FIN Compliance^m Getting Started System Features v3.8



Compliance Dashboard

FIN Compliance" Compliance Manager Dashboard Settings FIN Lancer Log Out Hi premiumplus@riareview.com! Welcome back. **Our Help Center** Premium Plus System Overview **Getting Started** FAQ Getting Started **Quick Tips Training Resources** System Search **Compliance Rules and Reviews** File Portals **Review Center** Snapshot of the Quarter Cloud Storage 36 policies Q1 2021 Files Received **SEC Best Practices** Click Here **Compliance Calendar** Public Disclosures 2021 Calendar - Click On Month To View Staff Disclosures February March May April lune January



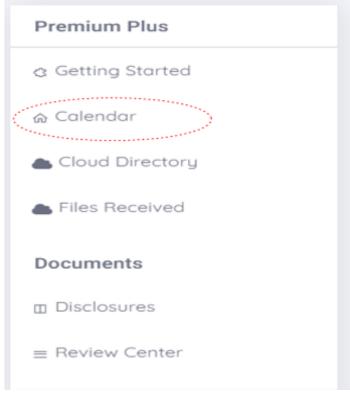
Accessing Compliance Calendar

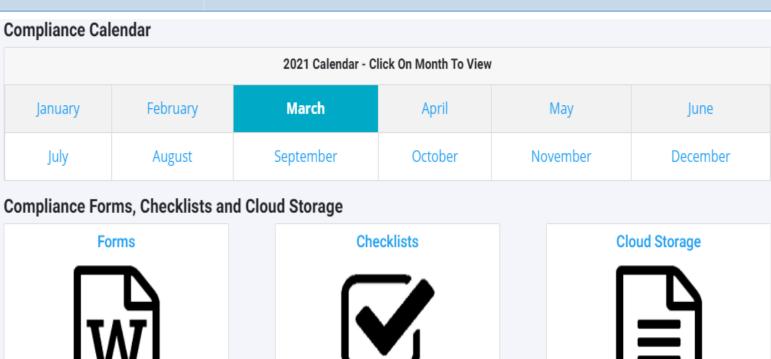
Templates

Navigation

Quick Link

Upload Books/Records





Procedure Reviews



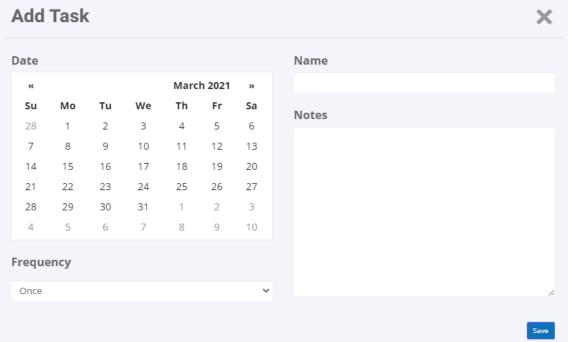
Compliance Calendar

View Calendar and/or To-Do lists

Scheduled Tasks

Online To-Do Lists





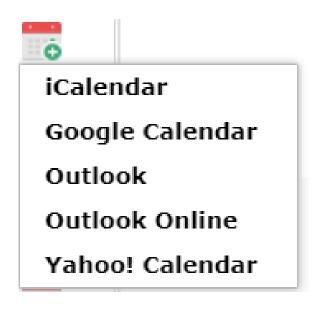


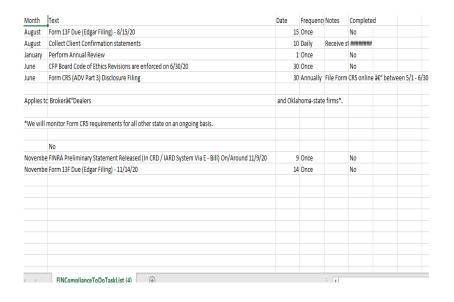
Compliance Calendar

Alerts/Integrations/Downloads*

Integrate Tasks

Audit Trail





^{*}Firms may also use Compliance Program/Logs excel document

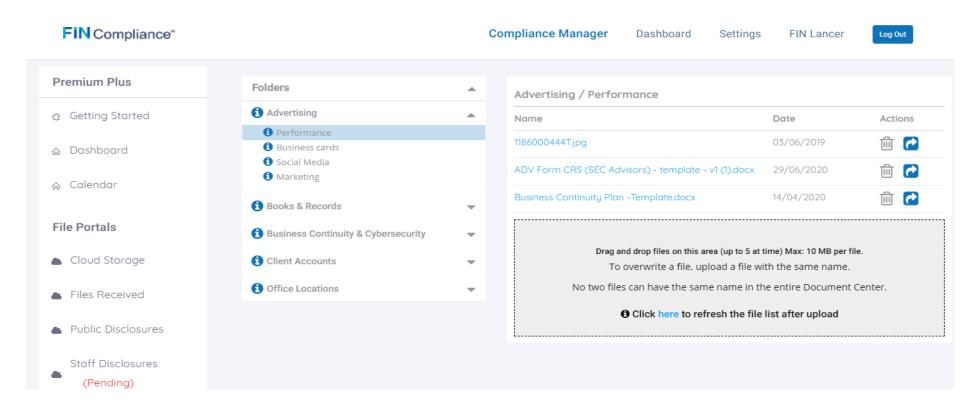


Storge - Cloud Directory

Upload/Share Compliance Book/Records Files for Audit Prep

List

Drag/Drop



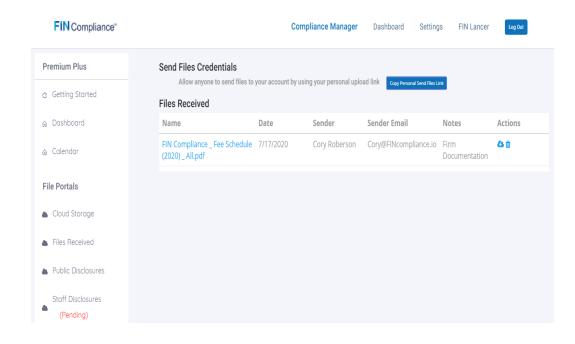


Files Received

Features

Files Received

Files Requested





Send Files To Roberson Consulting Team & Staff

Enter your information. Then drag and drop files on this area (up to 5 at time) Max: 10 MB per file.
Your Name*
Your Email*
Notes
Notes

