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## From The Desk Of The CEO:

Welcome to the 4th Quarter of 2021!

### ***ESOP Announcement***

#### The PCS Employee Stock Ownership Plan and Trust

PCS is pleased to announce the establishment of the PCS ESOP retirement plan for qualifying PCS Home Office employees. The ESOP is one of Private Client Services' most integral long-term business attraction, retention, compensation, and business continuity plans. It was initially conceived many years ago and has been studied and re-evaluated for many years. The business succession plan for PCS has been openly discussed with almost every advisor affiliated or considering affiliation with PCS, and is now taking the next step towards completing that plan.

The importance of the ESOP for everyone already associated with PCS, in any capacity (Employee, Registered Representative, Independent RIA Firm, vendor, etc.), or those considering an affiliation with PCS in the future is significance. Simply stated, the certainty which is defined by PCS becoming an ESOP company creates a permanent plan of employee ownership.

PCS wants to thank the many individuals from both large and smaller affiliated firms who have provided insight to the value of PCS being an ESOP company. Over the years, PCS was often asked to define the long-term business plan of the company from a longevity perspective. The ESOP accomplishes many objectives of the company for planning purposes well into the future. As a retention and attraction vehicle an ESOP allows PCS to maintain the best and the brightest employees and rewards them for their hard work and performance.

For our valued field associates and their affiliated organizations, it assures continuity of PCS management and key personnel. A major benefit to every registered representative is the additional security and knowledge that PCS, as their broker-dealer, has a retirement plan for its' employees that by its' very existence also provides long term succession planning for PCS employees, senior management, and shareholders that creates stability and longevity for your business. It eliminates the distractions and uncertainties many other firms have exposed registered representatives to. Our ESOP plan assures a strong foundation and future to anyone associated with PCS.

PCS has selected One America, who already handles the PCS 401 (k) plan, as the ESOP administrator. The plan was officially started for calendar year 2020 and has been funder for that year. Valuation of PCS stock will occur each calendar year immediately following the filing of required PCS audited financial statements with the Securities and Exchange Commission.



**CEO COMMENTS (CONTINUED):**

Some key facts about ESOP companies in general are available from the following resources: NECO (national Center for Employee Ownership) and ESOP (The ESOP™ Association). PCS has chartered an ESOP Committee consisting of a variety of home office employees and initially being chaired by Todd Oberhausen. PCS is pleased to make this important retirement benefit available to its' employees and believes it benefits all stakeholders in a multitude of ways.

As always, this newsletter is distributed in order to communicate important information related to the important projects and initiatives which are under way, regulatory updates, and policy and procedure changes and reminders. Please take the time to review the contents carefully and make any necessary changes to your office processes.

Thank you for your business and continued support, PCS plans to finish 2021 with a record year!

**Ernest Sampson, ChFC, CLU, AEP, CFP™**

**Direct (502) 992-3540**

**TECHNOLOGY UPDATE****Cybersecurity Is Everyone's Responsibility**

We would like to remind all of you to be extra diligent with regards to your cybersecurity best practices and more specifically, social engineering or "Phishing" campaigns that target each of you via email. The financial services industry has seen a significant uptick in phishing attacks over the course of the last couple of years and the trend is not slowing down. A recent phishing campaign even involved FINRA, where member firms received fraudulent emails purporting to be from "FINRA Membership". You can refer to recent FINRA Regulatory Notices <https://www.finra.org/rules-guidance/notices/21-08> and <https://www.finra.org/rules-guidance/notices/21-30> for more information.

Phishing attacks may take a variety of forms, but the goal of each of them is to convince you to provide information, typically in the form of Personally Identifiable Information (PII) or take an action, like clicking on an attachment or link. For more information on FINRA's guidance surrounding cybersecurity program best practices, in addition to helpful educational information please click the following hyperlink: [https://www.finra.org/sites/default/files/Cybersecurity\\_Report\\_2018.pdf](https://www.finra.org/sites/default/files/Cybersecurity_Report_2018.pdf).

Education and awareness serve as the best defense against cybersecurity threats. Please continue to take sufficient time to educate yourself through the PCS Annual Compliance Training and consider leveraging the vast amount of helpful material included on FINRA's website.

