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| Hiring A New IAR – Disclosure Checklist |

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| Review Form ADV Part 1A ***Important:*** *Updates made to highlighted items (Items 1.F, 1.L, 8, 9, and 11) should be made “promptly” by submitting an other-than-annual amendment.* | | | |
| **\_\_\_\_ Item 1.F.** Consider whether the firm should list an additional office on Schedule D, Section 1.F. | |
| **\_\_\_\_ Item 1.L.** Consider whether the firm should list additional websites and accounts on publicly available social media platforms (LinkedIn, X, FaceBook) on Schedule D., Section 1.l. | |
| **\_\_\_\_ Item 1.L.** Consider whether the firm should add additional books and records locations on Schedule D. Section 1.L. | |
| **\_\_\_\_ Item 2.** Consider whether the firm should provide additional notice filings. | |
| **\_\_\_\_ Item 5.B.** Update the number of employees, including IARs, broker-dealer registered representatives, insurance agents, and solicitors. | |
| **\_\_\_\_ Item 5.C.** Determine whether to update firm disclosures regarding clients and regulatory assets under management. | |
| **\_\_\_\_ Item 5.D.** Determine whether the firm should update the number of clients and regulatory assets under management. | |
| **\_\_\_\_ Item 5.E.** Determine whether the firm should update disclosures regarding compensation arrangements. | |
| **\_\_\_\_ Item 5.F.** Determine whether the firm should update its disclosure regarding assets under management. | |
| **\_\_\_\_ Item 5.G.** Determine whether the firm should update its disclosures regarding advisory activities. | |
| **\_\_\_\_ Item 5.H.** Determine whether to update the firm’s disclosures regarding financial planning services. | |
| **\_\_\_\_ Item 5.I.** Determine whether to update the firm’s disclosures regarding wrap programs. | |
| **\_\_\_\_ Item 5.J.** Determine whether to update the firm’s disclosures regarding investment advice for limited types of investments and whether client assets reported in Form ADV Part 2A are computed differently than the firm’s regulatory assets under management. | |
| **\_\_\_\_ Item 5.K.** Determine whether to update the firm’s disclosures regarding its separately managed accounts. | |
| **\_\_\_\_ Item 5.L.** Determine whether to update the firm’s disclosures regarding its marketing activities. | |
| **\_\_\_\_ Item 6.** Determine whether to update the disclosures about the firm’s other business activities. | |
| **\_\_\_\_ Item 7.** Determine whether to update the firm’s financial industry affiliations and private fund information on Item 7 of Schedule D. | |
| **\_\_\_\_ Item 8.** Determine whether to update information about the firm’s participation or interest in client transactions. | |
| **\_\_\_\_ Item 9.** Determine whether to update the firm’s disclosures regarding custody. | |
| **\_\_\_\_ Item 11.** Determine whether any disclosure information in Item 11 (and accompanying DRPs) should be updated based on the new IAR’s disciplinary history. | |
| **\_\_\_\_ Schedule A.** Consider whether the new IAR will be an owner or executive officer. If yes, then make changes to Schedule A using Schedule C. | |
| Form ADV Part 2A, the “Brochure” Review to determine whether any changes are required. Updates are required if the firm begins offering additional advisory services, changes its fee schedule, or provides new investment strategies. The firm should consider whether the new hire has any disciplinary issues that need to be disclosed. | | | |
| 3. Form ADV Part 2B, the “Brochure Supplement” | | | |
| **\_\_\_\_ Draft a new Part 2B** for IAR to be delivered to clients and maintained in the firm’s official books and records. | |
| **\_\_\_\_ Cover page:** IAR’s name, business address and phone number. | |
| **\_\_\_\_ Firm name, business address, and phone number.** | |
| **\_\_\_\_ Date of brochure.** | |
| **\_\_\_\_ Include disclosure:** *This brochure supplement provides information about [name of supervised person] that supplements the (name of advisory firm) brochure. You should have received a copy of that brochure. Please contact [service center or name and/or title of your contact person) if you did not receive [name of advisory firm)’s brochure or if you have any questions about the contents of this supplement.*  *Additional information about [name of supervised person) is available on the SEC’s website at www.adviserinfo.sec.gov.* | |
| **\_\_\_\_ Education and Business Experience.** Form ADV Part 2B must disclose the educational background and business experience of IAR, including whether the supervised person has no high school education, no formal education after high school, or no business background.  Disclosures about professional designations may be included, provided that they are accompanied by a sufficient explanation of the minimum qualifications required for the designation. | |
| **\_\_\_\_ Disciplinary Information**: Include disclosure about material events within the past 10 years. | |
| **\_\_\_\_ Other Business Activities.** Include disclosure about the supervised person’s other business activities, including whether the supervised person receives commissions, bonuses, or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service fees from the sale of mutual funds. | |
| **\_\_\_\_ Additional Compensation.** Disclose any additional compensation earned by the supervised person paid by someone who is not a client for providing advisory services. This includes sales awards and other prizes, and any bonus that is not based, at least in part, on the number or amount of sales, client referrals, or new accounts. Regular bonuses and salary do not count. | |
| **\_\_\_\_ Supervision**. Provide the name, title, and phone number of the individual responsible for supervising the supervised person's activities on behalf of the firm. Include an explanation of how the IAR is supervised. | |
| **\_\_\_\_ Requirements for State-Registered Advisers.** Disclose whether the IAR has been involved in an arbitration claim or a civil, self-regulatory organization, or administrative proceeding. Disclose whether the IAR has been the subject of a bankruptcy petition. | |
| 4. Form U4 The Firm must submit Form U4 to register the IAR through the FINRA Gateway. Update disclosures as necessary and compare Form U4 to Form ADV Part 2B to ensure that the disclosures are consistent. | | | |
| 5. Form ADV Part 3, Form CRS Review Form CRS to determine whether any changes are required as a result of hiring the IAR. Advisers are required to update Form CRS within 30 days if the information included becomes materially inaccurate and provided to existing clients within 60 days after the updates are required. | | | |