

Alone we can do so little; together we can do so much.

— Helen Keller



COMPLETE, COMPREHENSIVE RIA SOLUTIONS.



www.RIAComplianceFirm.com | 615-800-7949

COMPLETE, COMPREHENSIVE RIA SOLUTIONS.

Scale for Growth, Free Up Resources, and Dedicate Your Time to Engage with Your Clients and Prospects using RIA Compliance Firm (RIACF), its affiliated companies, and its' strategic relationships. RIA Compliance Firm, in cooperation with its' affiliated companies, and strategic relationships, collectively offer our clients customized risk management; business, compliance and wealth management solutions; best-in-class technology; and a Unified Managed Accounts (UMA) platform so clients can observe performance on an individual manager basis.



COMPLETE, COMPREHESIVE RIA SOLUTIONS.

The Services We Provide at RIACF.



“Teamwork is the ability to work together toward a common vision. The ability to direct individual accomplishments toward organizational objectives. It is the fuel that allows common people to attain uncommon results.” – Andrew Carnegie



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RIA Risk Mitigation Service¹

Business Formation:

The business structure you choose will significantly impact your business registration requirements, how much you pay in taxes, and your exposure to personal liability.

We can help you choose your business structure, secure your business name, register your business with state and federal governments, obtain federal and state tax IDs as well as file for required county, state and federal licenses and permits.

We are in the business of helping you create and build your financial services business.

Business structures we have expertise in:

- Limited Liability Company (LLC)
- Corporation (Inc.)
- Partnership
- Series Limited Liability Company
- Various structures for wealth preservation planning
- Sole Proprietorship
- Doing Business As (DBA)

Areas of Expertise:

- | | |
|----------------------------------|---|
| • Non-compete agreements | • Asset-Liability Management and Liquidity Planning |
| • Non-disclosure agreements | • Business Process Services |
| • Non-solicitation agreements | • Due Diligence |
| • Investment advisory agreements | • Information Security and Cyberrisk Management |
| • Client Disputes | • Internal Audit Assistance and Assessment |
| • Regulatory Issues | • Privacy and Data Protection |
| • Business continuity plans | • Regulatory Strategy and Advice |
| • Incident response plans | • Risk Management |
| • Business succession plans | • Regulatory enforcement action consulting |
| • Compliance | |

¹ RIA Compliance Firm, LLC does not engage in the practice of law or provide legal services. Any such legal services would be provided through a licensed attorney. RIA Compliance Firm, LLC currently works with Jeffrey Smith, Attorney at Law (dba RIA Law Firm), who provides all such services.



RIA Business Services

Outsourcing critical aspects of your business saves you time & money while providing your firm, staff and family with excellent benefits.

- **Corporate Branding** – We can help you create or modernize your corporate brand standards and every type of deliverable you can imagine.
- **Marketing** – Whether you are looking to conduct traditional marketing (direct mail and or seminars), digital marketing, email marketing, lead nurturing or radio shows our affiliated companies can provide turn key systems to help you maximize your results.
- **Payroll** - Run payroll faster in just a few clicks, on desktop or mobile.
- **HR** - Whether you face an unexpected challenge, planning a specific initiative or just want to know how other companies excel at HR — you can rely on us.
- **Accounting/Bookkeeping** – Track expenses, maximize deductions, track your firms P&L each month, manage bills & run key reports.
- **Health, Dental and Vision Benefits** - To thrive, your business needs to attract and keep the best and brightest employees. RIACF and its affiliates have got your back with standout benefits like retirement plans and group health insurance, as well as benefits administration.
- **Time and attendance** - Make time tracking easy, convenient and accurate for employees and managers.
- **Staffing Solutions** – Work with a staffing agency that exclusively works with financial advisors to help them hire quality team members including administrative staff, marketing associates, management personnel as well as associate advisors.
- **Business Insurance** - Your choices for business insurance policies may seem daunting. RIACF and its affiliates can help you obtain RIA/Insurance E&O, Directors & Officers (D&O) insurance, workman's compensations insurance, business owners policy, P&C insurance, commercial auto insurance & commercial umbrella policies for a competitive cost.
- **Business Management and Consulting** – We help you to develop and implement practical management strategies to achieve measurable goals utilizing proprietary tools as well as corporate training, retreats and presentations to aid you and your teams to take your performance to the highest levels.