**Please remember, if you suspect that an email you received is a phishing attempt, do not open it or click on attachments and delete immediately.**



Tim Graham,  
Chief Operations Officer

## ADMINISTRATIVE UPDATE:

### Errors & Omissions Insurance Renewal Information

The 2021-22 Errors & Omissions insurance renewal is currently underway. After another thorough review and vetting of various options and carriers, PCS elected to renew coverage through Evanston Insurance Company owned by The Markel Corporation.

Markel Corporation is a Fortune 500 holding company for insurance, reinsurance, and investment operations around the world. Founded in 1930, Markel's core business is specialty insurance.

New E&O certificates will be provided to all covered persons around December 9th, as soon as they become available. Contact Mary Wescott, Kim Hill, or Joe Cutsinger with questions or concerns.



Mary Wescott,  
Chief Administration Officer

### 2022 FINRA Registration Renewals

The 2022 FINRA annual renewal calendar has been published, and based on FINRA's timeline, there are several upcoming dates of which all registered persons should be aware:

- November 10<sup>th</sup> – Detailed information about the 2022 renewal process will be delivered by email to all registered personnel.
- November 11<sup>th</sup> – Invoices for registration renewals will begin being emailed out.
- November 12<sup>th</sup> – December 7<sup>th</sup> – All registered personnel should review invoices to determine registration needs in 2022.
- **December 10<sup>th</sup> – ALL registration invoices must be paid in full to PCS.**
- December 14<sup>th</sup> – PCS must pay ALL renewal fees to FINRA by the end of the business day.

PCS again reminds all registered representatives of your responsibility to be registered, and if applicable, insurance licensed in the residential state of your clients. Additionally, registered representatives are required to be registered in the state from which he or she conducts business. **Please note:** All registered reps included on a split code must be appropriately registered as described above to receive compensation on a transaction.

In preparation for a successful FINRA registration renewal, as well as to facilitate continued expedient commissions processing in the new year, all registered persons are encouraged to review his or her current state registrations and client lists.

Please contact Mary Wescott, Seth Owen, or Lindsey Ebben with questions.

### Medallion Guarantee Reminder

Signature guarantees are required by federal law during the transfer of securities. When money and securities are transferred from one individual to another, it is important those both parties agree to the transfer.

A Medallion Signature Guarantee ensures that:

1. The client's signature is valid
2. The client's identity has been confirmed
3. The client is the legal owner of the account/property being transferred, AND
4. The institution (PCS in this instance) will assume liability if forgery has occurred.

Because of the liability concerns, all registered representatives are reminded that the PCS Signature Request Guarantee Form should **ONLY** be submitted for clients with an active relationship with PCS. PCS is unable to issue signature guarantees for any client of a dually-registered representative whose relationship with the advisor is only on the advisory side.

Please contact Mary Wescott or the Operations Department with any questions or concerns.

## OPERATIONS UPDATE:

### PCS Lost Security Holder/Abandoned Property

When physical mail for an account holder is returned to PCS as undeliverable and a forwarding address is not provided by the United States Postal Service (USPS), PCS must conduct a search for the account holder. PCS Operations will notify you (advisor), via email, that mail has been returned for the account holder. As the advisor, you should attempt to reach out to the account holder to confirm the correct/current address. If the account holder has an updated address, you must complete an Address Change Form, include all accounts for the account holder and return it to PCS Operations for processing. *On rare occasion, the USPS may mistakenly return a piece of mail for an account holder who actually resides at the correct address. If this is the case, please be sure to reply to the email and confirm that the address on file is correct.*



Nicki Burton,  
Operations Specialist

If no response is received by you after 30 days, a commission hold may be added for the impacted account(s), and you will be notified via email. Additionally, after 30 days with no account holder address confirmation, the account(s) is flagged, and an address search is conducted by a third-party vendor through Pershing. Below is a description of how the search is handled:

- **First Search:** an automated initial search is conducted within a minimum time period of 3 months (but no longer than 1 year) after the first item of physical mail is returned as undeliverable.
- **Second Search:** an automated second search is conducted no fewer than six months from the initial search (but no longer than 24 months) after the first item of physical mail is returned as undeliverable.