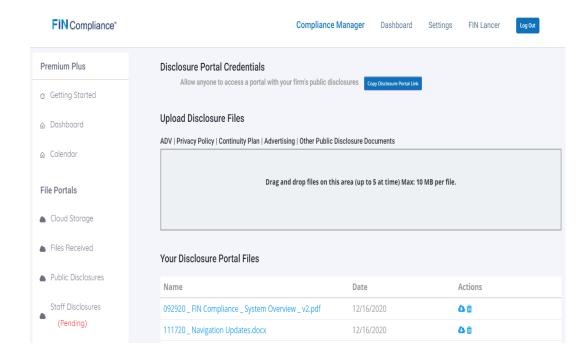


Public Disclosure

Features

Portal

Disclosure Notice



Public Disclosure Files for Roberson Consulting

Enter Your Name To Access Disclosure Files Enter
Public Disclosure Documents/Electronic Delivery Disclaimer We are required to make available our firm disclosure documents, which may include the: ADV Part 2A, 2B, Part 3 (Form CRS), privacy policy, business continuity plan, and other general information regarding our practice.
At a minimum, our firm brochures will contain a summary of our business services, activities, fees, education, background, brokerage activities, and material changes (when applicable).
The firm Business Continuity plan, an overview of our emergency provisions, and the Code of Ethics, a summary of our firm fiduciary standards is available upon request.
By entering your name above, you specifically acknowledge as part of your acceptance of the terms for viewing this page, that documents to be delivered electronically will contain public information regarding the firm's business practices.



Public Disclosure

Features

Delivery Preferences

Downloads

Public Disclosure Files for Roberson Consulting

Receive Files By Postal Mail

Receive Files By Email

ownload Files

Public Disclosure Files for Roberson Consulting

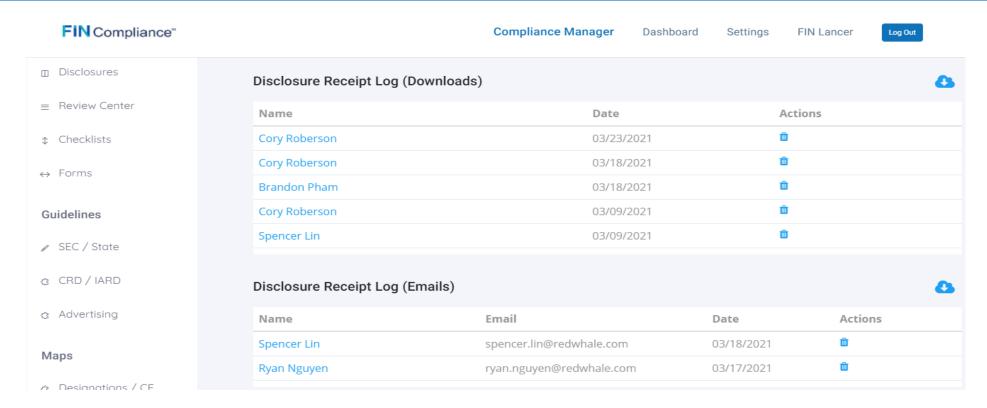
Name	Date	Actions
092920 _ FIN Compliance _ System Overview _ v2.pdf	12/16/2020	8
111720 _ Navigation Updates.docx	12/16/2020	۵
mba_lor14_15.pdf	12/16/2020	۵



Public Disclosure

Features

Audit Logs





Disclosure Documents*

Review Common Filing Instructions*

Menu

Word Document

Updated on 3/1/2018

FIN Compliance" RIA Review: Premium Plus Version Maps **ADV Updates** ADV Part 1/2A/B ADV Part 1/2A/B ADV Part 1/2A/B ADV Part 1/2A/B (New Rep Material Changes) (Rusiness Activities & Affiliations) (Firm Material Changes) (Private Fund Material Channes) Designations Client Onboarding Client Delivery ADV Part 1/2A/B ADV Part 2A **ADV Matching Matrix** Custody Center (Receiving/Giving Compensation) (PPP Loan Disclosures) Cubersecurity / Business Continuity Continuity/Succession FINRA Entitlement Form Disclosure (filling out form): FINRA Entitlement Form FINRA Entitlement Form FINRA Entitlement Form (New RIA's) Client Objectives Send us a message jivochat

ADV Part 1/2A/B: Making Material Changes (New Rep)

Amendment/Login Instructions:

Go to: http://crd.finra.org or http://firms.finra.org

Follow login instructions (user/password)

- Click on <u>IARD Main tab</u>
- Click on Forms: ADV: New/Draft filing
- Click on Submit an Amendment box "√"
- Click on Annual Updating Amendment (for annual update) or other-than-annual amendment (for interim updates)
- Click <u>Create New Filing</u> Box
- Access questions on left navigation tab (some answers are already marked from previous amendment

Uploading a new brochure:

Click on "Part 2"

- · Change brochure name and/or date by clicking on previous brochure link
- Make sure the amend box is checked "√"

Brochure is upload at very end of filing:

You will be prompted to submit a brochure AFTER clicking on Completeness Check (answering all required questions) and then clicking on Submit Filing. Note: These links are all on the left navigation panel.

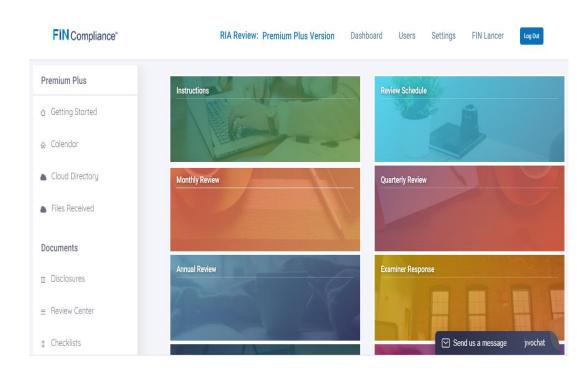


Review Center*

Review Regulatory Updates in a Monthly and Quarterly logs

Menu

Documents



ADV Part 1/2A/B: Making Material Changes (New Rep)

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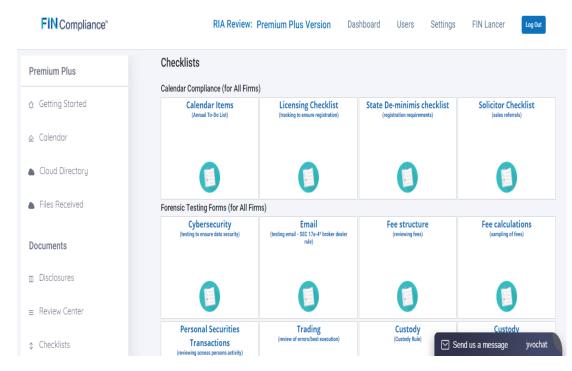
Checklists

Review To-Do List and Procedures

To-Do List/Schedule

Menu

Documents



WHEN TO LOG	TASK NAME	STATUS	DUE DATE	TASK TYPE
	Log Advertising	♠ In progress	Anytime	Compliance
	Log Client Compliants	A In progress	Anytime	Compliance
Anytime	Log Gifts & Entertainment	♠ In progress	Anytime	Compliance
myunc	Registration/De-Minimis	A In progress	Anytime	Compliance
	Log Trade Errors	A In progress	Anytime	Compliance
	Review Books/Records	♠ In progress	Annually	Compliance
To-Do List (Sched	Loo Business Continuity Testina ule) Access Persons Log Advertising Log Books & Rec +	♣ In progress	Annually	Compliance/Ope

