



SAMPLE TABLE OF CONTENTS

1. INTRODUCTION	Error! Bookmark not defined.
1.1 Use and Distribution of this Compliance Manual	Error! Bookmark not defined.
1.2 The Fiduciary Standard	Error! Bookmark not defined.
2. REGISTRATION	Error! Bookmark not defined.
2.1 Policy	Error! Bookmark not defined.
SEC Registration.....	Error! Bookmark not defined.
State Registrations	Error! Bookmark not defined.
2.2 Procedures	Error! Bookmark not defined.
Registration.....	Error! Bookmark not defined.
Renewal	Error! Bookmark not defined.
Withdraw from SEC Registration.....	Error! Bookmark not defined.
3. DISCLOSURE DOCUMENT	Error! Bookmark not defined.
3.1 Policy	Error! Bookmark not defined.
3.2 Procedure	Error! Bookmark not defined.
Amendments to Form ADV Part 1 and 2.....	Error! Bookmark not defined.
Amendments to U4 and Schedule D of Form ADV Part 1.....	Error! Bookmark not defined.
Form ADV-W	Error! Bookmark not defined.
Disclosure of Financial and Disciplinary Information	Error! Bookmark not defined.
Client Relationship Summary (Form CRS).....	Error! Bookmark not defined.
Section 13 Reporting Requirements	Error! Bookmark not defined.
4. ADVISORY AGREEMENT	Error! Bookmark not defined.
4.1 Policy	Error! Bookmark not defined.
4.2 Procedures	Error! Bookmark not defined.
5. ADVISORY FEES	Error! Bookmark not defined.
5.1 Policy	Error! Bookmark not defined.
5.2 Procedure	Error! Bookmark not defined.
Disclosure of Additional Compensation.....	Error! Bookmark not defined.
Referral Fees	Error! Bookmark not defined.
6. BOOKS AND RECORDS	Error! Bookmark not defined.
6.1 Policy	Error! Bookmark not defined.
6.2 Procedures	Error! Bookmark not defined.
Retention of Records.....	Error! Bookmark not defined.
Rollover Advice to Retirement Accounts	Error! Bookmark not defined.
Discontinuing Business.....	Error! Bookmark not defined.
Records Destruction	Error! Bookmark not defined.
Business Continuity Plan	Error! Bookmark not defined.
7. FINANCIAL RECORDS	Error! Bookmark not defined.
8. GENERAL CORPORATE RECORDS	Error! Bookmark not defined.
9. CODE OF ETHICS.....	Error! Bookmark not defined.
9.1 Policy	Error! Bookmark not defined.
9.2 Procedures	Error! Bookmark not defined.
Insider Trading	Error! Bookmark not defined.
Personal Securities Records.....	Error! Bookmark not defined.
Initial and Annual Holdings Reports.....	Error! Bookmark not defined.
Quarterly Personal Transactions Reports	Error! Bookmark not defined.
10. CUSTOMER COMPLAINT RECORDS	Error! Bookmark not defined.
11. ADVERTISING AND MARKETING.....	Error! Bookmark not defined.
11.1 Policy	Error! Bookmark not defined.
Use of the Terms "RIA" or "Investment Counsel"	Error! Bookmark not defined.
Use of Professional Designations	Error! Bookmark not defined.
Performance Data	Error! Bookmark not defined.



