

September – Compliance Call Notes

→ **Investment proposals/Financial Plans/Product Comparisons:** **ALL** investment proposals, used with TPMM or product/sponsor companies, need to be submitted into AdView (a **TEMPLATE** of the proposal needs to be uploaded). This includes, but not limited to... Brinker, Eqis, Howard Capital, AssetMark, SEI, Frontier, Clark Capital, *MorningStar*, *eMoney*, Riskalyze, etc...

** Please submit ASAP

** Reminder all sponsor company materials that you use need to be submitted into AdView

→ **Outside Business Activity:** If you are on of a *Board of Directors* for a non-profit or for-profit company, *part ownership* (even if it is .5%) in the family business, a *notary*, sell vitamin supplements (on the side), drive for LYFT, your DBA for taxes purposes is registered with the Secretary of State, etc... YOU NEED TO SUBMIT an OBA for these activities. FINRA can and will charge a fine for LATE OBA submissions (fines can begin at \$5k).

** An OBA is an activity outside of an individual's affiliation with Cambridge that generates revenue, has the potential to generate revenue, places the individual in a position of control or custody of funds, or provides the individual with influence or decision making authority of how funds are handled. (per CO 20-02)

Reminder all OBA activities need to be submitted and approved **before you engage in the activity. (CIR has been behind in their approval, but all "pending" submissions should be reviewed or approved this week)

** When in doubt, SUBMIT

→ **Firm Element/ACM/ACQ/AML** courses are now available: <https://www.cir2.com/Internal/Compliance/> Remember you have until October 15th to complete all courses.

**Some of these requirements can get completed next week during the virtual Ignite conference

→ **IGNITE:** If you registered for the virtual Ignite conference... you will receive an email on Friday afternoon, with instructions for how to access the platform and get a complete agenda of next week.

Always:

- Submit **all** advertising into Adview
- Submit correspondence **ON TIME**
- CyberFraud – be mindful of communications with clients & within the office
- **Make sure you U-4** and OBA are current and up to date
(when changes occur, you need to report within 24 hours)