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Professional Employer Organization (PEO) - Save time and money, protect your business, move forward with confidence and offer employees access to Fortune 500®-caliber benefits. With a PEO through RIACF your small (1-49 employees) or mid-sized (50-999 employees) business gets dedicated guidance and all-in-one technology to help you more efficiently and effectively manage your HR, talent, benefits and risks, and achieve better results at a lower cost.

STAT: 98% of PEO clients would recommend a PEO to a small or mid-sized business colleague*

What is a PEO?

With a PEO, both you and the PEO have a co-employment relationship with your employees. The PEO assumes certain employer responsibilities such as payroll processing and tax filing. You maintain control of your business and all of the management responsibilities. It works hand-in-hand with your business to focus on the services that you need most:

- Employee benefits, such as healthcare coverage and a 401(k)-retirement plan
- Payroll and payroll tax administration
- Attracting, developing, engaging and keeping great talent
- Workers' compensation
- Regulatory compliance assistance
- Employee relations and employment issues support
- Access to technology to manage HR

*Source: PEOs: Good for Businesses and Their Employees, National Association of Professional Employer Organizations, September 2017.



RIA Compliance Services

RIA Registration

Whether you have experience in the securities industry, or you are just starting to build your investment advisory business, you undoubtedly have questions about how to become a registered investment adviser. The process of setting up and registering a new investment advisor firm can seem like an overwhelming and daunting task for many. Let us answer your questions about how to become a registered investment advisor and guide you through the investment advisor registration process.

RIA Compliance Firm, LLC (RIACF) has developed a turn key investment adviser registration process to assist you with setting-up your investment adviser firm so that you can focus your time and energy on the other aspects of starting your new business such as business development and client management. By considering us as your service provider, you are taking the first step in determining whether you will use an investment adviser registration service provider or attempt to complete the investment adviser registration process on your own. We will try and help make that decision a little easier for you.

Who We Work With

Our clients know that a tailored, well-functioning compliance program is a key success factor in today's increasingly challenging business and regulatory environment. We respond to your needs by developing and maintaining high-quality compliance programs that are customized to each firm's particular business demands and operational realities.

- New RIAs (zero to \$50MM AUM)
- Small RIAs (\$50MM to 500MM AUM)
- Medium RIAs (500MM up to 1Billion AUM)
- Larger RIAs (1 billion or More AUM)

Private hedge fund and credit fund advisers: 3(c)(1), 3(c)(4), 3(c)(5), 3(c)(6), and 3(c)(7) funds

- Debt or Credit strategies
- Equity strategies
- Alternative strategies

Registered fund advisers (those registered with the SEC under the Investment Company Act of 1940)

- Mutual Funds (i.e., Investment Companies)
- Interval Funds
- Exchange Traded Funds / Exchange Traded Notes
- Private Equity Fund Advisers
- Insurance Company Asset Advisers
- Sub-advisers (Larger Firms that Serve as Sub-advisers to Private and Registered Fund RIAs)
- Individual Client RIAs
- Institutional Account RIAs





Ten Steps to Creating an RIA.



Ongoing professional compliance services using state-of-the-art automated compliance management technology and applying CCO level expertise





RIA Compliance

– At RIACF, you'll have senior level consultants with prior CCO and regulatory experience guiding you through all areas of compliance management and helping you more easily and efficiently maneuver through intense and complex levels of scrutiny from the SEC, FINRA, CFTC, NFA, state agencies, and other regulatory bodies. When you engage with us, you'll also have access to operational risk experts who have extensive experience on all sides of the consultant/client/regulator relationship.

RIACF offers ongoing support and training to ensure your firm has the necessary tools to remain compliant and empowered.

Firms need to be mindful of their need for annual renewal requirements if and when new representatives join, the addition of new jurisdictions where the firm operates, changes in operations, financial reporting requirements, and a host of other firm-specific requirements.

