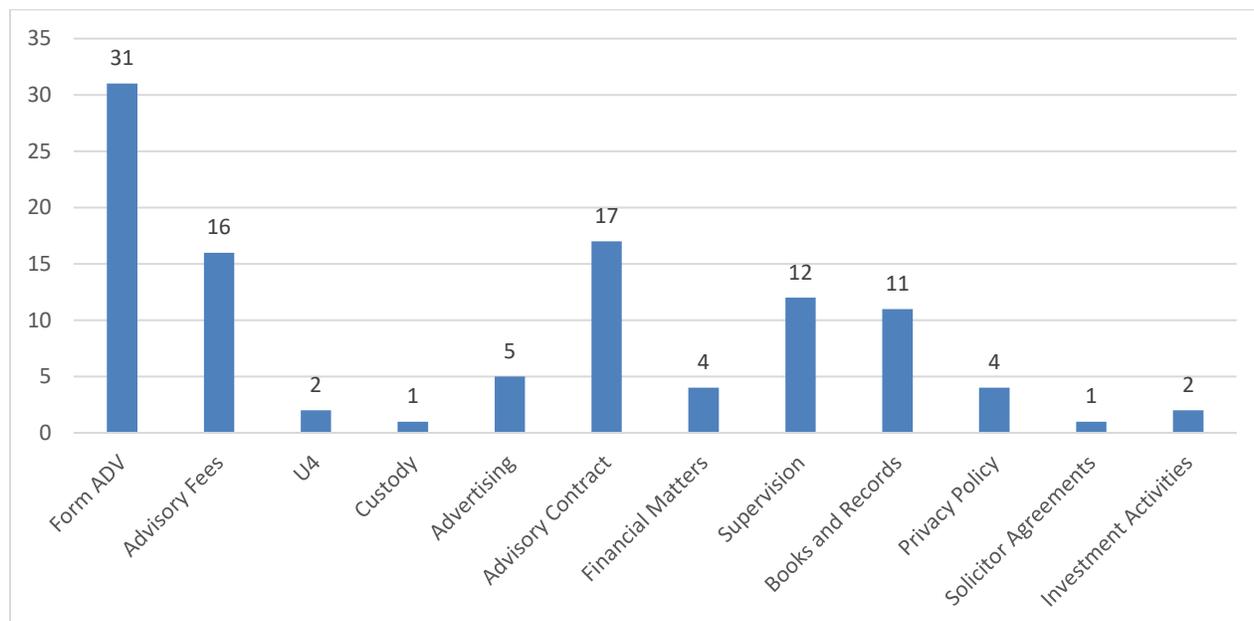


Exam Deficiencies July 1, 2018 through June 30, 2019



The findings represent 26 examinations completed from July 1, 2018 through June 30, 2019.

Form ADV

Inconsistency between Part I and Part 2A	(7)
Inconsistency with U4	(1)
Fee disclosure/refund of pre-paid fees	(4)
Types of services offered	(7)
Not disclosing soft dollar arrangement	(1)
Disciplinary language – objectionable	(1)
Inaccurate business designations	(1)
Failed to file annual update	(3)
Not provided to clients	(1)
Type of fee charged (annual) not disclosed	(1)
Failed to disclose business relationship(s)	(1)
Failed to keep and update brochure	(2)
Proxy disclosure inconsistent with advisory contract	(1)

Advisory fees

Formula not on fee statements	(4)
Method of calculation not disclosed (combined accts)	(1)
Values used do not match account statements	(3)
Fee invoices not provided	(2)
Charged fees without written agreement	(3)
Charged fees on assets not disclosed in advisory contract	(1)
Charged an unreasonable fee	(1)
Fee formula does not match ADV Part 2A	(1)

U4		
	Failed to disclose outside business activity	(1)
	Failed to register as IAR	(1)
Custody		
	Custody due to fee amount charged in violation of Rule 660:11-7-44-(d)	(1)
Advertising/Performance Reporting		
	Not disclosed and not submitted to ODS	(4)
	Misrepresented services offered & fees charged	(1)
Advisory Contract		
	Failed to disclose fee being charged	(4)
	Charged a fee that is different than disclosed in contract	(1)
	Failed to maintain contracts	(5)
	Failed to indicate fees are negotiable	(1)
	Failed to provide formula used to calculate fees	(1)
	Failed to address refunding of prepaid fees	(1)
	Failed to address fees upon termination of contract	(1)
	Offered services without a contract	(1)
	Used discretion without written authority	(2)
Financial Matters		
	Shared expenses without an agreement	(1)
	Failed to maintain monthly financial statements	(1)
	Inaccurate financial statements	(1)
	Insolvent	(1)
Supervision		
	Lack of written supervisory procedures	(2)
	Inadequate procedures	(4)
	Failure to address computer security/access to computers	(2)
	Cited SEC Rules instead of OK Rules	(4)
Books and Records		
	Emails/correspondence not maintained	(1)
	Records not maintained for RIAs working at other locations	(1)
	Insufficient suitability information	(5)
	Client information older than 36 months	(4)
Privacy Policy		
	Not provided to all clients	(2)
	Failed to disclose non-public information	(1)
	Failed to disclose non-public information shared with third party providers	(1)

Solicitor Agreements	
Executed by unauthorized person	(1)
Investment Activities	
Reverse churning	(1)
Unsuitable activity	(1)