



Registered Representative & Investment Advisory Representative

Compliance Onboarding Manual

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Compliance Contacts

NAME	TITLE	EMAIL	DIRECT #
Jill Zacha	CCO - LFAS and LFCM (Advisory) Corporate Counsel	jzacha@levelfourfinancial.com	972-284-5475
Kimberly Miller	CCO/AML-CO - LFF (Brokerage) CCO/AML-CO - CRI M&A Advisors	kmiller@levelfourfinancial.com	972-284-5478
Ernest Tannis	Branch Manager, Principal	etannis@levelfourfinancial.com	251-445-4784
Chrystal Badillo	Branch Manager, Principal	cbadillo@levelfourfinancial.com	972-284-5408
Rafael Sosa	Branch Manager, Principal	rsosa@levelfourfinancial.com	407-628-3883
Karen Lessard	Branch Manager, Principal	klessard@levelfourfinancial.com	972-284-5448
Skyler Hedden	Branch Manager, Principal	shedden@levelfourfinancial.com	972.284.5439
Jennifer Eggleston	Branch manager, Principal	jeggleston@levelfourfinancial.com	972-472-6304
Marian Stupka	Compliance Officer, International Wealth	mstupka@levelfourfinancial.com	972-472-6305
Molly Flynn	Compliance Associate	mflynn@levelfourfinancial.com	251-445-4787

Home Office & Compliance Main Address

12400 Coit Road, Suite 700
Dallas, TX 75251

Compliance inboxes:

Compliance@levelfourfinancial.com

Registrations@levelfourfinancial.com

EOM Documents & Daily Check Blotters go to:

Admin@levelfourfinancial.com

Or you can always email us directly or call with any questions.

Compliance Department Roles

(Who can you call?)

Branch Managers

(Ernest, Chrystal, Karen, Rafael, Skyler & Jennifer)

- Primary Point of Contact for Advisors
- Supervision of RR/IAR
 - Primary Compliance Contact for RR and IAR
 - Email Review
 - Wire / Money Movement Approval
 - New Account Approval
 - Exception Report Reviews
 - Variable Annuity Review/Approval
 - Trade Correction Reviews
 - Trade Surveillance
 - Daily Check Blotters
 - EOM Correspondence Review

Jill Zacha – CCO, Advisory & Corporate Counsel
Head of Compliance Org.

- Corporate Counsel
- Chief Compliance Officer (LFAS/LFCM)
- Advisory Customer Complaints

Kimberly Miller – CCO, Brokerage & AML-CO

- Chief Compliance Officer (LFF/BD)
- AML Compliance Officer
- Brokerage Customer Complaints
- Advertising Review
- Branch Manager Oversight
- Branch Exam Oversight
- Surveillance Oversight
- Licensing & Registrations
- Employee Account Surveillance
- Regulatory Filings
- RCI Compliance Administration
- Firm Element Continuing Education
- ADV 2B & Form CRS
- Manages Compliance Inbox

Molly Flynn – Compliance Administration

- Compliance Administration
- Licensing & Registration Support
- Branch Exam Support
- RCI Support
- Annual License Renewals
- Manages Admin Inbox
- Supports Compliance Team
- Quest & Global Relay Admin.
- End of Month Process
- Intranet Administrator

Marian Stupka – Compliance Officer

- International Account Surveillance
- Unit 21 Administration
- Foreign Custodian Customer Billing
- Foreign Custodian POC/Liaison
- Support AML-CO
- Assist International Team with Ongoing Account Due Diligence

Firm Intranet

During your first days please take time to visit the firm's Intranet and familiarize yourself with all of the useful information that is available to reps there. The link to the firm's Intranet is <https://harborfs1.com/>. A username and password should have been sent to you on your start date. Please email Compliance@levelfourfinancial.com if you need log in information.

Important information located on the firm's intranet includes:

Automated Forms

Form CRS & DISCLOSURE JotForm (Easy to use automated delivery platform for client disclosures including Form CRS and BD CRS Supplement, Firm ADV, your ADV2B, Wrap Brochures, SBLOC Disclosures and more. Complete the form for prospects or at the time of account opening and all required disclosures will be delivered systematically to your client's email address. There is also a hand delivery option where the disclosures are emailed to the Financial Professional for delivery. Evidence of delivery is documented and saved in the background and can be provided to a regulator if/when requested) **Note** Failure to complete this form will generate a NIGO when paperwork is presented to your Branch Manager for review.**

LF-169 ADVISORY ANNUAL ACCOUNT REVIEW JotForm - Easy to use automated platform for documenting that you completed your annual account reviews in accordance with SEC 40Act Rules. After you have conducted the annual review with your client, document the discussion and any changes in this JotForm. All information is documented and saved in the background and can be pulled by your branch examiner to evidence your reviews have been completed.

End of Month (EOM) Attestations Checklist JotForm – This simple to use form allows our registered producers to submit their EOM attestations systematically. All physical materials relating to this form should be sent to Admin@levelfourfinancial.com.

Current Level Four Account Opening Documents

Financial Professionals should always pull opening account documents from the firm's intranet as they will be the most current forms available and will help avoid any rejects (NIGOs) by the firm's Operations and/or Compliance Departments. Both Level Four Broker Dealer and Investment Advisor forms are accessible on this firm's intranet site.

The firm's intranet is the place to go to pull any and all of the firm's up-to-date account documentation for both Broker Dealer and Advisory Accounts.

Under "Training" there is also a "**New Accounts Wizard**" that will walk you through the account opening process and provide you with all of the information and documents you need to open a particular account.

Compliance Forms

Compliance Alerts - Compliance alerts are generally emailed directly to you from either Compliance@levelfourfinancial.com or Constant Contact and then published to the firm's Intranet. **It is important that you read ALL Compliance Alerts as they contain important information regarding policy changes at the firm and/or regulatory information that as a Financial Professional, you need to know.**

LFF Written Supervisory Procedures (Broker Dealer Policy Manual)

LFAS Compliance Procedure Manual (Investment Advisory Policy Manual)

THERE IS SO MUCH MORE!! LOG IN TODAY AND EXPLORE, THIS IS A GREAT TOOL!

Systems Contacts

Below are contacts that you will work with in order to obtain various applications needed for your role:

Application	Internal Contact	Email
ADP (Payroll System) (For Employees)	Ronnie Chambers	rchambers@levelfourgroup.com
Black Diamond	Dave Mauzey	dmauzey@levelfourfinancial.com
Chares Schwab	Melina Trevino	mtrevino@levelfourfinancial.com
Concur (Expense Reports) (For Employees)	Chris Goodrich	cgoodrich@levelfourfinancial.com
Digital Fax (For Employees)	Steve George	helpdesk@cricpa.com
DocuSign	Claudia Martin	cmartin@levelfourfinancial.com
FedEx (For Employees)	Joy Robinson	jrobinson@levelfourfinancial.com
Global Relay Email	Help Desk Molly Flynn / Compliance	helpdesk@cricpa.com mflynn@levelfourfinancial.com
Help Desk (For Employees)	CRI IT Department	helpdesk@cricpa.com
Jacomo Commission (J-Pass)	Diane Sherlock	dsherlock@levelfourgroup.com
Laserfiche	Claudia Martin	cmartin@levelfourfinancial.com
Level Four Intranet	Joe Jones / Marketing	jjones@levelfourfinancial.com
Quest – Advertising Review / Training	Molly Flynn	mflynn@levelfourfinancial.com.com
RCI - Compliance Application	Molly Flynn	mflynn@levelfourfinancial.com
RJ Advisor Access	Claudia Martin	cmartin@levelfourfinancial.com
RoboForm (For Employees)	Joy Robinson	jrobinson@levelfourfinancial.com
Salesforce (For Employees)	David Mauzey	dmauzey@levelfourfinancial.com
SecuriSync (For Employees)	Help Desk (App) Molly Flynn (UN/PW)	sgeorge@cricpa.com mflynn@levelfourfinancial.com
SonicWall Nextender (For Employees)	Help Desk (App) Molly Flynn (UN/PW)	helpdesk@cricpa.com mflynn@levelfourfinancial.com
Wealthscape (Fidelity)	Melina Trevino	mtrevino@levelfourfinancial.com

Important Industry Links

Please bookmark these sites for easy access/refence later.

FINRA

[FINRA Website](#)

[A Guide to Your Securities Industry Career](#)

[Registered Representative Brochure](#)

[Financial Professional Gateway \(FinPro\)](#) – (Regulatory Element CE Site)

SEC

[SEC Website](#)

[SEC – Regulation Best Interest](#)

Level Four

[Level Four Group, LLC website](#)

[Level Four Intranet](#)

[LF-169 Advisory Account Annual Review JOTForm](#)

[Form CRS & Disclosure JOTForm](#)

[End of Month Attestation JOTForm](#)

[Training + New Account Form Wizard](#)

[QuestCE](#) (For Advertising Review Submissions and Continuing Education)

[RCI Compliance Portal](#) (Disclosures: Outside Accounts / Questionnaires / Gifts & Entertainment / Private Securities Transactions etc.)

Voice Mail Scripts

Level Four IAR/Registered Representatives utilizing Level Four Branding

You have reached Rep First & Last Name with Level Four. I apologize that I am unable to answer the phone right now. Please leave your name, number and a brief message and I will return your phone call as soon as possible. Please be advised that I am unable to accept any trading instructions that are left on this voicemail system. If your call is of urgent nature or you have a trade that needs to be placed immediately, please hang up and call our corporate office at 866-834-1040 and select option 7 for trading support. Thank you for your business.

Level Four IAR/Registered Representatives utilizing registered DBA Name

You have reached Rep First & Last Name with DBA Name. I apologize that I am unable to answer the phone right now. Please leave your name, number and a brief message and I will return your phone call as soon as possible. Please be advised that I am unable to accept any trading instructions that are left on this voicemail system. If your call is of urgent nature or you have a trade that needs to be placed immediately, please hang up and call our corporate office at 866-834-1040 and select option 7 for trading support. Thank you for your business.

Remote Voicemail Script for Cell*

***If you forward your office phone to a cell phone, your voice mail message should read as follows:**

Hello, you have reached the voicemail of Rep First & Last Name. If your call is in regard to Level Four, please be advised that I am unable to accept any trading instructions that are left on the voicemail system. For immediate assistance with a trade, please hang up and call our back office at 866-834-1040 and select option 7 for trading support. Thank you and have a great day.

Signage

SIPC

Both FINRA and SIPC requires that all FINRA Member branch offices maintain signage in a prominent place visible to clients and/or guests to your office.

The required SIPC signage will be provided to you as part of the onboarding process. Please place the signage prominently, take a picture of its location and email it to the firm at Registrations@levelfourfinancial.com.

