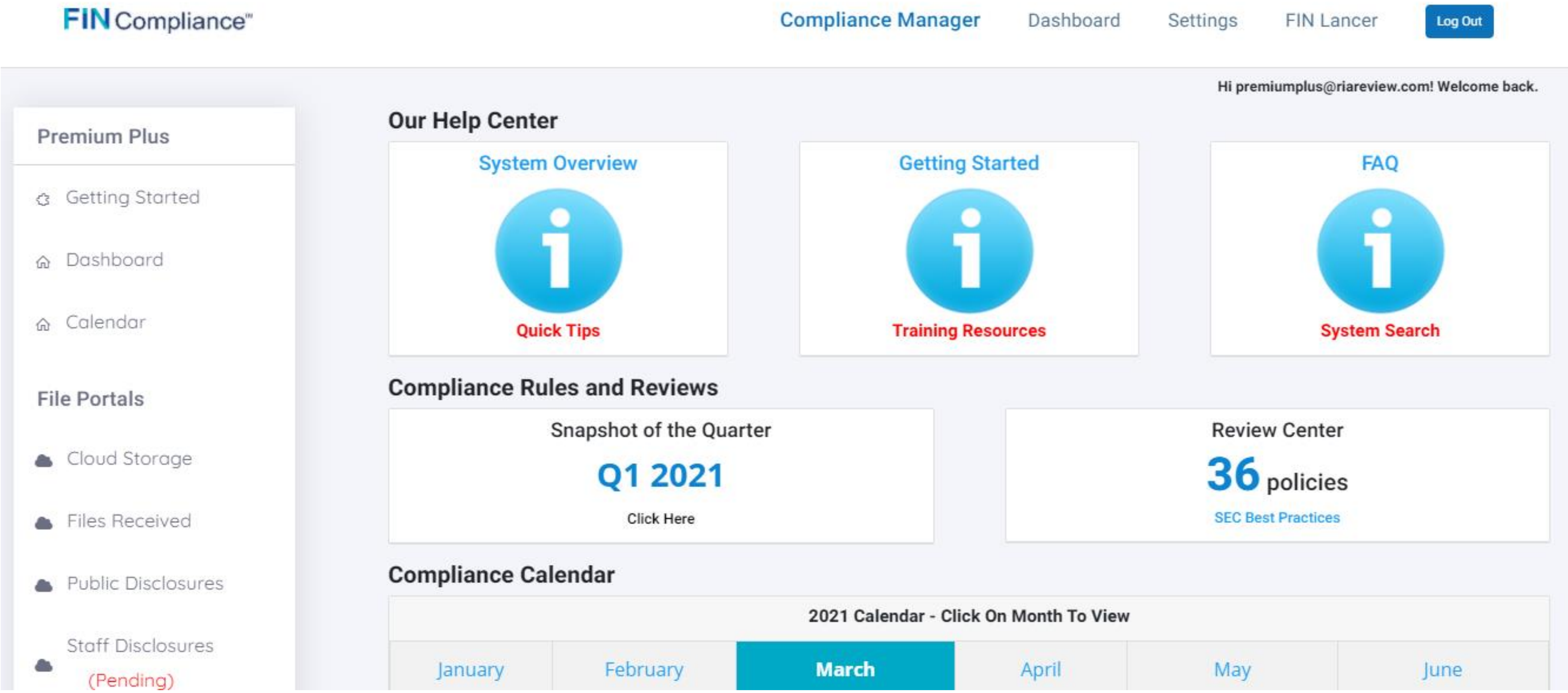
FIN Compliance™

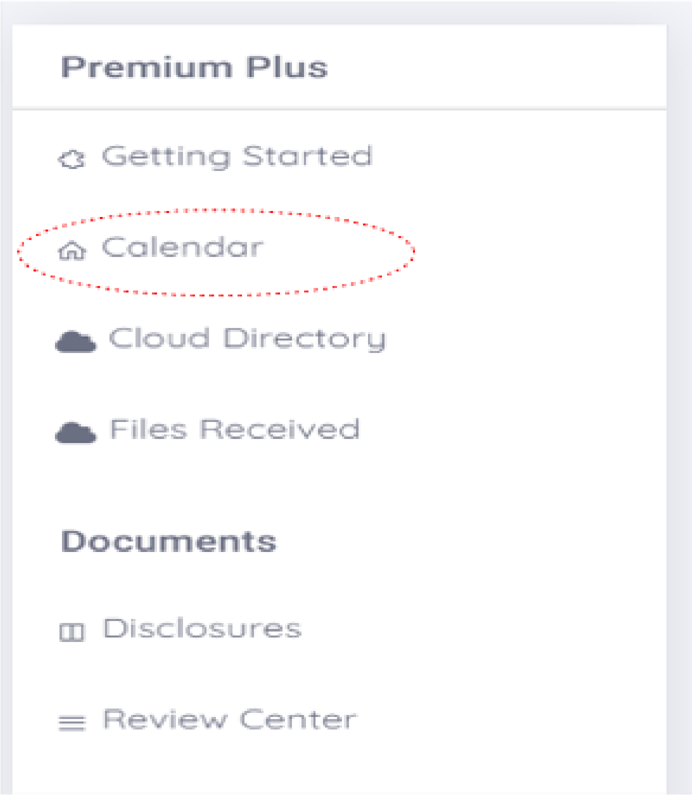
Getting Started
System Features v3.8

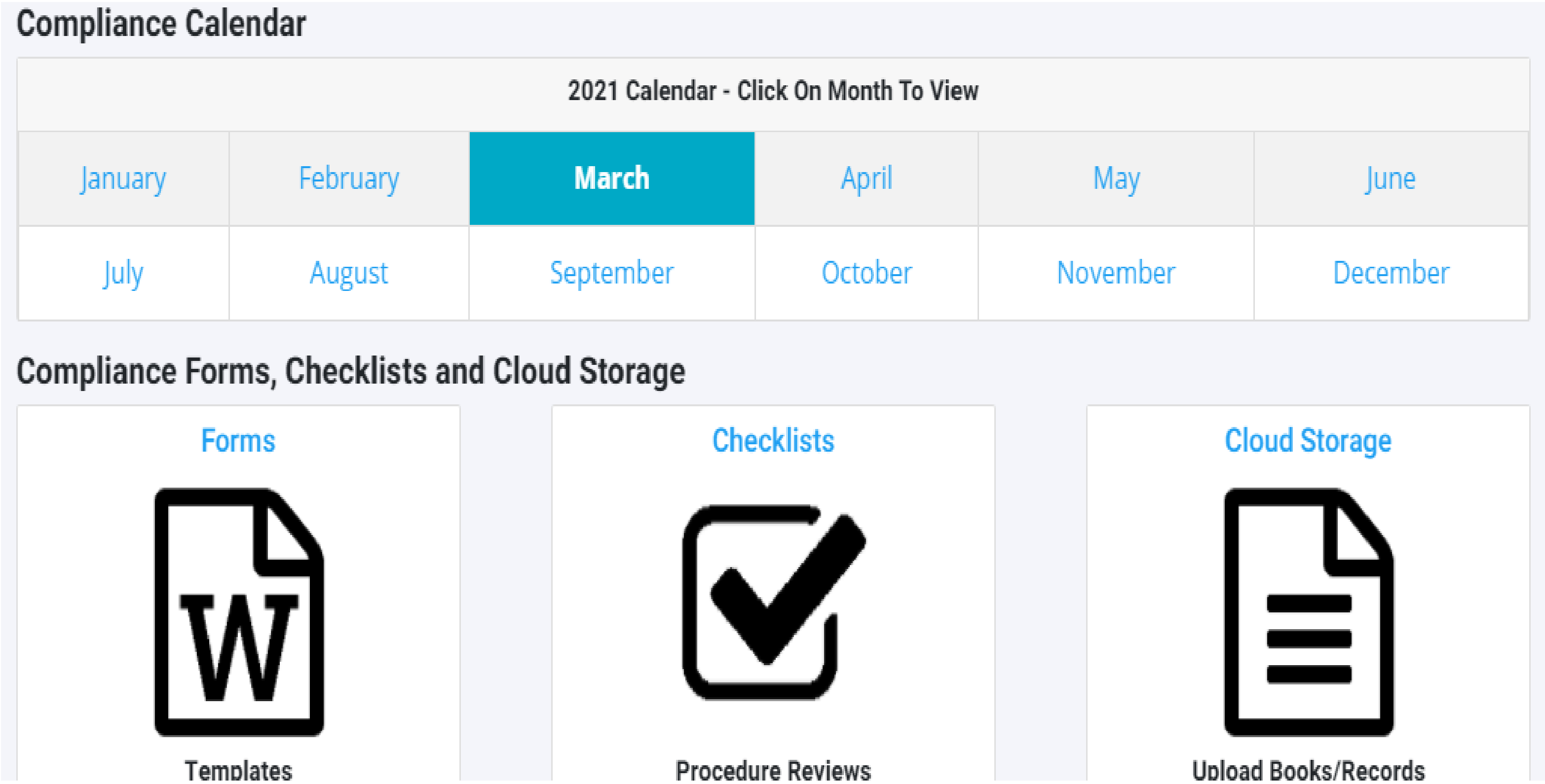
Compliance Dashboard



Accessing Compliance Calendar

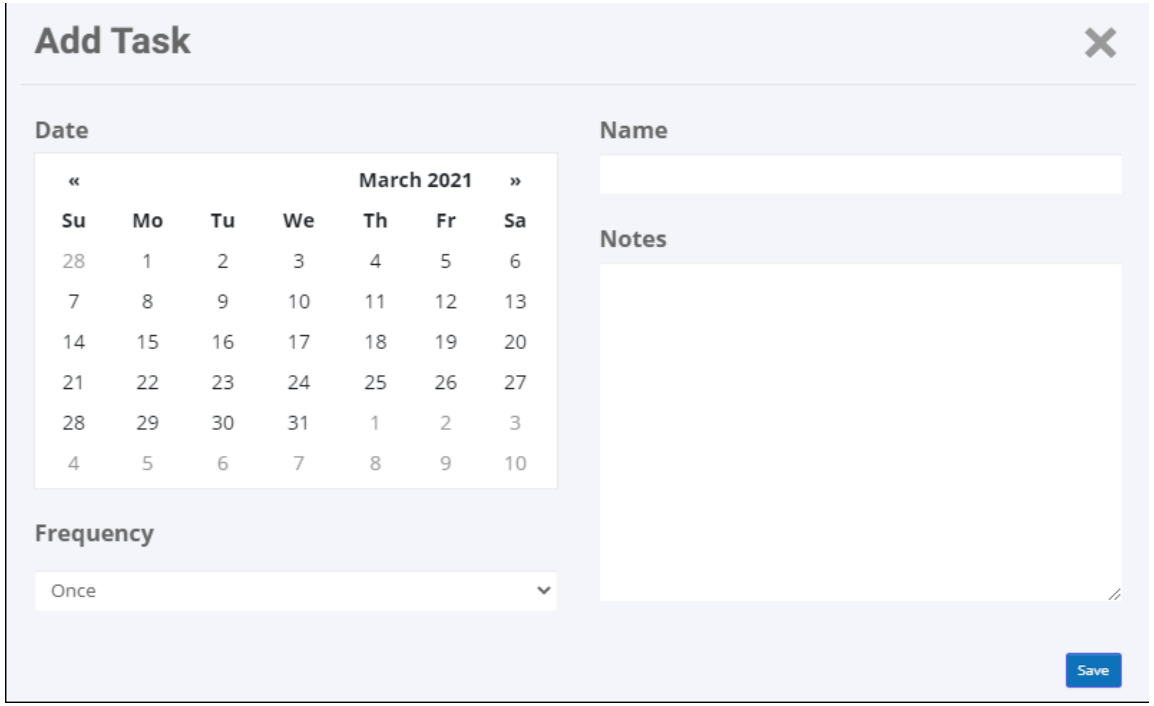
Navigation	Quick Link





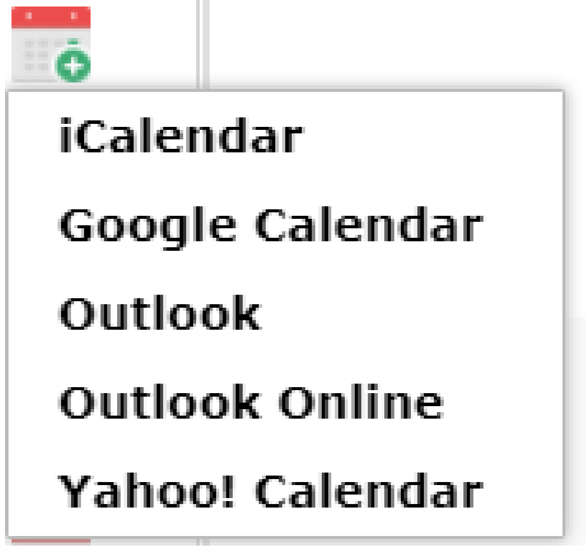
Compliance Calendar

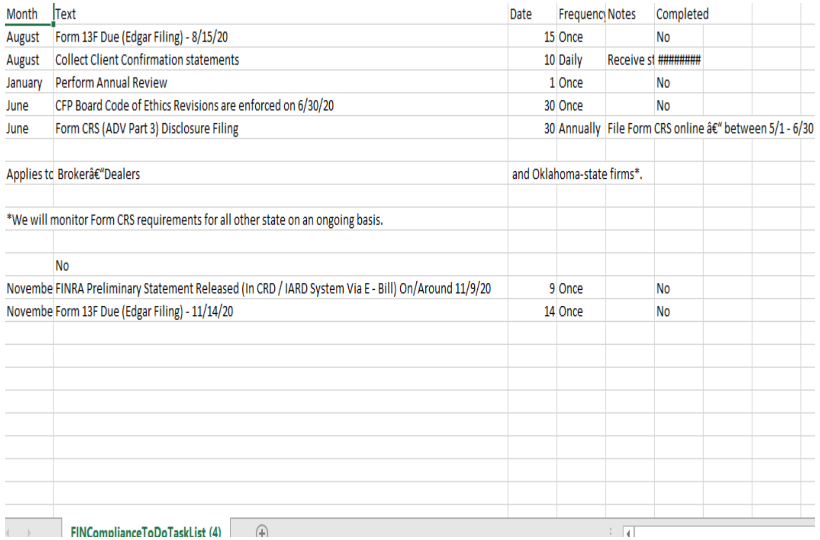
View Calendar and/or To-Do lists	
Scheduled Tasks	Online To-Do Lists