If either of the searches indicate that a new potential address has been found, the address is updated by PCS Operations and an email notification is sent out to you as notification of this change.

If an address is not located after the second address search is performed, and the results indicate that no match has been found, the account is automatically coded as abandoned by Pershing. During a final review of PCS Operations, the account may be flagged as abandoned, and the funds will be escheated according to state laws. If the final review indicates the account should remain coded as abandoned, you will be notified via email.

**It is imperative that you review and take appropriate action regarding these emails to avoid the possibility of the account getting flagged and potentially being escheated to the state. Once an account is escheated to the state, the account holder must contact the appropriate department at the state level to collect their assets.**

### Miscellaneous Cash Debit Balance Collection

The PCS Trading Department has conducted a review of aged (>30 days) outstanding miscellaneous cash debit balances (including, but not limited to, advisory fees, IRA annual custodial fees, and annual custodial fees) that are due for collection. Cash accounts are not permitted to maintain debit balances.

Please work with your client(s) to either deposit funds or liquidate sufficient securities to satisfy the outstanding debit balance. ***Please note, IRA check deposits must be accompanied by a letter detailing which fees are being covered and when they were incurred. This is to ensure deposits are coded correctly for reporting purposes.***

If the cash debit balance is not resolved by 12/01/2021, debits less than \$250 will be charged to the reps commissions, and debits greater than \$250 will be sold out of the customer account. ***Please note, Sellouts will be executed at the discretion of the trade desk and will not account for tax implications or varying market conditions***

The PCS Trade Desk will be emailing you a list of your aged outstanding miscellaneous cash debit balances shortly following this Newsletter distribution. For more information or questions concerning this policy, please contact the Trading Department at (800) 966-9347 or email [trading@pcsbdd.net](mailto:trading@pcsbdd.net).



## OPERATIONS UPDATE:

### Getting Started in Docupace

The Advisor Resource Center on the PCS website contains a wealth of Docupace training resources including operational guides, compliance guides and recorded training sessions. While the guides provide step-by-step instructions, the recorded training sessions offer a visual experience narrated by a trainer who shares the “whys” behind how to use the system in the manner it was designed. There are many paths to an end but following the correct workflow process will result in less detours.

To learn the basics of how to get started in Docupace, the three-part Field Series highlighted below is highly recommended. Even though each hour long session covers different topics, you must watch them in numerical order to understand where you are within Docupace as each session builds upon the previous session.




























Kelly VandenBrook,  
Director, B/D Operations

**Part 1 – Field Series** discusses the login process, how to submit a new account to be wet signed utilizing New > Starting Point, how to create a client folder, how to search for an existing client and how to create a Favorites Form Bundle.

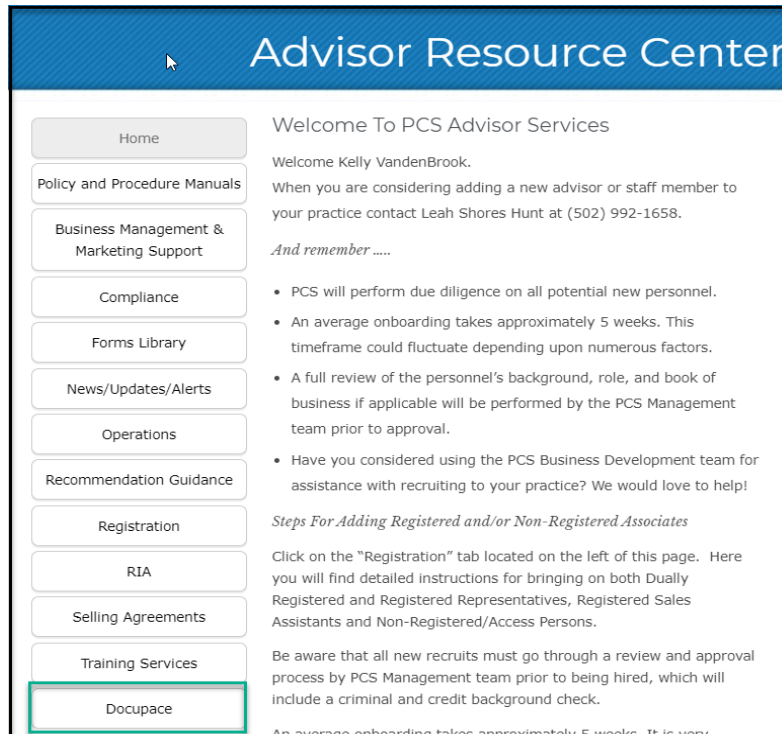
**Part 2 – Field Series** discusses the various ways to upload a document, the importance of printing and how to reprint bar code pages and an extensive demonstration of the esign process utilizing DocuSign thru Docupace.

