COMPLETED??

ALL NEW BUSINESS NEEDS PRE-APPROVED

NOTE: new business, CPFs, negative response letters, client account changes/add-ons and checks go to **Audrey in operations**

2023 Webinar Schedule

*takes place 2-3pm EST

February 9, 2023 May 11, 2023 August 10, 2023 November 9, 2023

links to register on the website