

2016 Annual Compliance Checklist

Retail Broker Dealer

General Compliance	Responsible Party	Date Completed
Annual Compliance Meeting - FINRA Rule 3110(a)(7)	_____	_____
Internal Audit of the Business Activities - FINRA Rule 3110(c)(1)	_____	_____
OSJ and Branch 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)	_____	_____
Annual A-12 Filing - MSRB Rule A-12	_____	_____
Market Transparency Filing/Political Contributions - MSRB Rule G-37	_____	_____

Financial	Responsible Party	Date Completed
PCAOB CPA Notice Filing - SEC Rule 17a-5 FINRA & Reg Notice 14-39	_____	_____
PCAOB CPA Audit of Financial Statements - SEC Rule 17a-5	_____	_____
Notarize Facing Page 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, Sch. A, Sect. 2	_____	_____
Pay Annual FINRA Registration Fees Through CRD Account	_____	_____

Anti-Money Laundering	Responsible Party	Date Completed
Annual AML Training s - FINRA Rule 3310(e)	_____	_____
Approval of Changes in AML Program - FINRA Rule 3310	_____	_____
Update Customer Identification Program - FINRA NTM 03-34	_____	_____
Independent Testing of the AML Program - FINRA Rule 3310(c)	_____	_____
Approval of the Findings of the Testing of the AMLCP - FINRA Rule 3110	_____	_____

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

Continuing Education	Responsible Party	Date Completed
Annual Needs Analysis - FINRA Rule 1250(b)(2)	_____	_____
Annual Training Plan - FINRA Rule 1250(b)(2)	_____	_____
Conduct Annual Firm Element Training - FINRA Rule 1250(b)(3)	_____	_____

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CRD Review	Responsible Party	Date Completed
<p>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.</p>	_____	_____
<p>* Form BR – Check and verify the accuracy of the Form BR to ensure it contains all current information and is up-to-date.</p>	_____	_____
<p>Form U4 - Print Out Reps Form U4 and Have Them Verify That All Information is Correct</p>	_____	_____
<p>Form U4 - Verify that all Outside Business Activities are Disclosed on Form U4</p>	_____	_____
<p>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</p>	_____	_____
<p>* CRD Daily & Renewal Account – Check and verify that the Firm’s CRD account is properly funded (Fees Due by 12/1)</p>	_____	_____
<p>* Registered Persons’ Registrations – Check and verify that each representative is properly and completely registered in all requisite state jurisdictions.</p>	_____	_____
<p>* Firm Registrations – Check and verify that the firm is properly and completely registered in all requisite jurisdictions.</p>	_____	_____
<p>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”</p>	_____	_____
<p>* 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</p>	_____	_____
<p>* CRD Queues – Check all of the Firm’s Pending Queues in its WebCRD account to verify that all amendments, withdrawals, updates, etc. have been submitted.</p>	_____	_____

Annual Certification	Responsible Party	Date 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.**