Syndicate Subscription Legal Plans

REGISTERED INVESTMENT ADVISER (RIA) LEGAL & COMPLIANCE INTAKE QUESTIONNAIRE:

KEY DEADLINES: the annual updating amendment to Form ADV is generally due within 90 days after your fiscal year end, and examination deficiency letters, document requests, and Form PF filings all carry fixed deadlines. Please do not include client personal information (names, account numbers, Social Security numbers) on this form.

CONFIDENTIAL. This questionnaire is for investment advisers — SEC-registered, state-registered, exempt reporting, and firms evaluating whether registration is required. It scopes registration and Form ADV work, compliance programs and policies, advisory and sub-advisory agreements, marketing and performance review, examinations and enforcement, and transactions involving advisory businesses. If a question does not apply, write "N/A." If unknown, write "Unknown."

NAME OF THE CLIENT (FIRM):

[__] Legal Name of Firm: ____

CRD No.: ____________________ SEC File No. (801-): __________ Year founded: __________

Registration status:

- [__] SEC-registered adviser
- [__] State-registered adviser
- [__] Exempt reporting adviser
- [__] Not yet registered
- [__] Dual registrant (BD & RIA)
- [__] Advisory affiliate of a bank or insurer
- [__] Family office

States registered / notice filed: ____

Regulatory AUM: $ ______________________ Client accounts: _________

IARs / employees: _____________ Syndicate Plan Member ID: ______________________________

Contact person & title: ______________________________ Chief Compliance Officer: ________

Address: ____

City: ___________________________ State: _______________ Country: ___ Zip: _______

Phone: ______________________________ Email: ________________________________

Custodian(s): __________________________________

PART 1 — SERVICES NEEDED

1.1 Check all that apply:

- [__] Federal or state registration (new firm)
- [__] Form ADV Parts 1, 2A, 2B & Form CRS
- [__] Annual updating amendment
- [__] Transition (state ↔ SEC)
- [__] Compliance program build or review
- [__] Compliance manual & written policies
- [__] Code of ethics & personal trading
- [__] Advisory agreement drafting

[__] Sub-advisory, solicitor / promoter, or licensing agreements

[__] Wrap fee program documentation

[__] Marketing & advertising review

[__] Performance presentation & GIPS review

[__] Custody rule analysis

[__] Private fund documents & Form PF

[__] Examination preparation

[__] Response to deficiency letter or enforcement action

[__] Sale, acquisition, or merger of an advisory business

[__] Analysis of adviser status or exemption from registration

1.2 Describe the matter and your objective: ______________________________

____

____

1.3 Deadline (filing date, exam response, closing): ______________________________

PART 2 — YOUR BUSINESS

2.1 Client types & services:

[__] Individuals / high net worth

[__] Institutions & retirement plans

[__] Private funds

[__] Registered funds

[__] Wrap fee programs

[__] Model portfolios / sub-advisory

[__] Financial planning only

[__] Digital / robo advice

2.2 How you are compensated:

[__] Percentage of assets (AUM fee)

[__] Fixed fees

[__] Hourly

[__] Performance-based fees

[__] Commissions (dual registrant)

[__] Subscription / retainer

2.3 Do you charge performance-based fees, and are those clients qualified? [__] Yes [__] No

2.4 Do you have discretionary authority over client accounts? [__] Yes [__] No

2.5 Do you have custody of client assets (including fee deduction or trustee roles)? [__] Yes [__] No

Custody triggers specific requirements, which may include a surprise examination and qualified custodian arrangements.

2.6 Do you or an affiliate manage private funds? [__] Yes [__] No

Fund names, strategies & AUM: $ ______________________________

PART 3 — COMPLIANCE PROGRAM

Policy / Program	In Place	Needs Update	Missing
Written compliance manual	[__]	[__]	[__]
Annual compliance review	[__]	[__]	[__]
Code of ethics & personal trading	[__]	[__]	[__]
Marketing / advertising policy	[__]	[__]	[__]
Custody & account statement review	[__]	[__]	[__]
Best execution & trade allocation	[__]	[__]	[__]
Soft dollars & research payments	[__]	[__]	[__]
Proxy voting policy	[__]	[__]	[__]
Books & records retention	[__]	[__]	[__]
Electronic & off-channel communications	[__]	[__]	[__]
Cybersecurity & Regulation S-P privacy	[__]	[__]	[__]
Business continuity & succession plan	[__]	[__]	[__]
Valuation policy	[__]	[__]	[__]
Conflicts of interest inventory	[__]	[__]	[__]