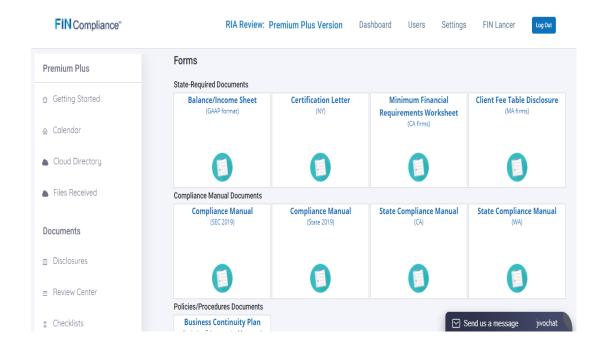


Forms

Update Forms/Templates

Menu

Documents



Best Execution

Firm Policy

ADVISORY FIRM's policy is to obtain best execution for its client transactions, (i.e. the best overall qualitative execution).

ADVISORY FIRM's policy is to review applicable brokerage trading reports (Rule 605/606) to ensure that clients receive favorable trading execution. Firm will periodically review as needed.

Regulatory Update:

July 11, 2018. The SEC Office of Compliance Inspections and Examinations' ("OCIE") issued a risk alert "Compliance Issues Related to Best Execution by Investment Advisers" that identified discrepancies in client trade quality reviews in its examination of more than 1500 investment advisory firms.

Best Practices for updating procedures:

- Periodically review transactional quality brokerage reports (Rule 605/606).
- Review metrics in transactional reports and engage trading team for input (e.g. investment committee meetings).
- · Check trading costs/quality with other brokers
- Add accurate trading disclosures on the ADV and Compliance manual.
- Add disclosures in ADV 2A and procedures manuals.
- Check best execution quality for bundled/mixed use arrangements.
- Poviou Procedures