Our services help safeguard your firm by continually informing and directly assisting and empowering you by implementing numerous ongoing compliance solutions, including:

- Conducting background and credit checks for potential Investment Advisor Representatives as well as staff.
- Use of the most sophisticated, proprietary technology platform available to enable even our smallest RIA clients to have a fully mature, SEC exam-ready, dashboard-based compliance program at a cost that is right-sized and reasonable for the RIA;
- Tri-party engagement arrangement that includes an independent securities law firm, which provides privileged and confidential communications that can only be protected through the inclusion of a law firm and which can assist with all securities and regulatory needs such as agreement drafting, private fund formations, examination and enforcement matters;
- A highly experienced team of professionals to service the client, with each professional having decades of experience in regulatory compliance, securities law, enforcement matters, SEC examinations, a deep understanding of the asset management and RIA industry and operations, and actual experience working with applicable regulators;
- The ability to scale from the smallest of service requirements to complete outsourcing of all compliance matters, including the Chief Compliance Officer function or compliance department;
- Providing substantial discounts and expertise on the client's use of needed technology for their operations and compliance functions;
- White glove, 5-star services aimed at exceeding all client's expectations at an affordable price; and
- The ability to fully outsource any or all of the compliance function, including the CCO role.



Document Maintenance

We provide relevant and timely firm document updates. Many RIAs do not maintain their firms documents as required, potentially causing unnecessary issues with regulators during regulatory exams or audits.

- Forms ADV Part 1 and ADV Part 2A & 2B
- Forms U4 and U5
- Form PF
- Form 13F
- Client agreements
- Business continuity plan
- Investment committee charter and guidelines
- Compliance Manual
- Code of Ethics
- Media policy
- Privacy policy
- Solicitor arrangements
- IARD/CRD account servicing
- Site or branch office visits

Initial RIA Risk Assessment or Risk Inventory

Under Rule 206(4)-7 of the Investment Advisers Act of 1940 (“Investment Advisers Act”), investment advisers registered with the U.S. Securities and Exchange Commission (“SEC”) are required to adopt and implement written policies and procedures reasonably designed to prevent and detect violations of the Investment Advisers Act and the rules that the SEC has adopted under the Investment Advisers Act. Well-designed policies and procedures should also be able to detect violations that have occurred and to promptly correct any violations that have occurred. Most state securities regulators have adopted similar rules requiring investment advisers to develop and implement written compliance policies and procedures. As an investment adviser, the first step in developing written policies and procedures should be to identify the areas of risk related to the investment adviser’s practice and business model. This process of identifying risks that make the investment adviser vulnerable to violations of the Investment Advisers Act is often referred to as a “Risk Assessment,” or the compilation of a “Risk Inventory.”

When RIACF conducts a risk assessment or risk inventory we identify and prepare a comprehensive list of all operational and compliance risks associated with the investment adviser’s business model, practices, and ongoing compliance responsibilities. When preparing this list, we review conflicts of interest and other unique matters regarding the investment adviser’s operations or business model that create risks to the investment adviser or its clients. RIACF identifies risks that are present in the investment adviser’s everyday operations. Some examples of these would be failure to provide clients with a copy of the Form ADV, not maintaining required books and records, failure to include required information on a trade ticket, incorrect fee calculations, or unsubstantiated marketing claims. After determining applicable risks, RIACF assists the investment advisers with developing policies and procedures designed to address those risks with a focus on preventing and detecting violations of the Investment Advisers Act.



The risk assessment process is not something that simply needs to be done at the time the policies and procedures are developed. It is something that should be reviewed and updated as necessary but at least annually. According to Rule 206(4)-7, SEC registered investment advisers are required to perform an annual review of their written policies and procedures. Investment advisers should begin the annual review process by reviewing identified risks and making any revisions or updates as necessary. Investment advisers must then conduct an assessment of its written compliance policies and procedures to ensure that it has the adequate controls in place to mitigate the risks identified.

Gap Analysis

The key to achieving the ideal compliance program is perfect alignment. This is achieved through alignment among three things: 1) applicable securities laws, 2) an RIA's policies and procedures, and 3) the RIA's actual business practices. RIACF's Gap Analysis services identify where there is a lack of alignment so that a plan can be created to obtain better alignment among these three critical areas.

