

FIRM NAME

FINRA Rule 3120/3130 CEO and Chief Compliance Officer Meeting

On **DATE**, 2017, **NAME**, Chief Executive Officer (“CEO”) and **NAME**, Principal met to discuss the firm’s compliance program, written supervisory procedures, and the results of the testing of the procedures.

During this meeting the following items were discussed:

- An overview of FINRA Rules 3120 and 3130
- A discussion about the supervisory structure to ensure that none of the firm’s principals were supervising their own activity.
 - As part of this process the firm has confirmed that none of its employees are self supervising. In addition, the firm has ensured that all of its registered employees have been trained regarding the prohibition of self supervision.
- Determine whether or not the Chief Compliance Officer is identified on Schedule A of Form BD
- Discuss the results of the testing of the supervisory procedures
 - The testing of the written supervisory procedures did not disclose any material inadequacies in the firm’s supervisory systems. There were several places where the written supervisory procedures have been expanded to include more detail but nothing significant enough to report.
- Discuss the changes in the supervisory procedures as a result of the issues noted in the report of the testing of the supervisory procedures.
 - As stated above, the supervisory procedures were updated to include more detail about the specific procedures executed by the firm’s registered principals.
- Discuss any contemplated changes in the firm’s operations and supervisory procedures in the next 12 months.
 - The firm does not anticipate any material changes in its operations in the next 12 months.

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