**Part 3 – Field Series** discusses how to handle and respond to Not In Good Order (NIGO) work items, adding an additional document to an existing work item, explanation of the Fax to Vendor process, monitoring the Send Failed queue in DashBoard, how to use Tracker BI and how to integrate Redtail CRM with Docupace.

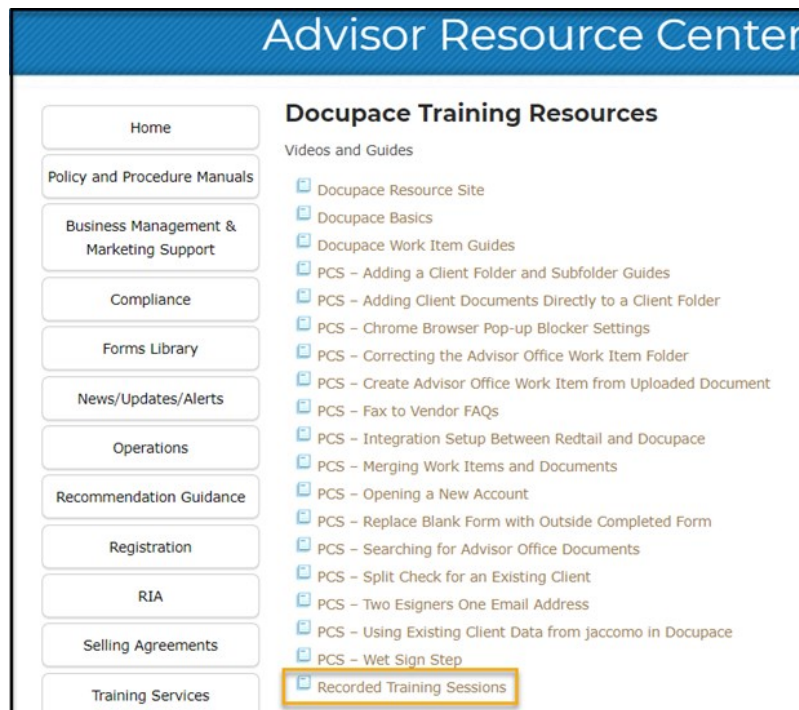
My files > Docupace Training	
 Name ▾	Modified ▾
 Docupace Compliance Training - 2020-12-22.mp4	 December 22, 2020
 Docupace Training Session 1 - OSJ Series - 2020-11-13.mp4	 November 16, 2020
 Docupace Training Session 1 Part 1 - Field Series - 2020-11-09.mp4	 November 10, 2020
 Docupace Training Session 1 Part 2 - Field Series - 2020-11-10 .mp4	 November 10, 2020
 Docupace Training Session 1 Part 3 - Field Series - 2020-11-12.mp4	 November 16, 2020
 Docupace Training Session 2 OSJ Series - 2020-12-04.mp4	 December 7, 2020
 Docupace Training Session 2 Part 1 Field Series - 2020-12-01.mp4	 December 2, 2020
 Docupace Training Session 2 Part 2 Field Series - 2020-12-02.mp4	 December 3, 2020
 Docupace Training Session 2 Part 3 Field Series - 2020-12-03.mp4	 December 4, 2020
 Docupace Training Session Field Series - New Account Wet Sign - 2021-...	 April 29
 Docupace Training Session Field Series - New Account eSign - 2021-04-...	 April 23
 Docupace Training Session Field Series - NIGO - 2021-05-05.mp4	 May 6

## OPERATIONS UPDATE (CONTINUED):

To access these recorded training sessions, click on the Docupace tab located in the bottom left corner of the Advisor Resource Center section of the PCS website.



