2025 COORDINATED INVESTMENT ADVISER EXAMS



NORTH AMERICAN SECURITIES ADMINISTRATORS ASSOCIATION



2025 COORDINATED INVESTMENT ADVISER EXAMS



1,086
INVESTMENT
ADVISER
EXAMINATIONS



EXAMINED
BETWEEN
FEBRUARY 1
AND
JULY 31, 2025



365 EXAMS WERE
THE FIRST TIME IA
WAS EXAMINED
BY THE STATE



2025 COORDINATED INVESTMENT ADVISER EXAMS

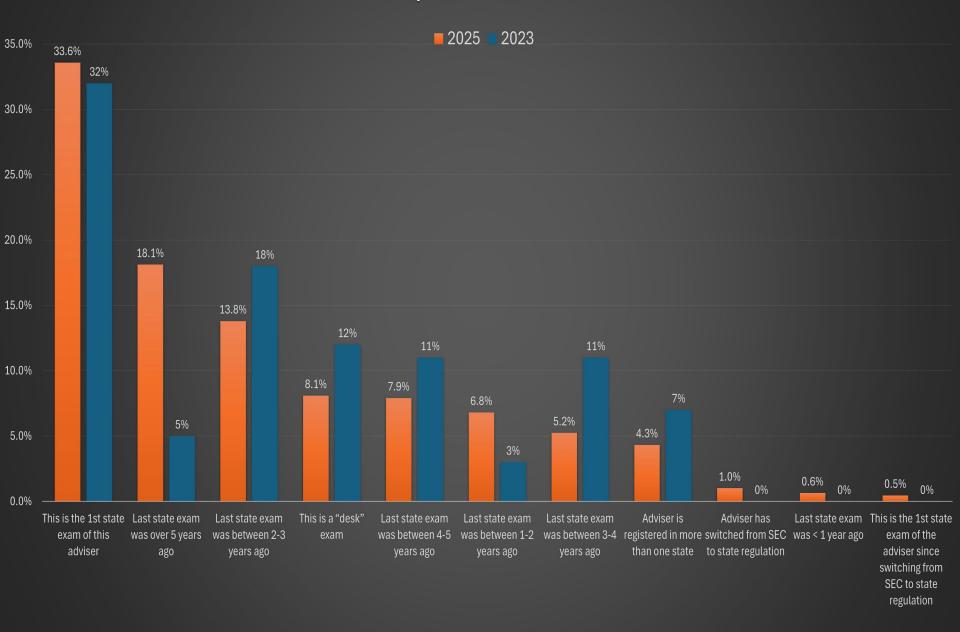
SECURITIES
EXAMINATIONS
FROM U.S.
JURISDICTIONS

