

2016 Annual Compliance Checklist

Investment Banking/M&A

General Compliance	Responsible Party	Completed
Annual Compliance Meeting - FINRA Rule 3110(a)(7)		
Internal Audit of the Business Activities - FINRA Rule 3110(c)(1)		
OSJ and Branch Office Audits (if applicable)FINRA Rule 3110(c)(1) & (2)		
Privacy & Electronic Storage Audit - SEC Rule 17a-3(f)(3)(v)		
Renew Fidelity Bond - FINRA Rule 4360		
BCP Annual Review & Sign off by CCO - FINRA Rule 4370(b)		
FINRA Contact Questionnaire Update - FINRA Rule 4517(c)		

inancial	Responsible Party	
PCAOB CPA Notice Filing - SEC Rule 17a-5 FINRA & Reg Notice 14-39		
PCAOB CPA Audit of the Firm's Financial Statements - SEC Rule 17a-5		
Notarize Facing Page Form for CPA Audit - SEC Form X-17A-5 Part III		
Send Original Notarized Bound CPA Audit Reports To:		
SEC Washington D.C. Office		
SEC Local Office		
Each state that the firm is registered in that requires a copy		
Upload Audited Financial Statements to FINRA Gateway		
File FOCUS Schedule 1 Report		
Pay & File Form SIPC-6 Filing		
Pay & File Form SIPC-7 Filing		
Pay FINRA Annual Assessment - FINRA By-Laws, Schedule A, Sect. 2		
Pay Annual FINRA Registration Fees Through CRD Account		

Anti-Money Laundering	Responsible Party	Completed
AML Training Attended by All Associated Persons - FINRA Rule 3310(e)		
Senior Executive Approval of Changes in AML program - <i>FINRA Rule 3310</i> Update Customer Identification Program - <i>FINRA NTM 03-34</i>		
Independent Review and Testing of the Anti-Money Laundering Compliance Program -FINRA Rule 3310(c)		
CEO/Senior Executive Officer Review and Approval of the Findings of the Independent Review and Testing of the AMLCP - FINRA Rule 3110		

Rule 3120/3130 Supervisory System Compliance Certification	Responsible Party	Completed
Test the Supervisory & Compliance System - FINRA Rule 3120(a)(1) Executive Officer Annual Compliance Certification - FINRA Rule 3130(b-c)		_
CEO and Compliance Officer Meeting - FINRA Rule 3130(c)(2)		

Continuing Education	Responsible Party	Completed
Annual Needs Analysis - <i>FINRA Rule 1250(b)(2)</i> Annual Training Plan - <i>FINRA Rule 1250(b)(2)</i> Conduct Annual Firm Element Training - <i>FINRA Rule 1250(b)(3)</i>		

CR	D Review	Responsible Party	Completed
*	Form BD and Associated Schedules – Check and verify the accuracy of the Form BD and the associated schedules to ensure it contains all current information and is up-to-date.		
*	<u>Form BR</u> – Check and verify the accuracy of the Form BR to ensure it contains all current information and is up-to-date.		
	Form U4 - Print Out Reps Form U4 and Have Them Verify That All Information is Correct		
	Form U4 - Verify that all Outside Business Activities are Disclosed on Form U4 New Employee Background Checks - Verify that national criminal and financial background checks are completed for all new employees (as of July 2015) - FINRA Rule 3110(e) & FINRA RN 15-05		
*	<u>CRD Daily & Renewal Account</u> – Check and verify that the Firm's CRD account is properly funded (Fees Due by 12/1)		
*	<u>Registered Persons' Registrations</u> – Check and verify that each representative is properly and completely registered in all requisite state jurisdictions.		
*	<u>Firm Registrations</u> – Check and verify that the firm is properly and completely registered in all requisite jurisdictions.		
*	Registered Persons Regulatory CE – Check and verify that each registered person has sat for and satisfied their individual Regulatory CE requirement, has been notified of any currently opened or pending Regulatory CE window and/or their status is not, "Deficient"		
*	Non-Registered Person Fingerprinting – Verify that all non-registered persons with access to the firm's books and records have been fingerprinted and a Form NFR was filed with the Central Registration Depository		
*	<u>CRD Queues</u> – Check all of the Firm's Pending Queues in its WebCRD account to verify that all amendments, withdrawals, updates, etc. have been submitted.		

Annual Certification	Responsible Party	Completed
* AML Compliance Attestation - FINRA Rule 3110		
* Outside Business Activities Disclosure Statement - FINRA Rule 3270		
* Private Securities Transactions Attestation - FINRA Rule 3040		
* WSP Attestation - FINRA Rule 3010		
* Gifts and Gratuities Disclosure *- FINRA Rule 3220		
* Outside Brokerage Account Disclosure - FINRA Rule 3050 & 2070		
* Insider Trading/Code of Ethics Attestation - FINRA Rule 3110(d)		'

^{*} Not required by rule but highly recommended. Please refer to the templates on the Thornton & Associates, LLC website.