Compliance Calendar

Alerts/Integrations/Downloads*	
Integrate Tasks	Audit Trail





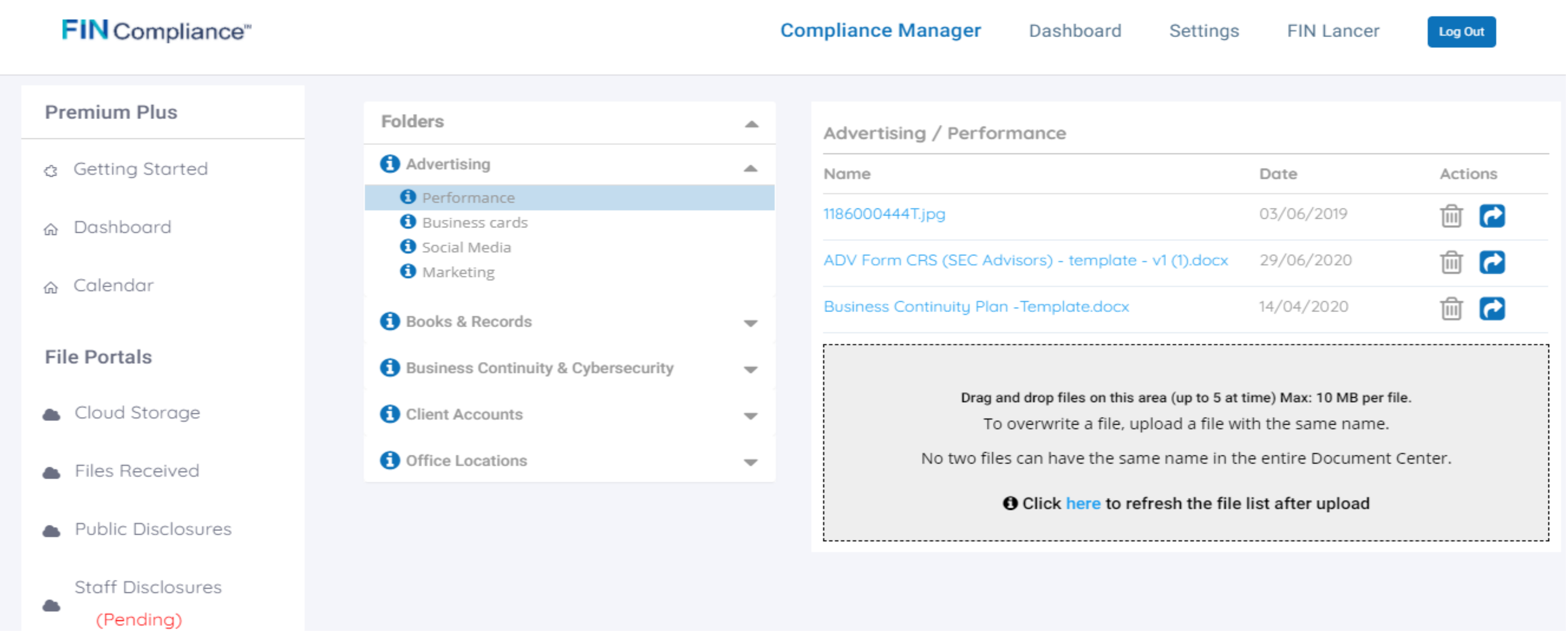
Month	Text	Date	Frequency	Notes	Completed
August	Form 13F Due (Edgar Filing) - 8/15/20	15	Once		No
August	Collect Client Confirmation statements	10	Daily	Receive st	########
January	Perform Annual Review	1	Once		No
June	CFP Board Code of Ethics Revisions are enforced on 6/30/20	30	Once		No
June	Form CRS (ADV Part 3) Disclosure Filing	30	Annually	File Form CRS online â€“ between 5/1 - 6/30	
Applies tc	Brokerâ€“Dealers	and Oklahoma-state firms*.			
*We will monitor Form CRS requirements for all other state on an ongoing basis.					
	No				
Novembe	FINRA Preliminary Statement Released (In CRD / IARD System Via E - Bill) On/Around 11/9/20	9	Once		No
Novembe	Form 13F Due (Edgar Filing) - 11/14/20	14	Once		No

FINComplianceToDoTaskList (4)

*Firms may also use Compliance Program/Logs excel document

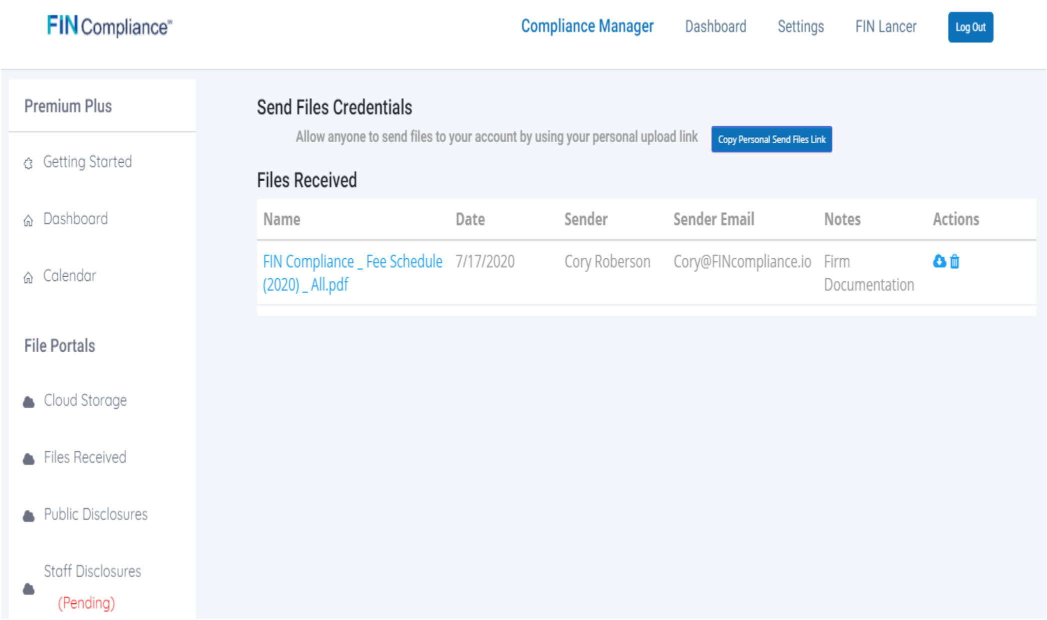
Storge - Cloud Directory

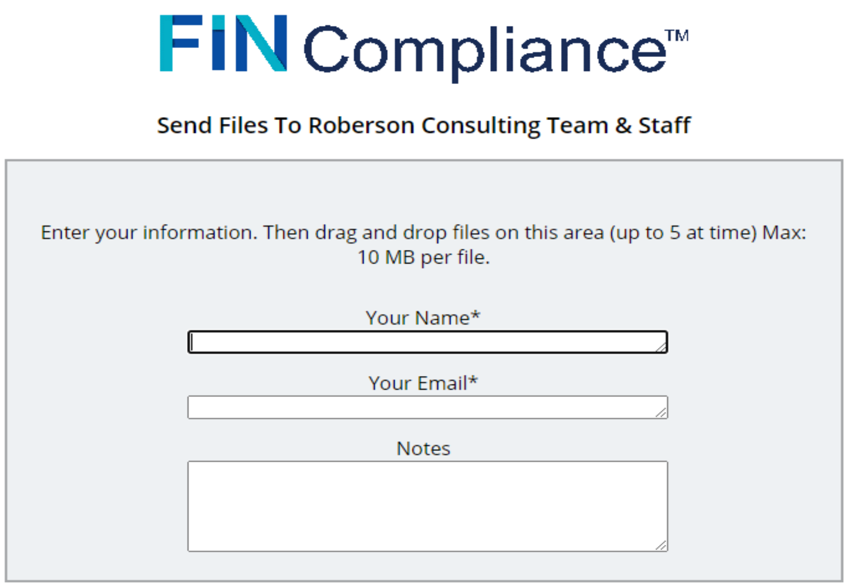
Upload/Share Compliance Book/Records Files for Audit Prep	
List	Drag/Drop



Files Received

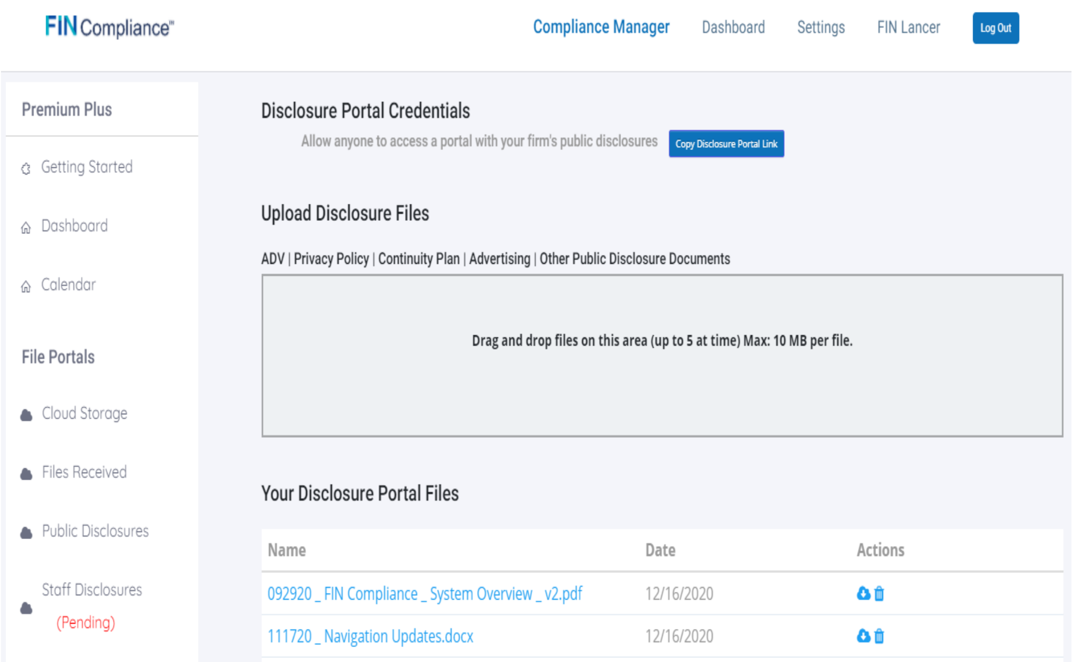
Features	
Files Received	Files Requested

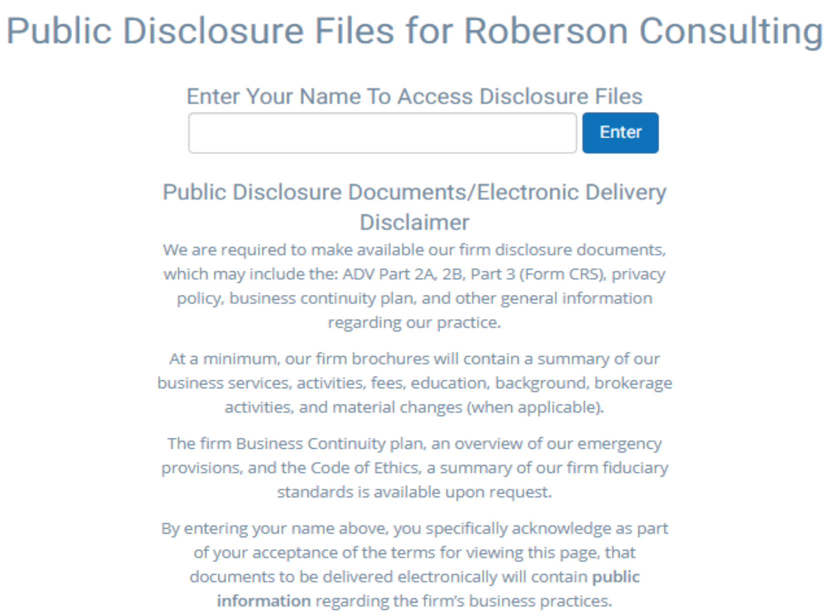




Public Disclosure

Features	
Portal	Disclosure Notice





Public Disclosure

Features	
Delivery Preferences	Downloads

Public Disclosure Files for Roberson Consulting

Receive Files By Postal Mail | Receive Files By Email | Download Files

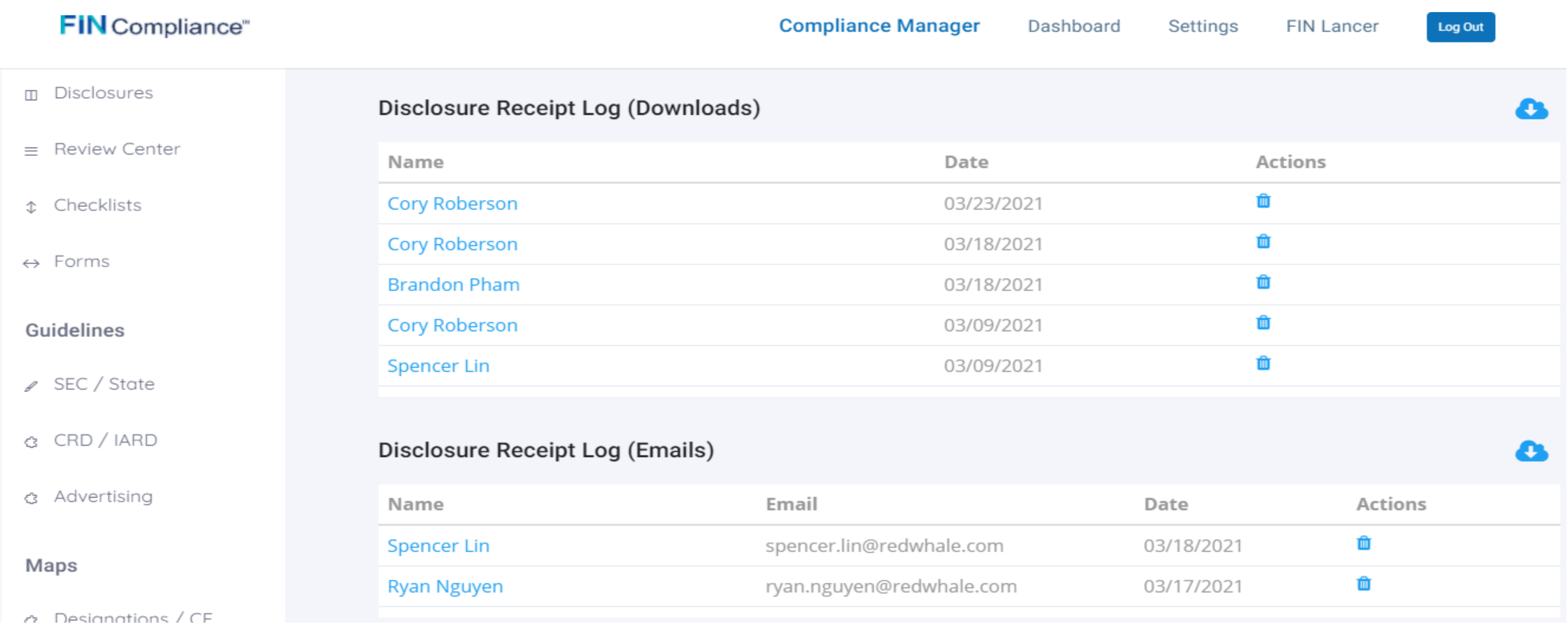
Public Disclosure Files for Roberson Consulting

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

Public Disclosure

Features

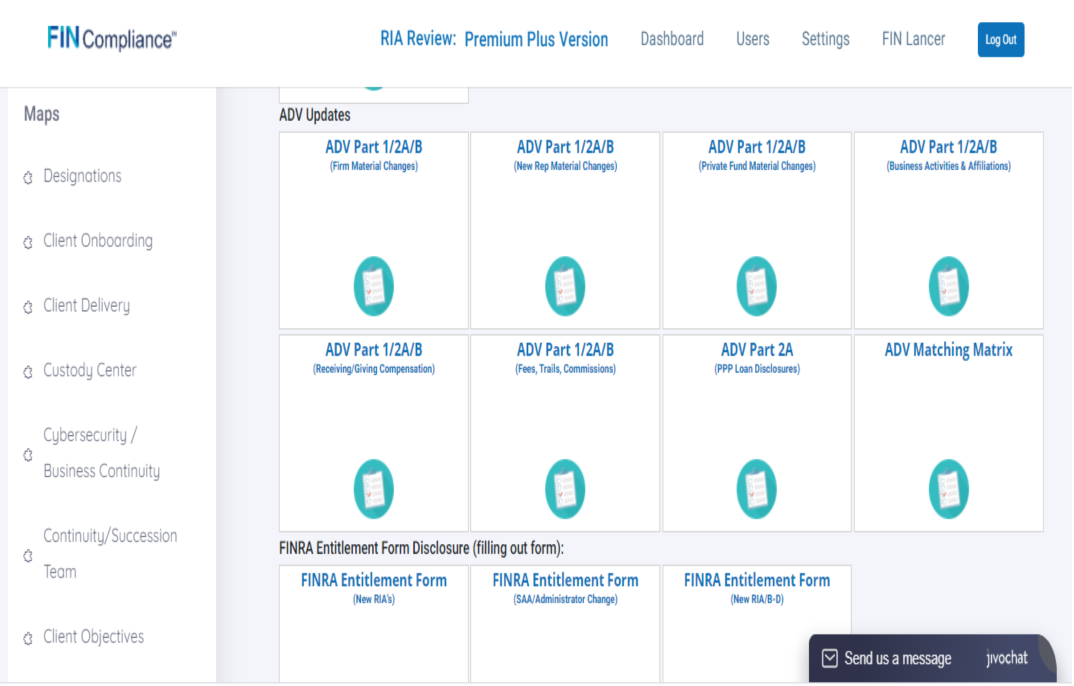
Audit Logs



Disclosure Documents*

Review Common Filing Instructions*

Menu	Word Document



Updated on 3/1/2018

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 IARD Main tab
- 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 Create New Filing 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 "√"