Additional SIPC signage can be requested by emailing Compliance@levelfourfinancial.com.

Note* If you are registered with FINRA, and work from your home, that is considered your branch office. Signage is needed if you meet with clients at your home.

Required Disclosure Guidance and instructions for Emails, Websites & Business Cards

Advisory (LFAS as RIA) & BD (LFF as BD) Business (Includes Non-Licensed Associates)

Email Disclaimer

Level Four Financial professionals (“We”) are committed to acting in our retail client’s best interest. For important Regulation Best Interest information, including Form CRS and other disclosures please [click here](#).

We cannot accept any orders and/or instructions regarding your account by email, voice mail, fax, or any alternate method. Securities are offered through Level Four Financial, LLC, a registered broker dealer and member of FINRA/SIPC. Advisory services are offered through Level Four Advisory Services, LLC, an SEC-registered investment advisor. Insurance services may be offered through Level Four Insurance Agency, LLC. Level Four Financial, LLC, Level Four Advisory Services, LLC, and Level Four Insurance Agency, LLC are independent but related entities. Accounts carried by Raymond James & Associates, Inc. Member New York Stock Exchange/SIPC. E-mail sent through the internet is not secure or confidential. This e-mail is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination, or other use of, or taking any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this message in error, please contact the sender immediately and delete the material from your computer.

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Level Four Financial Registered Representatives associated with this site may discuss and/or transact securities business only with residents in states where they are registered. Please refer to <https://brokercheck.finra.org> for additional information.

[Privacy Policy](#)
[Form ADV Part 2A](#)
[Form CRS](#)

Business Card Disclosure

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LFAS Advisor Only

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[Privacy Policy](#)

[Form ADV Part 2A](#)

[Form CRS](#)

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Dually Registered - Advisory and BD Business with w/DBA

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[Form ADV Part 2A](#)

[Form CRS](#)

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BD (LFF as BD) w/Separate (Hybrid) RIA (Includes Non-Licensed Associates)

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BD (LFF as BD) w/Separate (Hybrid) RIA (Includes Non-Licensed Associates) continued

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[Form CRS](#)

Business Card Disclosure

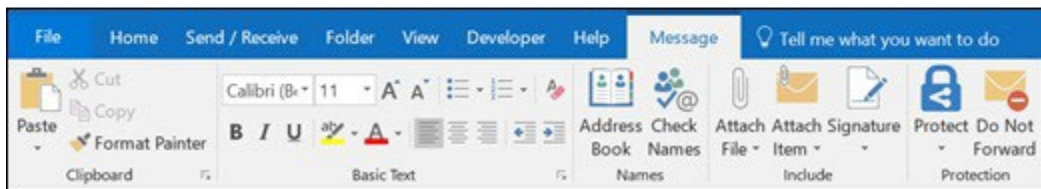
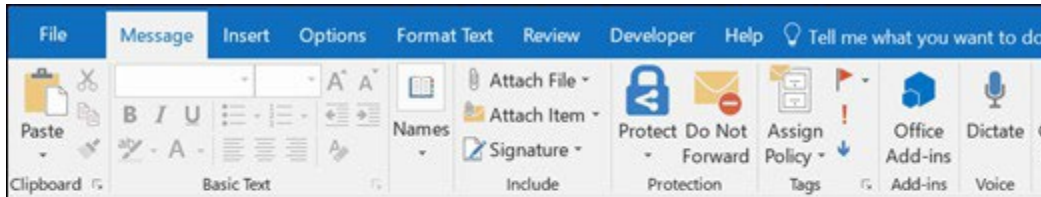
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How to Add Your Email Signature to Outlook

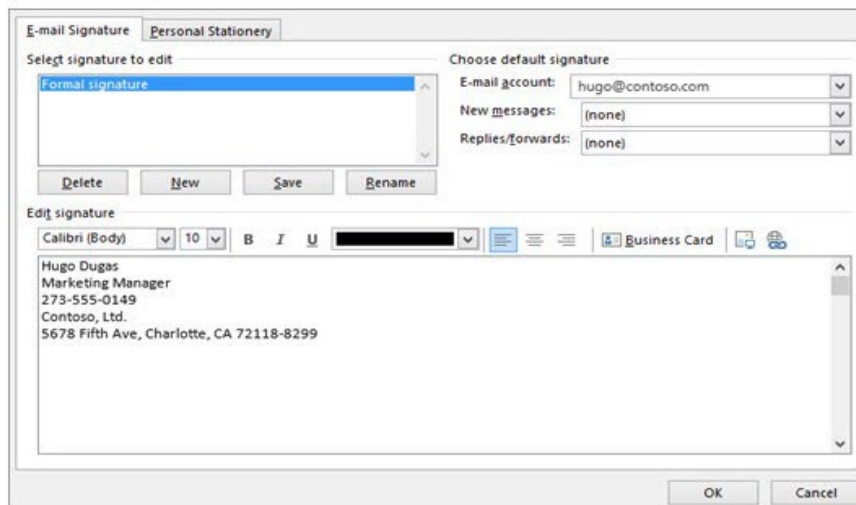
Outlook Email Signature

1. Open a new email message.
2. On the **Message** menu, select **Signature > Signatures**.

Depending on the size of your Outlook window and whether you're composing a new email message or a reply or forward, the **Message** menu and the **Signature** button might be in two different locations.



3. Under **Select signature to edit**, choose **New**, and in the **New Signature** dialog box, type a *name* for the signature.
4. Under **Edit signature**, paste the previously copied email signature given to you.



5. Under **Choose default signature**, set the following options for your signature:
6. In the **E-mail account** drop-down box, choose an email account to associate with the signature. You can have different signatures for each email account.
7. If you want your signature added to all new messages by default, in the **new messages** drop-down box, select one of your signatures.

8. Repeat steps 3 – 6 for the reply email signature.
9. Choose **OK** to save your new signature and return to your message.

Android phone email signature

1. Open the Email app or Gmail app on your Android device.
2. Toggle to an email that has the email signature in it. Highlight and Copy text.
3. Go to the main Menu and Click Settings.
4. Choose the email address you wish to change the signature for.
5. Select the Signature or Mobile signature setting.
6. Long hold to paste the text and click OK.

iPhone email signature

1. Open the **Email** app or Outlook app on your **Apple device**.
2. Toggle to an email that has the email signature in it. **Tap** and **long hold** to highlight text. **Copy**.
3. Navigate to the iOS Settings App, then to **Mail**, then to **Signatures**.
4. Choose the email address you wish to change the signature for.
5. Tap twice in the empty box and select **Paste** from the popup menu.
6. Shake your phone to generate the **Undo Change Attributes** popup.
7. Click **Undo**

Required Email Signatures for Employees of Level Four

Level Four employees should copy and paste the appropriate signature below into their Outlook set up as outlined above.

Advisory Only Associates

We care about your business, thank you!

Rep Name

Rep Title



Changing the future of financial advice

Street Address

City, State Zip

XXX.XXX.XXXX Direct

XXX.XXX.XXXX Office

866.763.9136 Fax

RepEmail@levelfourfinancial.com



[See Our E-Brochure](#)

www.levelfourgroup.com ▪ www.levelfourinsurance.com ▪ www.levelfourfinancial.com ▪ www.levelfouradvisors.com

Level Four Advisory professionals (“We”) are committed to acting in our retail client’s best interest. For important Regulation Best Interest information, including Form CRS and other disclosures please [click here](#).

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BD Only and Dually Registered Associates

We care about your business, thank you!

Rep Name

Rep Title



Changing the future of financial advice

Street Address

City, State Zip

XXX.XXX.XXXX Direct

XXX.XXX.XXXX Office

866.763.9136 Fax

RepEmail@levelfourfinancial.com



See Our E-Brochure

www.levelfourgroup.com ▪ www.levelfourinsurance.com ▪ www.levelfourfinancial.com ▪ www.levelfouradvisors.com

Level Four Financial professionals (“We”) are committed to acting in our retail client’s best interest. For important Regulation Best Interest information, including Form CRS and other disclosures please [click here](#).

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Level Four Group, LLC is a division of CRI Capital Group, LLC, a subsidiary of CRI Advisors, LLC. “CRI” is the brand name under which Carr, Riggs & Ingram, L.L.C. (“CPA Firm”) and CRI Advisors, LLC (“Advisors”) and its subsidiary entities provide professional services. CPA Firm and Advisors (and its subsidiary entities) practice as an alternative practice structure in accordance with the AICPA Code of Professional Conduct and applicable law, regulations and professional standards. CPA Firm is a licensed independent CPA firm that provides attest services to its clients, and Advisors and its subsidiary entities provide tax and business consulting services to their clients. Advisors and its subsidiary entities are not licensed CPA firms.

International Travel Policy

As we are all aware, aggressive, evolving threats to business and personal information are getting more sophisticated and, as a result, our organization must continually identify and adopt new “best practices” for protecting confidential information not only for our customers but for our employees and independent partners as well.

The Process

If you plan to travel internationally and you want access to Level Four email while international, you will need to submit an Internal Travel Exception Form to the compliance department.

If you do not need access, no form is required for international travel.

If it is anticipated that you will want access to Level Four email while traveling internationally, a new form will be required to be submitted to Level Four compliance and CRI Security teams each time you leave the country.

How to Submit an International Travel Exception Form

- Step 1: The [International Travel Exception Form](#) is located on the firm’s intranet website.
- Step 2: Add recipient's name and trip purpose.
- Step 3: Provide a brief description on the purpose of the trip helping the security team align privileges to your trip needs.
- Step 4: Provide a list of destinations, allowing the security team to properly line up access to the destination.
- Step 5: Provide a set of dates helping security to align access to your travel dates.
- Step 6: Submit the form to Level Four Compliance team of (Jill Zacha and Kimberly Miller).
- Step 7: Wait for approval, enjoy your trip!

Though Level Four may allow access to Outlook, and/or other Microsoft applications from your personal smart device (phone and/or tablet), traveling internationally with a Level Four owned laptop is strictly prohibited. Level Four owned assets are equipped with geo location tracking capabilities and failure to follow the International Travel Policy will result in the asset being frozen until you return to the US. Completion of this form is a formal exception request to access Level Four cloud resources from your personal smart device while traveling internationally. Access requests will be individually assessed, and determinations will be based on destination(s) and purpose of travel.

