

### 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 § 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



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*.

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**Investment Adviser Questionnaire - 2025** 

### State Registered Investment Adviser:

\* 1. Is the Firm an Investment Adviser registered with the Indiana Secretary of State, Securities Division?

This does not apply to SEC registered investment advisers that have notice filed in Indiana.

Yes

\* 2. Does the Registered Investment Adviser ("Firm") have more than one office in the State of Indiana?

Yes

No

If yes, provide the address and phone number of each office.



#### **RIA Section:**

#### \* 3. Firm CRD Number:

#### \* 4. Firm's full legal name:

Provide the Firm's full legal name, not an alternative name or Doing Business As (DBA) name.

#### \* 5. Alternative Firm advisory business name or DBA:

Provide any alternative business names, or DBA names used by the Firm that differ from the Firm's full legal name. Enter N/A, if this item does not apply.

#### \* 6. Chief Compliance Officer or Primary Contact:

#### \* 7. Primary Contact's Phone Number:

xxx-xxx-xxxx

#### \* 8. Individual CRD Number for Primary Contact:

Enter N/A, if this item does not apply.

#### \* 9. Primary Contact's Email:

\* 10. Firm Website(s) and all Social Media (including but not limited to FaceBook, Instagram, LinkedIn, X, etc.):

Enter N/A, if this item does not apply.

#### \* 11. Business Address:

Address		
Address 2		
City		
State		
ZIP Code		
	n located in a private resic	lence?
Ves No		
* 13. Are there	any other businesses loca	ted at this address?
Yes		
No		
*14 If yes are	any of these husinesses :	affiliated with the Firm or any of its
	sons, employees, or contra	
Yes	No No	
N/A		
* 15 Does the	Firm or any of its associate	ed persons, employees, or contractors
maintain a PO	box or alternate mailing ac	ddress other than their personal residence
	lress of the Firm?	
Ves No		
	iled information including the par	ne, alternate address or PO Box, and reason.
		<i>h</i>
	er of persons at this locatio	
Break down the total multiple categories.)	number of employees by each ca	ategory. (Note: Some individuals may fall into
Registered Representative(s)		
Non-Registered		
Investment Adviser Representative(s)		

Administrative Staff

* 17.	Does the Firm engage independent contractors (compliance support	t, IA
Repr	esentatives, etc.)?	

Yes

No

If yes, provide comprehensive details for each person including their roles and responsibilities.

## \* 18. Did the Firm terminate any individual or allow any person to resign in the last two years?

This question applies to full-time employees, part-time employees, and independent contractors.

Yes

No

If yes, provide comprehensive details for each person who was terminated or allowed to resign.

\* 19. Did the Firm or any of its associated persons, employees, or contractors receive any complaints in the last two years?

Yes

No

If yes, provide comprehensive details related to each complaint.

## \* 20. Does the Firm have any person who is under heightened or special supervision?

Yes

No

If yes, provide comprehensive details regard the individual(s), the reason for heightened or special supervision, and the process for monitoring and reporting.

# \* 21. In the following fields, please select the type(s) of investments the Firm recommends.

Stocks	•
Mutual Funds	
ETFs/ETNs	
Bonds or other Debt Securities	•
Derivatives (Options, Futures, Forwards, Swaps)	
Variable Annuities	
Insurance Products	
Real Estate Investment Trusts (REITs)	
Penny Stocks	
Alternative Investments (Private Funds, Commodities, Venture Capital, etc.)	
Private Placements	
Digital Assets such as Cryptocurrency Viaticals/Life Settlements	
Promissory Notes	\$
Unaffiliated, 3rd Party Investment Managers	
List any investments not identified	in the above list.
L	A
* 22. Has the Firm been o	examined by any regulator within the past two years?
Yes	Νο
If yes, name the regulator and t	he date of the examination.
<u> </u>	

This includes refer	ral or solicitation of prospective clients for compensation.
Yes	
Νο	
If yes, provide the n	ames and CRD/IARD number(s) of the entities for whom prospective clients are solicite
-	lividuals or entities solicit on behalf of, or refer potential clients to
the Firm?	
This includes referi the Firm to a third-	rals or solicitation of potential clients where fees or other compensation is paid by
Yes	
No	
lf yes, provide the n	ame and CRD/IARD number for each individual and/or entity which acts in such a
manner on behalf of	
* 25. Does the F Select YES if the Fi	Firm offer financial planning services? rm has provided any services, including but not limited to: retirement planning;
* 25. Does the F Select YES if the Fi education/college p planning; personal	rm has provided any services, including but not limited to: retirement planning; planning; estate planning; business planning; insurance planning; bankruptcy budget planning; or any other financial planning advice for which the Firm has
* 25. Does the F Select YES if the Fi education/college p planning; personal received compensa	rm has provided any services, including but not limited to: retirement planning; planning; estate planning; business planning; insurance planning; bankruptcy budget planning; or any other financial planning advice for which the Firm has
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* 25. Does the F Select YES if the Fi education/college p planning; personal received compensa Yes No * 26. Does the F any type of insu	rm has provided any services, including but not limited to: retirement planning; planning; estate planning; business planning; insurance planning; bankruptcy budget planning; or any other financial planning advice for which the Firm has tion. Firm or any of its associated persons, employees, or contractors sel arance product, including annuities?
<ul> <li>* 25. Does the Fiselect YES if the Fielducation/college polanning; personal received compensation of the Polanning of the Polanning of the Fiselect Yes</li> <li>Yes</li> <li>Yes</li> <li>Yes</li> <li>Yes</li> <li>Yes</li> <li>No</li> </ul>	rm has provided any services, including but not limited to: retirement planning; planning; estate planning; business planning; insurance planning; bankruptcy budget planning; or any other financial planning advice for which the Firm has tion. Firm or any of its associated persons, employees, or contractors sel arance product, including annuities?

Enter N/A, if this item does not apply.

* 29. List the name(s) of all custodians with whom the Firm is reflected as the
advisor of record on client accounts and the dollar value of assets held with each
respective custodian.

Enter N/A, if this item does not apply.

Custodian 1:		]	
Custodian 2:			
Custodian 3:			
Custodian 4:		]	
Custodian 5:			
* 30 Doos th	e Firm charge performa	anco-based foos?	
	•••	based compensation exemption see <u>710 IAC 4-9-10</u>	
Yes			
No			
* <b>31. Does the</b>	e Firm withdraw advisc	ory fees directly from client accounts?	
LII If yes, describe, in month/quarter er	•	ation methodology(s) and processes (e.g., advance, ar ce, monthly, quarterly, direct debit from client accoun	
			h
* 32 Describe +I	he Firm's process for d	epositing client funds and securities.	

\* 33. Describe how Standing Letters of Authorization ("SLOA") are handled when the recipient is not an identically registered account?

\* 34. Describe the Firm's advertising initiatives and the process for publishing/releasing any type of advertising.

	No
f yes, provide comprehensive informat	ion on the PIV(s) managed by the Firm.
-	ts associated persons, employees, or contractors h
access to any client's outside a or retirement account?	accounts, such as a bank, broker-dealer, mutual fu
T Yes	Νο
f yes, describe how these accounts are	
-	written succession or business continuity plan in
event of the unexpected loss o	of executives, key personnel, or owners?
	ns may provide for; protection, backup and recovery of books a
	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 event of death, disability, or incapacity of key personnel.
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