

Sample SEC Document Production List

PART I: Information to be Provided by Registered Investment Adviser Prior to Onsite Exam

General Information

1. Adviser's organization chart showing ownership percentages of the Adviser and control persons, and a schedule or chart of all affiliated entities.
2. List of all office locations, including the Adviser's principal office and place of business ("Main Office") and any other locations from which the Adviser routinely conducts investment advisory services ("Branch Offices"), the addresses, date office opened, any website addresses used by the Main Office and Branch Office locations (if different from the main website of the Adviser), and list the investment advisory services and other business conduct or products offered, if any, from each Branch Office location.
3. List of employees, partners, officers and/or directors, including the following information as applicable:
 - A. Individual's name;
 - B. Title (employment capacity);
 - C. Brief description of his/her duties;
 - D. CRD numbers;
 - E. Office address;
 - F. Hire date;
 - G. Termination date, as applicable;
 - H. Approved outside business activities;
 - I. Professional designations and/or securities licenses;
 - J. Whether a portion of their compensation is billed to an affiliate;
 - K. Any affiliated entity of which they are also an employee; and
 - L. Website addresses, including all affiliated websites.
4. Names of any of the Adviser's officers and/or directors who resigned during the Examination Period and information regarding the reason for their departure.
5. Any threatened, pending and settled litigation or arbitration involving the Adviser or any "supervised person" (if it relates to the individual's association with the Advisers or a securities-related matter) including a description of the allegations, the status, and a brief description of any "out of court" or informal settlement. Note that "supervised person" is any partner, officer, director (or other person occupying a similar status or performing similar functions), or employee of an investment adviser, or other person who provides investment advice on behalf of the investment adviser and is subject to the supervision and control of the investment adviser (defined in Section 202(a)(25) of the Advisers Act). If none, please provide a written statement to that effect.
6. Names of any joint ventures or any other businesses in which the Adviser or any officer, director, portfolio manager, or trader participates or has any ownership interest (other than their employment with the Adviser), including a description of each relationship. Please exclude the outside business activities requested in Item 3 above.
7. Copies of any revenue or expense sharing agreements to which the Adviser is a party. If no such agreements exist, provide a written description of any such arrangement.

8. The names and location of all affiliated and unaffiliated key service providers and the services they perform.
9. Current standard client advisory contracts or agreements.
10. All sub-advisory agreements executed with other investment advisers.
11. The most recent Part 2B of Form ADV ("Brochure Supplement") furnished to clients for the examination period.
12. Documentation supporting the Adviser's basis for registration with the Commission.

Information Regarding the Adviser's Compliance Program, Risk Management and Internal Controls

13. Copies of all compliance policies and procedures that were in effect during the Examination Period for the Adviser and its affiliates, including any Code of Ethics and any compliance policies and procedures specific to a Branch Office location.
14. All policies and procedures related to advisory fees and fee calculation/fee billing practices, including any written compliance policies and procedures, operating procedures, and/or desktop procedures including, but not limited to:
 - A. Any initial and/or continuing due diligence the adviser conducts on third parties that calculate fees for client accounts;
 - B. Any periodic review or reconciliation the adviser may conduct regarding fees calculated by third parties;
 - C. Any communication with third parties calculating fees regarding new or revised agreements with clients regarding fee billing; and
 - D. Any communication of client complaints about fee calculation/fee billing with third parties calculating fees.
15. Information relating to the firm's compliance testing, including any compliance reviews, quality control analyses, surveillance, and/or forensic or transactional tests performed by the firm. This information should include any significant findings, both positive and negative, of such testing and any information about corrective or remedial actions taken regarding these findings.
16. A current inventory of the Adviser's compliance risks that forms the basis for its policies and procedures, including any changes made to the inventory and the dates of the changes.
17. Any documents maintained that map the Adviser's inventory of risks to its written policies and procedures.
18. Written guidance the Adviser provided to its employees regarding the compliance program and documents evidencing employee compliance training during the Examination Period.
19. A record of any non-compliance with the Adviser's compliance policies and procedures, including any Code of Ethics and any compliance policies and procedures specific to a Branch Office location, and of any action taken as a result of such non-compliance.
20. Documentation maintained regarding any reviews conducted of Branch Offices and indicate whether the reviews were conducted on-site or via correspondence and resulted in any corrective or remedial actions.
21. Any client or investor complaints, and information about the process used for monitoring client

correspondence and/or complaints, including the name of any third-party service provider used and the Adviser's oversight of the service provider.

22. Documentation maintained regarding any reviews conducted of the Adviser's policies and procedures, including any annual and/or interim reports.
22. Information about the oversight process the Adviser uses for any remote offices and/or independent advisory contractors, and any policies and procedures with respect to such oversight.

