

Organization CRD/IARD Number

Investment Advisory Firm Name:

Firm d/b/a/ Name

Business Address

Address Line 1

Address Line 2

City

State

ZIP Code

Phone Number

Name of Chief Compliance Officer

First Name

Last Name

Email of Chief Compliance Officer

Name of contact person if other than Chief Compliance Officer

First Name

Last Name

Contact Person Email Address

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BUSINESS – Responses referencing your firm's ADV or other documents are not sufficient.

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

- Yes
 No

Does your advisory firm engage other individuals or firms to solicit on your firm's behalf?

- Yes
 No

Does your advisory firm use any robo-adviser?

- Yes
 No

Robo-advisor definition

Does your advisory firm offer financial planning services?

- Yes
 No

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

Does your advisory firm offer asset management services (AUM)?

- Yes
 No

* Assets under management means "Regulatory Assets Under Management" as defined in the SEC Form ADV instructions [pdf]

Do you manage investor portfolios with discretion?

- Yes
 No

* Accounts are defined as the number of accounts that an investor may have. For example, an individual may have a traditional IRA, a Roth IRA and a taxable account. This individual would be viewed as having three accounts.

Number of discretionary accounts as of December 31, 2023

[Input field for number of discretionary accounts]

Number of discretionary accounts for Minnesota residents as of December 31, 2023

[Input field for number of discretionary accounts for Minnesota residents]

Since December 31, 2023, 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

For any of your clients, are environmental, social and/or governance ("ESG") related considerations taken into account when providing investment advice?

- Yes
 No

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FEEs - Responses referencing your firm's ADV or other documents is insufficient.

Describe your fee calculation (i.e., percentage range or fixed percent, flat amount fee, hourly rate, any excluded assets, pro rata for less than full periods)

Are fees charged in advance, arrears or a combination of both?

Does your firm use a tiered fee schedule (fee rate decreases as AUM increases)?

- Yes
- No

Briefly describe

Does your firm practice householding of assets?

- Yes
- No

Does your firm practice fee calculation adjustments in certain instances?

- Yes
- No

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

- Yes
- No

Does your advisory firm or any of its representatives charge a performance fee?

- Yes
- No

Does your firm send an invoice for fees to your clients?

- Yes
- No

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

- Yes
- No

Have your advisory firm's investment advisory contract(s), including contracts used for financial planning and solicitation services, changed or been updated in 2023?

- Yes
- No

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 the Investment Advisers Act of 1940?

- Yes
- No

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POLICIES AND PROCEDURES – Responses referencing your firm’s ADV or other documents are insufficient.

Indicate if your advisory firm has the following:

Written supervisory procedures manual

- Yes
 No

Written code of ethics

- Yes
 No

Written policies or procedures on cybersecurity

- Yes
 No

Written privacy policy

- Yes
 No

Written procedures on how to protect and safeguard clients’ personal information

- Yes
 No

Written policies and procedures related to Safe Seniors Financial Protection

- Yes
 No

Written policies and procedures for the use of social media by your firm and its representatives

- Yes
 No

Written policies and procedures for the use of client’s log in information to access client accounts at any custodian such as an employer – sponsored retirement account, a broker–dealer or a commercial bank

- Yes
 No

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

- Yes
 No

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

- Yes
 No

Does your advisory firm encrypt emails or attachments that contain clients’ personal identifiable information and other client account information?

- Yes
 No

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

- Yes
 No

Does your advisory firm create and maintain the books and records required by Minn Rule 2876.4114?

- Yes
 No

Review Minn Rule 2876.4114

Does your advisory firm have a business continuity plan (“BCP”)?

- Yes
 No

What percentage of your clients are over the age of 65 or subject to the Safe Seniors Financial Protection Act, passed August 1, 2018

Input field for percentage

Read the Safe Seniors Financial Protection Act, passed August 1, 2018

Does your advisory firm recommend that clients identify a trusted person to serve as resource for your firm in administering the account, protecting assets, and responding to possible financial exploitation concerns in the event an occurrence warrants such?