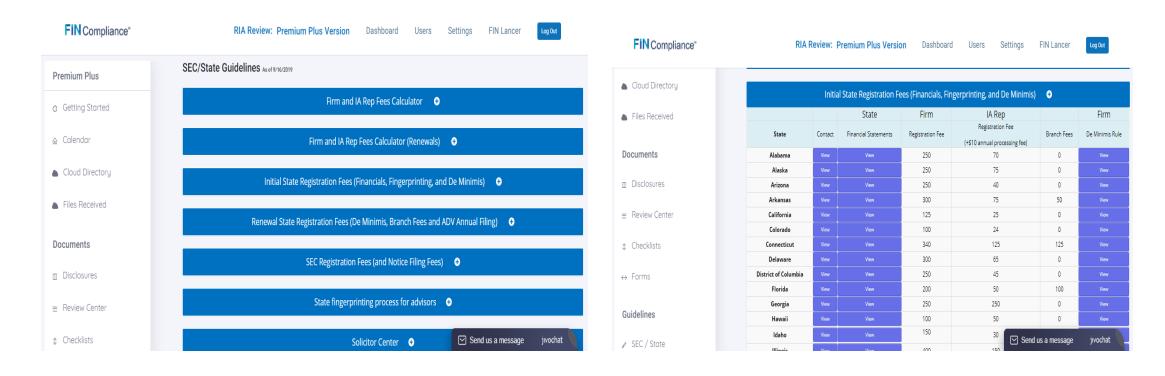


SEC and State Guidelines

Review SEC/State filing information

Menu

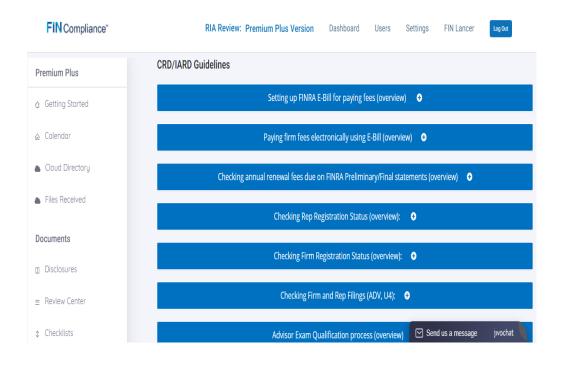
Data

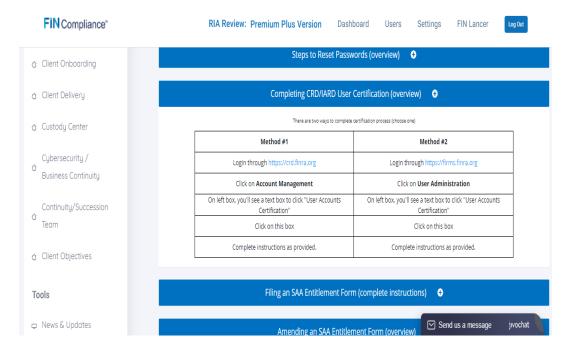




CRD and IARD Account Guidelines

CRD/IARD Account Tips Menu Data





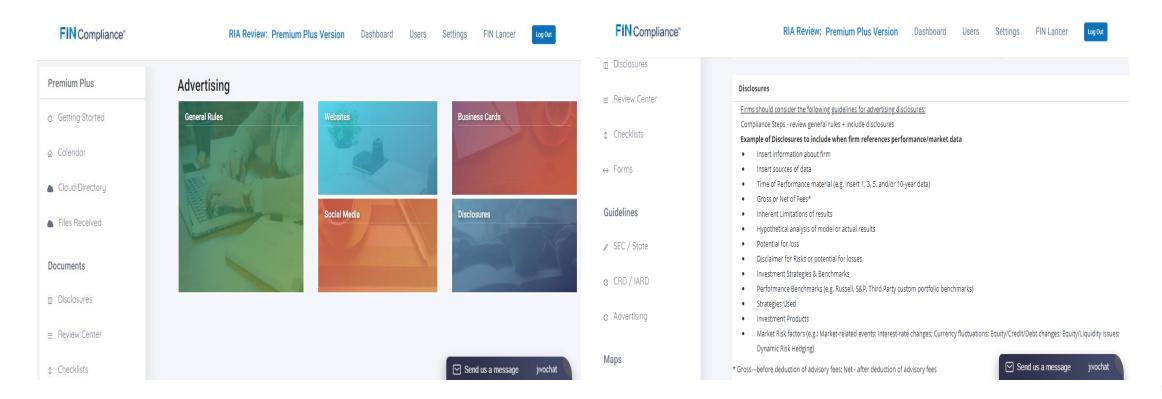


Advertising Guidelines

Overview of Disclosures for marketing materials

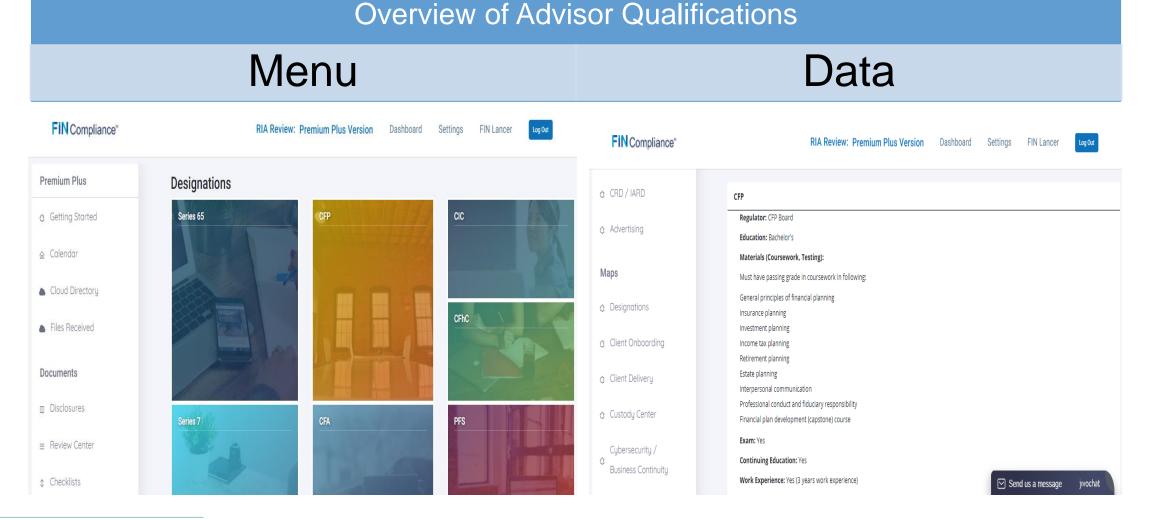
Menu

Data





Designations Maps



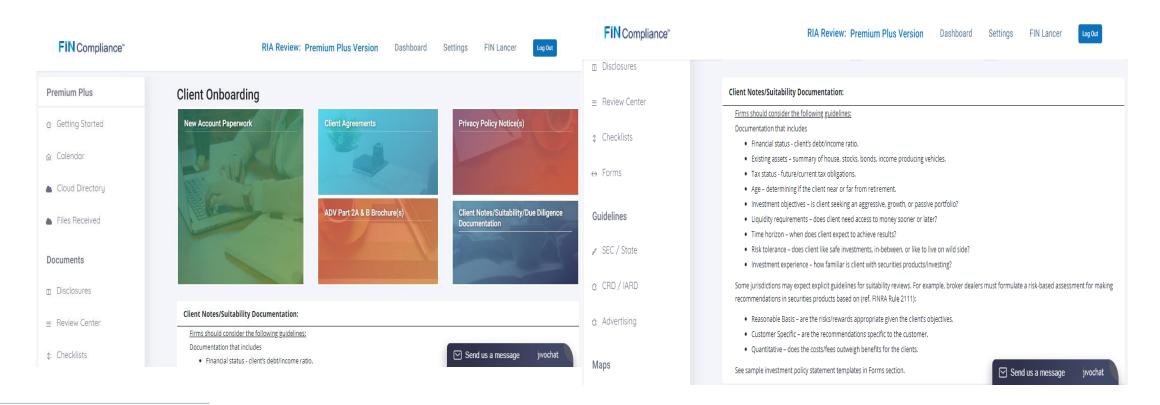


Client Onboarding Maps

See Common Client Onboarding Documents

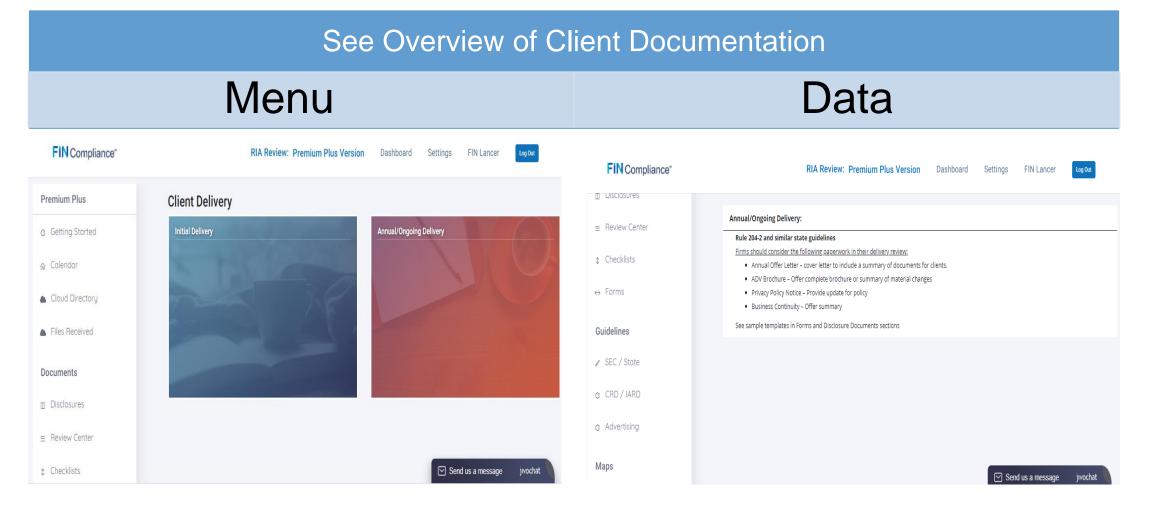
Menu

Documents





Client Delivery Maps





Custody Center Maps

See Overview of Custody Rule Requirement for Advisors

Menu Data

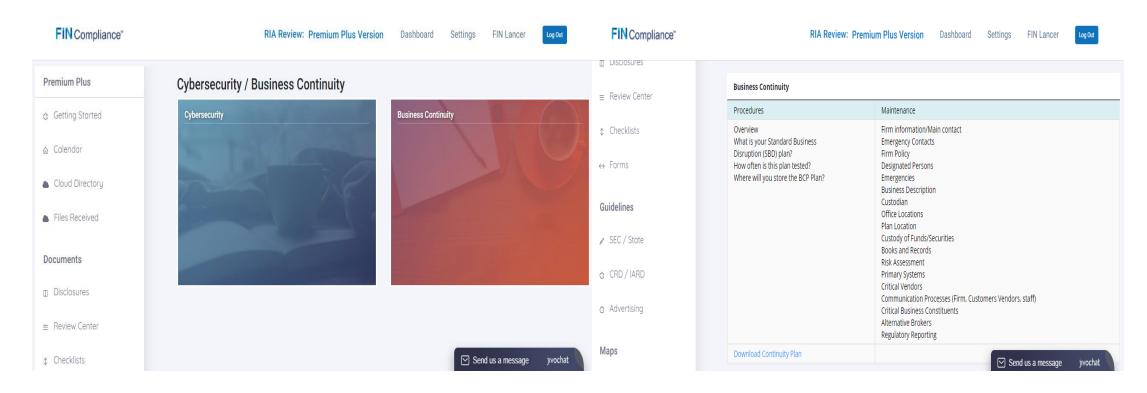
authority). Serving as advisor/sub-advisor to Pooled Investment Vehicle Maintaining check writing authority or serving as a trustee of Moving assets to a third party without a written authorization Access to client account passwords with ability to move fund Physical possession of client assets. Control - the power to manage a person or corporation Custody - holding, directly or indirectly, client funds or security.	ver a client trust.
Moving assets to a third party without a written authorization Access to client account passwords with ability to move fund Physical possession of client assets. Control - the power to manage a person or corporation Custody - holding, directly or indirectly, client funds or secund Custody including possession of client funds, authorization in the control of the control of the custody including possession of client funds.	
Physical possession of client assets. Control - the power to manage a person or corporation Custody - holding, directly or indirectly, client funds or secu Custody including possession of client funds, authorization	
Custody - holding, directly or indirectly, client funds or secu Custody including possession of client funds, authorization	s or securities.
Custody including possession of client funds, authorization	
	ities, or having any authority to obtain possession of them.
Independent certified public accountant – a certified CPA	or withdrawing client funds and other access to client funds.
	who meets standards of independence.
Independent representative – a person who is an agent for	r an advisory client.
	pooled investments, does not control the investment advisor and
Definitions has not business relationship with investment advisor	
Independent representative - person who acts as an agen	for an advisory client, does not control the investment advisor
