

## 2017 Annual Compliance Checklist

General Compliance	Responsible Party	Due Date	Completed Y/N	Comments
Annual Compliance Meeting - <b>FINRA Rule 3110(a)(7)</b>		31-Dec		
Internal Audit of the Business Activities - <b>FINRA Rule 3110(c)(1)</b>		31-Dec		
OSJ and Branch Office Audits (if applicable) - <b>FINRA Rule 3110(c)(1) &amp; (2)</b>		31-Dec		
Privacy & Electronic Storage Audit - <b>SEC Rule 17a-3(f)(3)(v)</b>		31-Dec		
Renew Fidelity Bond - <b>FINRA Rule 4360</b>		Varies		
BCP Annual Review & Sign off by CCO - <b>FINRA Rule 4370(b)</b>		31-Dec		
FINRA Contact Questionnaire Update Via FINRA Gateway - <b>FINRA Rule 4517( c)</b>		15-Jan		
SAA Annual Certification		01/09/17 - 02/09/2017		
Form ADV Update (if applicable)		31-Mar		
Financial	Responsible Party	Due Date	Completed Y/N	Comments
PCAOB CPA Notice Filing - <b>SEC Rule 17a-5 FINRA &amp; Reg Notice 14-39</b>	FinOp	10-Dec		
PCAOB CPA Audit of the Firm's Financial Statements - <b>SEC Rule 17a-5</b>	FinOp	60 Days After YE		
Notarize Facing Page Form for CPA Audit - <b>SEC Form X-17A-5 Part III</b>	FinOp	60 Days After YE		
Send Original Notarized Bound CPA Audit Reports To:				
SEC Washington D.C. Office	FinOp	60 Days After YE		
SEC Local Office	FinOp	60 Days After YE		
Each state that the firm is registered in that requires a copy	FinOp	60 Days After YE		
Upload Audited Financial Statements to FINRA Gateway	FinOp	60 Days After YE		
File FOCUS Schedule 1 Report	FinOp	17 Bus Days After YE		
Pay & File Form SIPC-6 Filing	FinOp	30 Days After First Fiscal 6 Months		
Pay & File Form SIPC-7 Filing		30 Days After First Fiscal Year End		
Pay FINRA Annual Assessment - <b>FINRA By-Laws, Schedule A, Sect. 2</b>	FinOp	Varies by Firm		
Pay Annual FINRA Registration Fees Through CRD Account	FinOp	1-Dec		
Anti-Money Laundering	Responsible Party	Due Date	Completed Y/N	Comments
AML Training Attended by All Associated Persons - <b>FINRA Rule 3310(e)</b>		31-Dec		
Senior Executive sign off on Changes in AML program - <b>FINRA Rule 3310</b>		31-Dec		
Update Customer Identification Program - <b>FINRA NTM 03-34</b>		31-Dec		

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**

31-Dec

31-Dec

### Rule 3120/3130 Supervisory System Compliance Certification

Responsible  
Party

Due Date

Completed  
Y/N

Comments

Test the Supervisory & Compliance System - **FINRA Rule 3120(a)(1)**

31-Dec

Executive Officer Annual Compliance Certification - **FINRA Rule 3130(b-c)**

31-Dec

CEO and Compliance Officer Meeting - **FINRA Rule 3130(c)(2)**

31-Dec

### Continuing Education

Responsible  
Party

Due Date

Completed  
Y/N

Comments

Annual Needs Analysis - **FINRA Rule 1250(b)(2)**

31-Dec

Annual Training Plan - **FINRA Rule 1250(b)(2)**

31-Dec

Conduct Annual Firm Element Training - **FINRA Rule 1250(b)(3)**

31-Dec

### CRD Review

Responsible  
Party

Due Date

Completed  
Y/N

Comments

\* **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.

31-Dec

\* **Form BR** – Check and verify the accuracy of the Form BR to ensure it contains all current information and is up-to-date.

31-Dec

**Form U4** - Print Out Reps Form U4 and Have Them Verify That All Information is Correct

31-Dec

**Form U4** - Verify that all Outside Business Activities are Disclosed on Form U4

31-Dec

\* **CRD Daily & Renewal Account** – Check and verify that the Firm's CRD account is properly funded (Fees Due by 12/1)

1-Dec

\* **Registered Persons' Registrations** – Check and verify that each representative is properly and completely registered in all requisite jurisdictions.

31-Dec

\* **Firm Registrations** – Check and verify that the firm is properly and completely registered in all requisite jurisdictions.

31-Dec

**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"

31-Dec

\* **Non-Registered Person Fingerprinting** – Verify that all non-registered persons with access to the firm's books and records have been fingerprinted and have had the fingerprint card and Section 2 of the Form U4 filed with the Central Registration Depository

31-Dec

\* **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.

	31-Dec		

Annual Certification	Responsible Party	Due Date	Completed Y/N	Comments
* AML Compliance Attestation - <b>FINRA Rule 3110</b>		31-Dec		
* Outside Business Activities Disclosure Statement - <b>FINRA Rule 3270</b>		31-Dec		
* Private Securities Transactions Attestation - <b>FINRA Rule 3040</b>		31-Dec		
* WSP Attestation - <b>FINRA Rule 3010</b>		31-Dec		
* Outside Brokerage Account Disclosure - <b>FINRA Rule 3050 &amp; 2070</b>		31-Dec		
* Insider Trading/Code of Ethics Attestation - <b>FINRA Rule 3110(d)</b>		31-Dec		
* <b>Not required by rule but highly recommended. Please refer to the templates on the Thornton &amp; Associates, LLC website.</b>				