Cybersecurity & Required Computer Settings

Required Security Protocols

Level Four has implemented the following cybersecurity procedures to protect Nonpublic Personal Information and the Firm's proprietary information. This policy shall apply to all electronic devices (i.e., computers, laptops, tablets, smartphones, and other similar devices), whether Firm owned, or employee owned, which are used to conduct Firm business (hereafter "Electronic Devices"):

1. LFF requires "strong" passwords, such as combinations of lower-case letters, upper case letters, and numbers or symbols to protect Electronic Devices and systems utilized on such devices.
2. Associated Persons must never share their passwords or store passwords in a place that is accessible to others and should refrain from using passwords that would be easily guessed, such as children's names, birthdays, or commonly used strings like "password" or "12345".
3. Associated Persons should shut down or lock their computers when they leave the Electronic Devices for any extended period of time.
4. Associated Persons should change passwords periodically and not use the same password across multiple platforms. If a password is compromised, the Associated Person must change his or her password immediately and promptly notify the Designated Principal of the breach.
5. Any theft or loss of an Electronic Device must immediately be reported to their Branch Manager. Employees should also report to the firm's Chief Technology Officer, David Mauzey at dmauzey@levelfourfinancial.com.
6. All laptops and portable storage devices containing Nonpublic Personal Information should be encrypted.
7. Associated Persons should not click on unknown links in email or on the internet. When sending LFF email with sensitive data, Associated Persons must type "Secure" in the subject line to encrypt the message.
8. Independent Associated Persons are responsible for implementing and maintaining appropriate protections for Electronic Devices and the systems utilized on such devices, including:
 - a. Anti-virus software,
 - b. Firewalls,
 - c. Encryption of all wireless data transmissions of sensitive data.
9. Utilize and update patches for operating systems, firewalls, and anti-virus and malware software for business computers, and personal electronic devices used for business purposes.

- 10. Shred documents when disposing of physical files.
- 11. Information may be retained on conventional media, such as laptops and compact discs, as well as electronic equipment such as fax machines and photocopiers. Prior to sale or disposal, such devices will be permanently erased or destroyed.

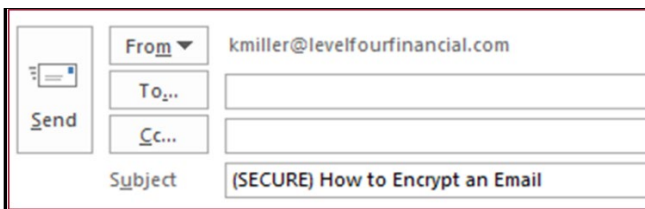
Personal Identifiable Information (PII)

Personal identifiable information ("PII") is defined as: an individual's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such individual: (a) Social Security number; (b) driver's license number or state-issued identification card number; or (c) financial account number, or credit or debit card number.

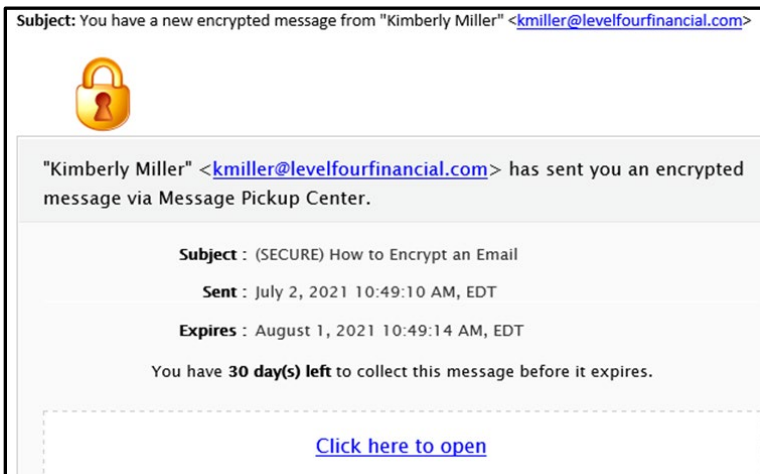
Sending Secure Emails

When sending email outside of the firm; make sure to send it (SECURE)!

To encrypt an email message type (SECURE) or [SECURE] in the subject line.



The receiving party will receive an encrypted email that looks like this:



Note: Cybersecurity is a regulatory hot button!! As part of email review and also your branch examinations your Compliance will be looking for appropriate computer settings and emails which contain PII that are sent unsecured. Please make sure you are sending secure emails to avoid compliance fines.

Artificial Intelligence (Use of AI)

Use of Artificial Intelligence (AI)

The Firm permits the use of artificial intelligence (“AI”) tools to support business activities. However, using AI does not replace your responsibility to exercise sound judgment, follow Firm policies, or comply with supervisory and regulatory requirements.

This policy applies to all employees, investment adviser representatives, principals, and contractors, and covers any AI-enabled tools, including generative AI and large language models, used in connection with Firm business.

Acceptable Use of AI

AI may be used as a support tool for routine, non-discretionary tasks, including:

- Drafting internal documents or outlines (with appropriate review)
- Administrative support, such as summarizing publicly available information
- Research using non-confidential, public data
- Other compliance-approved operational efficiencies

All AI-generated content must be reviewed by you for accuracy, completeness, and compliance before it is used or shared.

Prohibited Use of AI

You may **not** use AI tools to:

- Input or process client confidential information, non-public data, or personal identifiable information (PII)
- Generate or provide personalized investment advice without proper review and approval
- Upload or share Firm confidential or proprietary information (e.g., client documents, internal policies, branding, or intellectual property)
- Create or distribute client-facing materials unless approved under Firm advertising and communications policies
- Make investment decisions or execute transactions
- Bypass Firm supervision, recordkeeping, or surveillance systems
- Use AI tools that have not been approved by the Firm

Conflicts of Interest

Use of AI must align with the Firm’s fiduciary and regulatory obligations.

- AI may not be used in a way that creates, hides, or increases conflicts of interest
- You are responsible for identifying and escalating any conflicts related to AI use
- AI outputs cannot be relied on for recommendations unless you independently determine they are in the client’s best interest
- Any conflicts must be disclosed and handled in accordance with Firm policy

At all times, client interests must come first.

Data Privacy & Security

You must follow all Firm data protection and cybersecurity policies when using AI.

- Never input client or confidential Firm information into AI tools
- Only use approved tools in a secure and appropriate manner

For additional guidance, contact Compliance at compliance@levelfourfinancial.com.

Supervision & Monitoring

Managers and supervisors oversee AI use within their teams. The Firm may monitor usage through reviews or audits. Report any concerns or suspected misuse of AI to Compliance promptly.

Policy Violations

Failure to follow this policy may result in disciplinary action, up to and including termination, and may be reported to regulators if required.

Texting & Off-Channel Communications

Texting and/or use of un-approved (off-channel) communications are strictly prohibited.

Level Four offers an app-based texting solution through Global Relay. The app allows users to send business texts from their personal device. The texts are captured on the back end and are available for review by the compliance team and also for production to our regulators as required by industry regulations.

To learn more about our texting solution, please send an email to compliance@levelfourfinancial.com.

RCI / SS&C Compliance Platform

RCI / SS&C (“RCI”) is the platform currently utilized by compliance to track...

- **Employee Brokerage Accounts**
- **Gifts and Entertainment**
- **Outside Business Activity**
- **Political Contributions**
- **New Hire & Annual Questionnaires**
- **Pre-Clearance Requests**
- **Employee Questionnaires**
- **Private Securities Transactions**
- **Professional Designations**

How to Access RCI

If you have been designated as an access person, you will receive a link and also username and password to RCI during your first week of registrations. The link is as follows:

[Employee Portal \(rciemployeetrading.com\)](http://rciemployeetrading.com)

If you do not receive a user name and password – feel free to email compliance@levelfourfinancial.com and we will get you set up. Below is the main screen dashboard that you will see when you log in.

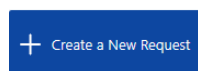
The screenshot shows the SS&C Compliance Platform dashboard. The top navigation bar includes the SS&C logo and a hamburger menu. The main content area is titled "Attestation & Request Summary" and contains several sections:

- My Attestation Documents:** A table with columns for Document Type, Sent Date Time, and Description. It shows "Showing last 0 Attestation Document(s)".
- My Pre-Trade Requests:** A table with columns for Intended Trade Date, Security Type, Security Symbol, Security Description, and Account. It shows "Showing last 0 Pre-Trade Request(s)".
- My Documents:** A table with columns for Request Date, Request Type, and Description. It shows "Showing last 0 Document(s)".
- My Other Business Requests:** A table with columns for Request Date, Request Type, and Description.

A left-hand sidebar contains navigation links for: My Dashboard, Pre-Trade Requests, Outside Business Activities, Gifts & Entertainment, Political Contributions & Donations, My Attestations, My Documents, and My Brokerage & Investment Accounts.

During your first week you will be assigned an onboarding attestation. The Questionnaire will be found under “My Attestations” on the left side of the dashboard pictured above.

Part of the attestation includes attesting that you have made appropriate disclosures about your brokerage accounts, outside Business affiliations, recent political contributions and owned private securities transactions. These can all be disclosed by clicking on the appropriate links on the left side of the RCI Dashboard pictured above and then click on....



Once you have completed each of these tasks, you will be ready to finalize your attestation.

Ongoing RCI Tasks

All gifts and entertainment purchases/receipts must be disclosed promptly under “Gifts & Entertainment”

Pre-approval is required for the following and must be submitted into RCI prior to engaging:

- Opening a new Brokerage Accounts
- Starting a new Outside Business Activity
- Making a Political Contribution
- New Private Securities Transactions
- Obtaining a new Professional Designations

Private Placements

No supervised person shall acquire beneficial ownership of any securities in a limited offering or private placement without the prior written approval of the CCO who has been provided with full details of the proposed transaction (including written certification that the investment opportunity did not arise by virtue of the supervised person’s activities on behalf of a client) and, if approved, will be subject to continuous monitoring for possible future conflicts.

To initial an approval, information relating to the private placement should be submitted to Compliance via the RCI application. This includes, but may not be limited to applicable ownership information, copies of offering documentation and copies of the subscription agreement.

Outside Accounts

Both employees and independent advisors are generally permitted to maintain accounts at the following broker dealer firms outside of Raymond James, the firm’s primary account custodian. Associated persons may hold accounts at the following Broker-Dealer firms:

Charles Schwab
Fidelity

Merrill Lynch
Morgan Stanley

Raymond James
Vanguard

Onboarding employees who hold covered accounts not held at the aforementioned Broker-Dealers must make plans to move the accounts within 30 days of hire. The list of permitted firms may expand as additional data feeds are introduced at RCI.

Covered accounts shall include accounts of the associated persons as well as accounts over which they are deemed to have a beneficial interest. Associated persons are considered to have a beneficial interest over accounts held by:

- The associated person’s spouse;
- Children of the associated person or their spouse who reside in the same household as the associated person or are financially dependent on the associated person;

- Other related persons over whose accounts the associated person has control; or
- Any other individual over whose account the associated person has control, and the associated person provides material support to the individual.