Click on 'Recorded Training Sessions'.



## OPERATIONS UPDATE (CONTINUED):

Copy the password, click on the blue 'Docupace Training Sessions' hyperlink and then select the first video in the three-part series referenced in the first screenshot above.

We continue to add step-by-step reference guides for various tasks and processes throughout the Docupace system so please be sure to check back often.

Please contact [Operations@pcsb.net](mailto:Operations@pcsb.net) with any questions.

**PCS Docupace Training Sessions**

Training Videos Sessions Link

[Docupace Training Sessions](#)

Password: [PCS\\_doc1110#](#)

Training Videos:

Field Training Session 1

Field Training Session 2

Field Training Session 3

Field Training New Account eSign

Field Training New Account Wet Sign

Field Training NIGO

OSJ Training Session

Compliance Training Session

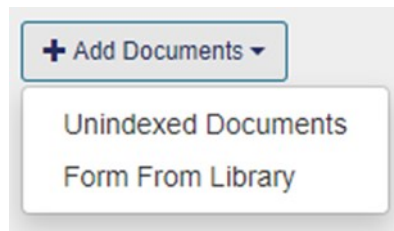
### Managing Forms - Most Recent Versions

With the ever-changing rules and regulations surrounding disclosures and paperwork, it can be a cumbersome process to keep track of which forms are the most recent versions used by PCS and/or Pershing. PCS is committed to ensuring that the most recent versions of PCS and Pershing forms are provided on all platforms used by advisors and employees. Therefore, if you need to print a form for use outside of Docupace, we encourage you to utilize the Advisor Resource Center, LaserApp, Quik or Docupace to find the most recent version. Many times, an older version of a form won't be accepted, therefore it is important not to keep copies of forms stored within the office or on desktop.



Nicki Burton  
Operations Specialist

When creating a work item within Docupace, the system will automatically populate the most recent version of the form(s). It is not recommended to print forms from other sources, then upload them into Docupace. Rather you should utilize Docupace to create your work item for the account type or work item you are choosing (New Account, Account Maintenance, etc.). Allow Docupace to add the required forms to your work item and then pull in any additional forms (if applicable), via the “+ **Add Documents** – *Form From Library*” feature, as shown below.



While creating your work item in Docupace, not only are you creating a client folder with your client's information stored for future use, but you are also populating the client information into the forms you are creating within the work item for.

## COMPLIANCE GUIDANCE:

### IAR CE On The Horizon

Beginning January 2022, all Investment Adviser Representatives (IAR) registered for advisory in a state that adopts the IAR Continuing Education Model Rule (see below) will be subject to continuing education (CE) requirements. The mandatory CE program will apply to all registered IARs of both state-registered and federal covered registered investment advisers (RIA). Under the model rule, IAR's will have to earn 12 CE credits per year (6 credits in Products and Practices and 6 credits of Ethics) in order to maintain their IAR registration.



Seth Owen  
Director of Compliance

The North American Securities Administrators Association (NASAA) has published some FAQs: <https://www.nasaa.org/industry-resources/investment-advisers/resources/iar-ce-faq/>

At present, the states that have adopted the model rule are as follows: \*Michigan, Mississippi, \*Nevada, \*Vermont and \*Wisconsin.

*\*State adoption may not be finalized prior to 2022. If so, implementation in the applicable state may not occur until January 1, 2023. Stay tuned for more information. If the IAR's home state has not adopted the model rule, the IAR would need to comply with the CE requirement in each of the other states in he or she is registered as an IAR. If advisory registered in multiple states, the IAR will be in compliance with the CE requirement of other states so long as the IAR's home state (if adopted the rule) has at least as stringent requirements as the other states where advisory registration is held.*

For dually registered persons (securities and advisory registered), the North American Securities Administrators Association (NASAA) will accept the securities industry Regulatory Element CE taken in 2020, 2021 and 2022 as an equivalent to the 6 credits for Products and Practices for 2022. FINRA is working on the reporting functionality in order to have those credits counted towards the new requirement and anticipates it becoming available in the 2<sup>nd</sup> Quarter of 2022.

