



Form ADV Part 1 Annual Amendment Questionnaire

To prepare your firm’s Form ADV Annual Amendment filing we are sending this questionnaire that you will need to complete and return as soon as possible.

Please note the 2022 Form ADV Annual Amendment fixed fee service covers only the items included in this questionnaire. Any additional requested changes to your firm’s Form ADV Part 1, Part 2A, Part 2A Appendix 1, Part 2B and Form U4s/U5s will be (1) applied against As-Needed Consulting Hours you may have available under an annual RCC compliance program or (2) billed separately at our normal hourly fee rates subject to our standard fixed fee schedule depending on the service requested.

Your Form ADV Annual Amendment must be submitted *anytime within 90 days* after your fiscal year end. You are not required to use December 31st values however, the Annual Amendment must be submitted within 90 days from the date your firm calculated its Regulatory Assets Under Management (Regulatory AUM).

#1 Firm Identifying Information

1. A) FIRM NAME:

1. B) NAME OF PERSON COMPLETING QUESTIONNAIRE:

1. C) DOES YOUR FIRM HAVE ANY CHANGES TO YOUR WEBSITE OR SOCIAL MEDIA ACCOUNT(S) THAT ARE CURRENTLY LISTED ON YOUR FORM ADV PART 1?

- NO (if no, you may skip to question 1D below)
- YES (if yes, type the changes in the text box below and separate the addresses using a comma).

1. D) DOES YOUR FIRM HAVE ANY CHANGES TO YOUR OTHER OFFICE(S) THAT ARE CURRENTLY LISTED ON YOUR FORM ADV PART 1?

- NO (if no, you may skip to question 2)
- YES (if yes, complete the table below with information for each additional office)

Full Address (Street, City, State & Zip)	Is this address a private residence? Y or N	Telephone #	Fax #

**We may need to ask for additional details if you are adding a new address.*

#1 Firm Identifying Information (cont.)

1. E) TOTAL NUMBER OF EMPLOYEES:

- For purposes of Form ADV reporting, "employee" includes owners and independent contractors providing investment advice on behalf of the firm and are supervised persons for purposes of your firm's compliance policies and procedures.
- You are not required to include clerical staff.

1. F) PLEASE INDICATE THE NUMBER OF EMPLOYEES THAT ARE:

Performing investment advisory functions:

Registered representatives of a broker dealer:

Registered as investment adviser representatives:

Registered as investment adviser representatives with an investment adviser firm other than your firm:

Licensed agents of an insurance company or agency:

Outside Solicitors: Number of firms or other persons that solicit advisory clients to your firm:

- Do not count any of your firm's employees and count a firm only once
- Do not count each of the firm's employees that solicit on your behalf

#2 Client Counts

2. A) FINANCIAL PLANNING CLIENTS:

Provide the approximate number of advisory clients receiving financial planning services during your most recently completed fiscal year.

2. B) NON-U.S. CLIENTS: %

Provide approximate percentage (%) of clients that are non-U.S. persons.

2. C) NON-REGULATORY AUM CLIENTS:

Provide approximate number of clients for whom you do not have Regulatory AUM but provided investment advisory services during the most recent year.*

*These clients need to be included in the column labeled "Exact Number of advisory clients" in Table 3A but will not be included in the "Amount of AUM" column of Table 3A and **will not be included in Table 4A.***

** Services include but are not necessarily limited to: financial planning and/or financial consulting, investment consulting or advisement services, pension consulting (that is not management), and referrals to third-party money manager platforms.*

#3 Provide the type and number of your client(s) for each category

Indicate the number of **clients** and amount of Regulatory AUM attributable to each of the following types of client(s). This question is asking for number of clients whereas the following Regulatory AUM question is asking for number of accounts. One client may have multiple accounts, but you need only count each client once for the chart below.