The following securities accounts are not considered to be brokerage accounts and do not have to be disclosed or moved to be in compliance with this firm policy:

- Non-brokerage retail direct mutual fund,
- Variable annuities
- Variable life accounts
- Unit investment trust (UIT) accounts
- 401k's without securities trading ability
- 529 Plans

When working to open a new account, approval must be received prior to account opening. Requests for 3210 Letters (aka 407 letters) may be directed to Compliance@levelfourfinancial.com. In order to receive approval to open a new account, they must be at one of the aforementioned brokerage accounts.

Gifts and Entertainment

Giving, receiving, or soliciting gifts in a business setting may create an appearance of impropriety or may raise a potential conflict of interest. Level Four has adopted the policies set forth below to guide supervised persons in this area.

General Policy

Level Four's policy with respect to gifts and entertainment is as follows:

- Giving, receiving, or soliciting gifts or business entertainment in a business may give rise to an appearance of impropriety or may raise a potential conflict of interest;
- Supervised persons should not accept or provide any gifts or favors or business entertainment that might influence the decisions you or the recipient must make in business transactions involving LFAS, or that others might reasonably believe would influence those decisions;
- Any extraordinary gifts or any gifts that have an aggregate value of more than \$100 annually from a single given are not permissible and must be returned or declined, absent approval by the Level Four CCO.
- Gifts of nominal value and up to \$100 in aggregate value from a single giver and promotional items may be accepted but must be reported as outlined in the Reporting Requirements section below. If giving a gift to a Level Four employee, the gift should be sent to their place of business and not to their home address.

- Business Entertainment that satisfies the requirements described above and that represent no more than \$400 per attendee at which both the supervised person and the giver are present may be accepted but must be reported as outlined in the Reporting Requirements section below. This includes without limitation business lunches and dinners, sporting, and cultural events. Supervised persons may not accept more than \$1,200 per year from any giver.

Reporting in RCI

Any supervised person who gives or accepts, directly or indirectly, anything of value from any person or entity that does business with or on behalf of Level Four, including gifts and gratuities with value and business entertainment must record and report such gift in RCI promptly upon receipt of the gift or attending the entertainment event.

Annual Questionnaires

On an annual basis, typically during start of 2nd Quarter, Level Four will distribute Annual Questionnaires to all associated persons of both the RIA and the Broker Dealer. The Questionnaires are delivered via RCI and are mandatory and should be completed by the due date. Associated persons will receive an email from noreply@dstsystems.com to let them know that the Questionnaire is ready for them to complete. Please white list this address so that it does not go into your email "Junk" folder.

Advertising Review

Compliance Pre-Review and Approval Required

The firm requires that all "Retail communication" be pre-reviewed by Compliance prior to distribution to clients. This includes any written (including electronic) communication that is distributed or made available to more than 25 retail investors within any 30 calendar-day period.

A "Retail investor" means any person, other than an institutional investor, regardless of whether the person has an account with a member firm.

An example of documents that should be submitted into Quest for pre-review are:

- Newsletters
- Website (Initial and Updates)
- Updates made to Social Media Sites (LinkedIn, Twitter, etc.)
- Business Cards and Letterhead
- Promotional Materials, Brochures and/or Handouts
- Speaking Engagement Presentations / Speeches
- Television/Radio Scripts
- Press Releases
- Seminar or Event Invitation (Including the attendee list)
- Newspaper/Magazine/Billboard/Telephone Listing

If you have a question about what requires pre-approval, please do not hesitate to reach out to the compliance department at compliance@levelfourfinancial.com. We are happy to assist!

No Pre-Review Required

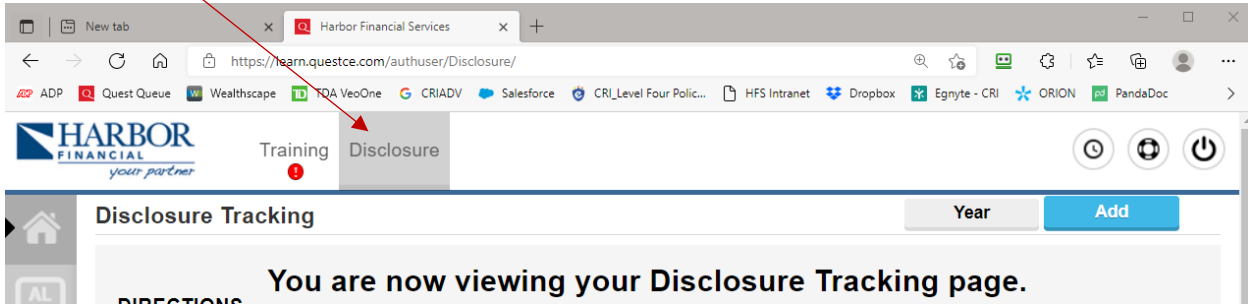
The firm does not require that correspondence be pre-reviewed. Correspondence includes any written (including electronic) communication that is distributed or made available to 25 or fewer retail investors within any 30 calendar-day period.

Every FP should be maintaining a correspondence file and is required to forward all Correspondence to Compliance as part of their End of Month attestations. Correspondence will be reviewed by Compliance on a monthly basis as part of the firm's ongoing supervision of your branch.

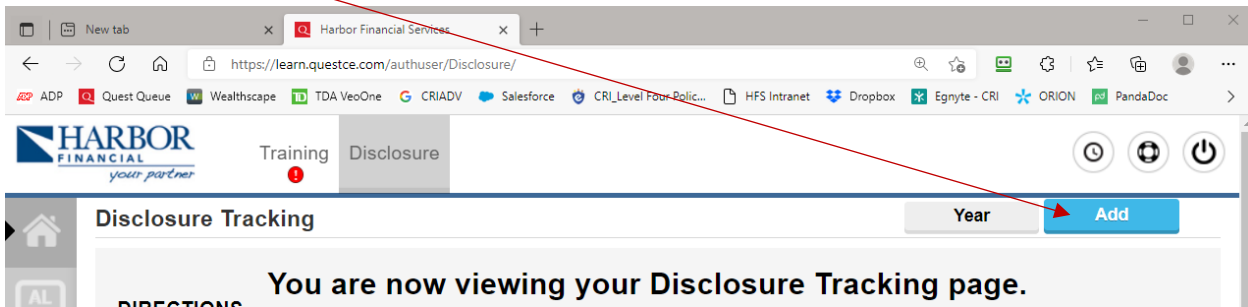
How to Submit Retail Communications to Compliance

All Advertising review materials should be submitted through QuestCE. To access, go to <https://learn.questce.com/harborfs>, and enter your username/password when prompted. Your username should be your email address. If you have not received an email with your user name and password to QuestCE, please request by sending an email to compliance@levelfourfinancial.com. Once access is obtained, follow the instruction below to submit your documents for Compliance review:

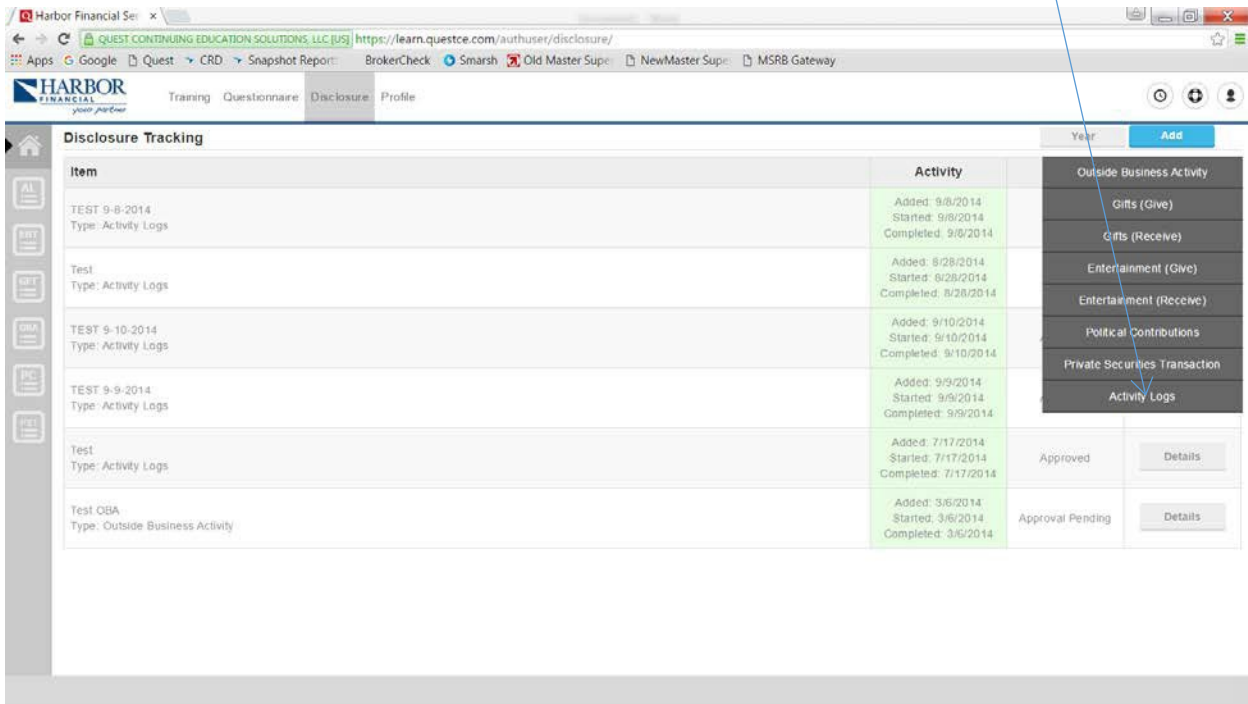
Click "Disclosure" menu



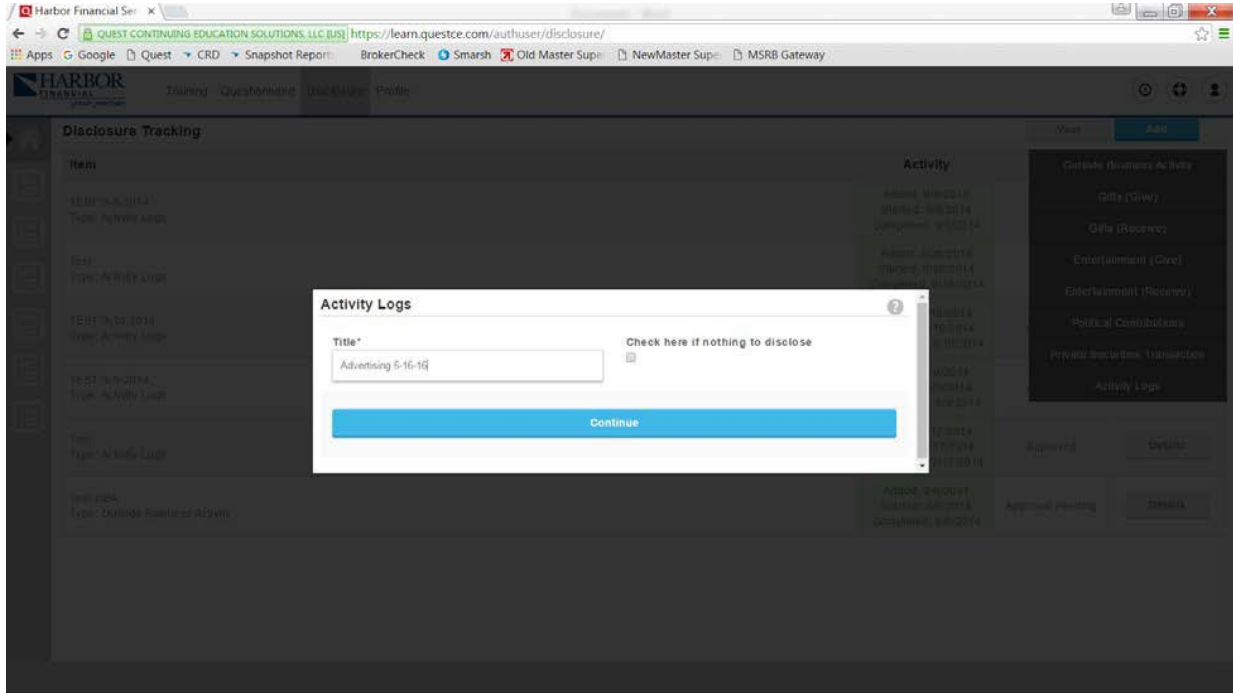
Then choose "Add" button at the top right for a new disclosure



Select the type of disclosure from the list. For advertising review request, click "Activity Logs"



Give the new request a name (i.e.. Weekly Newsletter, LinkedIn Update etc.)



Complete questions 1-16 as prompted. Question 4 will prompt you to upload a file via the “Upload Files” button. When you finish, you will see your disclosure item listed in the list and the status as noted in the “test” submission below.

Item	Activity	Status	Action
Test Type: Activity Logs	Added: 9/13/2021 Started: 9/13/2021	In Progress	Continue

Any questions regarding the Advertising submission process should be directed to Compliance@levelfourfinancial.com.

Presentations, Events & Public Appearances

FINRA Rule 2210 requires firms to establish appropriate written policies and procedures to supervise public appearances by associated persons.

Public Appearances are subject to the general content standards for communications; they be fair and balanced and not include false or misleading statements.

Scripts, slides, handouts or other written (including electronic) materials used in connection with public appearances are considered communications for purposes of the Rule and must be approved and maintained by the firm.

Level Four General Policies

Marketing Events/campaigns and Public Appearances should be disclosed to the firm several weeks ahead of the event date in [QuestCE](#). The disclosure should include, at a minimum, the following information:

- Information relating to the event/appearance...who, where, when, purpose, products discussed etc.
- Copy of the Invitation or Social Media Post relating to the event/appearance
- A list of the individuals invited to the event (if invitations are sent)
- Copy of the finalized presentation at least 1 week before the event/appearance
- Copies of any handouts that will be given to attendees
- Information as to who will be speaking and if the speakers will be paid
- Any other information relating to the event/appearance

Level Four Employee Policies

All Events & Public Appearances must be pre-approved by the firm's Chief Growth Officer, Dave Geshke, and go through the firm's Marketing Department. Pre-Approval* includes information relating to the following:

- Travel costs associated with the event/appearance (i.e. Hotel, flights etc.)
- Venue costs
- Budgets
- Subject matter
- Speakers
- Presentations, Flyers & Level Four Branding
- Give aways to attendees

In addition to the submission outlined above in QuestCE, events/campaigns should be submitted to the firm in Salesforce > [Events/Campaigns](#). Once documentation is reviewed in QuestCE, approval will follow in Salesforce if all documentation is received. Once marketing and compliance have approved, the event will be directed to executive leadership for review and approval.

Employees should provide cost details within the form but ALSO request reimbursement approval through Sales Force. ***As noted, costs associated with events may not be reimbursed if pre-approval is not received by David Geshke.**

Securities Licensing & Registrations

Personal Information U4 Updates

The following information is required to be accurate on your Form U4. In order to update the following information please email registrations@levelfourfinancial.com promptly. The email will start the process, additional information may be requested for Compliance to make the appropriate filings.

- Updated residential address
- Updated branch address
- Name change
- Bankruptcy
- You have a lien (open or closed)
- Arrest for ANY charge
- You are contacted by a regulator
- You are involved in a legal matter (business or personal)

State Registrations (Registered Representative)

To add or remove a state from your registrations, please email registrations@levelfourfinancial.com and the registrations team will update your state quickly and let you know once it has been approved/completed.

Please be advised of the following firm policies related to state registrations:

- It is the firm's policy that there are no exceptions for any de minimis rules for any individual states. Registered Representatives must be registered in each state where they have a brokerage customer residing in order to receive commission for that customer.
- Requests for state registrations must be made prior to opening a brokerage account in that state. Failure to comply with this requirement may open the registered representative up to state issued fines and/or sanctions. Any fine issued by a state for failure to register will be the responsibility of the representative.
- Any representative that is part of a joint rep code, both representatives must maintain state registrations in the customer's state.

State Registrations (Advisory)

As Level Four Advisory Services, LLC is an SEC registered investment advisor, Investment Advisor Representatives are only required to register in their home state. The two exceptions to this rule are the states of Texas and Louisiana. Advisors with clients in Texas and/or Louisiana must also be registered in these states to receive advisory fees.

Regulation Best Interest (RegBI)

As part of RegBI, the SEC adopted four obligations that impact you.

The SEC's [Regulation Best Interest \(Reg BI\) under the Securities Exchange Act of 1934](#) establishes a "best interest" standard of conduct for broker-dealers and associated persons when they make a recommendation to a retail customer of any securities transaction or investment strategy involving securities, including recommendations of types of accounts.

When making such a recommendation to a retail customer, you must act in the best interest of the retail customer at the time the recommendation is made, without placing your financial or other interest ahead of the retail customer's interests.

This **general obligation** is satisfied only if you comply with four specified **component obligations**:

- **Disclosure Obligation:** provide certain required disclosure before or at the time of the recommendation, about the recommendation and the relationship between you and your retail customer;
- **Care Obligation:** exercise reasonable diligence, care, and skill in making the recommendation;
- **Conflict of Interest Obligation:** establish, maintain, and enforce written policies and procedures reasonably designed to address conflicts of interest; and
- **Compliance Obligation:** establish, maintain, and enforce written policies and procedures reasonably designed to achieve compliance with Regulation Best Interest.

Record-making and Recordkeeping: You must also comply with new record-making and recordkeeping requirements.

As previously discussed, the SEC also adopted new rules and forms to require broker-dealers and investment advisers to provide a brief relationship summary, [Form CRS](#), to retail investors. This can easily be done using the firm's **LF-019 JotForm that initiates the email of all required disclosures, including Form CRS to new and prospective clients.**

What recommendations are covered?

Regulation Best Interest applies to recommendations of any securities transaction or investment strategy involving securities (including account recommendations).

What is a recommendation? The determination of whether a broker-dealer has made a recommendation that triggers application of Regulation Best Interest turns on the facts and circumstances of a particular situation, and therefore, whether a recommendation has been made is not susceptible to a bright line definition. Factors considered in determining whether a recommendation has taken place include whether the communication "reasonably could be viewed as

a ‘call to action’” and “reasonably would influence an investor to trade a particular security or group of securities.” The more individually tailored the communication to a specific customer or targeted group of customers about a security or group of securities, the greater the likelihood that the communication may be viewed as a “recommendation.”

We interpret whether a recommendation has been made to a retail customer that triggers the best interest obligation consistent with precedent under the anti-fraud provisions of the federal securities laws as applied to broker-dealers and with how the term has been applied under the rules of self-regulatory organizations (such as FINRA).

Regulation Best Interest does not apply to investment advice provided to a retail customer by a dual-registrant when acting in the capacity of an investment adviser, even if the retail customer has a brokerage relationship with the dual-registrant or the dual-registrant executes the transaction in a brokerage capacity.

Account recommendations include recommendations of securities account types generally (e.g., to open an IRA or other brokerage account), as well as recommendations to roll over or transfer assets from one type of account to another (e.g., a workplace retirement plan account to an IRA). As discussed more below, special considerations exist where the financial professional making the recommendation is dually-registered.

Any securities transaction or investment strategy involving securities includes:

- explicit hold recommendations; and
- implicit hold recommendations that are the result of agreed-upon account monitoring between the broker-dealer and retail customer. Special considerations for providing agreed-upon account monitoring are discussed more below.

When making an account type recommendation, does RegBI apply?

Dually registered financial professionals: If you are a financial professional who is dually registered (i.e., an associated person of a broker-dealer and a supervised person of an investment adviser (regardless of whether you work for a dual-registrant, affiliated firm, or unaffiliated firm)) making an account recommendation to a retail customer, whether Regulation Best Interest or the Advisers Act applies will depend on the capacity in which you are acting when making the recommendation. If you are acting as a broker-dealer or associated person thereof, you must comply with Regulation Best Interest and will need to take into consideration all types of accounts that you offer (i.e., both brokerage and advisory accounts) when making the recommendation of an account that is in the retail customer’s best interest.

Individuals registered only as broker-dealers or associated persons: If you are only registered as an associated person of a broker-dealer, Regulation Best Interest will apply to that account recommendation, but you need to take into consideration only the brokerage accounts available. You can only recommend a brokerage account that the broker-dealer offers if you have a reasonable basis to believe that the recommended brokerage account is in the best interest of the retail customer, and the broker-dealer otherwise complies with Regulation Best Interest.

Brokerage Account Voluntary Review: You may voluntarily, and without any agreement with your customer, review the holdings in your retail customer’s account for the purposes of determining whether to provide a recommendation to the customer. This voluntary review is not considered to be “account monitoring,” nor would it in itself create an implied agreement with the retail customer to monitor the customer’s account.

Any explicit recommendation made to your retail customer as a result of any such voluntary review would be subject to Regulation Best Interest and should be documented.

Questions regarding Regulation Best Interest should be directed to the Broker Dealer CCO. Contact information is noted under “Compliance Contacts” in this document.