Mock Audit

Every RIA should be SEC exam ready at all times. This is needed because the time given by the SEC to respond to examination requests is usually a matter of days and if the RIA is not able to meet this short deadline, this will often be deemed a deficiency in the RIA's compliance program and will also be a red flag indicating that the RIA requires a deeper, longer, more intrusive and a far more time-intensive examination. Generally, this leads to far higher costs for the RIA and perhaps can result in significant deficiencies being found or even enforcement actions. An RIACF Mock Audit will simulate a real SEC examination using recent SEC document requests and practices to create a real-life test under pressures similar to those imposed by the SEC to determine whether an RIA is truly ready for an SEC examination.

Annual Reviews under Rule 206(4)-7

We will assist the client in conducting annual reviews of the adequacy and effectiveness of their policies and procedures as required by Rule 206(4)-7 of the Investment Advisers Act of 1940. Among other important items, these reviews generally include a review of the policies and procedures, discussions with key personnel, obtaining certifications, reviewing internal and/or third-party compliance and internal control reports, reviewing cited regulatory deficiencies and/or exam results, noting observed risks, and testing implementation. RIACF will usually provide a detailed written report of its findings to the client's management after preferably sharing the initial findings under the cover of the attorney-client privilege.



Marketing Material Review

As an RIA, all advertisements must be truthful and accurate, and any advertising that is misleading, fraudulent, or deceptive is prohibited under the SEC rules and the Advisers Act. Therefore, RIAs should always require all marketing materials to be reviewed and pre-approved by compliance professionals prior to their use. RIACF marketing material reviews generally include, but are not limited to, the following:

- Emails
- Business cards
- Letterhead
- Seminar presentations
- Direct mailers
- Newsletters
- Websites
- Client correspondence
- Radio Shows
- Digital marketing
- Investor letters

Books and Record Keeping Assistance

Rule 204-2 under the Investment Advisers Act, usually referred to as the “Books and Records Rule”, gives an extensive list of the books and records to be maintained, the means of maintenance, and the time periods over which the materials must be maintained. The following is just a sampling of what is required:

- Ledgers and other records of assets, liabilities, reserves, capital, income and expense accounts
- Bank records such as checkbooks, statements, canceled checks and cash reconciliations
- Financial statements and client invoices related to the investment advisor’s business
- Correspondence relating to recommendations and advice, payment or delivery of securities and money and orders to buy or sell securities
- Records of powers of attorney and similar documents given by clients
- Copies of all notices, advertisements, newspaper articles, etc. distributed by RIAs
- Copies of the firm’s code of ethics
- Records on all Investment Advisor Representatives associated to the RIA
- Articles of incorporation and/or partnerships
- Executed client agreements
- Evidence of client suitability



Additional Compliance Service Offerings

- **Cybersecurity.** RIACF can help you develop policies and procedures to keep in line with the SEC's guidance on cybersecurity and regulatory requirements for protecting personally identifiable information for advisory clients. RIACF can also conduct staff training and compliance testing with respect to cybersecurity policies and procedures.
- **Compliance Committee & Routine Meetings.** We can assist you in convening, preparing for and conducting regular meetings of an internal compliance committee composed of senior managers and compliance staff. The compliance committee will address compliance issues, report on the status of the compliance program, and discuss the future of the compliance program.
- **Code of Ethics and Insider Trading.** We can assist you in setting up, monitoring and reviewing all Code of Ethics and insider trading activities, including securities holding and trading reports, gifts, entertainment, outside business activities and political contributions.
- **Training.** We can assist you in training employees on topics relevant to your compliance program, which may include compliance training for new employees, annual firm-wide training, training sessions for marketing personnel, AML training, Business Continuity Plan training, Incident Response Plan training, and review/update the marketing training presentation.
- **Outsourced Compliance Officer Services.** We can provide you with scalable Chief Compliance Officer ("CCO"), Deputy CCO, Compliance Officer or any level of compliance staff services needed either offsite or onsite.
- **Compliance Calendars and Regulatory Reminders.** RIACF develops customized compliance calendars to help keep your compliance team on track with legal requirements (deadlines for Form ADV, Form 13F or other Section 13 reporting), personnel code of ethics reporting obligations (e.g., deadlines for personal securities reporting, periodic attestations, etc.) and compliance testing.
- **IARD Administration.** RIACF can support all regulatory filings, including state notice filings, and perform annual investment adviser registration renewals.
- **Deficiency Letters.** Because we have assisted with hundreds of SEC exams, we are experts in preparing responses to SEC or state deficiency letters.
- **Consulting Hours.** We can assist our clients with any other compliance consulting services as requested by the client.
- **Research Assistance.** We can assist you by performing client-focused research and drafting related memoranda such as documenting the client's analysis of compliance issues and their proper adherence to the securities laws, rules, regulations and your policies and procedures.