Information to Facilitate Testing with Respect to Advisory Trading Activities

23. Provide the information below for all current advisory clients, including any privately offered funds. The preferred format for this information is Excel.
 - A. Account number;
 - B. Account name;
 - C. Account balance as of most recently ended calendar quarter within examination period (i.e. September 2018);
 - D. Value of each client's account that was used for purposes of calculating its advisory fee for the most recent billing period;
 - E. Whether the client is a related person, affiliated person, or a proprietary account of Adviser;
 - F. Client occupation and/or employer;
 - G. Client date of birth, age, annual income, net worth, liquid net worth, and federal tax bracket, if known;
 - H. Whether the client is currently retired or transitioning to retirement;
 - I. Type of account (e.g., individual, pension plan, registered fund, unregistered fund);
 - J. Date in which Adviser began management of the account;
 - K. Account custodian and location;
 - L. Whether the custodian sends periodic account statements directly to the client; whether or not the delivery is electronic, if so, a copy of the authorization; and the form of electronic delivery (e.g., email or website login);
 - M. Whether advisory fees are paid directly from the client's custodial account;
 - N. Whether the Adviser has discretionary authority;
 - O. Whether the client pays a performance fee and the most recent account performance figures;
 - P. Whether Adviser, an officer, an employee, or an affiliate acts as trustee, co-trustee, or successor trustee or has full power of attorney for the account;
 - Q. Whether client has provided Adviser a standing letter of authorization to transfer assets to third parties;
 - R. Whether Adviser or related persons are deemed to have custody of, possession of or access to the client's assets, and if so, the location of the assets.
 - S. Investment strategy (e.g., global equity, high-yield, aggressive growth, long-short, or statistical arbitrage) and the performance composite in which it is included, if any;
 - T. Risk tolerance;
 - U. Time horizon;
 - V. General investment knowledge (e.g. extensive, good, or limited);
 - W. Account portfolio manager(s);
 - X. Name of the account investment advisory representative;
 - Y. For clients obtained during the Examination Period, provide account inception date and name(s) of consultant(s) related to obtaining the client, if any; and
 - Z. For any accounts for which securities were not maintained with a qualified custodian, please include a description of the security, security name, and location of the security.

24. A trade blotter (*i.e.*, purchases and sales journal) that lists transactions (including all trade errors, cancellations, re-bills, and reallocations) in securities and other financial instruments (including privately offered funds) for: current and former clients; proprietary and/or trading accounts and access persons. The preferred format for this information is to provide it in Excel as indicated in Exhibit 1.
- A. Names of advisory clients lost, including the reason, termination date and asset value at termination.
 - B. Names of any financial planning, pension consulting or other advisory clients not named in response to item A above.
23. Names of securities held in all client portfolios (aggregate position totals for all instruments) as of the most recently ended calendar quarter within examination period (*i.e.* September 2018). This record should include the security name, name of each client holding an interest, the amount owned by each client, the aggregate number of shares or principal and/or notional amount held and total market value of the position. The preferred format for this information is in Excel.

Performance Advertising and/or Marketing

24. All pitch books, one-on-one presentations, pamphlets, brochures, and any other promotional and/or marketing materials furnished to existing and/or prospective clients for each investment strategy and/or mandate.
25. All advertisements used to inform or solicit clients. If information on services and investments is available on the Internet, such as websites and blogs, make all versions available as either printouts or electronic archives.

Financial Records

26. Adviser's balance sheet, trial balance, general ledger, cash receipts and disbursements journal, income statement, and cash flow statements as of the end of its most recent two fiscal years and the most current year to date.
27. Any budgets prepared by management, with detail of compliance expenditures, as of the end of the most recent fiscal year and the most current year-to-date.
28. Any loans from clients, including promissory notes, to the Adviser, or sales of the Adviser's or any affiliate's stock to clients.

EXHIBIT 1

Layout for Securities Trading Blotter/Purchase and Sales Journal

In conjunction with the scheduled examination, the staff requests records for all purchases and sales of securities for portfolios of advisory clients and proprietary accounts being advised. Please provide this record in Excel. This record should include the fields of information listed below in a similar format.

Please provide a single worksheet for: (i) equities (Note: ETF trades should be included with equities); (ii) fixed income; (iii) cash or cash equivalents, maturities, calls, pay-downs, expirations, or reinvestments of mutual fund dividends or capital gains distributions; (iv) mutual funds; and (v) options, futures, swaps and other derivatives. Please include a column denoting the type of security.

Examples:

I. Sample Trading Blotter for Equity Securities

Client Name/#	Trade Date	Settle Date	Buy/Sell	CUSIP	Security Symbol	Security Description	Quantity	Unit Price	Principal/Proceeds/Notional Value	Total Commission	Fees	Net Amount	Broker
155	1/1/00	1/3/00	B	1234567	MSFT	Microsoft Corp	100	\$100.00	\$10,000	\$10.00	\$0	\$10,010.00	ABC
123	1/2/00	1/5/00	S	89101112	IBM	IBM Corp.	500	\$100.00	\$50,000	\$50.00	\$1.67	\$49,948.33	DEF

II. Sample Trading Blotter for Fixed-Income Securities

Client Name/#	Trade Date	Settle Date	Buy/Sell	CUSIP	Security Description 1 (Issuer)	Security Description 2 (Coupon Maturity, etc)	Quantity	Unit Price	Accrued Interest	Principal Value / Proceeds	Total Commission	Net Amount	Broker
155	4/2/98	4/6/98	B	802586AG2	SANTA ROSA CA PKG FACS DIST	4.60% 07-02-2004	50,000	100	\$95.83	\$50,000	\$0	\$50,095.83	GHI

III. Sample Trading Blotter for Derivative Securities

Client Name / #	Trade Date	Settle Date	Buy/Sell	CUSIP	Security Description (Issuer)	Security Description 2 (Coupon Maturity, etc)	Quantity	Unit Price	Payments	Principal Value / Proceeds	Total Commission	Net Proceeds	Broker	Security Type	Economic Position "Long or Short" Position
178	4/1/05	4/3/05	B	DR80258RG	Deutsche Bank AG, Microsoft Corp., Credit Default Swap	6 Months 10-01-2005	100,000	100	\$95.83	\$100,000	\$0	\$100,095.83	DB	Credit Default Swap	Buying Protection
182	2/1/07	2/3/07	S	MOSMS149	Morgan Stanley; PD: If credit spreads as represented by the Barclays Capital U.S. CMBS AAA 8.5+ Index widen, pays the spread change minus 50 basis points*; RD: If credit	9 Months 11-01-2007	150,000	100	\$0	\$150,000	\$0	\$150,000	MOR	Total Return Swap	Economic Long