3,402
DEFICIENCIES IN
23 CATEGORIES



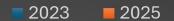


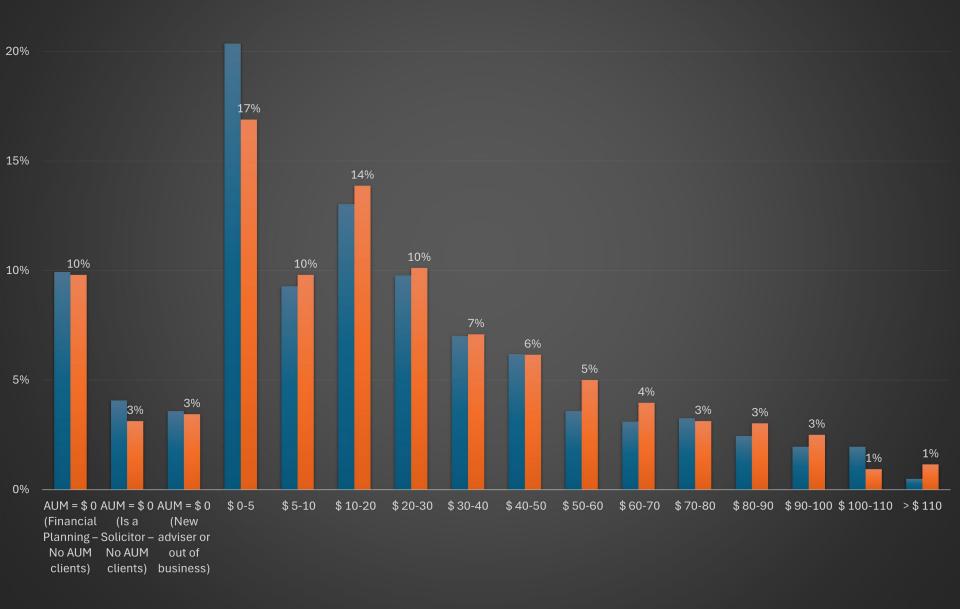
Sweep Data 2025 v 2023

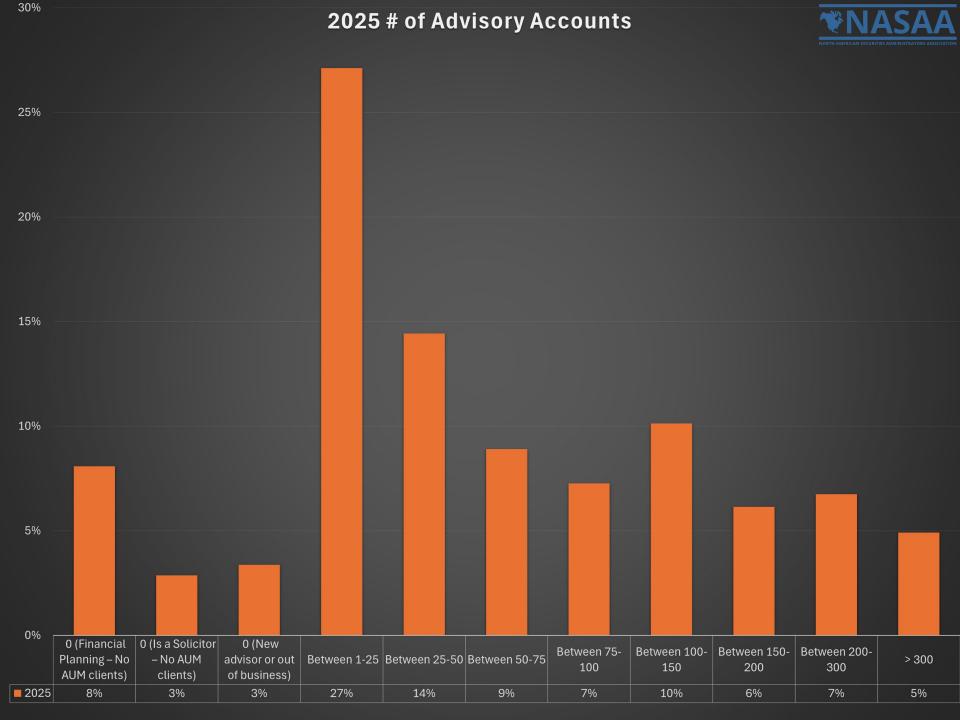




Assets Under Management 2023 and 2025 (Millions)