Important Guidance:

- Include **ALL** firm clients such as: Non-Regulatory and Regulatory AUM clients, Financial Planning Clients and Third-Party Money Manager clients.
- **What if a client fits into more than one category?** Select the one category that most accurately represents the client to avoid double counting clients and assets.
- Count clients the way you normally count them for your firm. For example some investment advisors count (**whichever method you choose, be consistent from year-to-year**):
 - multiple members of the same family (and a family trust) as a single client **or**,
 - multiple members of the same family (and a family trust) as separate clients.

Table 3a

* Include exact numbers, DO NOT round or estimate.

Place your clients in the below categories:	Exact Number of advisory clients*	Amount of AUM*
A. Non-High Net Worth Individuals (includes trust, estates, and IRAs and 401(k) plans of individuals and their family members)		
B. High Net Worth Individuals (\$1,100,000 of invested assets with your firm or \$2,200,000 net worth not including primary residence)		
C. Banking or thrift institutions		
D. Investment Companies		
E. Business Development Companies		
F. Pooled Investment Vehicles		
G. Pension and Profit Sharing Plans		
H. Charitable Organizations		
I. State or Municipal Government Entities		
J. Other Investment Advisers		
K. Insurance Companies		
L. Sovereign Wealth Funds and Foreign Official Institutions		
M. Corporations or other businesses not listed above		
N. Other: Please provide description of the client		
Totals:	0	\$ 0

#4 Regulatory Assets Under Management ("AUM")

4. A) PLEASE PROVIDE THE DATE YOUR FIRM CALCULATED ITS REGULATORY AUM:

Check this box if you don't provide continuous and regular supervisory or management services to securities portfolios and skip to section #5

Things to remember when calculating Regulatory AUM:

- **Determine your Regulatory AUM based on the current market value of the assets as determined within 90 days prior to the date you will file the Form ADV Annual Amendment.**
- Determine market value using the same method you used to report account values to clients or to calculate fees for investment advisory services. Provide the exact amount of Regulatory AUM. **Rounded to the nearest dollar. DO NOT GUESS OR ESTIMATE.**
- **Regulatory AUM and number of accounts must be broken into discretionary assets and non-discretionary assets. [Click here](#) to access RIA Compliance Consultants' web page for helpful tips on how to calculate Regulatory AUM.**
- **You must also provide the exact amount of client accounts.**
 - Note this question asks you to count the number of accounts, which is different than the instructions at #3, which asked you to provide information about your firm's number of clients.
 - Typically, firms will have more accounts than clients because one client could have multiple accounts under management. The following is asking for accounts, not clients. One client can have multiple accounts.
 - For example, one client could have two standard brokerage accounts, an IRA, a Roth-IRA and a Trust account. That would be one client with five accounts. Be sure to list the total number of accounts under management.

<i>Table 4a</i>	Discretionary Accounts	Non-Discretionary Accounts	Total
AUM Amount			\$ 0
Number of Accounts			0

4. B) INDICATE THE APPROXIMATE DOLLAR AMOUNT OF YOUR TOTAL REGULATORY AUM ATTRIBUTED TO CLIENTS WHO ARE NON-U.S. PERSONS :

#5 Managed Accounts

5. A) PROVIDE THE APPROXIMATE PERCENTAGE OF MANAGED ACCOUNT REGULATORY AUM ATTRIBUTABLE TO EACH OF THE CATEGORIES OF ASSETS IN TABLE 5a.

*See additional guidance on the following page to help complete Table 5a.

For this section do not include Pooled Investment Vehicles*.

Check this box if you **ONLY** have Pooled Investment Vehicles and skip to question #6

*Pooled Investment Vehicles = Registered investment companies, business development companies and pooled investment vehicles that are not registered (including, but not limited to, private funds) for which you serve as the investment adviser to the pooled investment vehicle. (All client types in Figure 3a except D. Investment Companies, E. Business Development Companies, and F. Pooled Investment Vehicles).