and has not business relationship with investment advisor	
Qualified custodian - a blank, registered broker-dealer, reg	stered merchant or financial institution who holds financial assets
for clients.	
Related person - person controlling or under common cont	



Cybersecurity & Continuity Maps

Review Data protection and Continuity planning

Menu Data





Continuity & Succession Team Maps

Menu Data FIN Compliance" RIA Review: Premium Plus Version FIN Compliance RIA Review: Premium Plus Version Premium Plus Business Continuity/Succession Team m Disclosures Continuity Team G Getting Started Succession Team Stakeholders/Designation Person/Authorization Levels for succession plan ■ Review Center • Principal/equity owners - full authorization • Designated persons - Someone with authorization to continue business operations and/or estate matters Checklists Staff - someone who will continue business operations from admin. Admin gives them access to information needed to fulfill their business Cloud Directory → Forms . Contributors - works with admin/staff to continue business operations. They can be a succession partner or third-party worker. Succession Vendors List Files Received Guidelines Admin - Principal of Firms ∠ SEC / State Documents Email ☼ CRD / IARD m Disclosures Phone Address Advertising = Review Center Admin - Responsible for monitoring, updating, and testing the firm's BCP Send us a message jivochat Send us a message jivochat Checklists

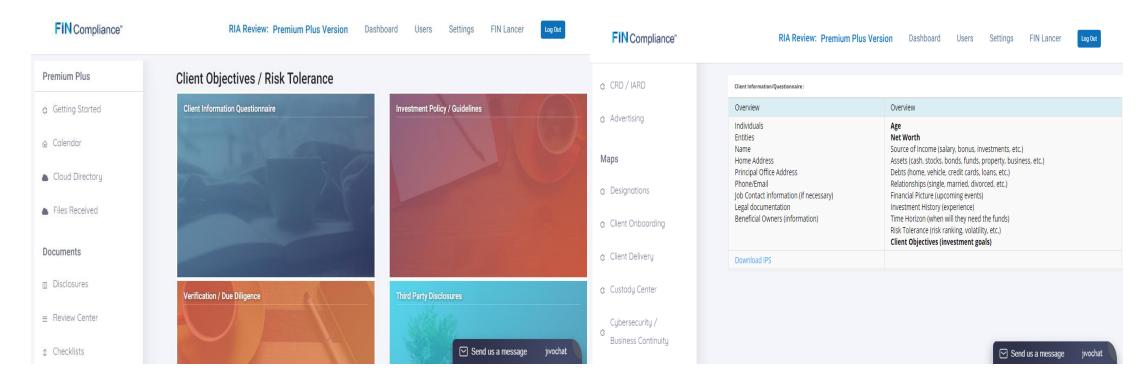
Download and Ceate your Team/Succession List



Client Objectives Maps

Client Risk Tolerance & Portfolio Instructions

Menu Data





News/Updates

Review Regulatory News Links

Menu Data

FIN Compliance

RIA Review: Premium Plus Version

Dashboard

Users

Settings

FIN Lancer

Log Out

Premium Plus

- ☆ Getting Started
- ☆ Calendar
- Cloud Directory
- Files Received

Documents

- □ Disclosures
- Review Center

News & Updates

SEC News and Announcements

SEC - General News	SEC General Information
SEC – Office of Compliance Inspection (OCIE)	SEC Regulatory Division/Unit
SEC - Division of Investment Management (IM)	SEC Regulatory Division/Unit

General News and Announcements

NASAA (State registrants) – General News	News from North American Securities Administrators Association	
FINRA (Broker-Dealers) – General News	News from Financial Industry Regulatory Authority (SRO)	
SIFMA (Securities Markets) – General News	News from Securities Industry and Financial ☑ Send us a message	jivochat