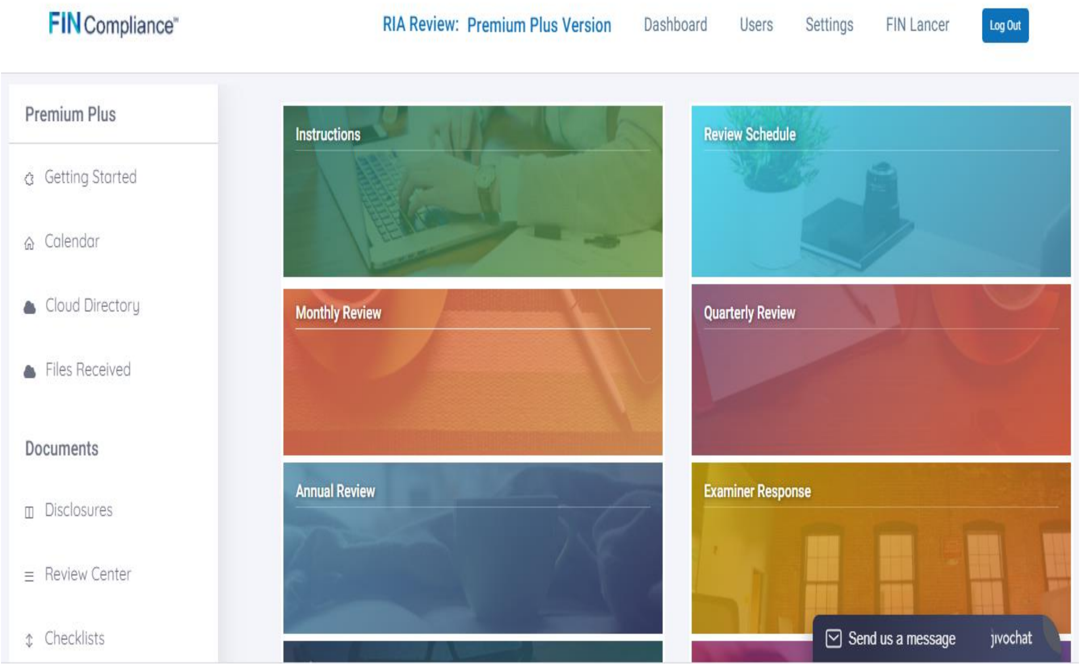
Brochure is upload at very end of filing:

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.

*Premium Plus users only

Review Center*

Review Regulatory Updates in a Monthly and Quarterly logs	
Menu	Documents



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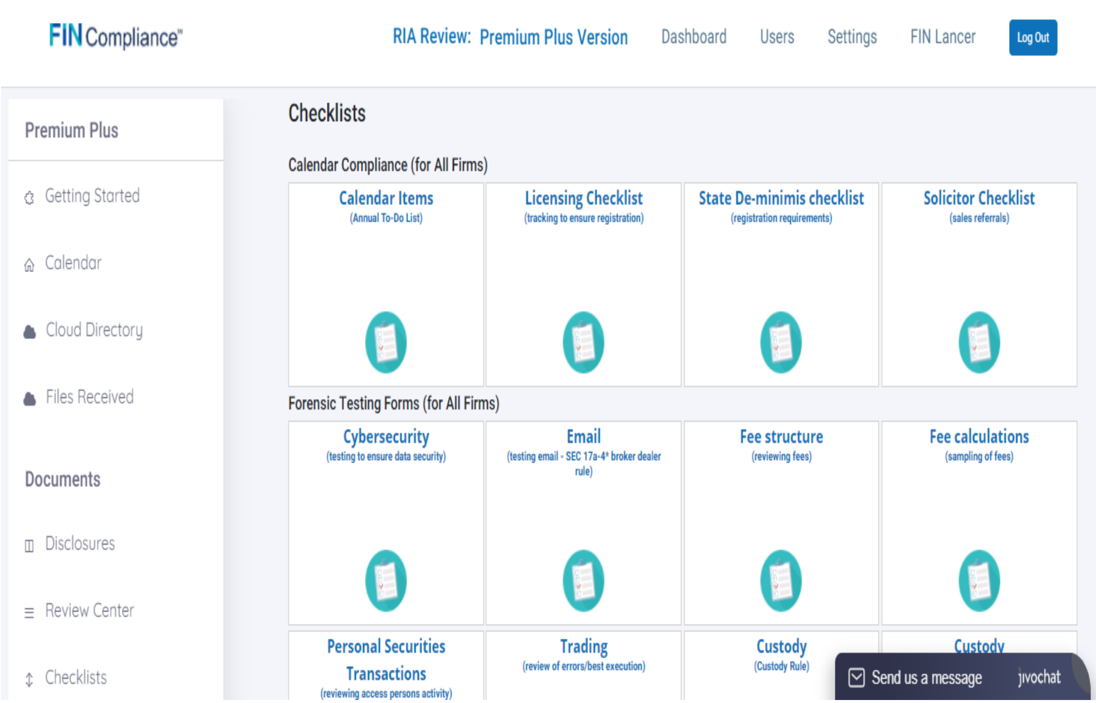
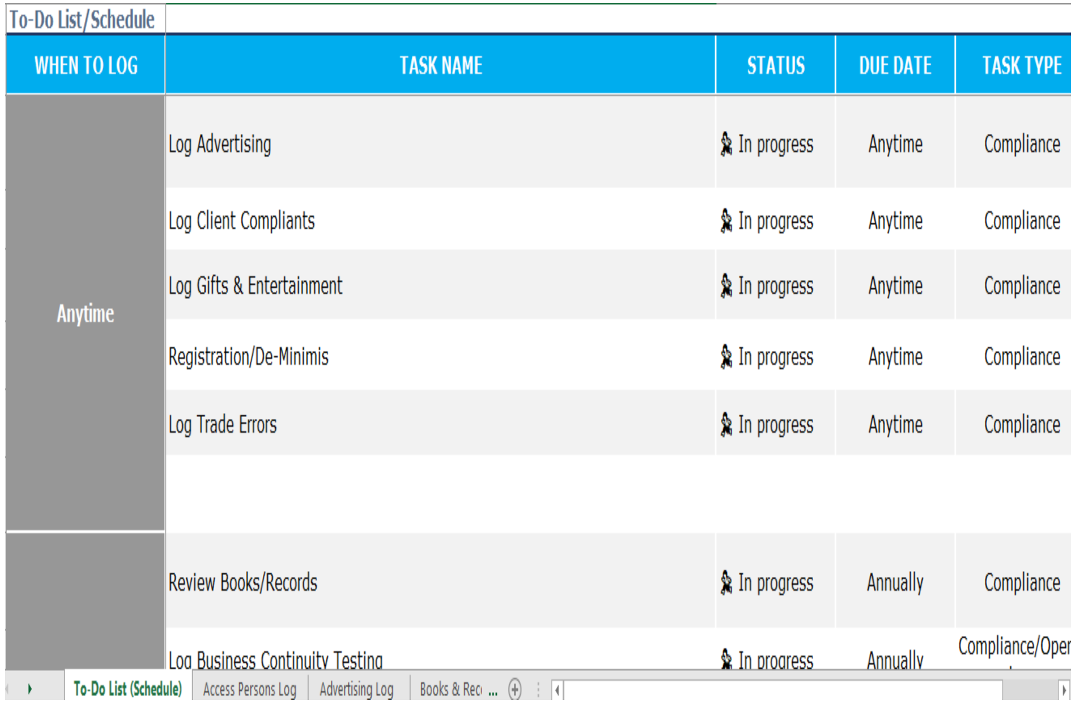
*Premium Plus users only

Checklists

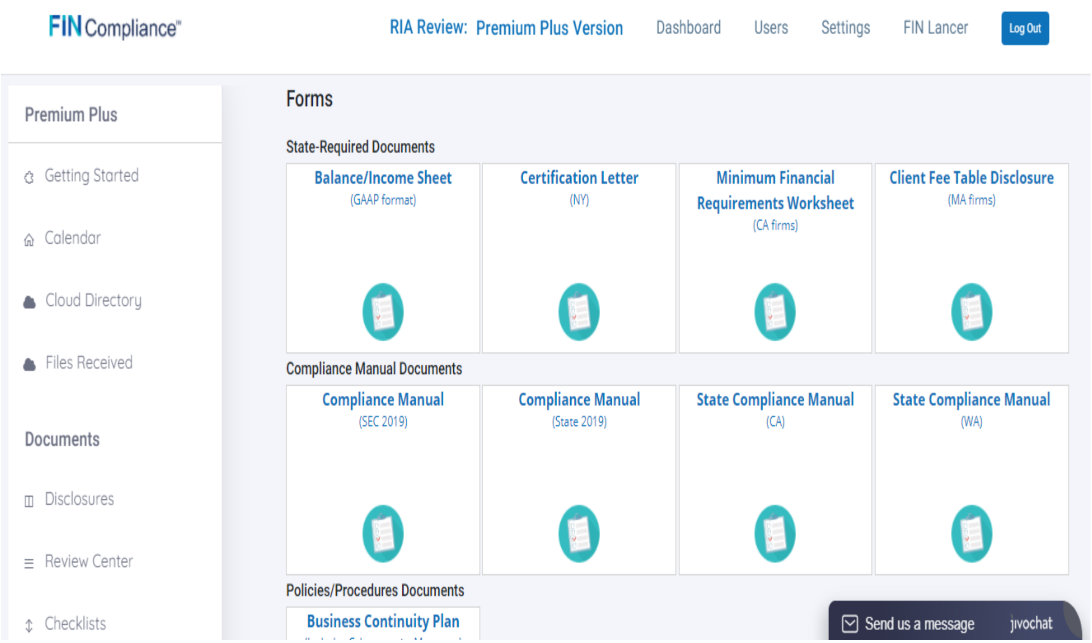
Review To-Do List and Procedures	
Menu	Documents





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:

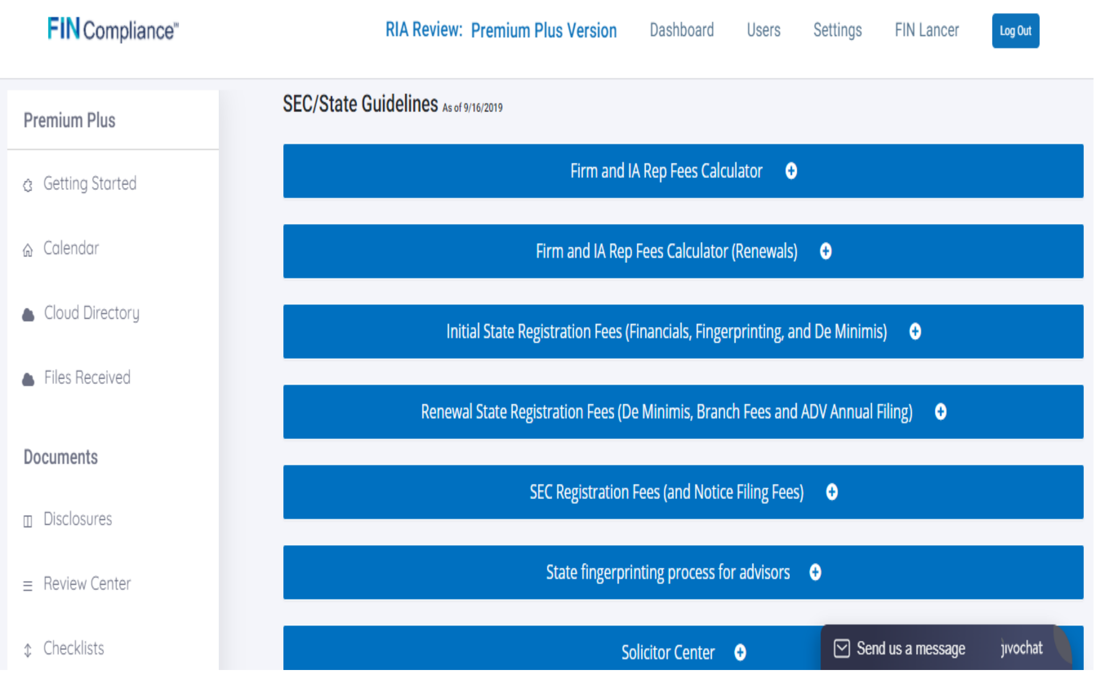
July 11, 2018. The SEC Office of Compliance Inspections and Examinations' ("OCIE") issued a risk alert "Compliance Issues Related to Best Execution by Investment Advisers" that identified discrepancies in client trade quality reviews in its examination of more than 1500 investment advisory firms.