RIACF Compliance Enterprise Dashboard Software

RIACF's Compliance Enterprise Dashboard is an award-recognized flagship compliance software solution that offers RIAs with immediate total visibility into their entire compliance program status, the most comprehensive regulatory compliance management software available, and the ability to assist our clients with being SEC exam ready at all times. This extremely flexible solution streamlines management of daily compliance activities and automates archiving of testing, procedures, evidence, findings, exceptions and resolutions to produce audit-ready output on demand. The system is modular and offers the ability for compliance team members and employees to view only those modules currently in use and only those to which management wishes them to have access. Such modules include:

Testing

The Testing module enables officers to create and conduct ad hoc or recurring tests. Procedures, policies and reviewers are defined, and the integrated calendar disseminates tests and notifications to responsible parties for completion.

Certifications

The system provides tailored certifications and staff compliance quizzes with individualized questions, hyperlinks to attachments, dependent questions and control over response types. Quizzes tally employee responses and return scores to supervisors, so you can make sure your staff stays compliance savvy.

Risk Assessment

Seamlessly accessed from the RIACF Dashboard, our compliance Risk Assessment module displays an inventory of your firm's compliance risk, provides the ability to rank and weight risk factors, archive past assessments and link to the controls (testing, certifications, etc.) that are mitigating identified risks, thus demonstrating an audit-ready business to regulators, senior management, and your Board.

Personal Trading

Customize security types and set up policies to auto-approve, auto-reject or submit trade requests for further review based on your firm's policies. Our system also integrates with third-party securities databases, including the vast majority of broker-dealers, to ensure the reliability of your reference data and allows for the monitoring of the status of automatic brokerage data feeds. The system also sends requests for verification of accounts positions. Our system provides all of the needed elements to fully automate and document compliance with your code of ethics.

Gifts & Entertainment (GEM)

Set firm-wide limits and track employee Gift & Entertainment (GEM) disclosures against defined thresholds. Employees can easily check limits and pre-clear activities. Notifications and warnings can be automatically sent to compliance staff and supervisors as exceptions occur.



Forms Studio

Our forms studio makes it easy to replace hardcopy documents with a flexible compliance technology tool that lets employees submit forms online, so you can better manage unscheduled or ad-hoc compliance-related events, such as outside business activity notifications, marketing material approval documents, conflict of interest disclosures, on-boarding materials and sub-adviser due diligence.

Whistleblower

Further evidence that you are engaging employees in maintaining a culture of compliance, our whistleblower module enables staff to submit anonymous tips of questionable compliance activities. Tips are instantly sent to authorized compliance administrators, and securely archived.

Employee Portal

Leverage the employee portal to engage your staff in maintaining a culture of compliance. Web-based access with reminders and alerts helps ensure the timely exchange and tracking of information among employees and other stakeholders. Employees can submit and track personal trading requests; manage personal accounts; enter gift and entertainment disclosures; complete ad-hoc forms and route them for processing; report an incident anonymously to designated officers; and access documents published by the compliance team through the online library.

RIA Turnkey Asset Management Program (TAMP) Services

(Powered by Virtue Capital Management & Summit Capital Solutions)²

Virtue Capital Management & Summit Capital Solutions) - Empower your firm with everything you need to survive your fast-paced environment while still providing the best client service. We provide best-in-class technology solutions for financial planning, reporting, and customized investment strategies so you can create high-contact client relationships. We can provide many of these TAMP solutions to your firm where you implement them at your firm level, or you can outsource these tasks for us to perform on your firm's behalf.

TAMP Offerings

- Institutional Quality Trade Execution
- Efficient Billing System
- Online Performance Reporting
- Access to 401(k) Management Solutions
- Access to Self-Directed Brokerage Account Solutions
- Technology Solutions for Your Whole Firm
- Powerful Proposal Generation
- Solutions that Scale as You Grow
- Tech-Savvy Support Team

² All investment advisory services are provided by either Virtue Capital Management, LLC or Summit Capital Solutions, LLC, each an SEC registered investment adviser. Each entity's Form ADV can be found on-line at the SEC's website. RIA Compliance Firm, LLC does not provide any investment advisory or brokerage services. This brochure is not any offer or sale of or providing any recommendations related to any securities or investment offerings.