Resources/Training

Review Regulatory Filing and Risk Alert Resources

Menu Data

FIN Compliance

RIA Review: Premium Plus Version

Dashboard

Users

Settings

FIN Lancer

Log Out

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Premium Plus

- ☆ Getting Started
- ☆ Calendar
- Cloud Directory
- Files Received

Documents

- m Disclosures
- Review Center
- Checklists

Resources

Firm AssessmentsGeneral Information

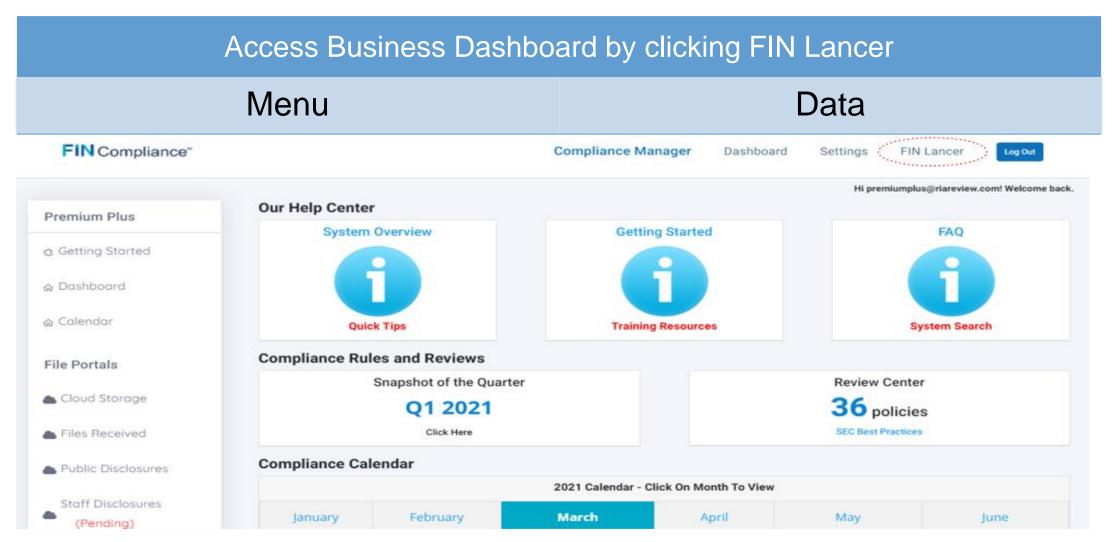
Business Continuity Assessment	Review your Continuity needs and score your firm.
Cybersecurity Assessment	Review your Cybersecurity needs and score your firm.

General Information

SEC - ADV Part 1A Instructions	Instructions for Form ADV filing/electronic version.
SEC - ADV Part 2A/B Instructions	Instructions for Form ADV filing/paper version.
SEC - ADV Part 3/Form CRS Instructions	Instructions for Form ADV filing/paper version.
SEC - Form ADV Glossary of Terms	Glossary for Form ADV terms.
SIFMA – Securities Markets Regulations	Guidelines on security market regulations from SIFMA association.
RIA - Maintaining Your Compliance	Cuidelines on starting your compliance program