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.
- Review Procedures

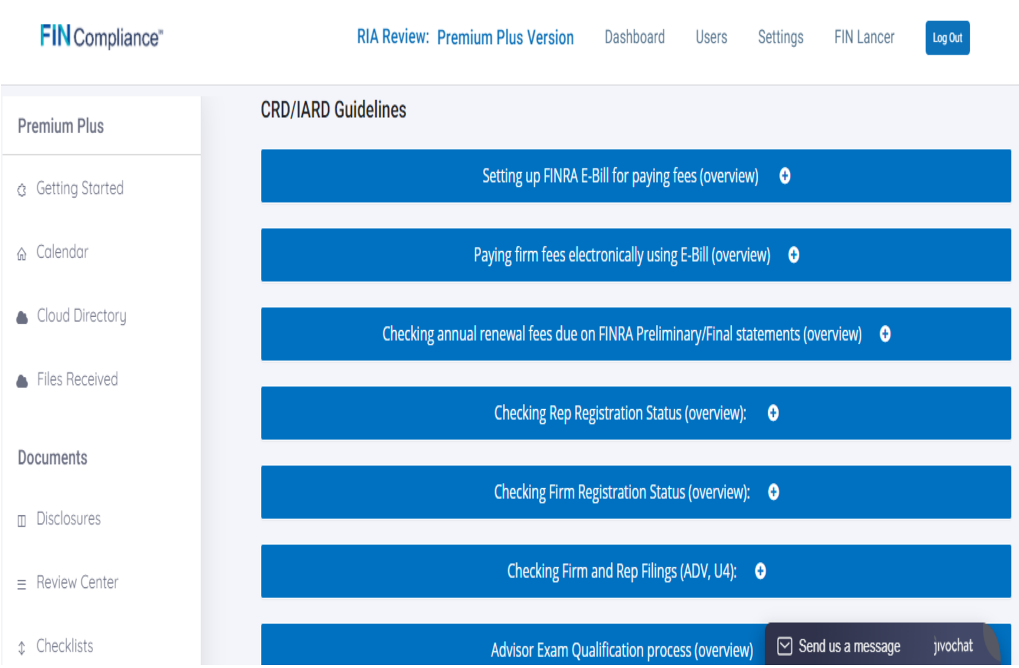
SEC and State Guidelines

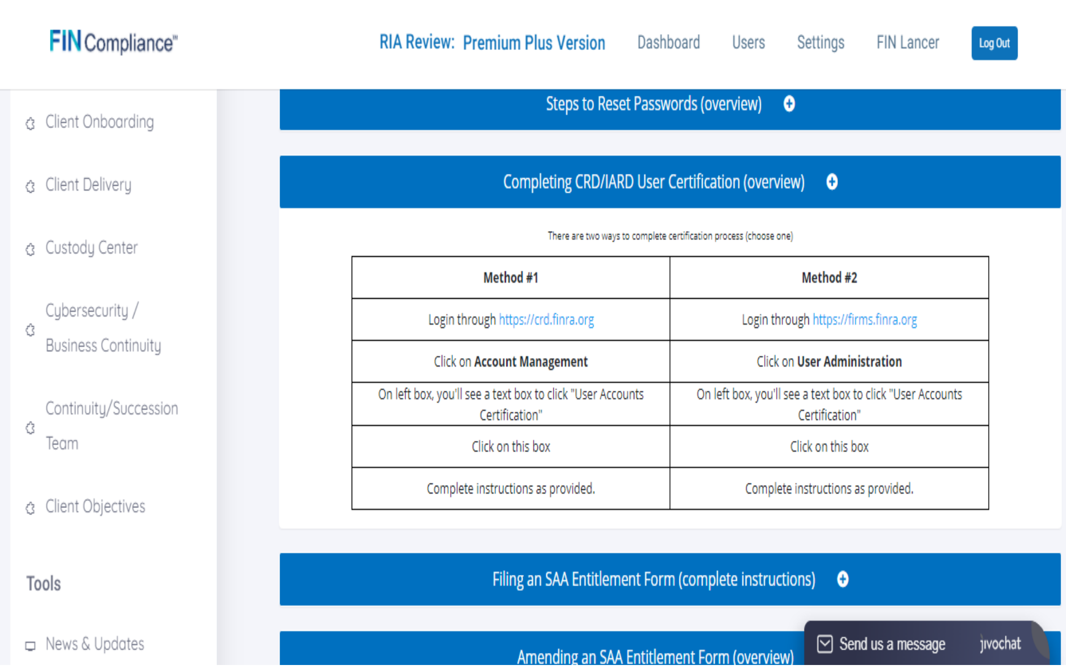
Review SEC/State filing information	
Menu	Data



CRD and IARD Account Guidelines

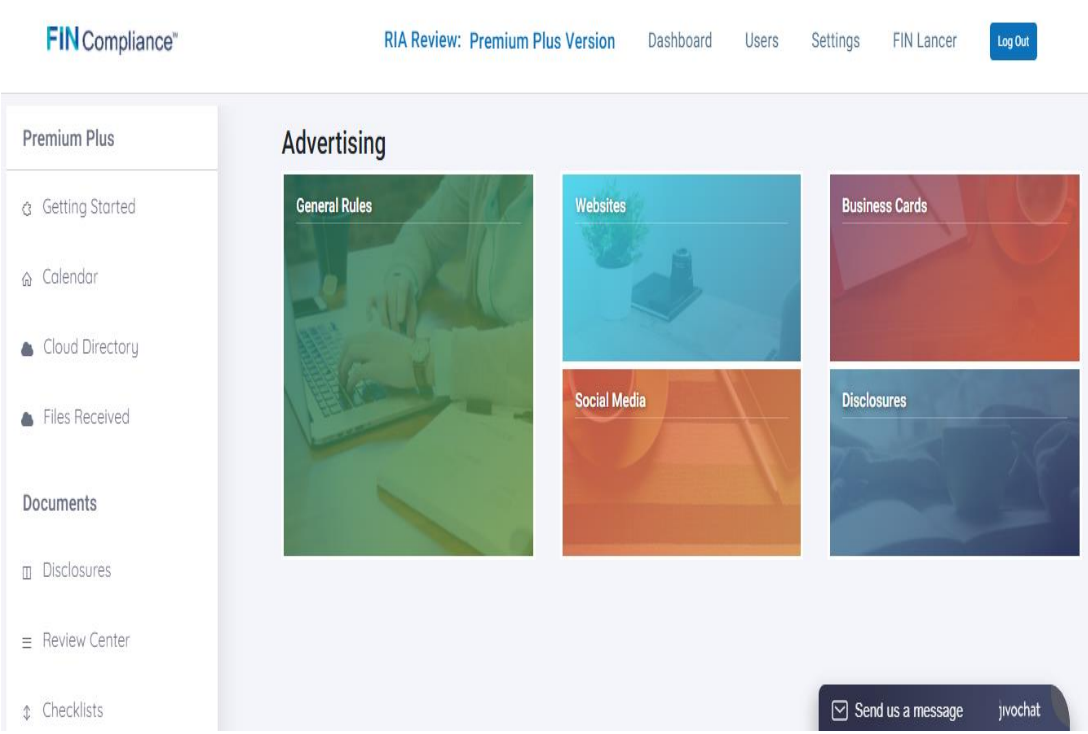
CRD/IARD Account Tips	
Menu	Data

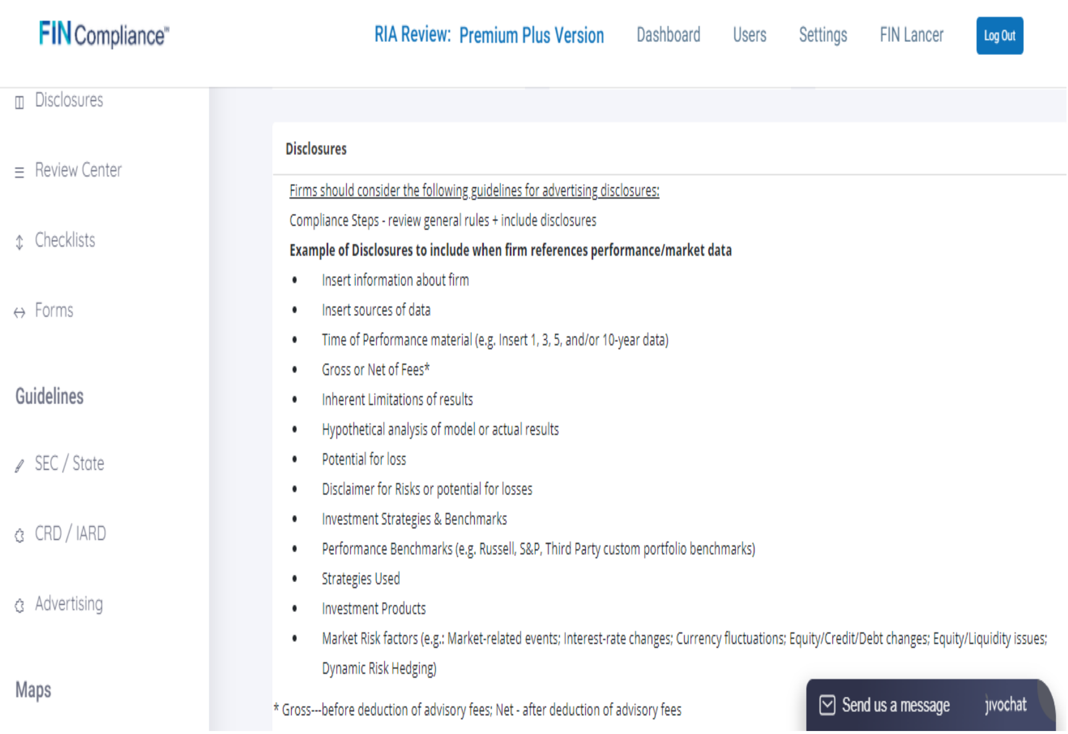




Advertising Guidelines

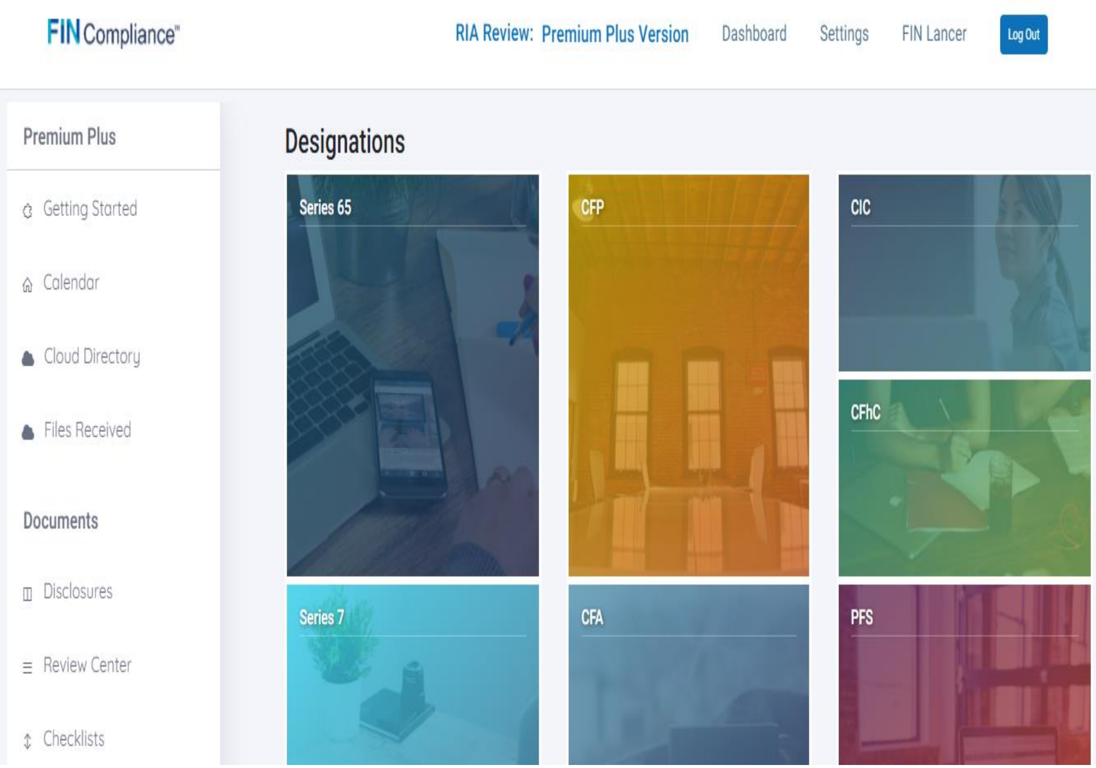
Overview of Disclosures for marketing materials	
Menu	Data

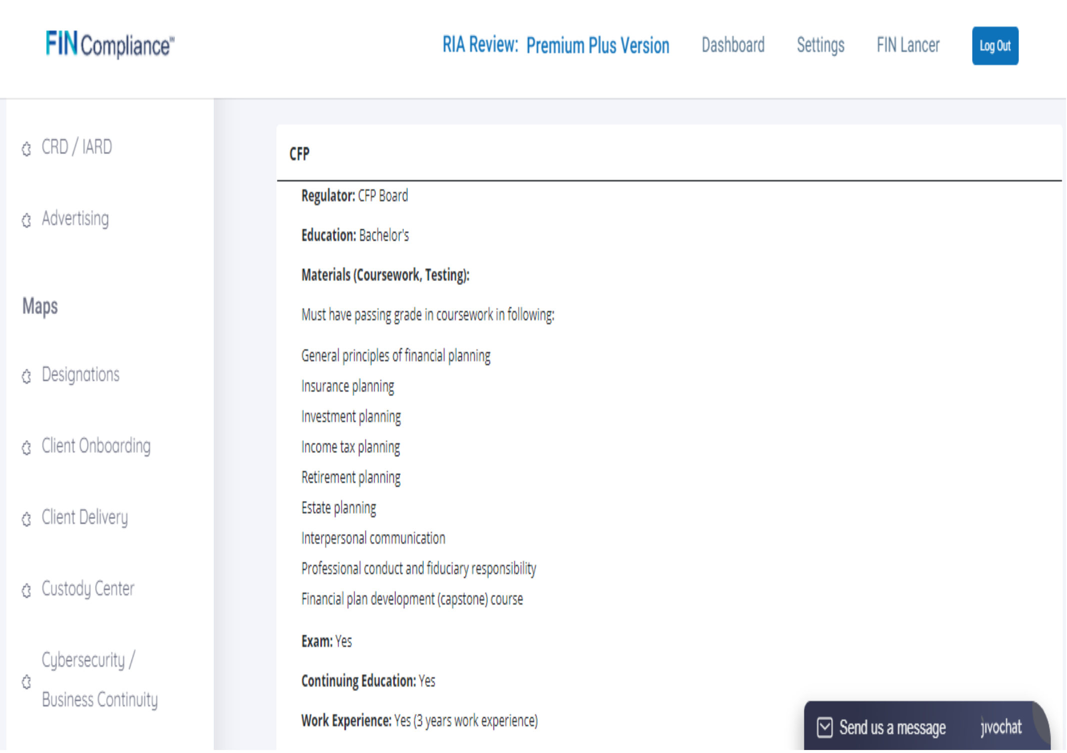




Designations Maps

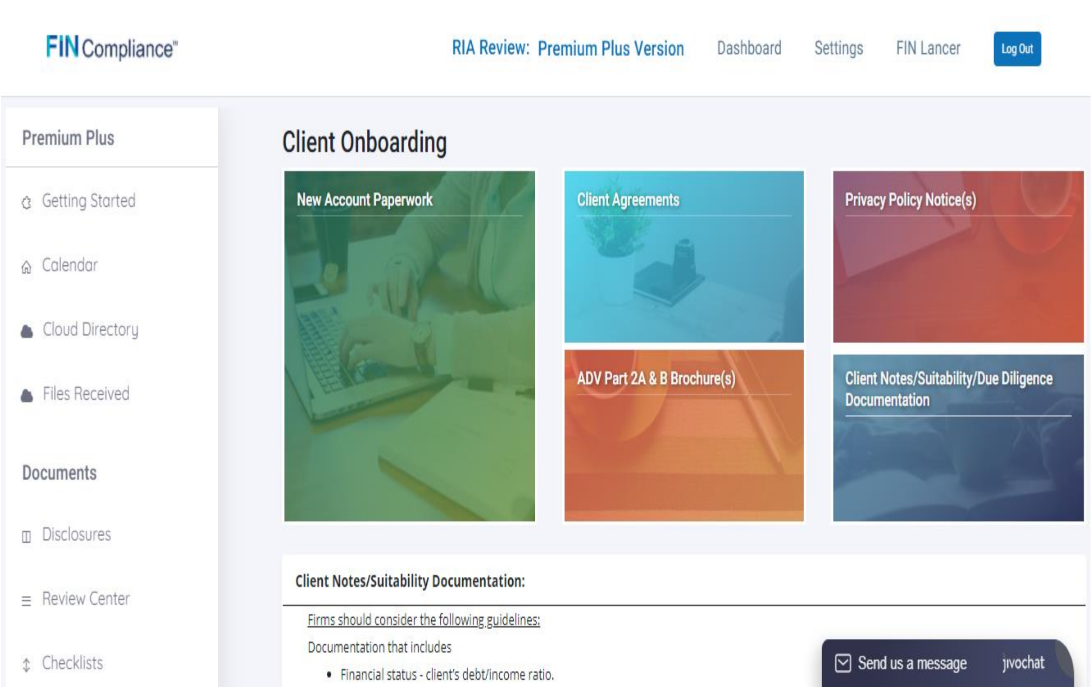
Overview of Advisor Qualifications	
Menu	Data