Conflicts of Interest

The Firm expects the undivided loyalty of its associates in the conduct of Firm business. It is important that associates be free from any financial interests or other relationships that might conflict with the best interests of the Firm and/or cloud their judgment in carrying out the business affairs of the Firm. A “conflict of interest” exists when a person’s personal or professional interest is averse to (or may appear to be averse to) the interests of the Firm. As an example, a conflict of interest may arise when an associate or a member of the associate’s family receives improper personal benefits as a result of the associate’s position within the Firm.

Disclosure Obligations

LFAS Advisors are required to provide the following documents to all new clients:

If the client account is an LFAS advisory account:

- Form ADV Part 2B supplement (individual representative supplement)
 - LFAS Form ADV Part 2A (*for non-wrap accounts*)
- OR**
- LFAS Wrap Brochure (*for wrap accounts*- Specific to the wrap program in which the client is participating)
 - ICA Platform
 - LFAS Form CRS

If the client accounts is managed by LFCM the client must ALSO receive the following:

- LFCM Form ADV Part 2A
- LFCM Form CRS*

If opening a Securities Backed Line of Credit:

- Securities Backed Line of Credit Disclosure (SBLOC) Must be sent to all clients
- SBLOC Checklist must be completed and signed by Rep, Client and Branch Manager

Form CRS:

- Must be sent prior to opening a new account **or**

- Before or at the time a recommendation is made to convert a client account platform (*brokerage to advisory / advisory to brokerage / fee-based platform change*) **or**
- A recommendation is made for a client to roll over assets from a retirement account into a new or existing account or investment.
- Clients opening new Brokerage accounts must deliver the Form CRS Supplemental Brochure

This is A LOT TO REMEMBER – We have tools to make it easy for you!!

Automated Disclosure Process:

The firm provides a “Jot Form” to aid in the disclosure delivery process:

A link to the Jot Form is here: [Form CRS & Disclosure Jot Form Link](#)

When you have a new client or prospect complete the Jot Form and the correct and up to date disclosures will be delivered directly to the client via email or you can print them out for personal delivery or mailing. You should document when mailed or delivered if not using the email function. **The system will track all forms so that you are able to evidence their delivery which is a regulatory requirement.**

Advisory Client Annual Reviews

Annual account reviews are required for all advisory accounts each year.

The firm utilizes the LF169 JotForm to evidence the complete of these reviews. The JotForm may be found in “Drop Box/Level Four Network Documents/LFAS Advisory Account Review Form - LF169”. A link is provided below. Please save this in your browser for ease of access.

[Annual Review Form](#)

*Please note that any changes to the client’s fee schedule needs to be communicating to the firm’s Operations Department. Updating the fee schedule on the FL169 form will not relay to the firm’s back office.

Outside Email Addresses

Independent Advisors are permitted to request approval to utilize a non-Level Four Financial email address. In order to do so, the advisor must agree to allow the email domain to be under the control of the firm, must adhere to the firm's encryption policy to send secure emails and must agree to comply with the firm's policies with respect to using email to communicate with clients and prospects. Per regulations, all emails to and from the approved domain must be captured into the firm's email review software and emails will be reviewed by the firm's Branch Managers in accordance with regulatory guidelines and the firm's policies and procedures. Please note that there is a one-time \$350 set up fee that will be passed through to independent advisors that utilize their own email domain.

No persons associated with either the BD or the Advisor are permitted to utilize an outside email (non-captured) address for business purposes. Failure to follow this policy will result in a fine and sanctions which may include termination from the firm.

Document Integrity

To protect both clients and the Firm, associates are not permitted to complete missing information or correct erroneous data in an account-related document after the client has signed the document.

Prohibited actions:

- Signing a document on behalf of a client.
- Asking a client to sign a blank or incomplete document.
- Presenting only signature page(s) to a client, rather than the full document in its entirety.

Associates are permitted to correct errors and/or incomplete information either by:

- Returning the incomplete/inaccurate document to the client to amend by adding their missing information and/or correcting erroneous data and initialing or signing and dating next to each change.
- Pre-filling the client's completed/corrected information in a new, unsigned document and sending the new document to the client for review/signature.
- Errors and/or incomplete information related to home-office or internal use only fields (branch number, FA number, etc.) may be corrected by branch or home office associates.

Social Media Policy

Any Associated Person who wishes to use a social networking site such as LinkedIn, Twitter or Facebook for personal use is able to do so as long as they abide by the following firm policies relating to usage social media.

If using social media site for personal use only, the associated person must NOT:

- use their social networking profile to conduct or solicit securities business of any type.
- use their social networking profile to communicate with clients or prospects.
- mention the firm for their profession in any posts without prior approval from Compliance.
- have any LinkedIn recommendations and/or endorsement that could be construed as a testimonial or endorsement from a client.

If using the social media site for business purposes, the associated person MUST:

- obtain pre-approval from compliance which includes information included the associated person's profile
- submit all social media posts for pre-approval through the firm's Quest Advertising Submission queue.
- link social media site(s) within the Firm's compliance tool, Global Relay, which will capture all communications into/out of the linked social media site for compliance review and archiving.
- add the following disclosure to their social media site that they are using for business purposes.

"Level Four Financial, LLC reserve the right to retain, monitor, and reproduce all electronic communications consistent with applicable law. The Firm will not accept purchase or sales orders via LinkedIn, Facebook, or any electronic messaging systems. The comments, postings or views expressed are my own and do not necessarily reflect that of the Firm. Level Four Financial, LLC is not responsible for content posted by third parties. Statements and messages are for U.S. residents only, and all products and services mentioned may not be available in all states. This page is for informational purposes only and should not be construed as a recommendation to buy or sell products or to provide investment advice."

Social Media Best Practices

The keys to success in social media are being honest and being thoughtful before posting and respecting the purpose of the social media community.

- **Be Transparent**—An authorized independent producer for a company should identify him or herself clearly. Never hide an identity for the purpose of promoting a company through social media. Use of social media should focus on a brand as a resource on issues relating to insurance or retirement planning solutions.
- **Be Thoughtful**—Remember that this is a public forum; please do not communicate anything that should not be public knowledge.

- **Be Respectful**—As with all forms of communications producers must be professional and respectful in online communications. It is critical to treat the Company, employees, producers, customers and competitors with respect. Do not post any material that is obscene, offensive, profane, defamatory, threatening, harassing, abusive, hateful, or embarrassing to another person or entity. Disparaging remarks and disrespectful communications may result in your company or producer appointment being terminated.
- **Be Accurate**—Be truthful in all marketing. Verify all the facts before disseminating any information. Online reputations are better served by verifying and sourcing the correct information the first time rather than having to post a correction or retraction. Specifically cite sources when possible. If an error is made, correct it quickly and visibly. T
- **Think Before Posting**—There’s no such thing as a “private” social media site. Search engines can turn up posts years after the publication date. Comments can be forwarded or copied. Archival systems maintain information even if a post has been deleted. Ask “How will this look if everyone views it?” before posting.
- **Maintain Confidentiality**—Do not post confidential or proprietary information about LFAS or its employees. Do not use or disclose any client personal identifiable information of any type on any social media. Even if an individual is not identified by name within the information, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of law and company policy.
- **Follow Fair Use and Copyright Laws**—Linking to or citing another’s work is the best blogging policy. It is essential to respect copyrighted material and to source materials as appropriate. This includes copyright laws for text as well as images, videos, and music.
- **Be Responsible**—Representatives and their employees are personally responsible for posts, blogs, wikis, or other forms of online communication. Keep in mind that anything written online will remain online for a long period of time. One of our Company’s core values is integrity, and the Company expects representatives to use personal responsibility whenever participating in online communication in any social media format. This includes breaching the trust of those with whom the representative is communicating. Conduct any advertising or promotion via social media with the same responsibility as is required with written material.
- **Do Not Be Confrontational**—If misrepresentations about the Company are identified in the media, by analysts, or other online communicators, please notify the Company’s appropriate representatives. Do not engage in an interactive dialogue with the individual over social media.

Check Deposit Procedures

When a client check is received at your office for deposit into a Raymond James client account, there are two options:

Self-Deposit:

1. Scan and complete your deposit via Advisor Access > My Client > Money & Security Movement > Check Deposit (Check must be deposited in its original form, as received in the mail)
2. Print the RJ Deposit Confirmation
3. Date stamp check with date received (Do NOT write on the check until after it is scanned into the system)
4. Make a back and front copy of the check
5. Complete the Level Four Financial Daily Check Blotter (located in Level Four Financial EOM packet)
6. Send all documents to admin@levelfourfinancial.com at the end of the business day for Branch Manager Review.

Overnight Checks to Raymond James for Deposit:

1. Enter the information under Advisor Access > My Clients > Money & Security Movement > Check Deposit
2. Print the check in transit confirmation
3. Date stamp check with date received
4. Make a back & front copy of the check
5. Complete the Level Four Financial Daily Check Blotter (located in Level Four Financial EOM packet)
6. Create a form of overnight delivery label with tracking option through UPS, FedEx or USPS
7. Overnight the check and copy of the RJ Check in transit confirmation to Raymond James at 880 Carillon Parkway, St. Petersburg, FL 33716
8. Send copies of all of the above to admin@levelfourfinancial.com for Branch Manager Review
9. Verify receipt of the following day and note in the Level Four Financial Daily Check Blotter

Check received for deposit into Direct Accounts held at the Fund Company:

1. Date stamp check with date received
2. Make a back & front copy of the check
3. Complete the Level Four Financial Daily Check Blotter (located in Level Four Financial EOM packet)
4. Create a form of overnight delivery label with tracking option through UPS, FedEx or USPS
5. Overnight the check to the Fund Company
6. Send copies of all of the above to admin@levelfourfinancial.com for Branch Manager Review
7. Verify receipt of the following day and note in the Level Four Financial Check Blotter.

Important Reminders

***Do NOT hold checks overnight**

***Do NOT accept checks made out to the Advisor DBA, Advisor or Level Four Financial, LLC**

Checks should be made out to Raymond James

***Checks must be sent Overnight and a Tracking Number must be recorded**

Privacy

In the conduct of business, the Firm and its associates collect and retain personal and confidential information about individuals. To strike a workable balance between the need for information and the privacy of individuals, associates shall be guided by the following principles in the collection, storage, use, and dissemination of information about the persons to whom the Firm provides investments, insurance products, and other services.

