

# **Secretary of State State of Indiana**

### **Securities Division**

#### **COMPLIANCE ALERT**

**TO**: All Indiana domiciled Registered Investment Advisers

FROM: Indiana Securities Division

**DATE**: February 14, 2025

**RE**: Annual State Registered Firm Questionnaire Due on or before March 31, 2025.

The Indiana Secretary of State, Securities Division ("Division") requires that all Indiana domiciled Investment Advisers ("Firm") complete the Investment Adviser Questionnaire ("Questionnaire") annually. Firms must electronically submit responses to the Questionnaire in its entirety to comply with this inquiry. The Questionnaire must be completed **on or before March 31, 2025.** 

The link for the Questionnaire was distributed to registered Firms via email. The email was distributed through the online survey software company SurveyMonkey. The subject line for the email is: "2025 Indiana Securities Division Questionnaire – Responses Due on or Before March 31, 2025." The email's sender will display as "SecuritiesExaminations@sos.in.gov via SurveyMonkey."

Firms who have not received the link for the Questionnaire should check their junk or spam email folders and any other filter which may have disrupted its delivery. The obligation to ensure that the Questionnaire has been completed rests with a registered Firm. Any Firm who cannot find or has other difficulty accessing the Questionnaire link must contact the Division so that any technological issues can be resolved.

Firms who successfully complete the survey through the link will receive a confirmation email from SurveyMonkey shortly after their responses have been submitted. Firms should preserve this confirmation email for their records.

The Questionnaire has multiple pages, which a user navigates through by clicking the "Next" button to proceed to the next page. Once all applicable prompts have been answered, the user completes and submits the Questionnaire by clicking the "Done" button.

For any questions, please contact: <u>SecuritiesExaminations@sos.in.gov</u>.

Failure to complete and return the Questionnaire by March 31, 2025, may be deemed by the Division a violation of the Indiana Securities Act within the meaning of Ind. Code  $\S$  23-19-4-12(d)(2) and the matter may be referred to the Division's Enforcement Section.

Indiana Government Center South, E-111 Indianapolis, Indiana 46204 (317) 232-6681, Fax (317) 233-3675



#### **Investment Adviser Questionnaire - 2025**

#### Welcome to the Annual Investment Adviser Questionnaire - 2025

The Indiana Secretary of State, Securities Division ("Division") requires that all Indiana domiciled Investment Advisers ("Firms") complete the Investment Adviser Questionnaire ("Questionnaire") annually. Firms must electronically submit responses to the Questionnaire in its entirety to comply with this inquiry. The Questionnaire must be completed on or before March 31, 2025.

Before you proceed, please ensure you review the copy of the PDF version. If you do not have a copy of the PDF, you may obtain a copy from the Indiana Secretary of State's website at: https://securities.sos.in.gov/general-information/investment-adviser/ under Helpful Resources. This PDF is provided as a convenience to assist you in the preparation of your responses, however the survey must be completed and submitted online.

The Questionnaire's software will direct Firms to the specific questions they must complete. The Questionnaire has multiple pages, which a user navigates through by clicking the "Next" button to proceed to the next page. Once all applicable prompts have been answered, the user completes and submits the Questionnaire by clicking the "Done" button.

Firms who successfully complete the survey through the link will receive a confirmation email from SurveyMonkey shortly after their responses have been submitted. Firms should preserve this confirmation email for their records.

Questions should be directed to **SecuritiesExaminations@sos.in.gov**.

Failure to complete and return the Questionnaire by March 31, 2025, may be deemed by the Division a violation of the Indiana Securities Act within the meaning of Ind. Code § 23-19-4-12(d)(2) and the matter may be referred to the Division's Enforcement Section.