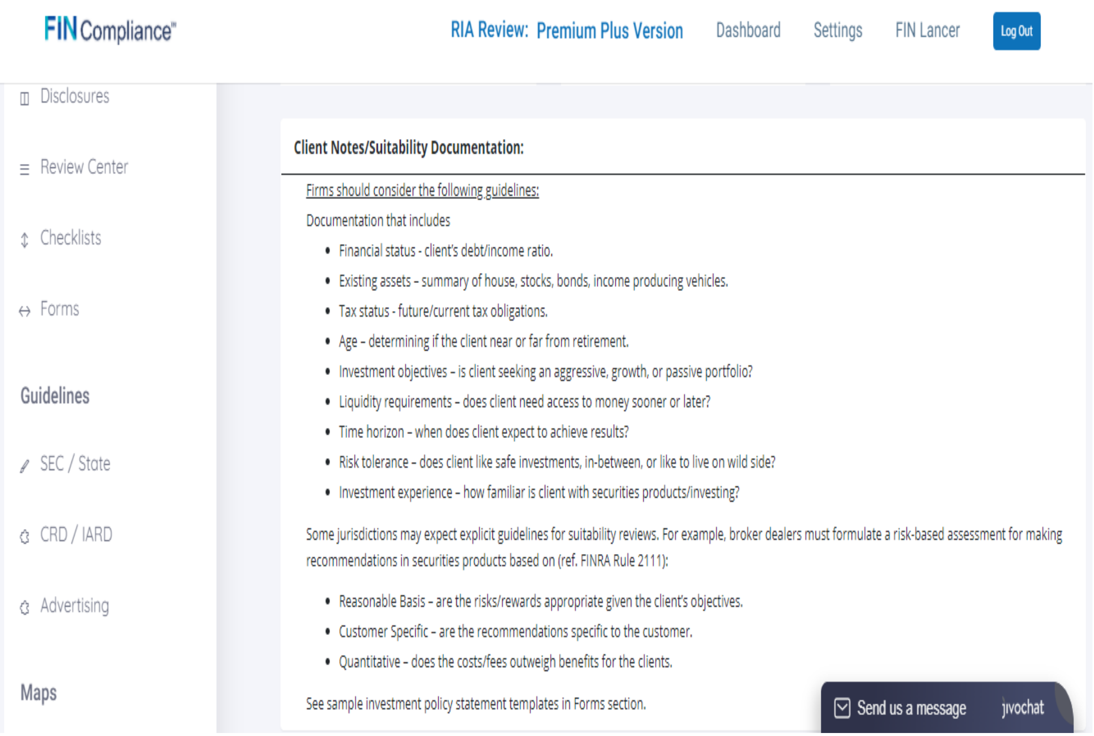




Client Onboarding Maps

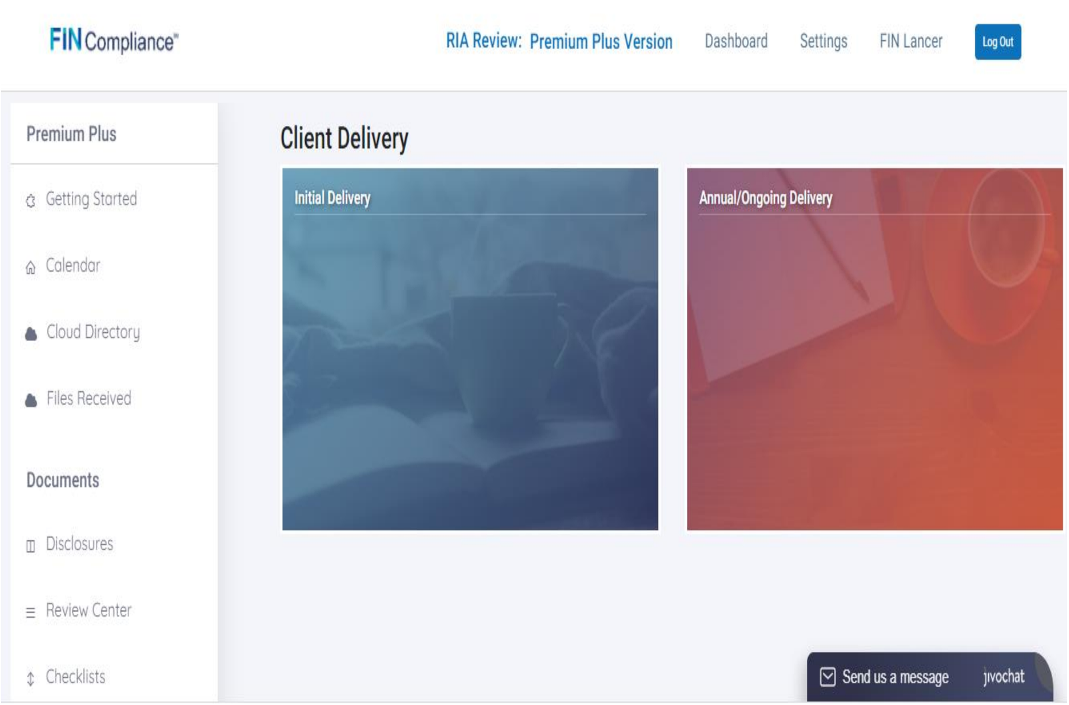
See Common Client Onboarding Documents	
Menu	Documents

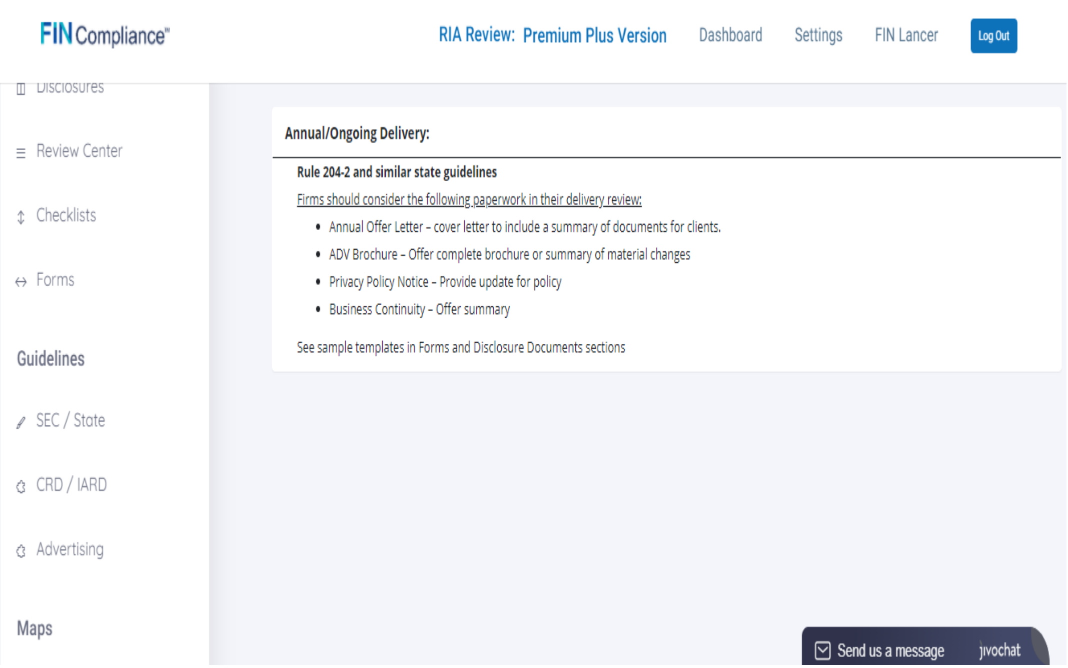




Client Delivery Maps

See Overview of Client Documentation	
Menu	Data





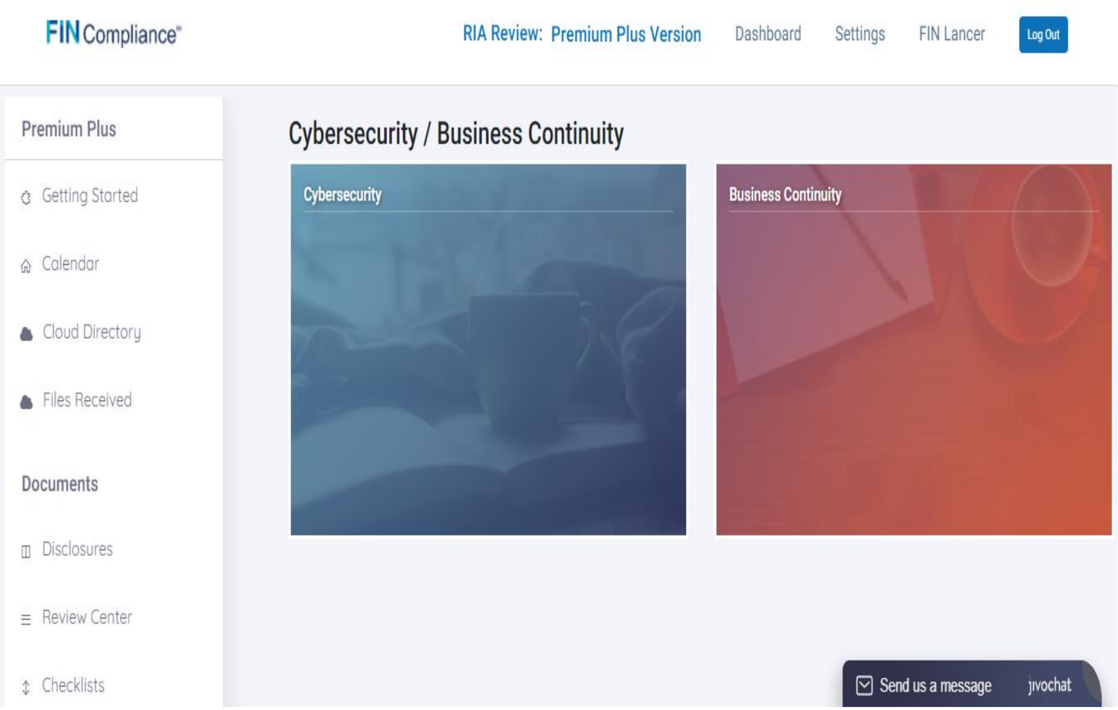
Custody Center Maps

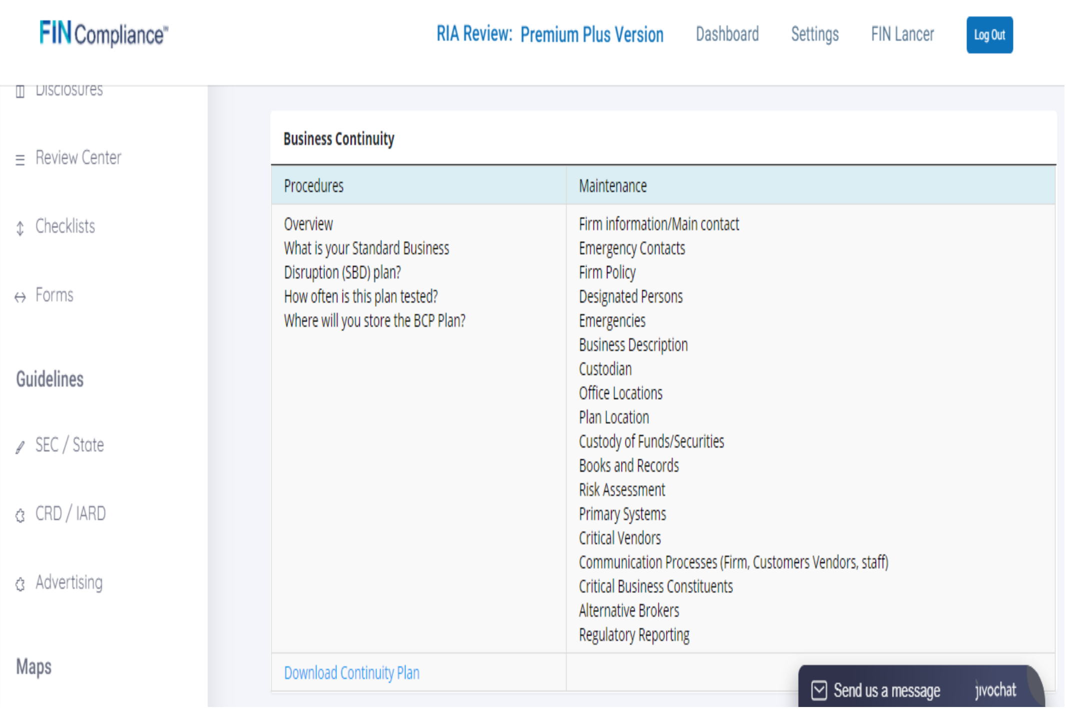
See Overview of Custody Rule Requirement for Advisors	
Menu	Data

Custody	
Examples of custody	Maintaining ability to transfer client funds or securities in an account without approval of client (outside of discretionary authority). Serving as advisor/sub-advisor to Pooled Investment Vehicles. Maintaining check writing authority or serving as a trustee over a client trust. Moving assets to a third party without a written authorization. Access to client account passwords with ability to move funds or securities. Physical possession of client assets.
Definitions	**Control** - the power to manage a person or corporation **Custody** - holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them. Custody including possession of client funds, authorization for withdrawing client funds and other access to client funds. **Independent certified public accountant** – a certified CPA who meets standards of independence. **Independent representative** – a person who is an agent for an advisory client. **Independent party** - a person who acts as a gatekeeper for pooled investments, does not control the investment advisor and has not business relationship with investment advisor **Independent representative** - person who acts as an agent 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, registered merchant or financial institution who holds financial assets for clients. **Related person** - person controlling or under common control with the investment advisor.

Cybersecurity & Continuity Maps

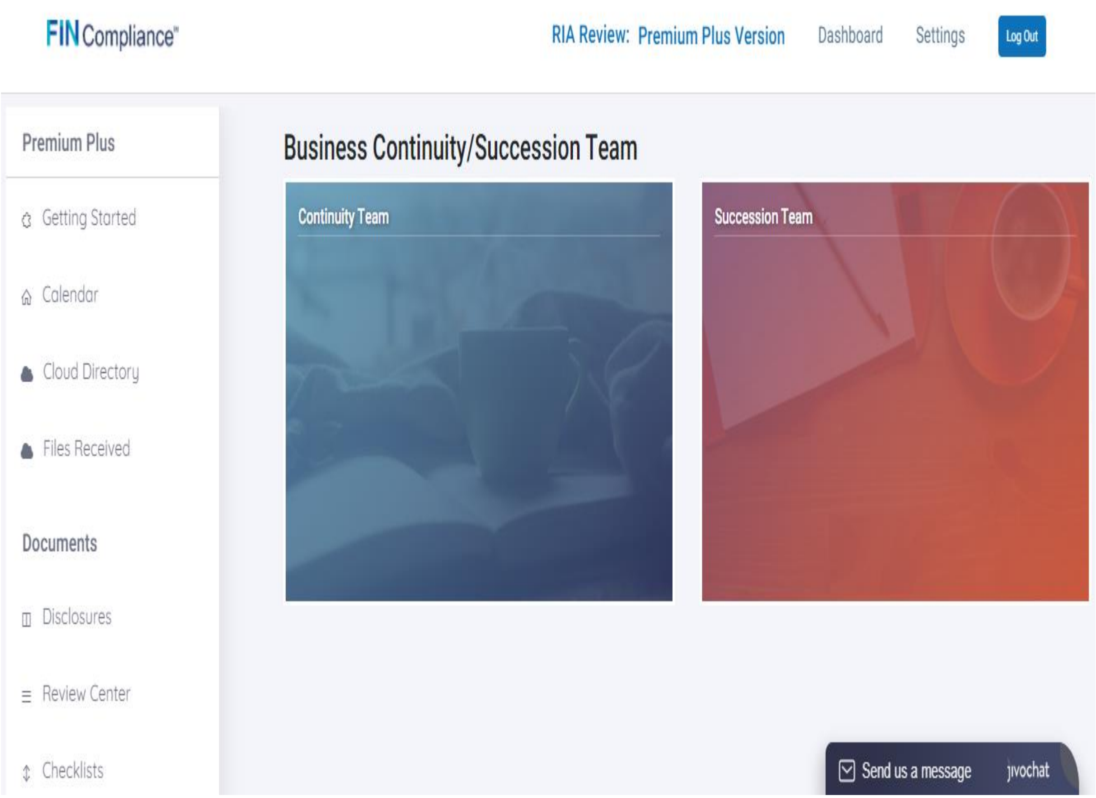
Review Data protection and Continuity planning	
Menu	Data

