

Initial Examination Information Request List

Examination Period

Information is requested for the period _____ through _____ (the “Examination Period”) unless otherwise noted.

Organizing the Information to be Provided

In order to efficiently process the material assembled for the staff’s review, please label the information or electronic files so that they identify the item number in the request list to which they are responsive. Production of documents can be made on a rolling basis. If information provided is responsive to more than one request item, you may provide it only once and refer to it when responding to the other request item numbers. If any request item does not apply to your business, please indicate “N/A” (not applicable). Provide all information electronically to the extent possible.

Information to be Provided by

General Information

1. Adviser’s organization chart with ownership percentages showing the adviser, control persons, and all affiliates.
2. List of current employees, partners, officers and/or directors and their respective titles, office location, and hire date.
3. All compliance policies and procedures and standard operating procedures.
4. Most recent annual compliance review.
5. A list of any employees of the Adviser who resigned or were terminated and who filed or stated complaints against the firm or its employees, alleging potential violations of securities laws as the cause for the resignation or termination.
6. Any threatened, pending and settled litigation or arbitration involving the Adviser or any “supervised person” (if the matter relates to the supervised person’s association with the Adviser or a securities-related matter) including a description of the allegations, the status, and a brief description of any “out of court” or informal settlement. Note that “supervised person” is any partner, officer, director (or other person occupying a similar status or performing similar functions), or employee of an investment adviser, or other person who provides investment advice on behalf of the investment adviser and is subject to the supervision and control of the investment adviser (defined in Section 202(a)(25) of the Advisers Act). If none, please provide a written statement to that effect.

7. If not stated in policies and procedures, information about the process used to monitor and control the receipt, flow and use of non-public information, including any restricted, watch, or grey lists.
8. Personal trading activities of all access persons including access to brokerage statements, confirmations, or other applicable trading records.
9. The total value of assets under management for all clients as of _____.
10. The following information for all advisory clients, including any registered investment companies and privately offered funds, as of _____, in Excel format.
 - a. Account number, account name and the current balance;
 - b. Whether the client is a related person or a proprietary account;
 - c. Type of account (e.g., individual, family office, defined benefit retirement plan, registered fund, privately offered fund);
 - d. Whether the Adviser directly manages the account or acts as a sub-adviser;
 - e. Investment strategy (e.g., global equity, high-yield, aggressive growth, long-short, statistical arbitrage);
 - f. Whether the Adviser has discretionary authority;
 - g. Whether the Adviser, an officer, or an affiliate acts as trustee, co-trustee, or successor trustee or has full power of attorney for the account;
 - h. Whether the Adviser or related persons are deemed to have custody of, possession of or access to the client's assets, and if so, the location of the assets;
 - i. Portfolio manager;
 - j. Whether the client has a directed brokerage (dealing) arrangement (include name of broker and purpose for such direction, if known), in which the client has directed the Adviser to use one or more brokers to transact all or a portion of deals placed for its account;
 - k. Value of each client's account at end of period that was used for purposes of calculating its advisory fee for the most recent billing period;
 - l. Whether the client pays a performance fee, the amount of the most recent fee, and the account on which the fee is based;
 - m. Whether advisory fees or performance fees are paid directly from the client's custodial account;
 - n. Account custodian and location; and
 - o. Whether or not the custodian sends periodic account statements directly to the client;
 - p. Whether or not the delivery is electronic, if so, a copy of the authorization; and the form of electronic delivery (e.g., email or website login).
11. A list of clients obtained during the Examination Period, inception dates, and identity of any third party consultants instrumental in Adviser obtaining a particular account.
12. A list of clients lost during the period, their effective dates of termination, and the reason for termination.

13. Adviser's financial statements for **FYE** _____ and all cash receipts and disbursements for **FY** _____.
14. A list of all outside business activities of employees, partners, officers and/or directors and copies of any approval forms associated with such outside business activities.
15. Any incidents of unauthorized access to client accounts, funds or assets by fraudulent persons/entities (e.g., as a result of bogus email requests sent directly to the client or to the adviser's staff).
16. Any cybersecurity testing (scope, findings, steps taken).
17. Any disaster recovery testing (scope, findings, steps taken).

Portfolio Management/Trading

18. A trade blotter for the **Examination Period** (i.e., purchases and sales journal) that lists transactions (including all trade errors, cancellations, re-bills, and reallocations) in securities and other financial instruments (including privately offered funds and securities) for: current and former clients; proprietary and/or trading accounts and access persons. The preferred format for this information is to provide it in Excel as indicated in Exhibit 1.
19. Names of securities held in all client portfolios (aggregate position totals for all instruments) as of _____ and _____. Provide the record in Excel format and it should include:
 - a. The security name;
 - b. Name of each client holding an interest;
 - c. The amount owned by each client;
 - d. The aggregate number of shares or principal and/or notional amount held; and
 - e. The total market value of the position and the location/custodian where the security may be found.
20. Any written portfolio management policies and procedures, including investment decision making processes.
21. Any minutes maintained from investment committee meetings during the Examination Period.
22. Current standard client advisory contracts or agreements.
23. Documents relating to investment restrictions or investment policy statements.
24. Any exception reports relating to violations of investment restrictions.

25. List of all principal transactions that took place from _____ through _____ between current or former clients and/or proprietary or affiliated accounts. Please identify the security, number of shares, price, total dollar value, the client accounts and the reason for the principal transactions.
26. List all cross transactions between current or former clients and/or proprietary or affiliated accounts. Please identify the security, number of shares, execution price, pricing sources, total dollar value, the client accounts and the reason for the crosses.
27. A list of trade error(s) with brief descriptions and any corrective action taken.
28. List of IPO/primary or secondary offerings participated in, indicating whether full or partial fill (equities and fixed income) was received.
29. List of any post trade allocations (e.g., re-allocations) in _____.
30. Any written trading policies and procedures.
31. Soft dollar budget or similar document if any that describes the products and services the Adviser obtains using clients' brokerage commissions. State the annual hard and soft dollar costs of each product.

Marketing and Performance Calculation

32. Copies of all advertising used by Adviser during the Examination Period.
33. All pitch books, one-on-one presentations, pamphlets, brochures, and any other promotional and/or marketing materials furnished to existing and/or prospective investors for each investment strategy and/or mandate.
34. A list of any solicitation arrangements.
35. A list of all third party consultants for whom Adviser completed questionnaires or otherwise corresponded during the period.
36. All completed RFPs.
37. Any third-party performance verification, examination, or audit reports and related engagement letters.

Confidentiality and Whistleblower

38. All compliance policies and procedures pertaining to Confidentiality/Whistleblower Topics.

39. Documents pertaining to communications with officers, directors, employees or contractors regarding any violations or potential violations of Confidentiality/Whistleblower Topics.
40. If the confidentiality and non-disparagement clauses (or clauses with similar effect) in the employment agreements entered into during the Examination Period are standard, a copy of the agreement containing those clauses. If the confidentiality or non-disparagement clauses (or clauses with similar effect) have varied, all agreements containing such variations (with names of employees and amounts of payments redacted).
41. If not otherwise produced, all policies regarding whistleblowers.