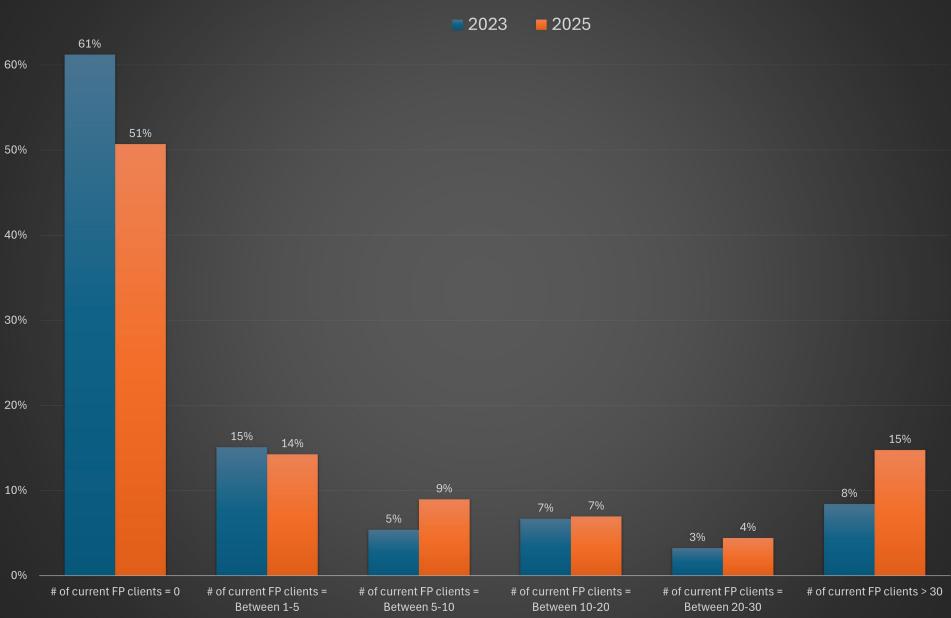






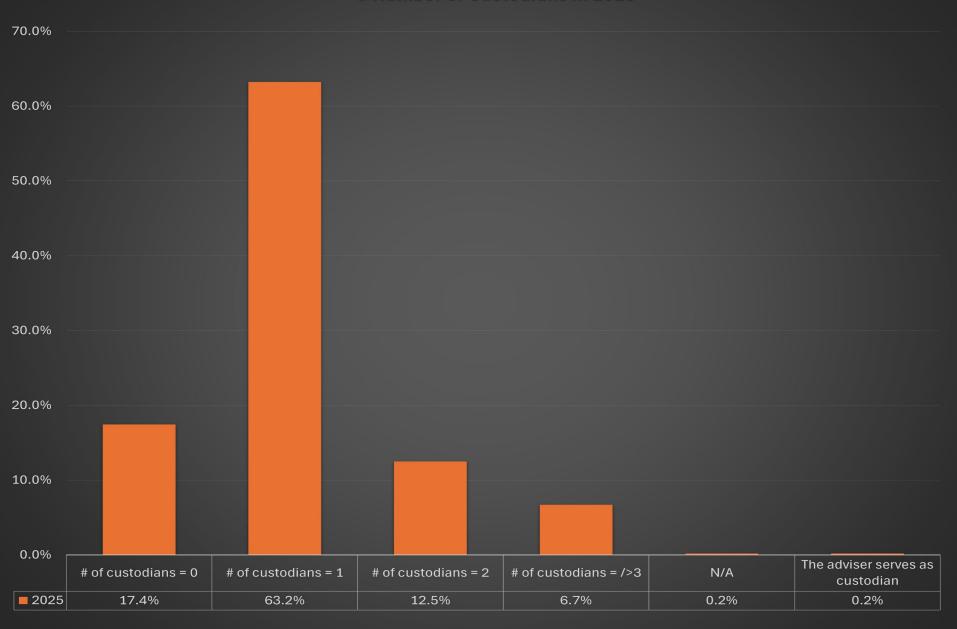






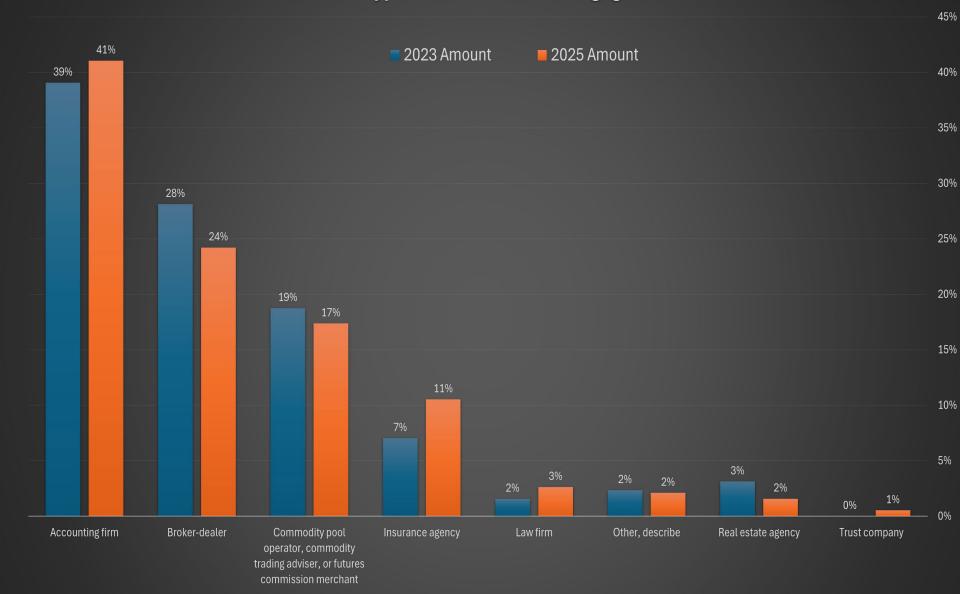