# Investment Adviser Questionnaire - 2025

| <u> cate Registe</u> i | <u>red Investment Ad</u>  | <u>lviser:</u>      |                       |                    |
|------------------------|---------------------------|---------------------|-----------------------|--------------------|
|                        |                           |                     |                       |                    |
| * 1. Is the Fir        | m an Investment Ad        | viser registered    | d with the Indian     | a Secretary of     |
|                        | ties Division?            |                     |                       |                    |
|                        | ply to SEC registered inv | estment advisers (  | that have notice file | d in Indiana.      |
| Yes                    |                           |                     |                       |                    |
| No                     |                           |                     |                       |                    |
| * 2. Does the          | Registered Investm        | ent Adviser ("F     | irm") have more       | than one office in |
| the State of I         | ndiana?                   |                     |                       |                    |
| Yes                    |                           |                     |                       |                    |
| No                     |                           |                     |                       |                    |
| lf yes, provide th     | e address and phone num   | ber of each office. |                       |                    |
|                        |                           |                     |                       |                    |
|                        |                           |                     |                       |                    |
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## **Investment Adviser Questionnaire - 2025**

### **RIA Section:**

| * 3. Firm CRD Number:  |  |
|--|--|
|  | 7  |
|  |  |
| * 4. Firm's full legal name:   |  |
| Provide the Firm's full legal name, not an alternative nam   | e or Doing Business As (DBA) name.             |
|  |  |
|  |  |
|  |  |
| * F. Altaunativa Firm advisom business name  | · DDA  |
| * 5. Alternative Firm advisory business name or<br>Provide any alternative business names, or DBA names us |  |
| legal name. Enter N/A, if this item does not apply.  | ed by the 1 mm that affect from the 1 mm 3 run |
|  | 7  |
|  |  |
| * 6. Chief Compliance Officer or Primary Contac  | <b>t</b> :                                     |
| or emer compliance officer or i i many contact   |  |
|  |  |
| * 7. Primary Contact's Phone Number:   |  |
| xxx-xxx-xxxx   |  |
|  | 7  |
|  |  |
| * 8. Individual CRD Number for Primary Contact   | •  |
| Enter N/A, if this item does not apply.  | •  |
|  |  |
|  | 7  |
|  |  |
| * 9. Primary Contact's Email:  |  |
| <u> </u>   | 7  |
|  |  |
| * 10. Firm Website(s) and all Social Media (incl   | uding but not limited to FaceBook              |
| Instagram, LinkedIn, X, etc.):   | and the minimum to i decook,                   |
| Enter N/A, if this item does not apply.  |  |
|  |  |
|  |  |
|  |  |

| * 11. Business A                       | ddress:   |
|--|---|
| Address                                |   |
| Address 2                              |   |
| City                                   |   |
| State                                  |   |
| ZIP Code                               |   |
| * 12. Is the Fi                        | rm located in a private residence?  |
| Yes                                    |   |
| No                                     |   |
| * 13. Are ther                         | e any other businesses located at this address?   |
| Yes                                    |   |
| No                                     |   |
| maintain a PC                          | e Firm or any of its associated persons, employees, or contractors<br>) box or alternate mailing address other than their personal residen<br>ldress of the Firm? |
| Yes                                    |   |
| No                                     |   |
| If yes, provide de                     | tailed information including the name, alternate address or PO Box, and reason.   |
| * 16. Total numb                       | per of persons at this location:  |
|  | al number of employees by each category. (Note: Some individuals may fall into  |
| Registered                             |   |
| Representative(s)                      |   |
| Non-Registered                         |   |
| nvestment Adviser<br>Representative(s) |   |
| Administrative Staff                   |   |