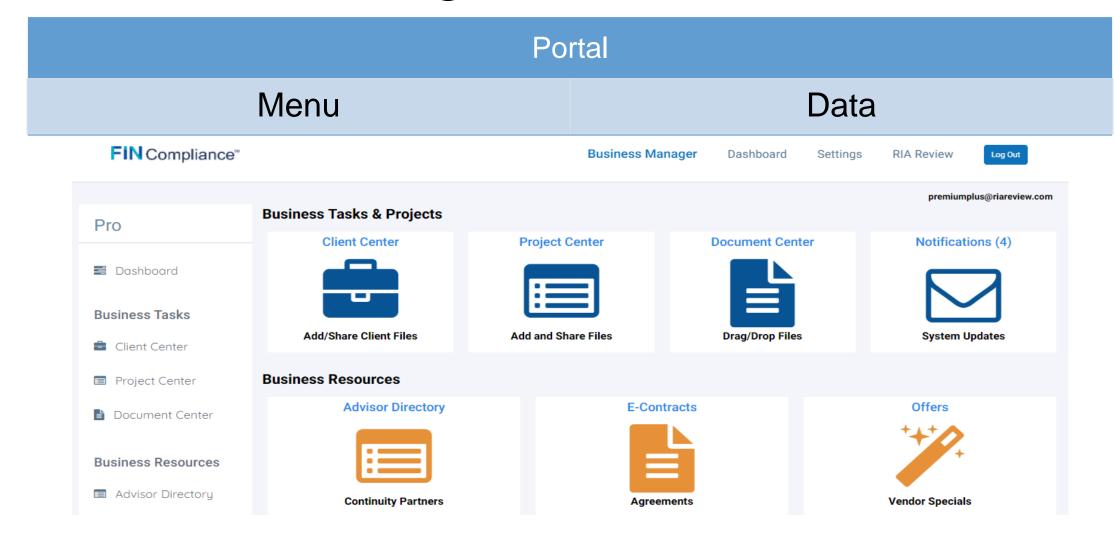


Go to Business Manager Portal





Business Manager Portal



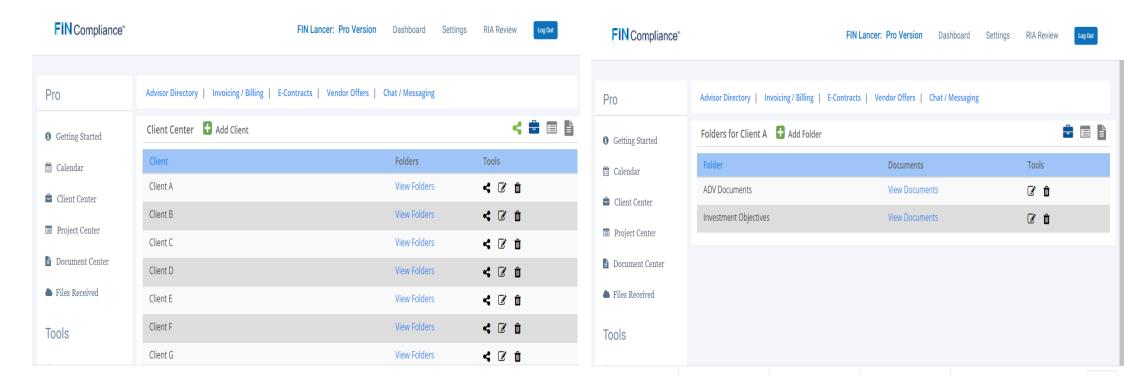


Client Center

Click to Create/Upload/Share Client Documents

Folders

Menu



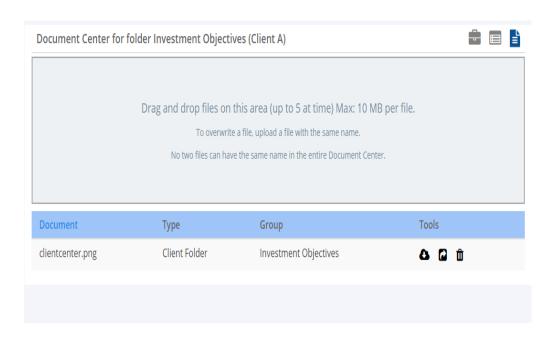


Client & Project Center: Sharing Files

Sharing Documents to Third Parties

Sharing

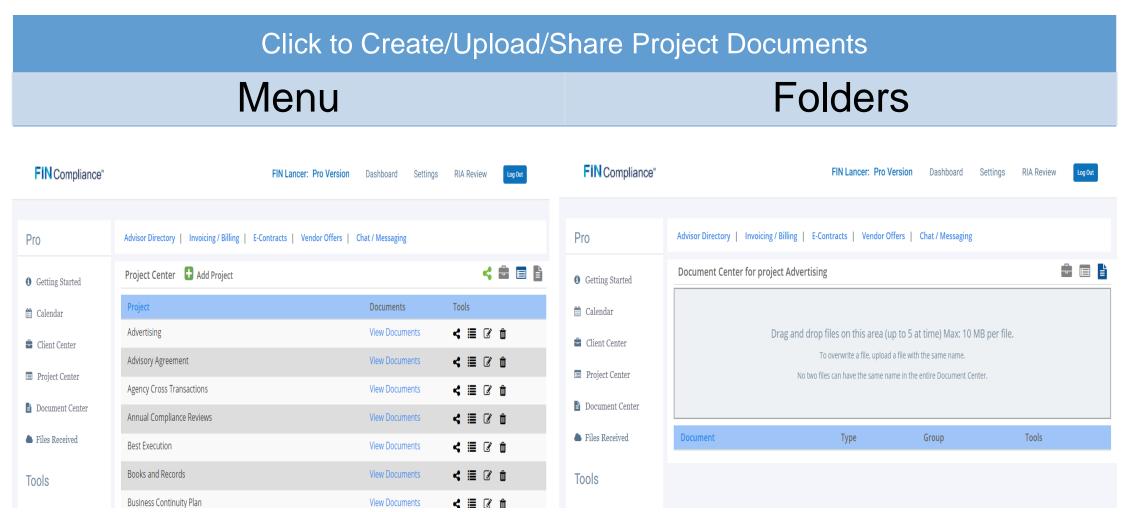
Sending Link



Share File		×
Fileshare URL https://storage.googleapis.com/premiumplusriareviewcom/documentCenter%2Fclientcente	Copy URL	
OR		
Email Address	E-Mail URL	
Email Text		

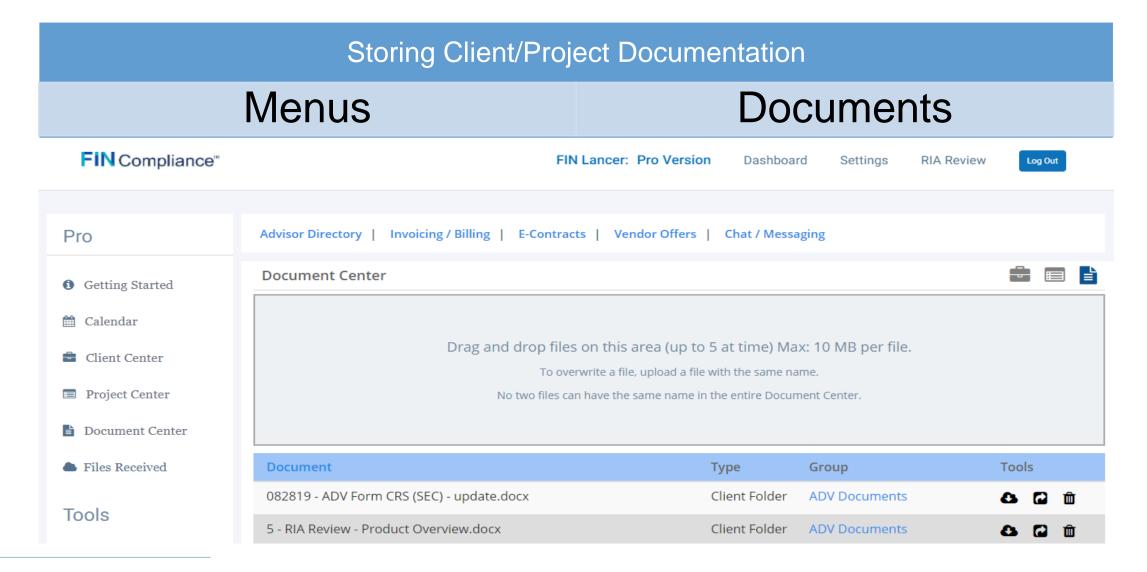


Project Center





Document Center





Sample Compliance Procedures Folder

Create a Full Procedures folder in Client or Project Center

Photo #1

Photo #2

Advertising	View Documents	∢ ≣ 🕜 🛍
Advisory Agreement	View Documents	∢ ≣ ♂ 🛍
Agency Cross Transactions	View Documents	∢ ≣ ♂ 🛍
Annual Compliance Reviews	View Documents	∢ ≣ ♂ 🛍
Best Execution	View Documents	∢ ≣ ♂ 🛍
Books and Records	View Documents	ሩ ≣ ♂ 🛍
Business Continuity Plan	View Documents	∢ ≣ ♂ 🛍
Client Correspondence/Complaints	View Documents	ሩ ≣ ♂ 🛍

Client File Contents	View Documents	< ∄	Ø	Û
Code of Ethics	View Documents	< ■	Ø	Û
Compliance Directory	View Documents	< ■	Ø	Û
Corporate Records	View Documents	< ≣	Ø	Û
Custody	View Documents	< ∄	Ø	Û
Cybersecurity/Data Breaches (new info)	View Documents	< ≣	Ø	Û
Directed Brokerage	View Documents	< ∄	Ø	Û
Disaster Recovery/Business Continuity	View Documents	< ∄	Ø	Û
Disclosure Documents	View Documents	< ∄	Ø	Û
Email & Other Electronic Communications (new info)	View Documents	< ∄	Ø	û
ERISA	View Documents	< ∄	Ø	Û



Sample Project Procedures Folder

Create a Full Procedures folder in Client or Project Center

Photo #3

Photo #4

FINRA - Branch Office Review	View Documents < I ☑ 🛣 🛣
Insider Trading	View Documents
Invoicing/Billing/Fees	View Documents < I ☑ 🛣 🛣
Mock Audit Documents	View Documents
Performance	View Documents
Political Contributions	View Documents
Principal Transactions	View Documents < I ☑ 🛈
Privacy Policy	View Documents < I ☑ 🛈
Proxy Voting	View Documents
Quarterly Reviews	View Documents < I ☑ 🛈
Quarterly Reviews - Checklist	View Documents < I ☑ 🛈 🛍