Important Guidance:

- Individual (i.e. direct) stock holdings need to be reported at (i) and (ii).
- Individual (i.e. direct) bond holdings need to be reported at (iii) through (vii).
- ALL Mutual Funds (legally known as open-end companies), Closed-End Funds (legally known as closed-end companies), UITs (legally known as unit investment trusts), and Exchange Traded Funds (ETFs) are SEC registered investment companies so need to be included at (ix).

Table 5a Asset Types	Approximate % (round up or round down to the nearest whole number)
(i) Exchange-Traded Equity Securities	
(ii) Non-Exchange-Traded Equity Securities	
(iii) U.S. Government/Agency Bonds	
(iv) U.S. State and Local Bonds	
(v) Sovereign Bonds	
(vi) Investment Grade Corporate Bonds	
(vii) Non-Investment Grade Corporate Bonds	
(viii) Derivatives	
(ix) Securities Issued by Registered Investment Companies or Business Development Companies (ex: Mutual Funds, UITs, ETFs)	
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	
(xi) Cash and Cash Equivalents	
(xii) Other Add description of "Other" category	

- These columns (%'s) can add up to a range from 94% to 106%.
- Columns do not have to add up to 100%.

#5 Managed Accounts (cont.)

GUIDANCE ON ASSET TYPES CATEGORIES:

The SEC provided the following Form ADV guidance to help you determine how assets listed in Table 5a should be reported.

- If you are a subadviser to a managed account, you should only provide information with respect to the portion of the account that you subadvise.*
- End of year refers to the date used to calculate your regulatory assets under management for purposes of your annual updating amendment. **These columns (%'s) can add up to a range from 94% to 106%. Columns do not have to add up to 100%.***
- Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.*
- Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.*

5. B) DO YOU ENGAGE IN BORROWING TRANSACTIONS ON BEHALF OF ANY OF THE MANAGED ACCOUNT CLIENTS THAT YOU ADVISE? (i.e. short selling and margin accounts)

- No, and I will **skip to #5C**
- Yes, and I completed Table 5bc because our Regulatory AUM is more than \$500 million and less than \$10 billion
- Yes, and I will **NOT complete** Table 5bc because our Regulatory AUM is less than \$500 million. **I will skip to #5C**
- Yes, and I will request RCC for additional table to complete, because our Regulatory AUM is at least \$10 billion

5. C) DO YOU ENGAGE IN DERIVATIVE TRANSACTIONS ON BEHALF OF ANY OF THE MANAGED ACCOUNT CLIENTS THAT YOU ADVISE?

- No, and I will **skip to #5E**
- Yes, and I completed Table 5bc because our Regulatory AUM is more than \$500 million and less than \$10 billion
- Yes, and I will **NOT complete** Table 5bc because our Regulatory AUM is less than \$500 million. **I will skip to #5E**
- Yes, and I will request RCC for additional table to complete, because our Regulatory AUM is at least \$10 billion

#5 Managed Accounts (cont.)

5. D) COMPLETE TABLE 5bc IF APPLICABLE FROM ANSWERS FOR 5B and 5C ABOVE.

In Table 5bc provide the following information regarding the managed accounts you advise as of the date used to calculate your Regulatory AUM. If you are a sub adviser to a managed account, you should only provide information with respect to the portion of the account that you sub advise.

Table 5bc

	Gross Notional Exposure	(1) Regulatory AUM	(2) Borrowing
	Less than 10%		
	10-149%		
	150% or more		

Helpful tips to complete the Table 5bc	
Column 1 - Regulatory AUM	Indicate the Regulatory AUM attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any borrowings and (b) the gross notional value* of all derivatives, by (ii) the Regulatory AUM of the account.
Column 2 - Borrowings	Provide the dollar amount of borrowings** for the accounts included in column 1. You may, but are not required to, complete the table with respect to any separately managed accounts with Regulatory AUM of less than \$10,000,000.
*Gross notional value	Defined in the Glossary to Form ADV as "The gross nominal or notional value of all transactions that have been entered into but not yet settled as of the reporting date. For contracts with variable nominal or notional principal amounts, the basis for reporting is the nominal or notional principal amounts as of the reporting date. For options, use delta adjusted notional value."
** Borrowings	Defined in the Glossary to Form ADV as "Secured borrowings and unsecured borrowings, collectively. Secured borrowings are obligations for borrowed money in respect of which the borrower has posted collateral or other credit support and should include any reverse repos (i.e., any sale of securities coupled with an agreement to repurchase the same (or similar) securities at a later date at an agreed price). Unsecured borrowings are obligations for borrowed money in respect of which the borrower has not posted collateral or other credit support."