### Retail Communication Submissions - Source citations

As a reminder, please ensure sources used to draft your retail communications (materials sent or made available to more than 25 retail investors within a 30 day period) are cited within the written communication itself. Compliance has seen instances primarily in representatives' own general market commentary and newsletters where specific detailed quotes, third party surveys, and third-party statistics from publicly available websites/online publications were not properly cited within the document itself. Those sources should be cited within the document prior to approval and distribution.

Properly citing sources and maintaining documentation to support claims made in written communications is important and becomes even more important with the new SEC's Marketing Rule which the SEC has set a compliance effective date of November 4<sup>th</sup>, 2022.

If you have questions, please reach out to Peter McLaughlin in the Compliance Department:

[pmclaughlin@pcsbld.net](mailto:pmclaughlin@pcsbld.net)



## PRINCIPAL REVIEW DESK

### UTMA/UGMA Account Reminders

There has been some confusion regarding UTMA/UGMA accounts. Assets deposited in an UTMA/UGMA constitute an irrevocable transfer or gift to the minor, can no longer be accessed by the grantor or custodian, and cannot be considered a source of liquidity.

Upon reaching the age of majority (which is determined state by state), the owner has full rights to the assets and can transfer them to an individual account.

When completing a Customer Account Form for an UTMA/UGMA, the minor's name appears on the left side of page one, while the custodian's information appears on the right. On page two of the CAF, all of the financial information pertains to the minor, while the investment experience pertains to the Custodian.



Jane Vande Voort  
Director Field Supervision

#### UTMA/UGMA

Account Registration					
Name (Primary Owner / Trust Name / Entity Name)			Name (Joint Owner / Trustee / POA / Executor / Authorized Person)		
Sally Smith (owner/minor)			Joe Smith (custodian)		
Social Security # or Tax ID#	Marital Status	Date of Birth/Trust	Social Security # or Tax ID#	Marital Status	Date of Birth/Trust
123456789	S	09/01/18	987654321	M	10/01/74
Legal Street Address (No P.O. Box)			Legal Street Address (No P.O. Box)		
123 Main Street			123 Main Street		
City	State	Zip	City	State	Zip
Anytown	WI	12345	Anytown	WI	12345
Mailing Address (if different)			Mailing Address (if different)		
PO Box 222, Anytown, WI			PO Box 222, Anytown, WI		
Country of Citizenship	Primary Phone Number		Country of Citizenship	Primary Phone Number	
USA	(123) 456-7891		USA	(123) 456-7891	
E-mail	Alternate Phone Number		E-mail	Alternate Phone Number	
			jsmith@smithcorp.com	(987) 654-1123	

*Patriot Act Verification:* Required

*Employment Data:* Required

*Patriot Act Verification:* Required

*Employment Data:* Required

*Financial Information:* Minor

*Investment Experience:* Custodian

*Signature(s):* Custodian

Please contact your Managing Principal when completing UTMA/UGMA applications with any questions.

### PCS Purchase Form - Replacement/1035 Exchange - Performance Section Guidance:

In reviewing the purchase form, we want to provide better guidance as it relates to the Performance section on page four of the purchase form.

When a transaction is a switch, replacement, or 1035 exchange the performance section requires a comparison of the existing investment vs. the new recommendation. The performance comparison section should not list actual performance percentages as these may be misinterpreted as performance reporting and are subject to industry disclosure requirements.

The performance section should contain a narrative based on the discussion with the client that took place around performance considerations for the new recommendation versus the existing investment. An example could be related to a product recommendation that has a consistent moderate growth track record that aligns with the client's investment objectives. It could also be documented here a discussion about the array of investment options that are available with the new recommendation. Remember, the Purchase form helps document the sale and justifications for the sale, and reiterates to the client the reasons for the purchase. The greater documentation provided, the stronger the sale and compliance with Regulation Best Interest.