11.2	Procedures	Error! Bookmark not defined.
	Telemarketing Rule.....	Error! Bookmark not defined.
12.	INVESTMENT PROCESSES AND TRADING.....	Error! Bookmark not defined.
12.1	Trading.....	Error! Bookmark not defined.
12.2	Idle Cash.....	Error! Bookmark not defined.
12.3	Trading Errors.....	Error! Bookmark not defined.
12.4	Trading Allocation Procedures.....	Error! Bookmark not defined.
12.5	Aggregation of Orders	Error! Bookmark not defined.
12.6	Best Execution.....	Error! Bookmark not defined.
12.7	Direct Brokerage	Error! Bookmark not defined.
12.8	Soft Dollars	Error! Bookmark not defined.
12.9	Principal Trading and Agency Cross Transactions.....	Error! Bookmark not defined.
12.10	Supporting Client Documentation.....	Error! Bookmark not defined.
12.11	Selection of Other Advisors/Managers	Error! Bookmark not defined.
13.	WRAP FEES	Error! Bookmark not defined.
13.1	Policy.....	Error! Bookmark not defined.
13.2	Procedure.....	Error! Bookmark not defined.
14.	FINANCIAL PLANNING.....	Error! Bookmark not defined.
14.1	Policy.....	Error! Bookmark not defined.
14.2	Procedure.....	Error! Bookmark not defined.
	Required Agreements	Error! Bookmark not defined.
	Billing for Financial Planning Services	Error! Bookmark not defined.
	Duties in Providing Financial Planning Services	Error! Bookmark not defined.
15.	PRIVATE PLACEMENTS	Error! Bookmark not defined.
15.1	Policy.....	Error! Bookmark not defined.
15.2	Procedures	Error! Bookmark not defined.
	Accredited Investor.....	Error! Bookmark not defined.
	Due Diligence	Error! Bookmark not defined.
	Document Retention.....	Error! Bookmark not defined.
16.	ERISA MATTERS.....	Error! Bookmark not defined.
17.	CUSTODY.....	Error! Bookmark not defined.
17.1	Policy.....	Error! Bookmark not defined.
17.2	Procedures	Error! Bookmark not defined.
18.	PRIVACY POLICY	Error! Bookmark not defined.
18.1	Policy.....	Error! Bookmark not defined.
18.2	Procedures	Error! Bookmark not defined.
	Notices to Clients	Error! Bookmark not defined.
	Safeguarding Client Information.....	Error! Bookmark not defined.
19.	CYBERSECURITY	Error! Bookmark not defined.
19.1	Policy.....	Error! Bookmark not defined.
19.2	Procedures	Error! Bookmark not defined.
	Periodic Risk Assessment and Inventory	Error! Bookmark not defined.
	Information Systems and Controls	Error! Bookmark not defined.
	Contingency Plan	Error! Bookmark not defined.
	Service Provider Management.....	Error! Bookmark not defined.
	Reporting and Investigation of Security Incidents	Error! Bookmark not defined.
	Employee Training.....	Error! Bookmark not defined.
	Data Breach Notification.....	Error! Bookmark not defined.
20.	SUPERVISION AND INTERNAL CONTROLS.....	Error! Bookmark not defined.
20.1	Policy.....	Error! Bookmark not defined.
20.2	Procedures	Error! Bookmark not defined.
	Gifts, Rebates or Other Payments	Error! Bookmark not defined.
	Outside Employment or Other Activities.....	Error! Bookmark not defined.



Investment Advisor Representatives.....	Error! Bookmark not defined.
Money Laundering.....	Error! Bookmark not defined.
Regulatory Visits and Press Inquiries.....	Error! Bookmark not defined.
21. PROXY VOTING POLICY.....	Error! Bookmark not defined.
21.1 Policy.....	Error! Bookmark not defined.
21.2 Procedure.....	Error! Bookmark not defined.
22. REPORTING VIOLATIONS AND WHISTLEBLOWER POLICY.....	Error! Bookmark not defined.
State Specific Information.....	Error! Bookmark not defined.
23. SENIOR SAFE ACT, FINANCIAL EXPLOITATION, DIMINISHED CAPACITY.....	Error! Bookmark not defined.
23.1 Policy.....	Error! Bookmark not defined.
23.2 Procedure.....	Error! Bookmark not defined.
Financial Exploitation.....	Error! Bookmark not defined.
State Specific Information.....	Error! Bookmark not defined.
Diminished Capacity.....	Error! Bookmark not defined.
State Specific Information.....	Error! Bookmark not defined.
24. POLITICAL CONTRIBUTIONS.....	Error! Bookmark not defined.
INITIAL AND ANNUAL PORTFOLIO HOLDINGS REPORT.....	Error! Bookmark not defined.
QUARTERLY PERSONAL TRANSACTION REPORT.....	Error! Bookmark not defined.
RECORD KEEPING CHECKLIST.....	Error! Bookmark not defined.
ACKNOWLEDGEMENT OF RECEIPT.....	Error! Bookmark not defined.
ADVERTISING APPROVAL FORM.....	Error! Bookmark not defined.
OUTSIDE ACTIVITY APPROVAL FORM (one form per activity).....	Error! Bookmark not defined.
TRADE ERROR FORM.....	Error! Bookmark not defined.
GIFT LEDGER.....	Error! Bookmark not defined.
CUSTOMER COMPLAINT LOG.....	Error! Bookmark not defined.
POLITICAL CONTRIBUTION FORM.....	Error! Bookmark not defined.
DEPARTMENT OF LABOR.....	Error! Bookmark not defined.
RETROSPECTIVE REVIEW REPORT.....	Error! Bookmark not defined.