5. E) DOES A QUALIFIED CUSTODIAN HOLD 10% OR MORE OF YOUR AGGREGATE MANAGED ACCOUNT REGULATORY AUM?

- NO (if no, skip to #6)
- YES (if yes, complete Table 5e below for each qualified custodian)

<i>Table 5e</i>	Custodian's full legal name	Is the custodian a related person of your firm? Yes or No	What dollar amount of your Regulatory AUM attributable to managed accounts is held at the custodian?

**We may need to ask for additional details if you are adding a new custodian.*

#6 Wrap Fee Program

6. A) DO YOU PARTICIPATE IN ONE OR MORE WRAP-FEE PROGRAMS?

- NO (if no, skip to #7)
- YES (if yes, complete Table 6a below)

What is the amount of your Regulatory AUM* attributable to acting as:

Table 6a

a. Sponsor of the wrap-fee program?	
b. Portfolio Manager of a wrap-fee program?	
c. Sponsor of and Portfolio Manager for the same wrap-fee program?	

If you report an amount in "c", do not include that amount in "a" or "b".

*Do not include wrap-fee program accounts not included in your Regulatory AUM.

Helpful Definitions

Sponsor	A sponsor of a wrap free program sponsors, organizes, or administers the program or selects, or provides advice to clients regarding the selection of, other investment advisers in the program.
Portfolio Manager	A portfolio manager of a wrap fee program controls the assets held within the wrap accounts and chooses appropriate investments and allocates the funds in the account.

#7 Custody Dollars and Clients

Being a General Partner of a Private Fund, Acting as a Trustee for non-family accounts, Firm initiated Third-Party Transfers or Disbursements, or firms with their home office registered in the state of Florida are a few reasons you will need to complete the following information in Table 7a.

7. A) DOES YOUR FIRM OR RELATED PERSONS* REPORT HAVING CUSTODY ON FORM ADV PART 1A, ITEM 9?

***Related Persons** are any advisory affiliates**and any person that is under common ownership with your Investment Adviser Firm.

****Advisory Affiliates** are (1.) all of your officers, or partners, or directors (or any person performing similar functions) (2.) all persons directly or indirectly controlling or controlled by you. (3.) all of your current employees (other than employees performing only clerical, administrative, support or similar functions).

- NO (if no, skip to #8)
- YES (if yes, complete Table 7a below)

Table 7a	Amount of Custody Dollars	Number of Custody Clients
The Firm's:		
Related Persons*		

7. B) IF YOU WERE SUBJECT TO A SURPRISE EXAMINATION BY AN INDEPENDENT PUBLIC ACCOUNTANT DURING YOUR LAST FISCAL YEAR, PROVIDE THE DATE THE EXAMINATION COMMENCED:

#8 Only STATE registered firms need to complete the following information

If your firm is state registered, provide the total dollar amount of securities investments and total dollar amount of non-securities investments* made in the last year based on financial planning services provided to the number of clients you listed in #2 of this questionnaire. If your answer to #2 is "0" (meaning you do not have any financial planning clients), do not provide a response below. Your answer can be a range.

(This includes all investments made, not just assets placed in an advisory account. For example, if you prepared a financial plan for a client and that same client then uses you to establish an asset management account, a regular commission-based brokerage account and a life insurance policy, you need to include the investments made in the 2 accounts and the premium received for the insurance policy.)

Securities Investments =

Non-Securities Investments =

*Non-securities investments include: insurance products (other than variable annuities which are considered securities), real estate, coins, gold, silver, etc.