

## **Annual Compliance Questionnaire**

Optivise Advisory Services ("OAS") requires that this questionnaire be completed annually by all covered persons associating with OAS. Your responses may require OAS to make certain regulatory disclosures based on the information provided. Please return to the CCO within ten (10) days of receipt. Thank you.

1	NAME: DATE:		
		YES	NO
	Have you disclosed to Compliance all brokerage, personal trading, or other types of accounts that you or anyone in your household (spouse, children, other relatives you support) opened or closed in the past year?  If no, please describe:		
	Do you have any outside employment or business activity?		
	If yes, please describe:		
	Do you or any members of your household serve as a Director, Officer, Trustee, Member, Partner, or in any other capacity, for any other entity?		
	If yes, please describe.		



Have you received any gifts from, or made any gifts to, anyone doing business with the firm other than gifts of "de minimis" value? ("De minimis" is defined as no more than \$100 for gifts, services, or any other things received or given by employees. This amount is expressed as an aggregate value per person, per year.)  If yes, please describe:	
Have you recently reviewed your Form U4 and ADV Part 2B for accuracy?	
Have you made any charitable or political contributions to clients or anyone doing business with the firm in an amount greater than \$250?	
If yes, please describe:	
Have you accepted or provided entertainment above "reasonable value" from or to anyone that does or seeks to do business with the firm? ("Reasonable value" is defined as no more than \$250 per person, per event, for a business entertainment occasion where the person providing the entertainment is present.)	
If yes, please list describe:	
Do you own any interests in any securities or other investments not included on your brokerage statements, (e.g., Private Placements, Limited Partnerships, or other non-custodied securities) which have not been previously disclosed?	
If yes, please List:	



	Do you have any ownership interest (a minimum 5% interest) in other entities (public or non-public) not included on brokerage statements?		
	If yes, please List:		
	Have you reviewed, understand, and intend on complying with all current policies and procedures regarding personal securities trading and insider trading activity at our firm?		
	Have you reviewed, understand, and intend on complying with all current policies and procedures in OAS's Compliance Manual?		
	Do you currently act as a trustee, co-trustee, or contingent trustee for any non-direct family members?		
	If yes, please list:		
	Do you understand that it is the Firm's policy to not allow any IAR to serve as a trustee, co-trustee, or contingent trustee for a non-direct family member?		
	Have you ever offered a promissory note, private lending, merchant cash advance, or other unregistered products to any client or prospect?		
	If yes, please provide details:		
	Do you understand that it is the Firm's policy to not offer or refer a client or prospect to any product that has not been reviewed and approved by the Firm?		
	Have you received any correspondences from any client regarding any matter that may be considered a complaint?		
	If yes, please provide details:		
	Do you compensate any person for client referrals?		
	If yes, please provide details:		
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Are you familiar with the Firm's Cyber Security Policy?	
Have you ever:  (a) been convicted or pled guilty or nolo contendre ("no contest") in a domestic, foreign, or military court to any <i>felony</i> ?	
(b) been <i>charged</i> with any felony?	
Based upon activities that occurred while you exercised <i>control</i> over it, has an organization ever:	
(a) been convicted or pled guilty or nolo contendre ("no contest") in a domestic or foreign court to any <i>felony</i> ?	
(b) been charged with any felony?	
Have you ever:  (a) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign or military court to a misdemeanor involving: investments or an investment-related business or any fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	
(b) been charged with a misdemeanor specified in 14B(1)(a)?	
Based upon activities that occurred while you exercised control over it, has an organization ever:  (a) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic or foreign court to a misdemeanor specified in 14B(1)(a)?	
(b) been charged with a misdemeanor specified in 14B(1)(a)?	



Have you been charged with a misdemeanor involving investments, false statements, omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses over the past 10 years?	
Has any of your contact information (legal name, address, employment information, including job title or telephone number/email) changed within the last 12 months?	
If YES, please provide new contact information below:	
Has the U.S. Securities and Exchange Commission or the Commodity Futures Trading Commission ever:	
(a) found you to have made a false statement or omission?	
(b) found you to have been involved in a violation of its regulations or statutes?	
(c) found you to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	
(d) entered an order against you in connection with investment-related activity?	
(e) imposed a civil money penalty on you, or ordered you to cease and desist from any activity?	
(f) found you to have willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or found you to have been unable to comply with any provision of such Act, rule or regulation?	