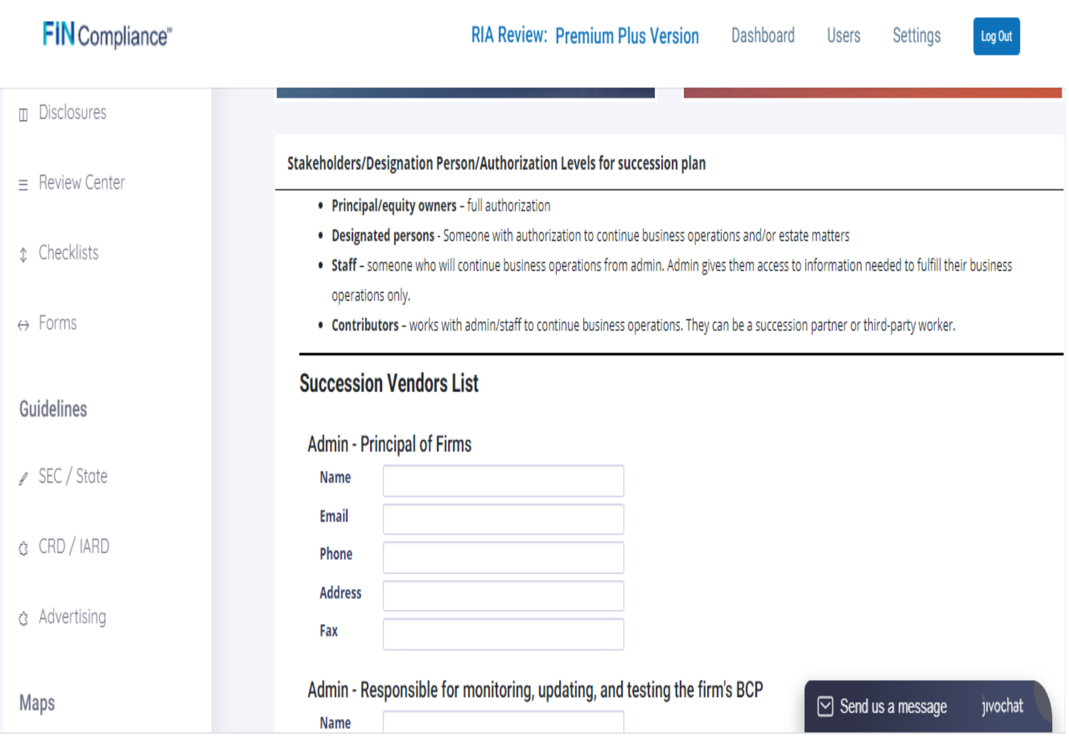




Continuity & Succession Team Maps

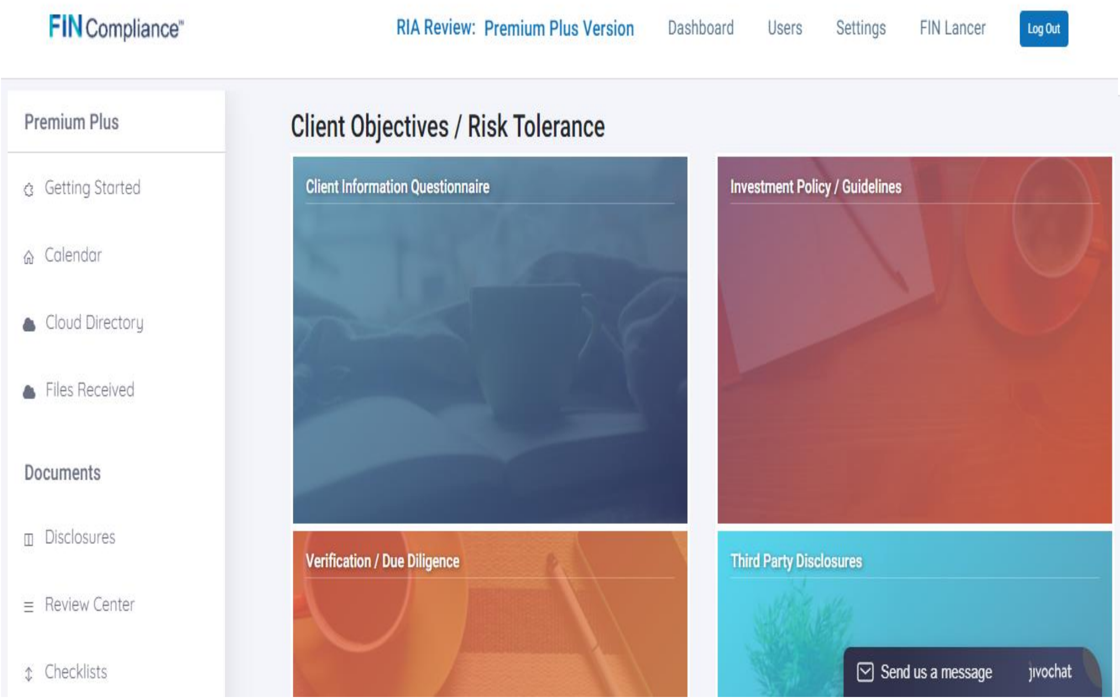
Download and Ceate your Team/Succession List	
Menu	Data

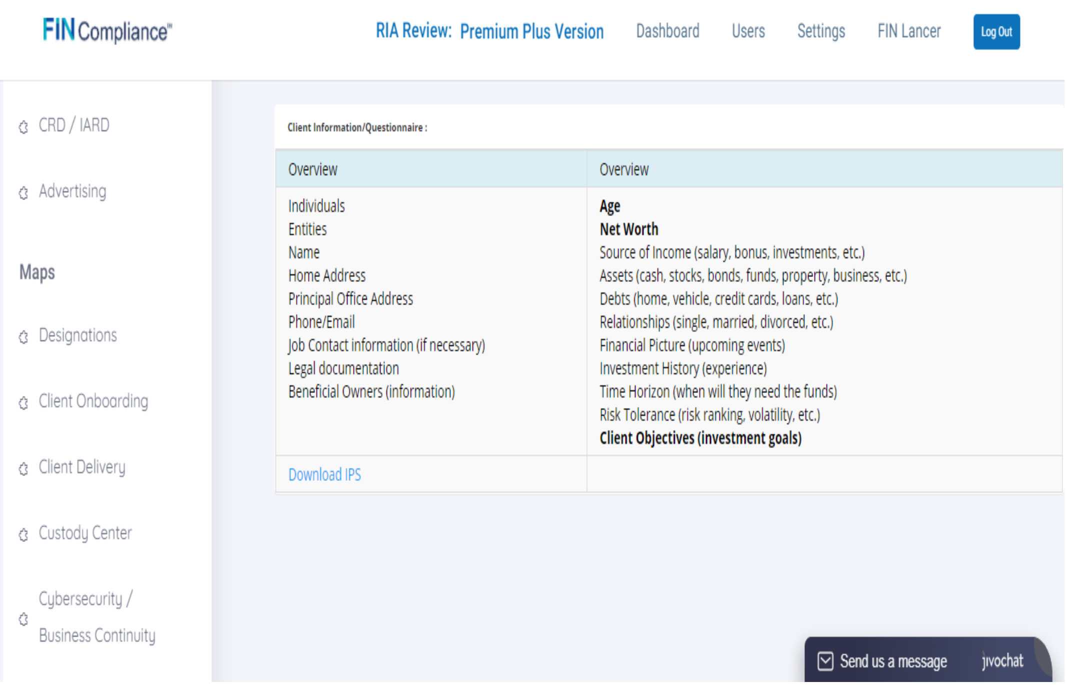




Client Objectives Maps

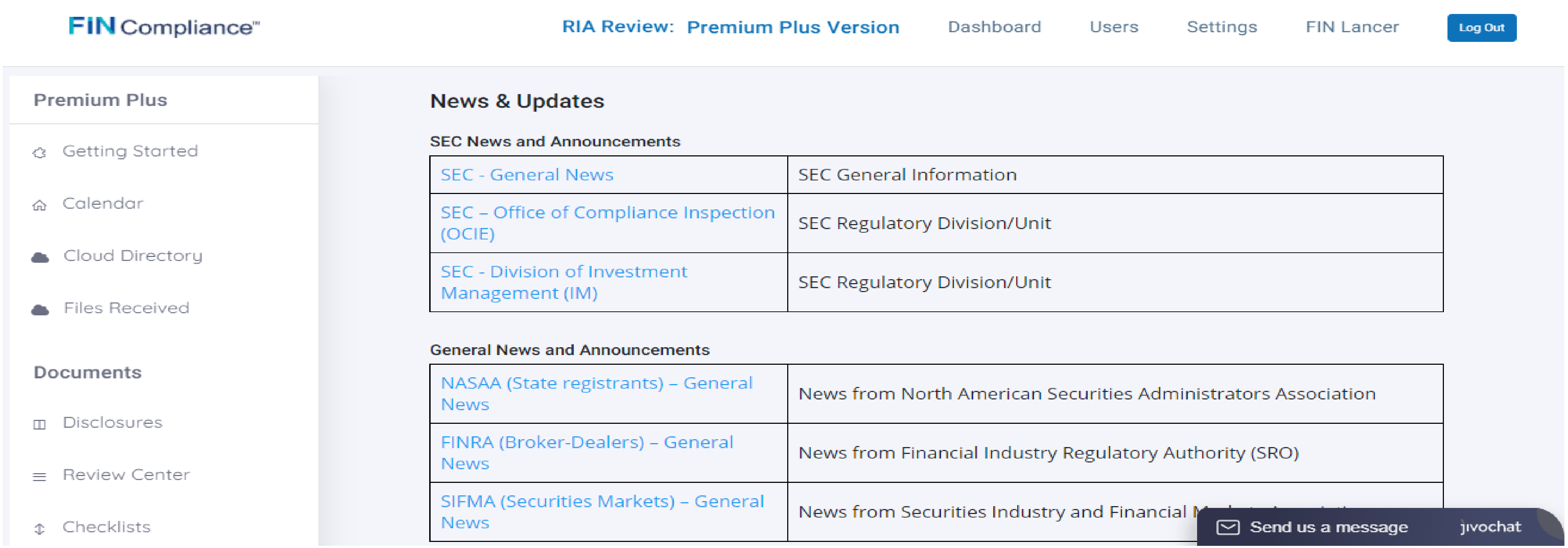
Client Risk Tolerance & Portfolio Instructions	
Menu	Data





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
- Checklists

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 M

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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

Premium Plus

- Getting Started
- Calendar
- Cloud Directory
- Files Received

Documents

- 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	Guidelines on starting your compliance progra

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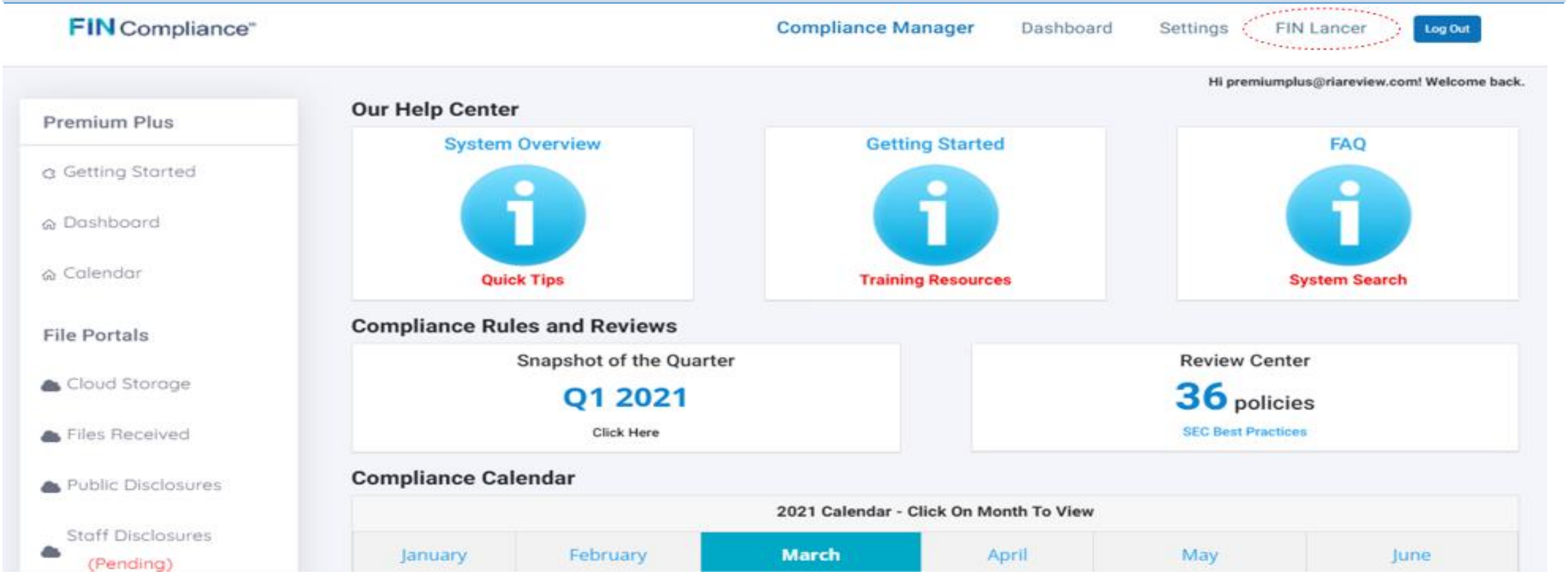
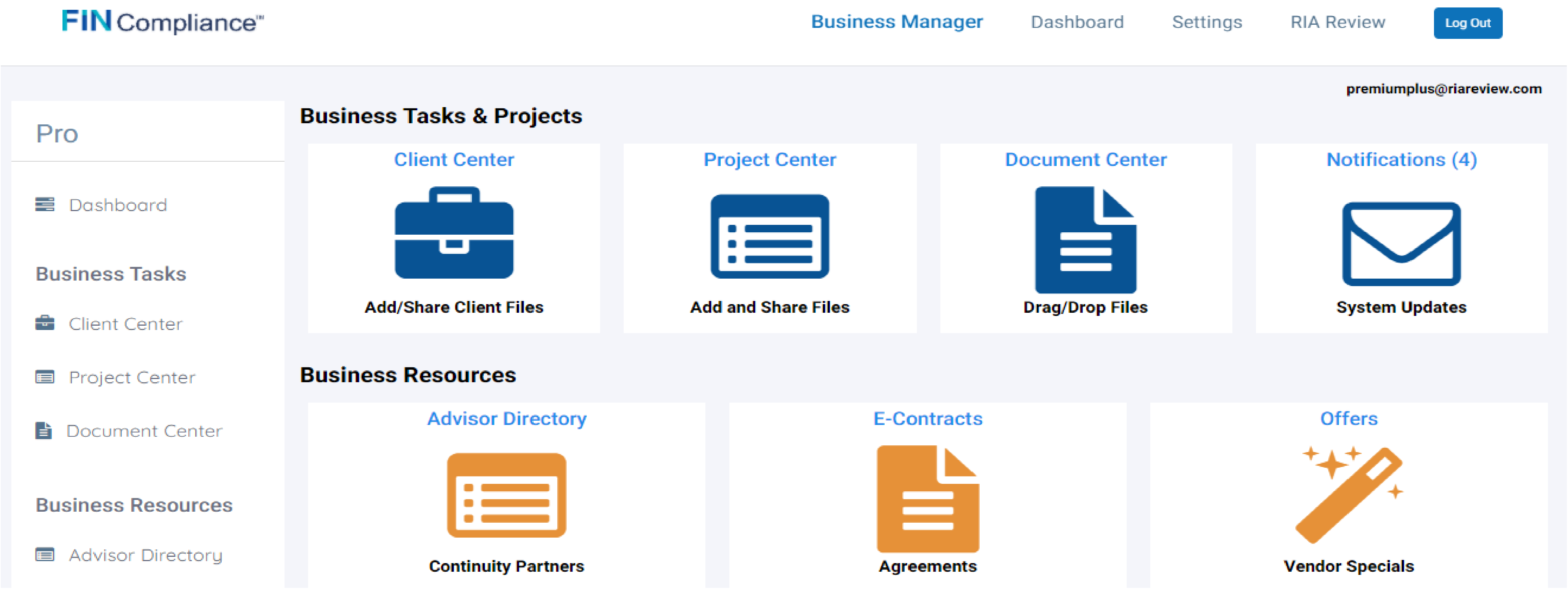
Go to Business Manager Portal