| Stocks   | <b>(</b>   |
|--|--|
| Mutual Funds   |  |
| ETFs/ETNs  | •  |
| nds or other Debt  | •  |
| Securities  Derivatives  |  |
| ptions, Futures,<br>rwards, Swaps)   | •  |
| riable Annuities   | •  |
| urance Products  | •  |
| Real Estate<br>vestment Trusts<br>(REITs)  | <b>\$</b>  |
| Penny Stocks   |  |
| Alternative<br>estments (Private<br>Funds,<br>Commodities,<br>enture Capital,<br>etc.) |  |
| vate Placements  |  |
| gital Assets such<br>Cryptocurrency  | <b>*</b>   |
| Viaticals/Life<br>Settlements  | <b>\$</b>  |
| omissory Notes   | •  |
| naffiliated, 3rd<br>arty Investment<br>Managers  | *  |
| any investments not identified in  | the above list.                                    |
|  |  |
|  |  |
| 22. Has the Firm been ex   | camined by any regulator within the past two years |
| Yes  | □ No   |
| yes, name the regulator and the  | e date of the examination.                         |

| (s) of the entities for whom prospective clients are solicite                   |
|---|
| (s) of the entities for whom prospective clients are solicite                   |
|   |
| .22   |
| icit on behalf of, or refer potential clients to                                |
| ial clients where fees or other compensation is paid by                         |
| ar chems where rees or other compensation is paid by                            |
|   |
|   |
|   |
| or each individual and/or entity which acts in such a                           |
|   |
|   |
| ner financial planning advice for which the Firm has                            |
|   |
|   |
|   |
|   |
| iated persons, employees, or contractors se<br>ng annuities?                    |
| iated persons, employees, or contractors se                                     |
| iated persons, employees, or contractors se<br>ng annuities?                    |
| iated persons, employees, or contractors se<br>ng annuities?                    |
| iated persons, employees, or contractors se<br>ng annuities?                    |
| iated persons, employees, or contractors se<br>ng annuities?                    |
| iated persons, employees, or contractors se<br>ng annuities?<br>ement Services? |
| iated persons, employees, or contractors se<br>ng annuities?<br>ement Services? |
| iated persons, employees, or contractors se<br>ng annuities?<br>ement Services? |
|   |

|                  | name(s) of all custodians with whom the Firm is reflected as the ord on client accounts and the dollar value of assets held with each |
|------------------|---|
| respective cus   | itodian.<br>item does not apply.  |
| Custodian 1:     | tem does not appry.   |
| Custodian 2:     |   |
|                  |   |
| Custodian 3:     |   |
| Custodian 4:     |   |
| Custodian 5:     |   |
| * 30. Does t     | he Firm charge performance-based fees?  |
|                  | n regarding the performance-based compensation exemption see 710 IAC 4-9-10   |
| Yes              |   |
| No               |   |
|                  |   |
| * 31. Does t     | he Firm withdraw advisory fees directly from client accounts?   |
| Yes              |   |
| No               |   |
| If yes, describe | , in detail, the fee billing calculation methodology(s) and processes (e.g., advance, arrears,  |
|                  | end value, average daily balance, monthly, quarterly, direct debit from client account,   |
| withdrawai iron  | n client bank account, etc.).   |
|                  |   |
|                  |   |
|                  |   |
|                  |   |
| 32. Describe     | the Firm's process for depositing client funds and securities.  |
|                  |   |
|                  |   |
|                  |   |
| * 33. Describe   | how Standing Letters of Authorization ("SLOA") are handled when the   |
| recipient is no  | t an identically registered account?  |
|                  |   |
|                  |   |
|                  |   |
| * 34. Describe   | the Firm's advertising initiatives and the process for  |
|                  | easing any type of advertising.   |
|                  |   |
|                  |   |
|                  |   |