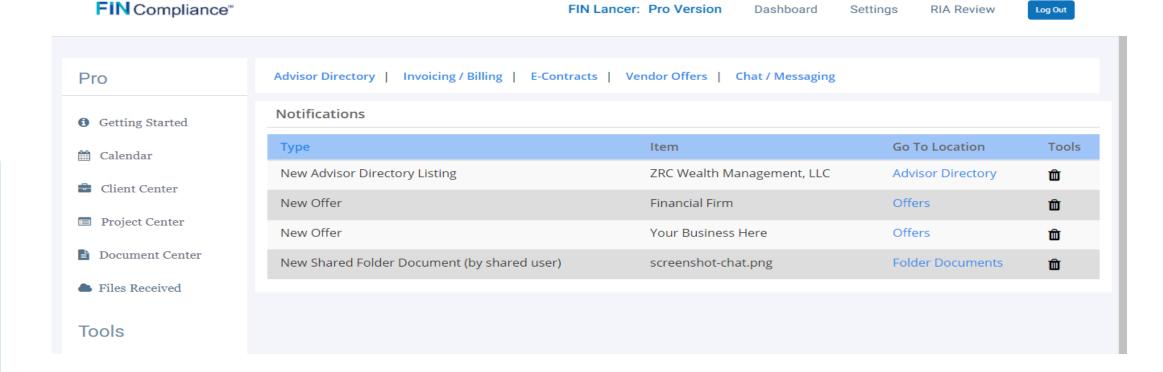
Registration and Licensing	View Documents	< ≣ ♂ 🛍
Regulation S-ID (Identity Theft)	View Documents	< ≣ ♂ 🛍
Regulatory Requirements	View Documents	< ≣ ♂ 🛍
Robo-Advisory ("Internet Advisors") (new)	View Documents	∢ ≣ ♂ 🛍
Safe Senior Act	View Documents	< ≣ ♂ 🛍
SEC - Compliance Manual - 2019	View Documents	< ≣ ♂ 🛍
SEC - Examination Notes	View Documents	≺ ≣ ♂ 🛍
Soft Dollar Policy	View Documents	≼ ≣ ♂ 🛍
Solicitor Arrangements	View Documents	≺ ≣ ♂ 🛍
Supervision/Internal Controls	View Documents	≼ ≣ ♂ 🛍
Trading	View Documents	⊀ ≣ ♂ 🛍
Valuation of Securities	View Documents	≺ ≣ ♂ 🛍



Notifications Log

Documentation of Activities

Log



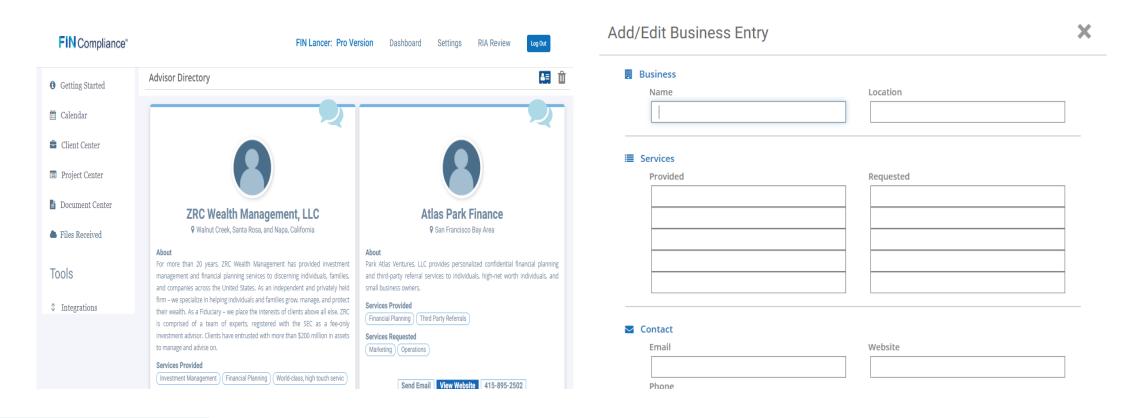


Advisor Directory

List your firm for opportunities

Menus

Add Profile



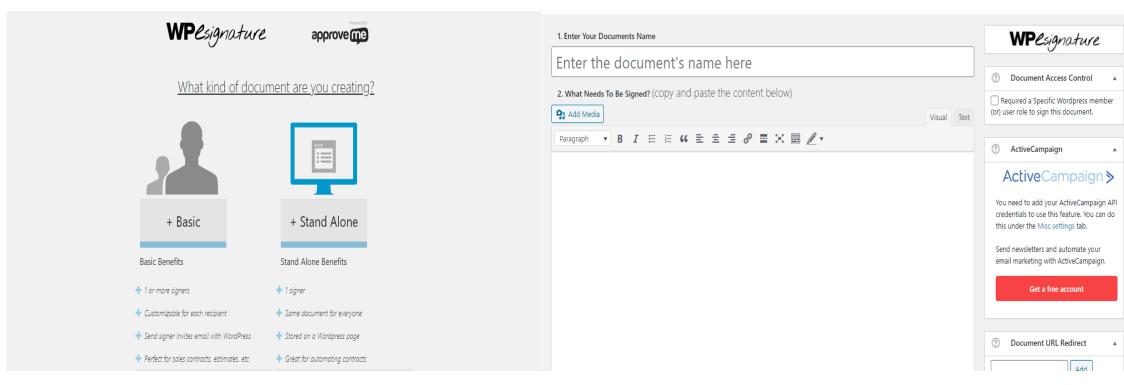


E-Contracts (Approve Me Integration)

Documentation

Menus

Documents





Offers Section

E-Contracts

View Offers from Third Party Vendors

Menus

Data

Settings

RIA Review

Log Out

Business Manager Dashboard

FIN Compliance **Vendor Offers** Pro **6** Getting Started math Calendar **Business Tasks Atlas Park Consulting NAFPA** Client Center Chicago, IL San Francisco Bay Area Project Center Join NAPFA's fee only network \$500 off (new clients with minimum service) The National Association of Personal Financial Advisors (NAPFA) believes those For advisors seeking to improve their firm operations with a business analysis and for those seeking to take their firm to the next level with a Business providing financial planning services must be comprehensive in their advice, and Document Center display a high level of competence. "Fee only" Advisors can join here -Improvement Plan. Firms of any size can benefit from having a roadmap to https://www.napfa.org/membership achieve goals. More details: https://youtu.be/5MO0XFvb6LU **Business Resources** Offer Categories Offer Categories Advisor Directory Membership Study Groups Advisor Resource Listing Advisor Business Coaching Operations, Processes & System Invoicing / Billing View Website 888-333-6659 View Website 415-895-2502

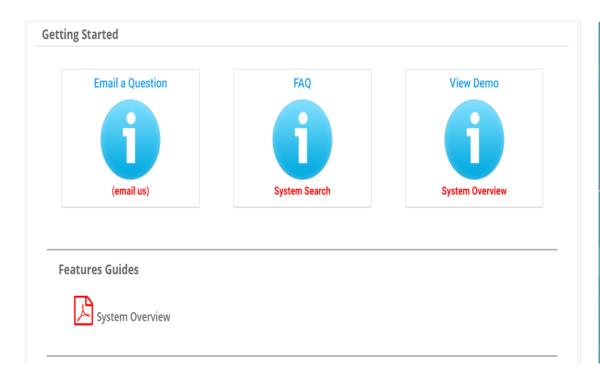


Help Center

View System Training Materials

Menus

Guides/Videos





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Contact Us

Email Cory Roberson, Founder

cory@fincompliance.io



650-305-2688