Access Business Dashboard by clicking FIN Lancer	
Menu	Data



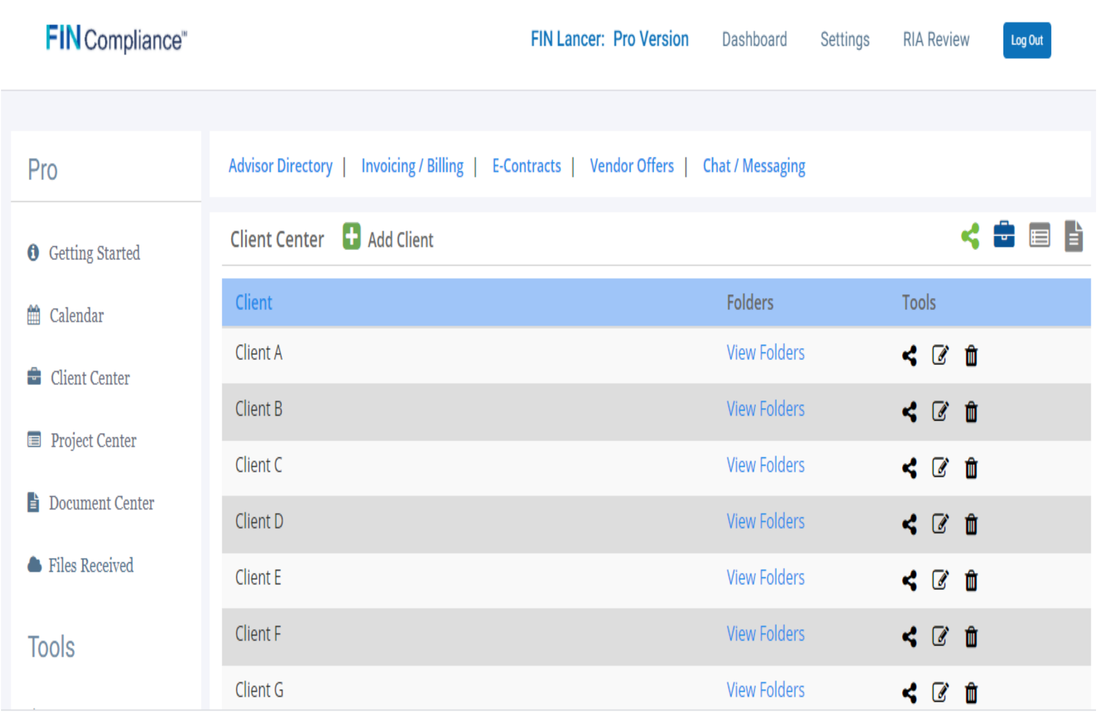
Business Manager Portal

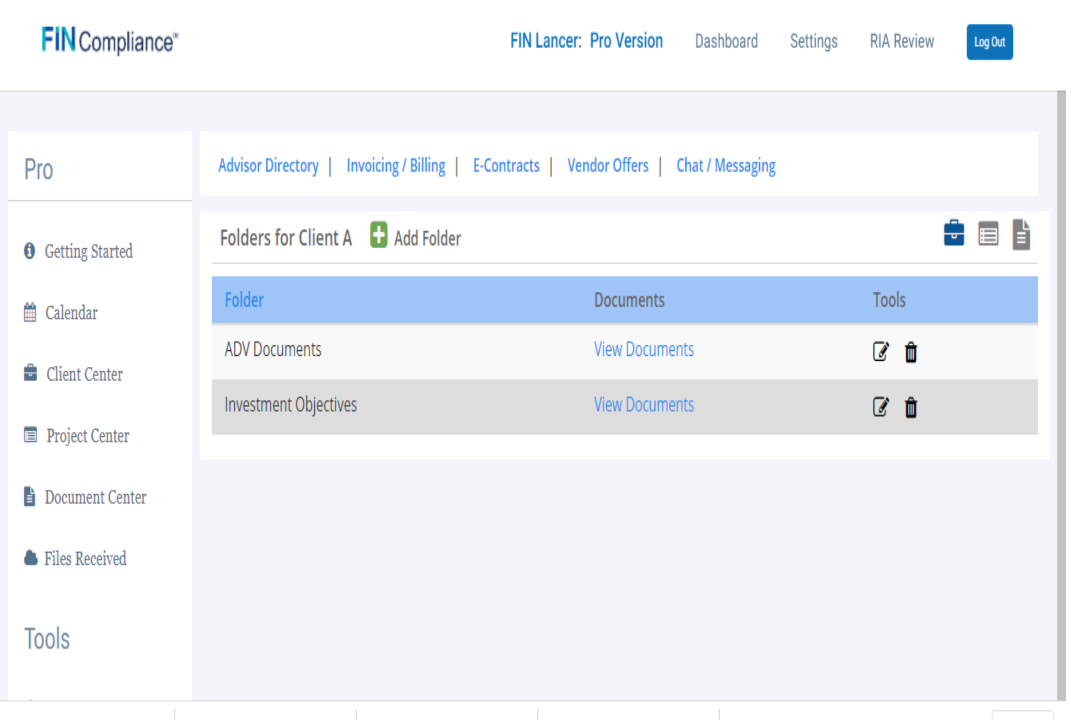
Portal	
Menu	Data



Client Center

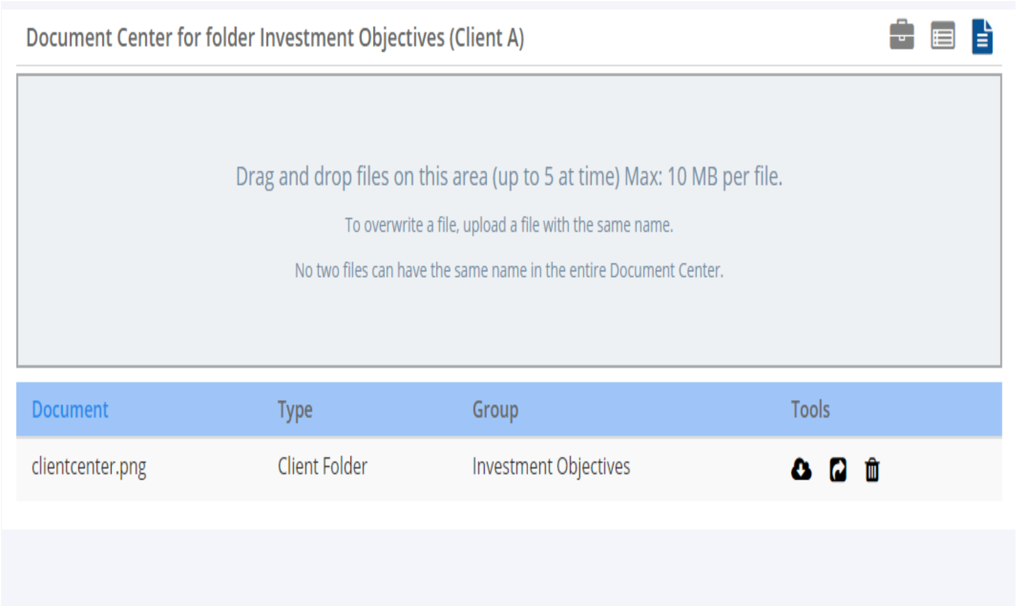
Click to Create/Upload/Share Client Documents	
Menu	Folders

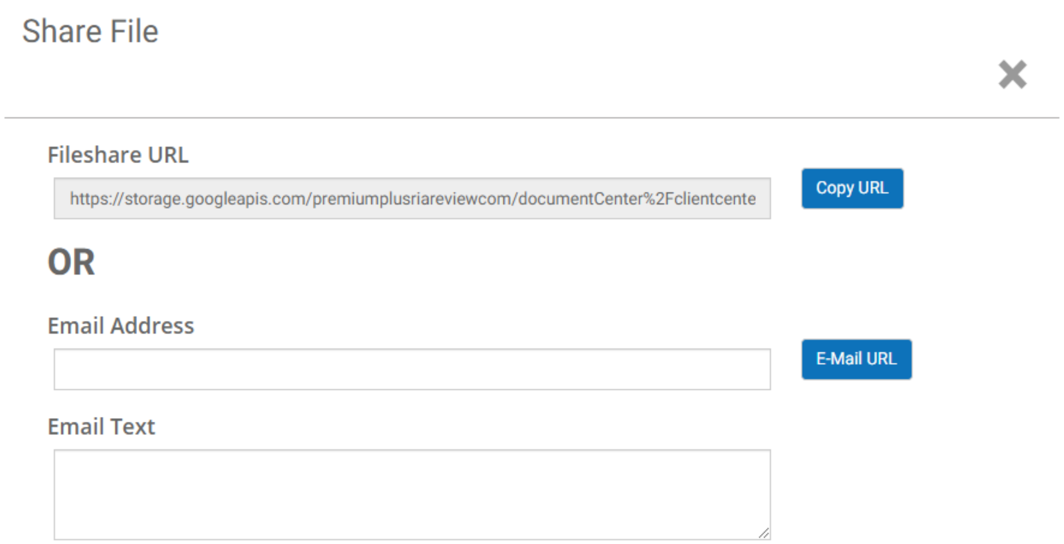




Client & Project Center: Sharing Files

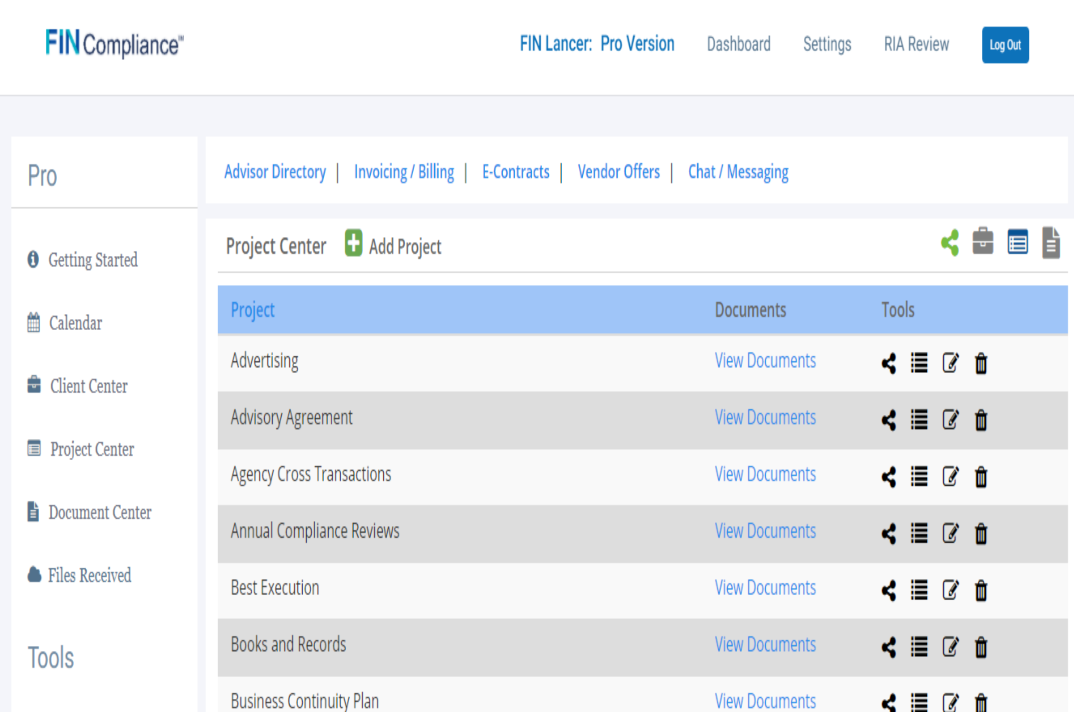
Sharing Documents to Third Parties	
Sharing	Sending Link