(g) found you to have willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board?	
(h) found you to have failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board?	
Has any other Federal regulatory agency or any state regulatory agency or foreign financial regulatory authority <i>ever</i> :	
(a) found you to have made a false statement or omission or been dishonest, unfair or unethical?	
(b) found you to have been involved in a violation of investment-related regulation(s) or statute(s)?	
(c) found you to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked or restricted?	
(d) entered an order against you in connection with an investment-related activity?	
(e) denied, suspended, or revoked your registration or license or otherwise, by order, prevented you from associating with an investment-related	
business or restricted your activities?	
Have you been subject to any final order of a state securities commission (or any agency or office performing like functions), state authority that supervises or examines banks, savings associations, or credit unions, state insurance commission (or any agency or office performing like functions), an appropriate federal banking agency, or the National Credit Union Administration, that:	
(a) bars you from association with an entity regulated by such commission, authority, agency, or officer, or from engaging in the business of securities, insurance, banking, savings association activities, or credit union activities; or	



(b) constitutes a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	
Has any self-regulatory organization <i>ever</i> :	
(a) found you to have made a false statement or omission?	
(b) found you to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the U.S. Securities and Exchange Commission)?	
(c) found you to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked or restricted?	
(d) disciplined you by expelling or suspending you from membership, barring or suspending your association with its members, or restricting your activities?	
(e) found you to have willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or found you to have been unable to comply with any provision of such Act, rule or regulation?	
(f) found you to have willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board?	
(g) found you to have failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board?	
Have you ever had an authorization to act as an attorney, accountant or federal contractor that was revoked or suspended?	



Have you been notified, in writing, that you are now the subject of any:	
(a) regulatory complaint, investigation or proceeding that could result in a "yes" answer to any part of Question 11 on your Form U4?	
Has any domestic or foreign court <u>ever</u> :	
(a) enjoined you in connection with any investment-related activity?	
(b) found that you were involved in a violation of any investment-related statute(s) or regulation(s)?	
(c) dismissed, pursuant to a settlement agreement, an investment-related civil action brought against you by a state or foreign financial regulatory authority?	
Are you named in any pending investment-related civil action that could result in a "yes" answer to any part of Question 11 on your Form U4?	
Have you <u>ever</u> been named as a respondent/defendant in an investmentrelated, consumer-initiated arbitration or civil litigation which alleged that you were involved in one or more sales practice violations and which:	
(a) is still pending; or;	
(b) resulted in an arbitration award or civil judgment against you, regardless of amount, or;	
(c) was settled, prior to 05/18/2009, for an amount of \$10,000 or more; or;	
(d) was settled for an amount of \$15,000 or more?	
Have you <u>ever</u> been the subject of an investment-related, consumer-initiated (written or oral) complaint, which alleged that you were involved in one or more sales practice violations, and which:	
(a) was settled prior to 05/18/2009, for an amount of \$10,000 or more, or;	
(b) was settled, on or after 05/18/2009, for an amount of \$15,000 or more?	
Within the past twenty four (24) months, have you been the subject of an	
investment-related, consumer-initiated, written complaint, not otherwise responded to above, which:	



(a) alleged that you were involved in one or more sales practice violations and contained a claim for compensatory damages of \$5,000 or more (if no damage amount is alleged, the complaint must be reported unless the firm has made a good faith determination that the damages from the alleged conduct would be less than \$5,000); or	
(b) alleged that you were involved in forgery, theft, misappropriation or conversion of funds or securities?	
Have you <u>ever</u> been the subject of an investment-related, consumer-initiated arbitration claim or civil litigation after 05/18/2009 which alleged that you were involved in one or more sales practice violations, and which:	
(a) was settled for an amount of \$15,000 or more, or;	
(b) resulted in an arbitration award or civil judgment against any named respondent(s)/defendant(s), regardless of amount?	
Within the past twenty-four (24) months, have you been the subject of an investment-related, consumer-initiated arbitration claim or civil litigation not otherwise reported, which:	
(a) alleged that you were involved in one or more sales practice violations and contained a claim for compensatory damages of \$5,000 or more (if no damage amount is alleged, the arbitration claim or civil litigation must be reported unless the firm has made a good faith determination that the damages from the alleged conduct would be less than \$5,000), or;	
(b) alleged that you were involved in forgery, theft, misappropriation or conversion of funds or securities?	
Have you <u>ever</u> voluntarily resigned, been discharged, or permitted to resign after allegations were made that accused you of:	
(a) violating investment-related statutes, regulations, rules, or industry standards of conduct?	
(b) fraud or the wrongful taking of property?	
(c) failure to supervise in connection with investment-related statutes, regulations, rules, or industry standards of conduct?	
Within the past 10 years have you made a compromise with creditors, filed a bankruptcy petition or been the subject of an involuntary bankruptcy petition?	



Within the past 10 years based upon events that occurred while you exercised control over it, has an organization made a compromise with creditors, filed a bankruptcy petition or been the subject of an involuntary bankruptcy petition?	
Within the past 10 years based upon events that occurred while you exercised control over it, has a broker or dealer been the subject of an involuntary bankruptcy petition, or had a trustee appointed, or had a direct payment procedure initiated under the Securities Investor Protection Act?	
Has a bonding company ever denied, paid out on, or revoked a bond for you?	
Do you have any unsatisfied judgments or liens against you?	