## PRINCIPAL REVIEW DESK (CONTINUED)

### Regulation B.I Recommendation Documentation Supplement Guidance

For the last few months Private Client Services has had the Securities and Exchange Commission reviewing sales of variable annuities. Part of the review involves compliance with Regulation Best Interest and the processes the firm has in place to comply with the rule. One of the key components of our procedures is the use of the Recommendation Documentation Supplement (RDS). The SEC reviewed approx. 40 VA transactions during their review and there have been some mixed feedback related to the use of the RDS. The most common comment has been the lack of alternative products listed on the RDS.



John Taylor-Jones  
Chief Compliance Officer

One of the key components of Regulation B.I. is the CARE obligation. The CARE obligation adds to the requirements of Finra Rule 2111 (Suitability Rule) requiring that the representative show that care was taken to determine the recommendation was in the client's best interest. Part of this obligation is to also consider reasonably available alternative products. What does that mean? It means that as you formulate your recommendation for a client, you are required to consider other products available on the firm approved product list in order to determine your recommendation. These alternative product considerations must be listed on the RDS to evidence that the representative completed their obligation under the rule. Remember the old standard "if it is not documented, it didn't happen". A good rule of thumb should be that a minimum of three product alternatives should be listed on the RDS.

Many of the transactions reviewed by the SEC showed where multiple products had been presented to a client, and where multiple products were used during a recommendation determination, however there were more instances where the RDS only listed the product recommendation and perhaps one alternative. We need to do a better job documenting our process.

PCS recently introduced Due Diligence Works (DDW) as a new tool that can be used to research and compare products. DDW is currently in final development of a new report that will allow the user to select a product and then the system will identify the reasonably available alternative products for you. You can then use the results of the report to select other product considerations to review prior to making a final recommendation.

All registered persons recently completed the 2021 Firm Element CE program, and likely noticed that there were multiple courses related to Regulation Best Interest. We customized the courses to reflect the firm policies and procedures and hopefully you found that information helpful as you continue to adjust your sales process to incorporate the new rule. The PRD desk and Compliance Department will continue to provide guidance related to Regulation Best interest and are available to answer questions and help with the RDS for new recommendations. Please be aware that if you submit a RDS for a new purchase and it does not contain sufficient information to document your recommendation process, or other product considerations, it will be sent back and potentially delay the approval of an application. (This does not just apply to VA sales, but to all retail customer recommendations).

In the September 2021 newsletter I provided some comment related to the process most representatives go through in their mind when considering a client recommendation. I will reiterate what I stated in that newsletter and remind you to document that process utilizing the RDS. The better you denote your process the easier it will be for the firm principal to understand the needs of the client and the process you went through to determine your recommendation.

Finally, the PRD Desk and Compliance are working together to standardize the review process for VA transactions and will be preparing a FAQ to provide more guidance related to the standard items that cause delays, confusion, and potential risks. These FAQs will help answer questions and provide a more efficient application submission and review process both for the home office and you, the representative.

If you have questions, please reach out to your Managing Principal, OSJ or the Compliance Department.

**U4 UPDATE REMINDER:****Disclosure Reminder:**

The FINRA form U4 must be updated in a timely manner (Usually within 30 days, but sometimes within 10 days) if any registered person has a disclosable event. These disclosable events include, but are not limited to, financial matters such as bankruptcy, compromise with creditors, or liens; legal matters; violations of industry rules; and other items related to outside business activities. Failure to disclose reportable items to the Home Office may result in delayed disclosure and significant late filing fees. Each late disclosure may result in as much as a \$1,575 late filing fee, which is the responsibility of the Representative to pay!

**BUSINESS DEVELOPMENT UPDATE:**

We'd like to welcome the following new groups and financial professionals to the PCS family:

Date	Company	Registered Rep	City	State
09/07/21	Billy Muhizi (Adams Brown)	Billy Muhizi	Hutchinson	KS
10/15/21	Guardian Wealth	Martin Hardy	Durham	NC
10/21/21	Ashlea Jones (Prime Capital)	Ashlea Jones	Hiawatha	IA

PCS is currently working with a number of new representatives and partner groups who will join us in the 4th quarter and new year. We look forward to continued success and growth throughout 2022.