- Yes
 No

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PERSONNEL, ASSOCIATED PERSONS, and OTHER ACTIVITIES- Responses referencing your firm's ADV or other documents are not sufficient

Upload a list of all current investment adviser representatives of your advisory firm as an attachment:

- including their accompanying CRD number(s)
• any professional designations they use.
• indicate any dual affiliations or registrations as a broker-dealer agent or investment adviser representative with any other broker-dealer or investment advisory firm
• If so, include 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.

Please use this spreadsheet to upload a list of all current investment adviser representatives of your advisory firm.

Upload list of representatives

Drag and drop here or Browse files
Max file size: 30 MB

When was the last time your advisory firm was examined by any state or federal regulator?

[Empty text input field]

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

Does your advisory firm employ any non-registered personnel?

- Yes
 No

Does your advisory firm have any other entity which assists your firm in completing and submitting any forms filed with the IARD or directly with the Department and/or provides consulting services?

- Yes
 No

Are there any other business activities or joint ventures conducted on your premises, such as, but not limited to office sharing, accounting, tax services, mortgage-related services, insurance, real estate, pension or retirement plan administration, other business advisory or consulting services, etc.?

[Empty text input field]

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

- Yes
 No

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 2023 or are currently pending, whether disclosed or not on your advisory firm's ADV?

- Yes
 No

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 2023, whether or not disclosed on your advisory firm's ADV?

- Yes
 No

Has your advisory firm or any person associated with it been the subject of any regulatory inquiry, investigation or action in 2023, whether or not disclosed on your advisory firm's ADV?

- Yes
 No

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 disclosed or not on your advisory firm's ADV?

- Yes
 No

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ADVERTISING and PROMOTIONAL ACTIVITIES
- Responses referencing your firm's ADV or other documents are not sufficient.

Does your firm carry errors & omissions insurance?

- Yes
- No

Does your advisory firm maintain or use any website or use any social media service?

- Yes
- No

Do your investment adviser representatives maintain or use any website or use any social media service besides the firm website and social media services?

- Yes
- No

Does your advisory firm conduct seminars or presentations to an audience?

- Yes
- No

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

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CUSTODY and FINANCIAL CONDITION - Responses referencing your firm's ADV or other documents are not sufficient

Does the advisory firm, directly or through a related person, maintain "custody" ?

- Yes
 No

As defined by Minn. R. 2876.4116, subp. 3, 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 advisory fees when earned and due

Is your advisory firm "solvent"?

- Yes
 No

* Solvent means that the liabilities of the investment advisory firm do not exceed the assets of the investment advisory firm, or that the investment advisory firm can meet its obligations as they mature.

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:

other accounts (e.g., bank accounts, credit card accounts, loan accounts, etc.) owned or controlled by the client?

- Yes
 No

accounts owned or controlled by any third party not the client?

- Yes
 No

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

Has your advisory firm or any affiliated person under common control at any time in 2023, managed or advised any pooled investment vehicle?

- Yes
 No

If applicable, please upload a word document that list the name, address and CRD number of all custodian firms who currently hold (or held in 2023) 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

Drag and drop here or Browse files
Max file size: 25 MB

If your advisory firm is located in Minnesota and manages client assets with discretion, does it now have and at all times maintain net worth of at least \$10,000?

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

Review Rule referencing net worth of at least \$10,000

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

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ACKNOWLEDGEMENT & SIGNATURE

Is the Preparer the Chief Compliance Officer?

- Yes
- No

Name of Chief Compliance Officer

<input type="text"/>	<input type="text"/>
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First Name

Last Name

CRD Number of Chief Compliance Officer

Phone

Email

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Complete if preparer is not the Chief Compliance Officer

Full Name of Preparer

<input type="text"/>	<input type="text"/>
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First Name

Last Name

CRD Number of Preparer

Title/Position

Company

Phone

Email

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

Use your mouse or finger to draw your signature above

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