

## Introduction

The Firm acknowledges that in the course of business, some firms may receive periodic complaints on various issues related to its investment advisory business. As such, the Firm has established a policy on the receipt and processing of complaints received by any registered and/or associated person employed by the Firm. In order to prevent and/or reduce future complaints from occurring, it is the Firm's policy to conduct all business with the observance of high professional standards and customer service.

### 8.01 Key Definitions

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The definition of a "customer complaint" can be any written statement by a customer, or any person acting on behalf of a customer, who alleges wrongdoing by a person acting under the Firm's control in connection with a investment transaction of that customer.

### 8.02 Handling of Customer Complaints

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#### Receipt and Processing of Complaints

It is the Firm's policy that any recipient of a *written* complaint, who is employed by the Firm, should forward all such documentation to the appropriately designated supervisor for immediate review. Any *oral* complaints made by customers will be immediately forwarded to the appropriately designated supervisor for research and review. It shall be the responsibility of the designated supervisor to determine whether each complaint can be considered an operational issue or a sales practices issue for the proper handling of all complaints.

#### Record Keeping Requirements

The Firm shall maintain a separate file for all written and electronically transmitted customer complaints in its main office, to include the following information:

- Identification of each complaint;
- The date each complaint was received;
- Identification of each IAR servicing the account;
- A general description of the matter of complaint;
- Copies of all correspondence involving the complaint; and,
- The written report of the action taken with respect to the complaint. ►►

#### Implementation Strategy

The designated supervisor will review each customer complaint in order to promptly address the allegations as well as determine the facts and circumstance of the complaint. If the complaint meets the criteria of a reportable event, the designated supervisor will immediately take action to resolve the issue with the complainant. A review of each customer complaint will be evidenced and subsequently placed in the Customer Complaint file for future reference.

### **8.03** Regulatory Inquiries

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In the event of a formal or informal inquiry made by any federal, state or other regulatory authority, any investment adviser representative and/or associated person will be responsible for forwarding all calls or other requests to the appropriately designated supervisor for further review.

### **8.04** Inappropriate Activity

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The designated supervisor will notify the appropriate member of senior management at any time there is an indication that any associated person is involved in any activity that is not consistent with fair and equitable practices of trade and in compliance with federal and state rules and regulations as they pertain to investment advisory activities. This includes, but is not limited to, any evidence of misrepresentation, fraud, inappropriate conduct, harassment, or any other activity that violates any federal, state, statutory, or regulatory law, rule, or regulation.