1. Seek to obtain personal information only if pertinent to the effective conduct of Firm business.
2. Obtain personal data by lawful and ethical means only and, to the extent practicable, obtain it directly from the individual concerned.
3. Make every effort to ensure the accuracy, completeness, timeliness, and relevance to the specific business purpose of any information concerned.
4. Make every effort to inform the individual what information will be collected, how it will be collected, and for what purposes it will be used. This requirement shall not apply to investigations involving possible criminal activity, fraud or security violations, and internal investigations by the Audit, Compliance, Legal or other departments.
5. Where required by law, make available to individuals any information that is maintained on them.
6. In so doing, the Firm reserves the right to protect the privacy of the source of the information.
7. Permit clients or associates to clarify or supplement the information held by the Firm, and to correct or delete any information known to be inaccurate.
8. Limit access to information in the Firm's records to those persons who have a bona fide business related need to see it, or whose request is based on valid legal process or proper regulatory purpose.
9. Store and safeguard confidential information in a manner appropriate to its nature.
10. When creating, designing, or revising any information system, ensure that the system as designed or revised is consistent with these principles.

Continuing Education

Quest

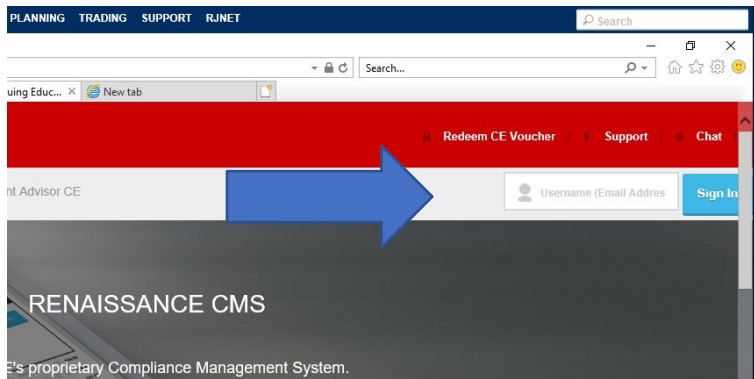
Both the BD and RIA utilize Quest CE for Firm Element and RIA CE Training. Once courses are assigned you will receive a notification from Quest CE that your CE is required with a due date and log in instructions. While the platform is straight forward, if you have trouble, below are step-by-step instructions on how to access your courses.

Firm Element Course Log in Instructions

Access the online training website by clicking on the following link:

<https://learn.questce.com/>

1. Enter your Username (your email address) in upper right box

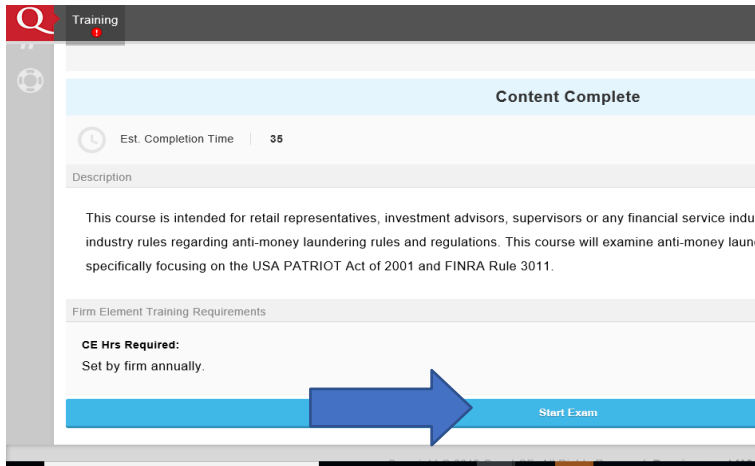


2. Enter your password. First time user password is Welcome+123
3. Select continue
4. Start your course by selecting Start button

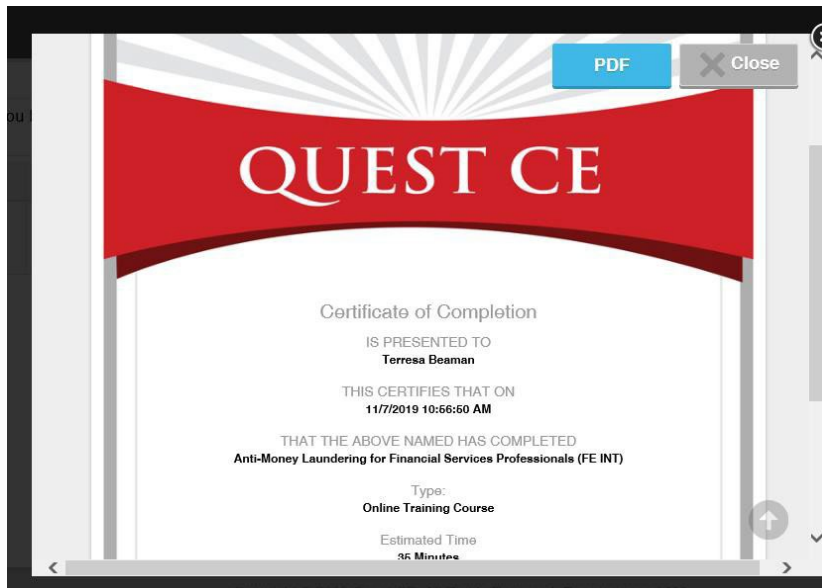
Firm Element

Status	Title	Content	Exam
Not Started	Annual AML Update: COVID-19 Risks, Legislative Updates, and Enforcement Actions (FE INT)	Start	
Not Started	Cybersecurity: Phishing (FE INT)	Start	

5. When you complete your course, scroll down your screen to [Start Exam] tab



6. To Print your Course certificate, Select [Open Certificate of Completion].



Please direct any questions regarding QuestCE Access to Compliance@levelfourfinancial.com and we will be happy to assist!

Investment Advisor Representative (IAR) Continuing Education

Every investment adviser representative (IAR) registered in a jurisdiction that has adopted the model rule is subject to its continuing education (CE) requirements. The mandatory CE program applies to all registered IARs of both state-registered and federal covered investment advisers. Each year, IARs will need to attain 12 CE credits to maintain their IAR registration. The 12 credits must include six credits of Products and Practice and six credits of Ethics and Professional Responsibility. For those that are dually

registered with a Broker Dealer Firm, the Products and Practice credits may be obtained by completing the Regulatory Element CE via FinPRO (see below for additional information).

See the [NASAA Model Rule on Investment Adviser Representative Continuing Education](#) for complete details.

For those FPs that are required to complete IAR CE, based on their state registrations, the firm will issue the training via Quest. Follow the instructions noted above to complete this training each year in order to maintain your SEC IAR Registrations.

Annual Regulatory Element Continuing Education / FinPro

Beginning Jan. 1, 2023, registered persons will be required to complete CE Regulatory Element annually by Dec. 31. Additionally, CE participants will now receive content tailored specifically to each representative or principal registration category that they hold. Individuals who fail to complete their Regulatory Element within the prescribed annual deadline of Dec. 31 will be automatically designated as CE inactive by FINRA.

All registered persons will need to complete their Regulatory Element CE via FINRA’s FinPro site.

[Financial Professional Gateway \(FinPro\) | FINRA.org](#)

Once on the site the FP will be able to create an account or log-in to their existing FinPro account to complete the required training. The training MUST be completed annually in order to maintain licenses in good standing with both FINRA and Level Four.

First-Time FinPro Users	Returning FinPro Users
<p>Before creating an account: Have you self-enrolled in an exam or used one of these FINRA systems? If so, you can use the same system credentials to log in to FinPro.</p> <p>Can't remember your user id or password? Recover them via email.</p> <p>CREATE AN ACCOUNT</p>	<p>If you have logged in to FinPro before, sign in or quickly retrieve your credentials through the buttons below.</p> <p>Note: You may need to create a new FinPro account if more than three years have passed since your last login. FinPro credentials are automatically deleted after 36 months of inactivity.</p> <p>LOG IN TO FINPRO</p> <p>FORGOT USER ID OR PASSWORD</p>

In addition to taking your CE, you will be able to verify information on your U4, sign up for email alerts relating to CE or other topics and review FINRA announcements amongst other things on the FinPro site.

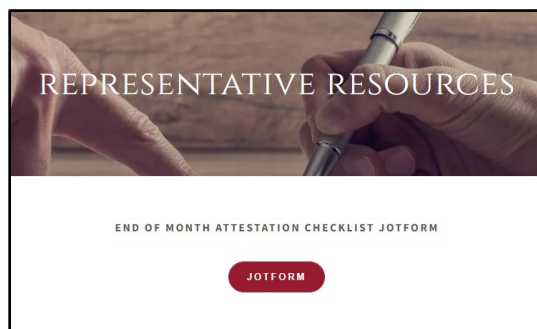
End of Month “EOM” Packet

Requirement

The EOM Packet is due not later than the 10th day of the month for the previous months business (*example: November work is due by December 10th*).

End of Month (EOM) Attestations Checklist JotForm – This simple to use form allows our registered producers to submit their EOM attestations systematically. All physical materials relating to this form should be sent to Admin@levelfourfinancial.com.

The EOM form is available on the firm’s [intranet](#) under [Compliance/Representative Resources](#).



In order to successfully submit the EOM Packet, you will need to:

1. Send all client correspondence for the reporting month to admin@levelfourfinancial.com or acknowledge on the JotForm that there was none.
2. Provide copies of all physical security certificates deposited for the reporting month to admin@levelfourfinancial.com or acknowledge on the JotForm that there was none.
3. **On a daily basis** - provide copies of the front and back of all checks deposited for that day to admin@levelfourfinancial.com. If overnighted, please send a copy of the UPS/FedEx label used to send the check to the fund company and/or the Clearing Firm. You will be required to attest to providing this information to Level Four on a daily basis as part of the EOM JotForm process.
4. Acknowledge that all Gifts and Entertainment were reported to Compliance via the RCI Compliance applications discussed earlier in this manual.
5. Acknowledge that all Registration updates were reported to Registrations@levelfourfinancial.com where applicable. This includes the following which are required to be reported promptly:
 - a. Any compromise with creditor, judgment, lien or bankruptcy filings
 - b. Any misdemeanor or felony charges
 - c. Business or Residential Address Changes
 - d. Any outside business affiliation not already reported.

- e. Name Changes
- f. Any other updates that need to be made to your U4.

Turning in your EOM Packet

Make sure to access and complete the EOM JotForm not later than the 10th day of each month. It is as simple as making your attestations and clicking on “submit”.