| Yes  | No  |
|--|---|
| yes, provide comprehensive informat  | ion on the PIV(s) managed by the Firm.  |
| 3 . 1  |   |
|  |   |
|  |   |
| 36. Does the Firm or any of it   | ts associated persons, employees, or contractors  |
| <del>-</del>   | accounts, such as a bank, broker-dealer, mutual   |
| or retirement account?   |   |
| Yes  | No  |
| yes, describe how these accounts are   | accessed.   |
|  |   |
|  |   |
|  |   |
| 37. Has the Firm developed a   | written succession or business continuity plan i  |
| -  |   |
| vent of the unexpected loss o  | of executives, key personnel, or owners?  |
|  |   |
| or example husiness continuity plan  | ns may provide for; protection, backup and recovery of book   |
| or exampie, business continuity pian   |   |
|  |   |
| ecords, a method for communication   | s with customers, and for responsible persons to act and/or   |
|  |   |
|  | s with customers, and for responsible persons to act and/or   |
| moothly wind down business in the e  | s with customers, and for responsible persons to act and/or   |
| smoothly wind down business in the e   | s with customers, and for responsible persons to act and/or   |
| moothly wind down business in the e  | s with customers, and for responsible persons to act and/orevent of death, disability, or incapacity of key personnel.  |
| moothly wind down business in the e  | s with customers, and for responsible persons to act and/or   |
| Yes No B. Provide details regarding wohysical or paper format.   | s with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  hat type of records the Firm maintains exclusive   |
| Yes No B. Provide details regarding wohysical or paper format.   | s with customers, and for responsible persons to act and/orevent of death, disability, or incapacity of key personnel.  |
| Yes No B. Provide details regarding wohysical or paper format.   | s with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  hat type of records the Firm maintains exclusive   |
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| moothly wind down business in the end of the | s with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  hat type of records the Firm maintains exclusive   |
| Yes No  B. Provide details regarding worksical or paper format.  Per N/A if all of the Firm's records are  | s with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  hat type of records the Firm maintains exclusive   |
| Yes No  B. Provide details regarding worksical or paper format.  B. Provide details records are a ser N/A if all of the Firm's records are ser N/A if all of the Firm's records are ser N/A if all of the Firm's primare.  | s with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  hat type of records the Firm maintains exclusive maintained in digital or electronic format.   |
| Yes No  B. Provide details regarding worksical or paper format.  B. Provide details records are a ser N/A if all of the Firm's records are ser N/A if all of the Firm's records are ser N/A if all of the Firm's primare.  | s with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  hat type of records the Firm maintains exclusive maintained in digital or electronic format.   |
| Yes  No  B. Provide details regarding wohysical or paper format.  Per N/A if all of the Firm's records are select all that apply.  Phone   | with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  Text   |
| Yes No  B. Provide details regarding worksical or paper format.  Per N/A if all of the Firm's records are seed to be seed | with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  That type of records the Firm maintains exclusive maintained in digital or electronic format.  Try form(s) of communications with clients?                             |
| Yes  No  B. Provide details regarding wohysical or paper format.  Per N/A if all of the Firm's records are select all that apply.  Phone   | with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  Text   |
| Yes  No  B. Provide details regarding wothly sical or paper format.  Provide of the Firm's records are select all that apply.  Phone  Email  D. What systems are used to select all that systems are used to select to the side of the sid | with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  hat type of records the Firm maintains exclusive maintained in digital or electronic format.  Ty form(s) of communications with clients?  Text  Written Correspondence |
| Yes  No  B. Provide details regarding wothly sical or paper format.  For N/A if all of the Firm's records are in the fill of the Firm's primare select all that apply.  Phone  Email  D. What systems are used to select all that al | with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  hat type of records the Firm maintains exclusive maintained in digital or electronic format.  Ty form(s) of communications with clients?  Text  Written Correspondence |
| Yes  No  R. Provide details regarding wothysical or paper format.  Yer N/A if all of the Firm's records are all that apply.  Phone  Email  O. What systems are used to see the second of the systems.  | with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  hat type of records the Firm maintains exclusive maintained in digital or electronic format.  Ty form(s) of communications with clients?  Text  Written Correspondence |
| * 39. What is the Firm's primar Select all that apply.  Phone    Phone   Phone   Email   | with customers, and for responsible persons to act and/or event of death, disability, or incapacity of key personnel.  hat type of records the Firm maintains exclusive maintained in digital or electronic format.  Ty form(s) of communications with clients?  Text  Written Correspondence |