**HOME OFFICE STAFF:****Adam Pickens - Technology Support Specialist**

Please join us in welcoming Adam Pickens to PCS. Adam is our new Technology Support Specialist. Adam will be the primary person monitoring and answering inquiries made to the PCS Helpdesk ([pcshelpdesk@pcsbd.net](mailto:pcshelpdesk@pcsbd.net)). Adam has over 19 years of experience in the IT customer support field and believes that relationship building is at the core of IT support. In addition to having many years in the field, he is a teacher and trainer at heart and has trained multiple customers and co-workers to better support their teams and clients through technology. Adam holds a Bachelor of Science Degree with a focus on Electronic Engineering and is certified as a Red Hat Linux Systems Administrator and Customer Support Professional. Adam will be a remote team member, located in Concord, NC.

**Effective Communication with the Home Office**

PCS has set up multiple "Department Email Inboxes" designed to help with timely responses to field questions. PCS continues to deliver personalized communication to the field, however we have also noticed that there are sometimes circumstances where a home office associate is out of the office and an email may go unanswered for a period of time. To alleviate this communication gap we are asking that if you are sending a question or action item to the home office, and to a specific person, please cc the department inbox so we can make sure your question or request is handled efficiently. We would encourage you to put in the subject matter the name of a specific person if directing the message to an individual.

Attached to this newsletter is the current home office Department and Employee Directory for your reference and convenience.

## MORE COMPLIANCE INFORMATION:

### Retail Communication Review Changes Coming in 2022

PCS has utilized MarketingPro for approx. 10 years to review and archive approvals for submitted retail communications (formerly advertising) as well as provide a library of materials for representatives to use when communicating with clients and prospects. A number of years ago MarketingPro was purchased by FMG Suite. Many representatives use FMG Suite for website hosting services and may be familiar with their services.

FMG Suite is retiring some of the services provided on the MarketingPro platform and PCS has entered into a new contract with FMG Suite for ongoing services. There are some changes, but also some things remain the same.



John Taylor-Jones  
Chief Compliance Officer

Let's start with what remains the same:

- When submitting materials that you have created yourself, including business cards, letterhead, market commentary, profile pages, flyers, client event announcements, etc. these items will continue to be submitted through the MarketingPro system and login you currently have.
- The MarketingPro "File based Ad Submission" process will remain on the same platform for now, but may migrate to the FMG Suite platform at a later date. PCS will provide notice and training when this takes place. There is no timeline available from FMG Suite at this time.

Now let's look at what is changing:

- Access to marketing material content will no longer be available on the MarketingPro platform, but will be available on the FMG Suite platform.
- "Marketing Library" subscriptions are transitioning to "Marketing Suite" on the FMG platform. The "MarketingPro" subscriptions will become "Marketing Suite Pro" on the FMG platform.
- Marketing content on the FMG platform will be distributed via email or social media form within the FMG platform, so each user will provide a distribution list to FMG and each email will be cc'd to the representative and Compliance for archiving purposes.
- Marketing materials utilized through the FMG Suite platform will be reviewed and approved within the FMG system by PCS Compliance and may be used by any representative with an FMG Suite subscription.
- The cost for each subscription and "File Based Ad Submission" will be increasing slightly. These changes will be reflected either in the PCS technology fee or via invoice/commission adjustment depending on how you currently have your fees set up for MarketingPro.

#### **Finally the best news:**

- Beginning 1/3/2022, the requirement to maintain a copy of the approval certificate for a retail communication submission will no longer be required at the branch level. The new contract with FMG includes language that guarantees access to the approval records for the required retention period. OSJ and Branch offices can access historical approval certificates from MarketingPro and FMG Suite within the applicable systems.
- Branch procedures may be updated to reflect this change starting 1/3/2022. Please continue to maintain approval certificates through the end of 2021.

If there are any questions, please feel free to reach out to the Compliance Department via email: [compliance@pcsbd.net](mailto:compliance@pcsbd.net).