3.1 Date of last annual compliance review: ____________________ Reviewer: ______________________________

3.2 Is the CCO in-house, outsourced, or dual-hatted with another role? [__] Yes [__] No

If yes, explain: ____

____

3.3 Have there been any code of ethics or personal trading violations? [__] Yes [__] No

If yes, explain: ____

____

PART 4 — MARKETING & PERFORMANCE

4.1 Marketing activities:

[__] Website & social media

[__] Hypothetical or model performance

[__] Third-party ratings

[__] Newsletters & seminars

[__] Performance advertising

[__] Testimonials or endorsements

[__] Solicitor / promoter arrangements

[__] Referral fee arrangements

4.2 Are performance results supported by records? [__] Yes [__] No

4.3 Do you claim GIPS compliance or use a verifier? [__] Yes [__] No

4.4 Are compensated testimonials or promoters used with disclosures? [__] Yes [__] No

The SEC marketing rule sets conditions for testimonials, endorsements, third-party ratings, and hypothetical performance, including specific disclosures and written agreements with compensated promoters.

PART 5 — AGREEMENTS

5.1 Agreements to draft or review:

- [__] Investment advisory agreement
- [__] Sub-advisory agreement
- [__] Solicitor / promoter agreement
- [__] Licensing or model delivery agreement
- [__] Service provider agreements (custodian, administrator, technology)
- [__] Wrap program sponsor agreement
- [__] Joint venture / revenue sharing

5.2 Do agreements address fees, termination, and assignment? [__] Yes [__] No

5.3 Do any agreements include liability limits or hedge clauses? [__] Yes [__] No

PART 6 — EXAMINATIONS, INQUIRIES & ENFORCEMENT

6.1 Current matters:

- [__] Routine SEC examination
- [__] State examination
- [__] Document request / subpoena
- [__] Deficiency letter
- [__] Wells notice
- [__] Proposed settlement or order
- [__] Client complaint
- [__] Arbitration or litigation
- [__] None

6.2 Regulator & matter reference: ______________________ Response due: ____________________

6.3 Summary of the issues or findings: ____

____

____

6.4 Are Form ADV or Form U4 disclosure amendments required as a result? [__] Yes [__] No

Syndicate provides advisory and compliance support; appearances in arbitration or court are handled by counsel of record.

PART 7 — TRANSACTIONS & REGISTRATION STATUS ANALYSIS

7.1 Transaction type:

- [__] Buying an advisory business
- [__] Selling an advisory business
- [__] Internal succession / equity transfer
- [__] Adding or removing owners
- [__] Change of control
- [__] None

Counterparty: ____________________________________ Target closing: ___________________

A change of control or assignment of advisory contracts generally requires client consent under the Investment Advisers Act.

7.2 Adviser Status & Exemption Analysis:

Describe the services provided, how compensation is earned, and to whom advice is given: _______________

____

____

Exemptions you believe may apply:

- [__] Private fund adviser exemption
- [__] Family office
- [__] De minimis / fewer than 15 clients
- [__] Venture capital adviser exemption
- [__] Intrastate exemption
- [__] Not sure

PART 8 — DOCUMENTS & CERTIFICATION

8.1 Is a non-disclosure agreement required before documents are shared? [__] Yes [__] No

Please provide the following, if applicable. Check each item available. Redact client personal information.

- [__] Form ADV Parts 1, 2A, 2B & Form CRS
- [__] Annual review report
- [__] Marketing materials & performance presentations
- [__] Private fund offering documents
- [__] Exam correspondence & deficiency letters
- [__] Compliance manual & code of ethics
- [__] Advisory agreement templates
- [__] Custody / qualified custodian agreements
- [__] Organizational chart & ownership
- [__] Purchase or sale documents (transactions)

Certification:

I declare that the information provided in this questionnaire is true, correct, and complete to the best of my knowledge, and that I am authorized to provide it on behalf of the firm named above. I understand this information is provided to Syndicate Subscription Legal Plans in confidence for the purpose of evaluating and scoping this engagement.

Signed and dated this ____ day of _______________________, 20___

Signature: ____

Print Name: _____________________________

Title: _____________________________

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Your information will be reviewed within one hour.