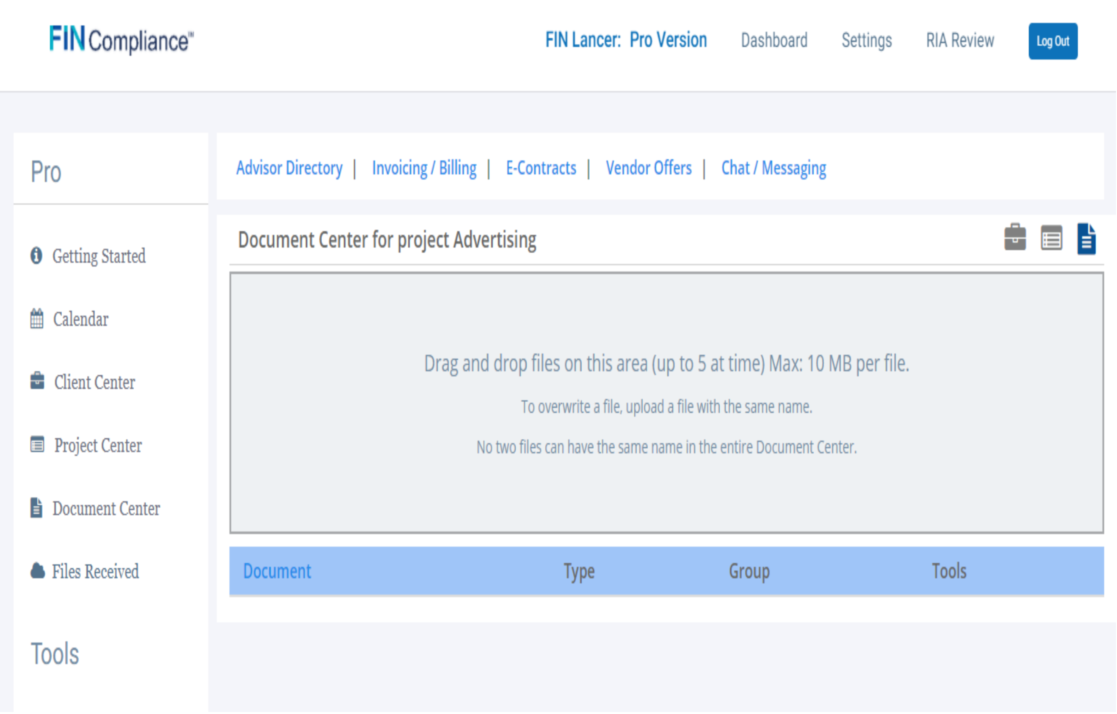




Project Center

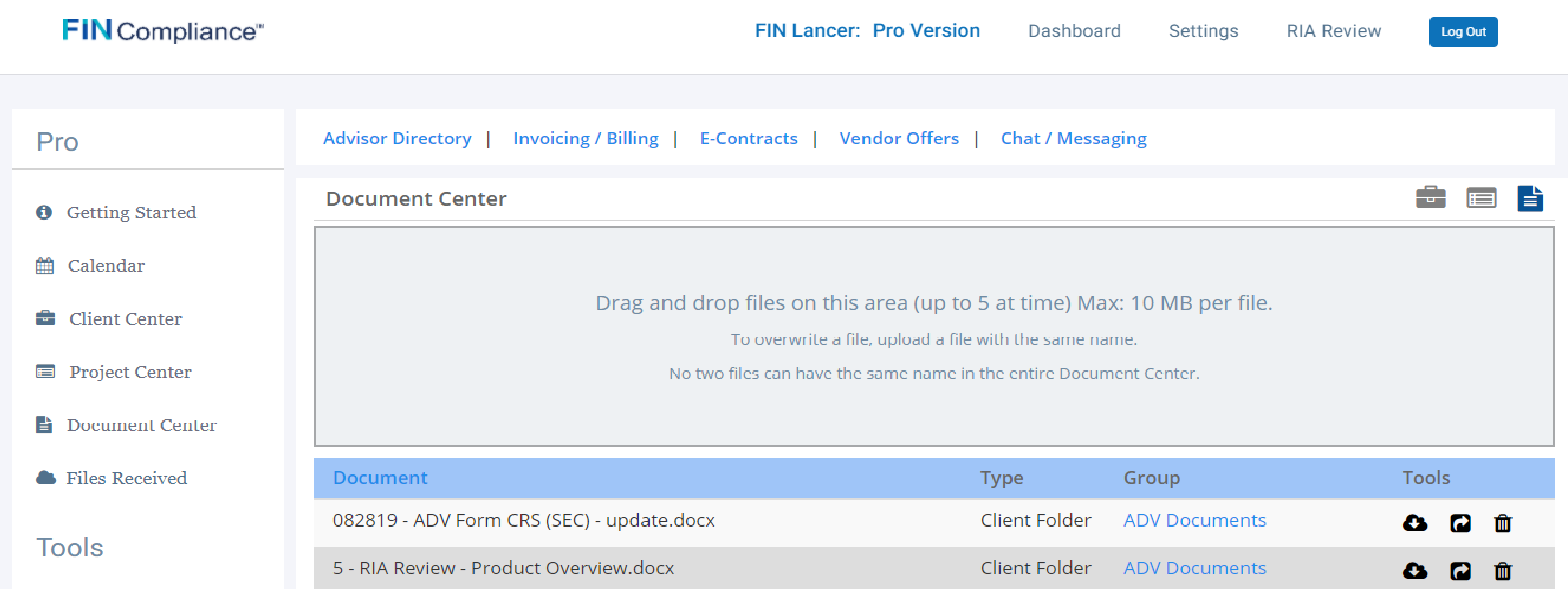
Click to Create/Upload/Share Project Documents	
Menu	Folders





Document Center

Storing Client/Project Documentation	
Menus	Documents



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
Business Continuity Plan	View Documents
Client Correspondence/Complaints	View Documents

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

Sample Project Procedures Folder

Create a Full Procedures folder in Client or Project Center

Photo #3

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

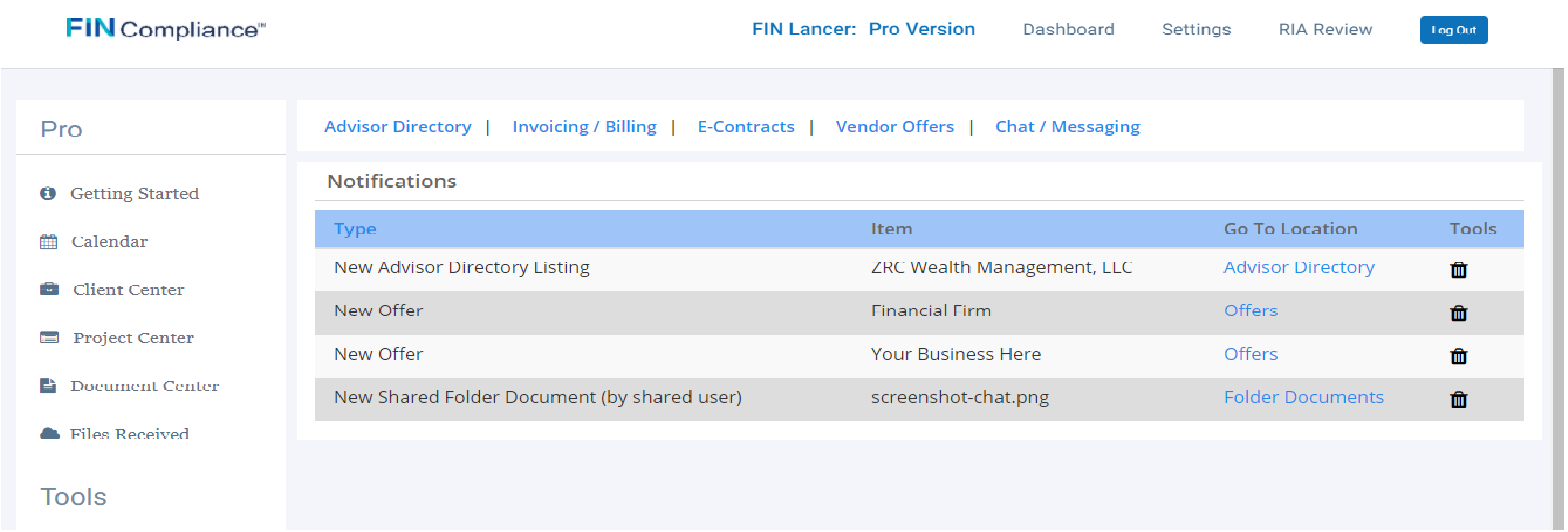
Photo #4

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

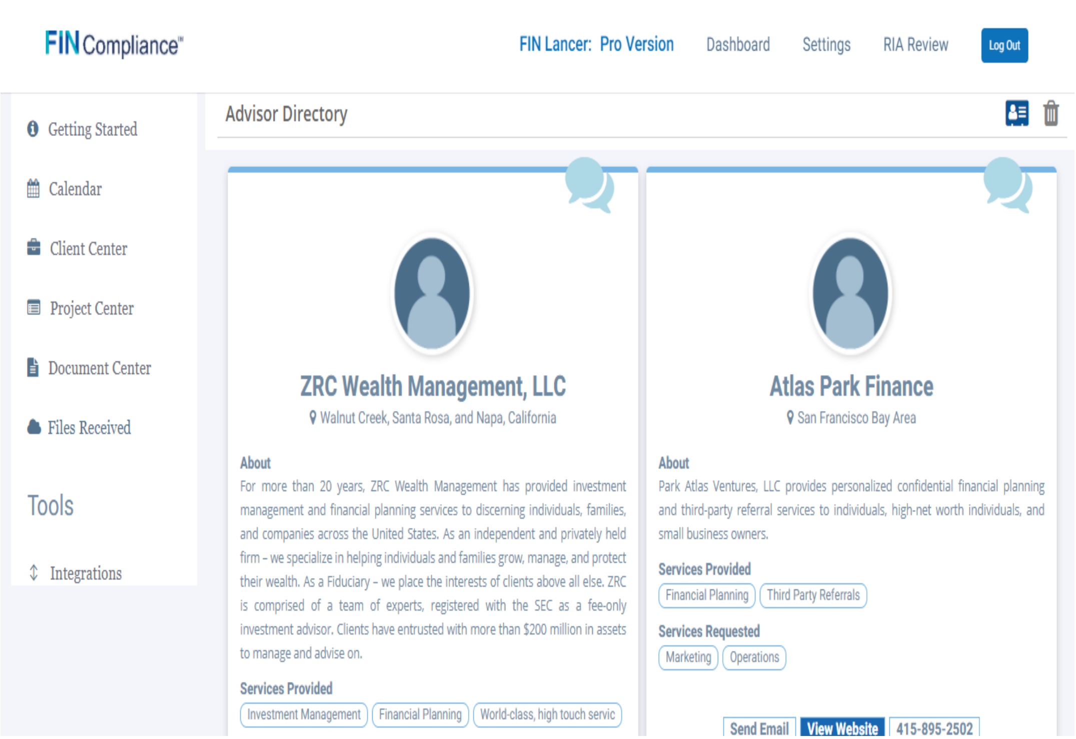
Log

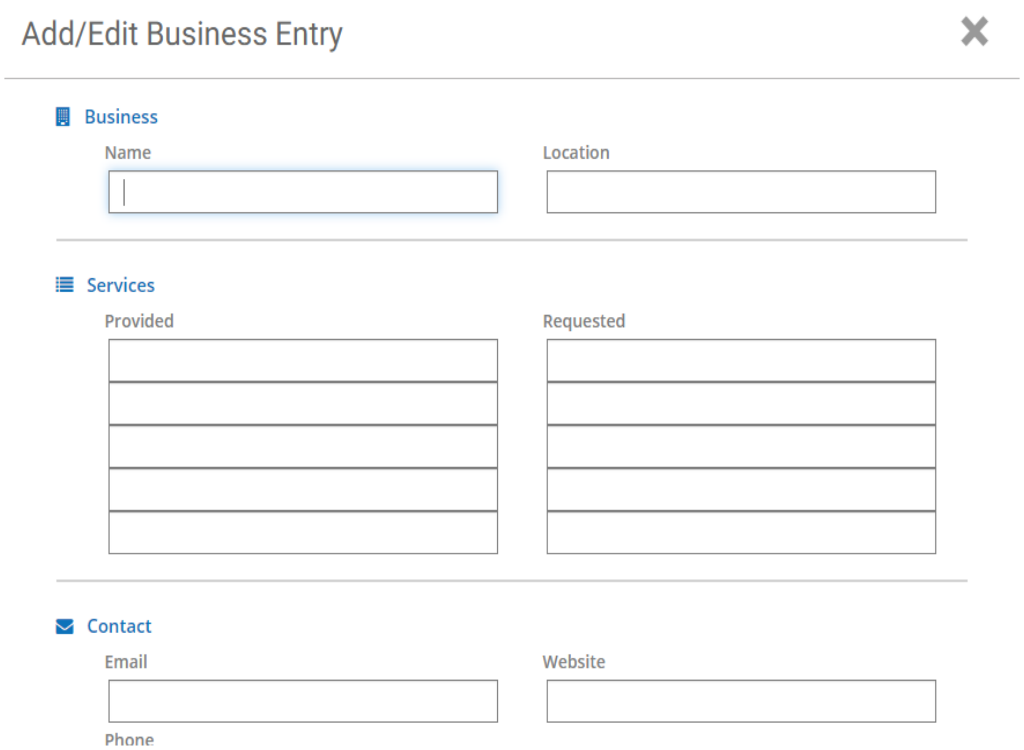


Advisor Directory

List your firm for opportunities

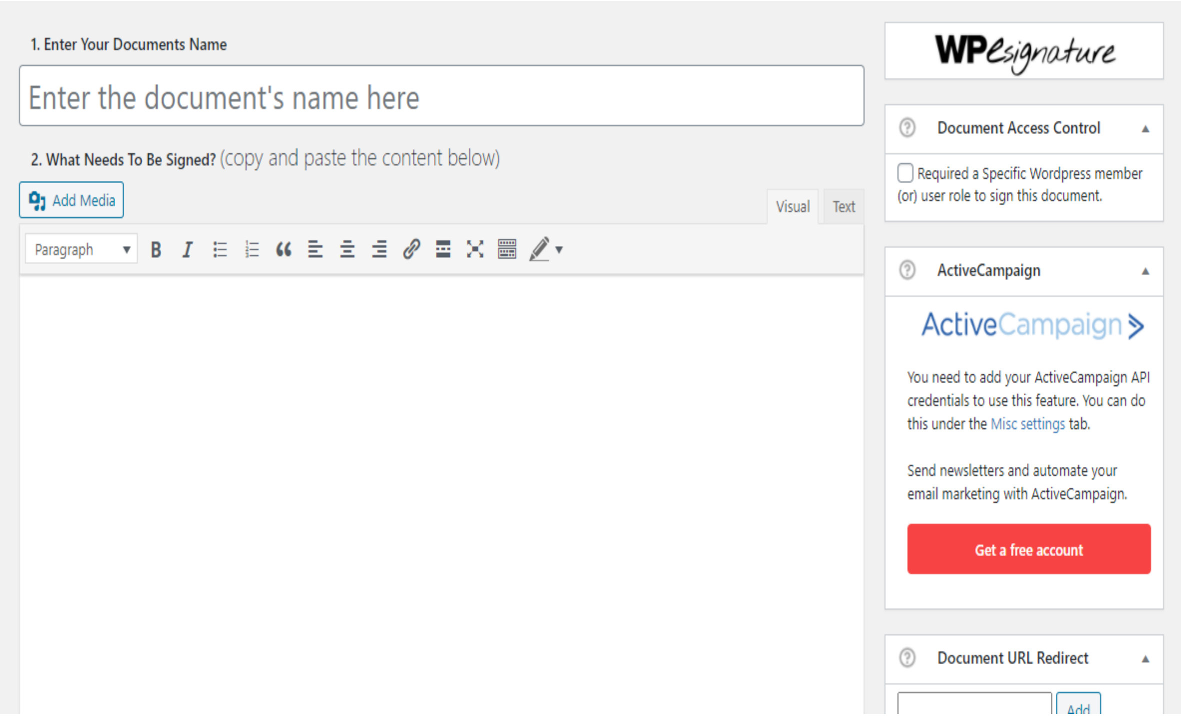
Menus	Add Profile





E-Contracts (Approve Me Integration)

Documentation	
Menus	Documents

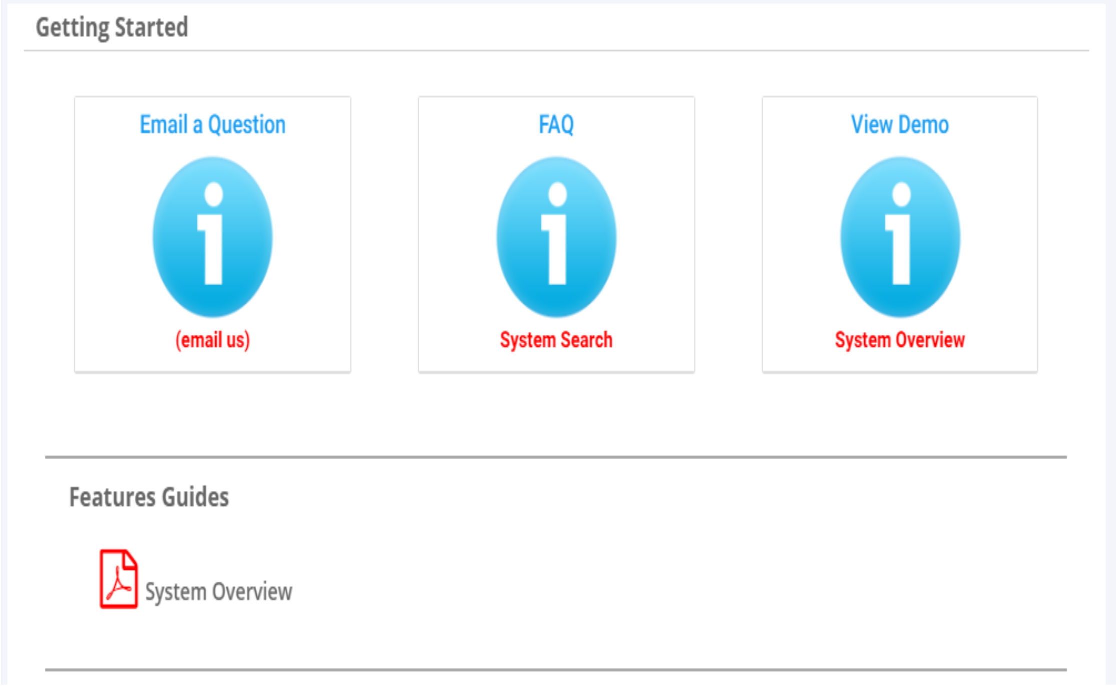


Offers Section

View Offers from Third Party Vendors	
Menus	Data

Help Center

View System Training Materials	
Menus	Guides/Videos



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