

ADV Part 3 / Form CRS Delivery Requirements

Initial Delivery

Firms must deliver the ADV Part 3 Customer Relationship Summary “Form CRS” to each retail investor before or at the earliest of the time you: (i) enter into an investment advisory contract with the retail investor; (ii) make a recommendation of an account type, a securities transaction, or an investment strategy involving securities; (iii) place an order for the retail investor; or (iv) open a brokerage account for the retail investor.

Paper/Electronic Delivery and Website posting

Electronic Delivery: Form CRS may be delivered electronically. If delivered electronically, it must be presented prominently in the electronic medium.

Paper Delivery: If you provide the Form CRS along with a package of documents (i.e. to initial clients with a copy of their agreements, privacy policy, etc.); the Form CRS must be at the top of the package.

Website: If you have a website, you must post the current Form CRS in a location and format easily accessible for retail investors.

Amendments and Delivery Requirements

- Firms must update Form CRS and file it within 30 days whenever any information becomes materially inaccurate.
- Firms must communicate, without charge, any changes in the updated Form CRS to retail investors who are existing clients within 60 days after the updates are required to be made.
- Each amended Form CRS must highlight the most recent changes by, for example, marking the revised text or including a summary of material changes. The additional disclosure showing revised text or summarizing the material changes must be attached as an exhibit to the unmarked amended relationship summary.

Additional Delivery Requirements to Existing Clients

Firm must re-deliver Form CRS to existing clients upon any of the following “triggering events”:

- opening a new account that is different from the retail investor’s existing account(s);
- recommending that the retail investor roll over assets from a retirement account into a new or existing account or investment;
- recommending or providing a new brokerage or investment advisory service or investment that does not necessarily involve the opening of a new account and would not be held in an existing account, for example, the first-time purchase of a direct-sold mutual fund or insurance product that is a security through a “check and application” process, i.e., not held directly within an account; and/or
- Within 30 days upon the retail investor’s request.

See also: <https://www.sec.gov/investment/form-crs-faq>

Note: Unlike ADV 2A, there is not currently an annual delivery requirement associated with Form CRS.

Please let us know if you have any questions whatsoever.