Integrations and Trusted Partners

Every advisory firm is different. We focus on providing personalized solutions to fit your needs, and we partner with industry leaders to find the best solutions for complex challenges.

- TD Ameritrade
- Orion
- Salesforce
- Quick!
- DocuSign
- Morningstar Advisor Workstation
- OnPointe
- eMoney
- Money Guide Pro
- Wealth Access
- Annuity Rate Watch
- Case Design Pro
- FireLight

Third Party Investment Manager Options

The managers you find on our platform are verified and vetted to ensure their performance and investment principles meet our standards. There are over 50 strategies available on the platform. Approximately 70% are tactically managed and can go defensive and reinvest into cash, cash equivalents, fixed income or other asset classes depending on the strategy and the market conditions. The goal is to reduce volatility and maximum drawdown. Look at some of the managers we work with to see who your next strategist might be.

- Brown Advisory
- Clark Capital Management
- ClearBridge Investments
- MorningStar
- Niemann Capital Management
- Summit Capital Solutions
- Zacks Investment Management
- Zega Financial
- Taiber Kosmala & Associates



RIA Operational Services

Pursue next-level operational efficiencies by outsourcing these professional services to a team of experts that have the team and technologies in place to provide these services in a cost-efficient way. We are able to establish accounts, service accounts, conduct monthly billing, trading, and performance reporting among many other services in a transparent manner.

Cloud Based Service Portal

Our top priority is to provide unsurpassed customer service to our clients. To help deliver this service, we will provide you access to our operations Support Portal. In addition to delivering unsurpassed customer service, our support portal will help advisors streamline their office workflow. The operations Support Portal is a complete resource for advisors and their staff. It was created based on feedback we received from advisors over the last several years.

The three key areas where we offer solutions to some of the most common problems advisors are faced with are: Transparency/Accountability; Knowledge Base and Resources

Transparency & Accountability:

Submitting new business and servicing existing clients can bring a lack of transparency and accountability (both internal and external). Many advisors waste countless hours of their time or their staff's time submitting business through several avenues, creating inefficiencies not only on the submission process but also the follow-up process. Additionally, there seems to be a lack of accountability when a mistake is made either by your staff or the company you are working with.

Ticketing and Tracking Solution – The operations Support Portal provides an online ticketing and tracking solution from the business level down. This gives advisors and their staff the ability to submit business in one central location and also allows tracking of the submission until the task is completed creating a more transparent and efficient workflow.

Review Your Requests – All of your requests submitted will be available for review whether they are submitted online, fax, email, or by phone. To create the highest level of transparency RIACF posts all requests for you to view.

Data included in a ticket generally includes:

- Date submitted
- Submitted by
- Ticket number
- Client information
- Purpose of request
- Special instructions
- Ticket status
- Complete history of request
- Team member working on your submission



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Tracking Your Requests – Typically when you submit a request it is difficult to track unless you or your staff constantly follow-up with the company it was submitted to which can take up a significant amount of time after a few calls and emails. Through the operations Support Portal you can track the real-time progress of all of your firm's and staff's requests. Additionally, this will create more efficiency within the office as you will know what your staff is working on with a click of the button.

RIACF Knowledge Base:

No matter what financial services provider you work with there is a learning curve for you and your staff. How do you shorten this learning curve? You need a resource you can access at any time. Additionally, it should be something that is easy to understand and use.

Knowledge Base Search Function - Not sure what to look for? Use our search function. This will help you and your staff locate the information you need within the knowledge base.

Support Portal – Forms

In addition to our Knowledge Base, we have also added a comprehensive forms library of all of our partners' required forms. Included in this section are:

- RIA required Forms
- TD Ameritrade Institutional Forms
- Illustration request
- Compliance Documents
- Recorded webinars
- Manager Market Commentary

Support Portal – Portfolio Information

Details and performance information for each of the model portfolios available to our affiliates can be accessed on the service portal.