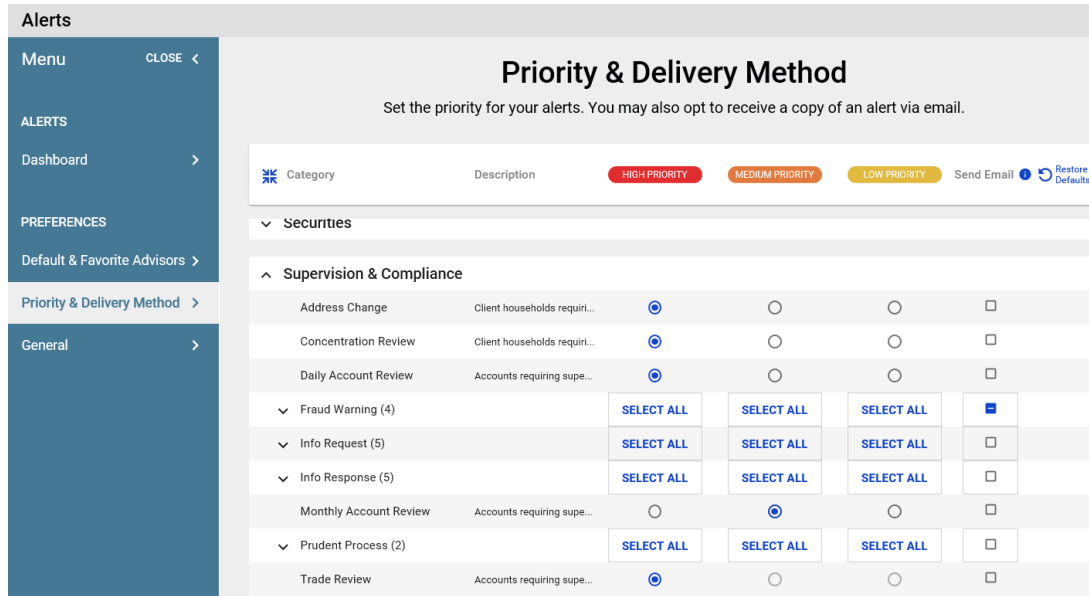
Late Fee Policy

The EOM acknowledgement is an important tool utilized by the firm to supervise its registered producing associates. The EOM acknowledgements are due on or before the 10th of each month. Any EOM acknowledgements not received by the 15th of the month will result in a \$50 fine to the advisor. The fine will continue to increase by \$50 for each additional week late until the packet is received. Please help us stay compliant by getting your EOM acknowledgements and associated materials turned in on time.

Raymond James Alerts Portal

Please make sure that you are checking your Alerts Portal on the Raymond James Advisor Access Platform **DAILY**.

On your advisor access menu bar select “My Practice>Alerts” to view your individual alerts. To get started, make sure that your Alerts Setting is set to receive inquiries from Compliance as shown below:

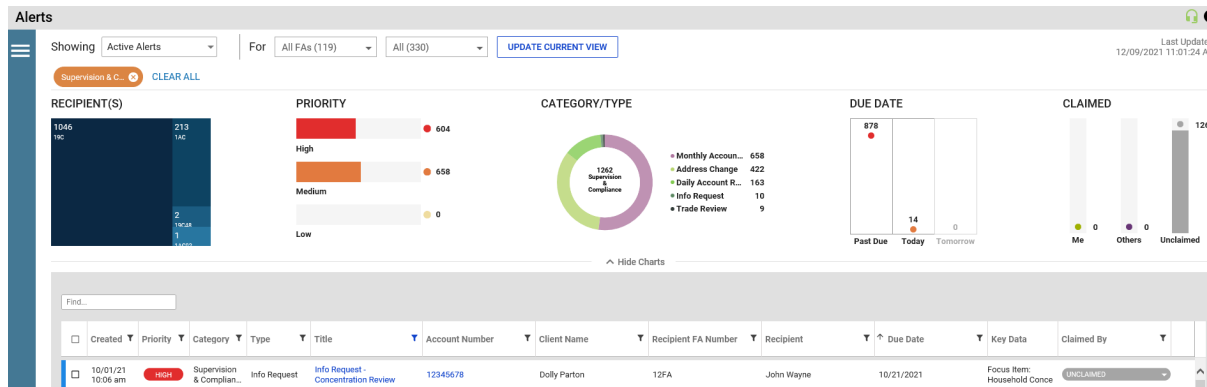


Click the “down arrow” on the left side of the alert name to expand to see the individual alerts. There are different options for receiving alerts, select which you feel will work best for you; they can always be updated.

Responding to Requests for Information

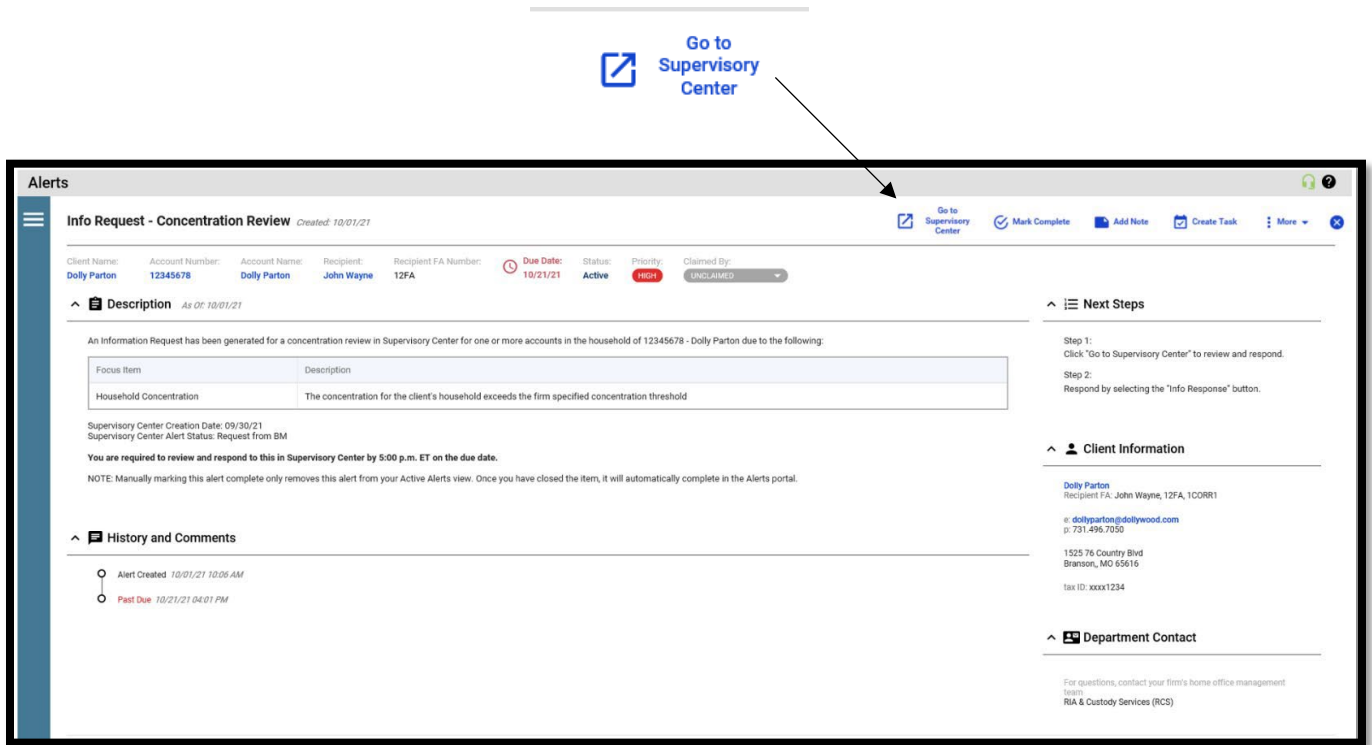
This short guide will help you correctly respond to Requests for Information (RFI) sent to you from your branch manager.

First, to open a request for information, you will click on the title of the alert in the Alerts Portal.

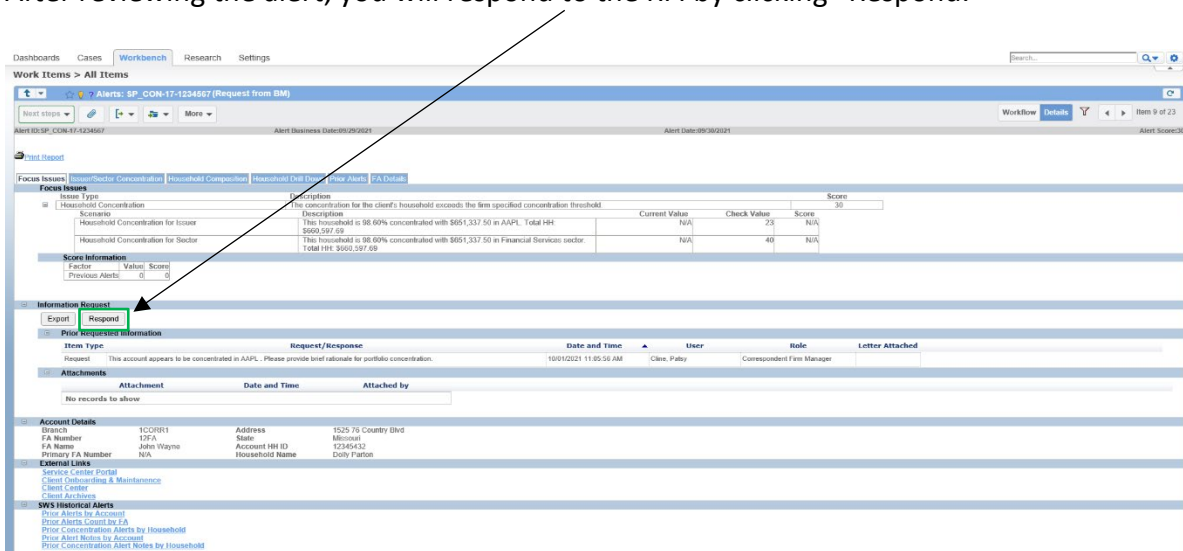


Next, you will be taken to the Alert Details screen for that particular alert.

Step 1: To respond to the request for information, click the “Go to Supervisory Center” button at the top right of the Alert Details screen.



This will take you into the Supervisory Center application, where you can review the alert in further detail, look at past alerts for this account or relationship, and perform additional research if needed. After reviewing the alert, you will respond to the RFI by clicking “Respond.”



A popup will appear that will allow you to type in a response to the request, attach any files, if necessary, then submit the response.

Alert Id: SP_CON-17-1234567 Account: 12345678
Account HH ID: 12345432 Account Name: Dolly Parton
To: Cline, Patsy

Prior Requested Information

Item Type	Request/Response	Date and Time	User	Role	Letter Attached
Request	This account appears to be concentrated in HFBL . Please provide brief rationale for portfolio concentration.	10/01/2021 11:05:56 AM	Cline, Patsy	Correspondent Firm Manager	

Response*

Attach Files

Attachments

Attachment	Date and Time	Attached by
No records to show		

Upon submitting the response, it will appear in the Supervisory Center alert and notify your branch manager/compliance officer that the request has been fulfilled. Additionally, the alert in the Alerts Portal will be marked complete and closed out of your active work items.