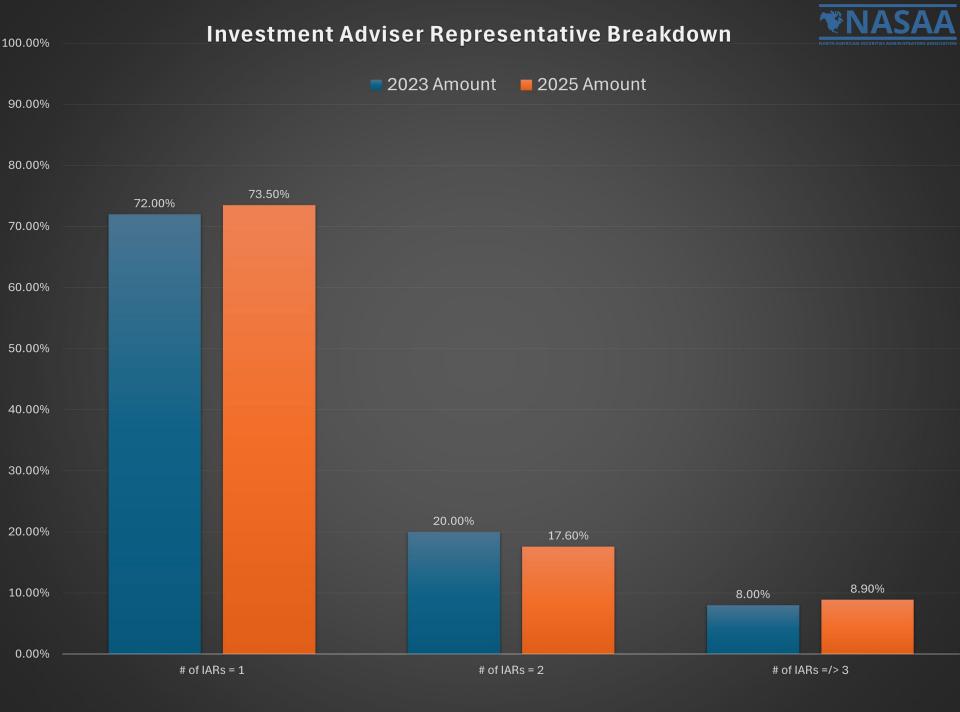
Number of Custodians in 2025



Other Types Of Business RIA Engages In

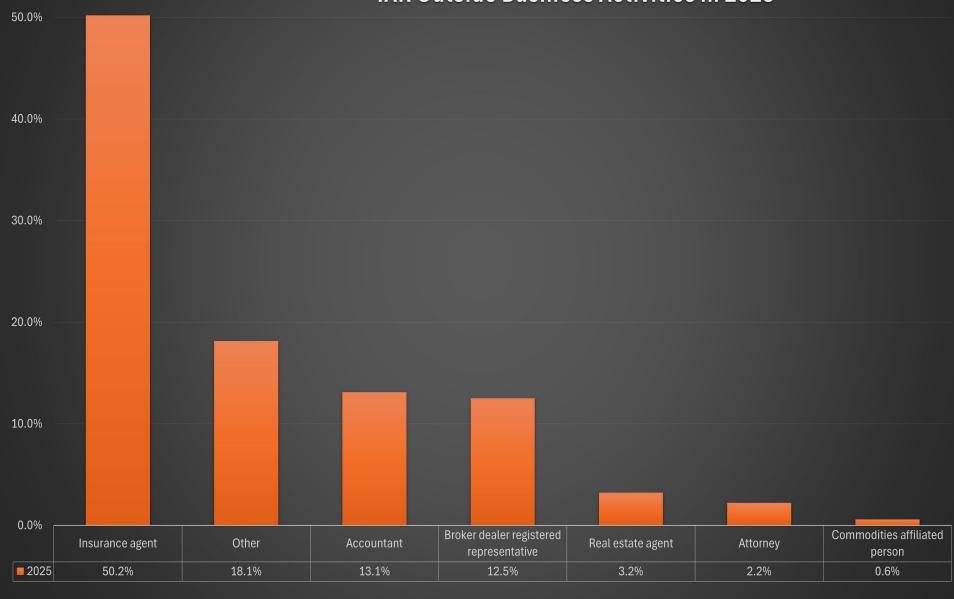


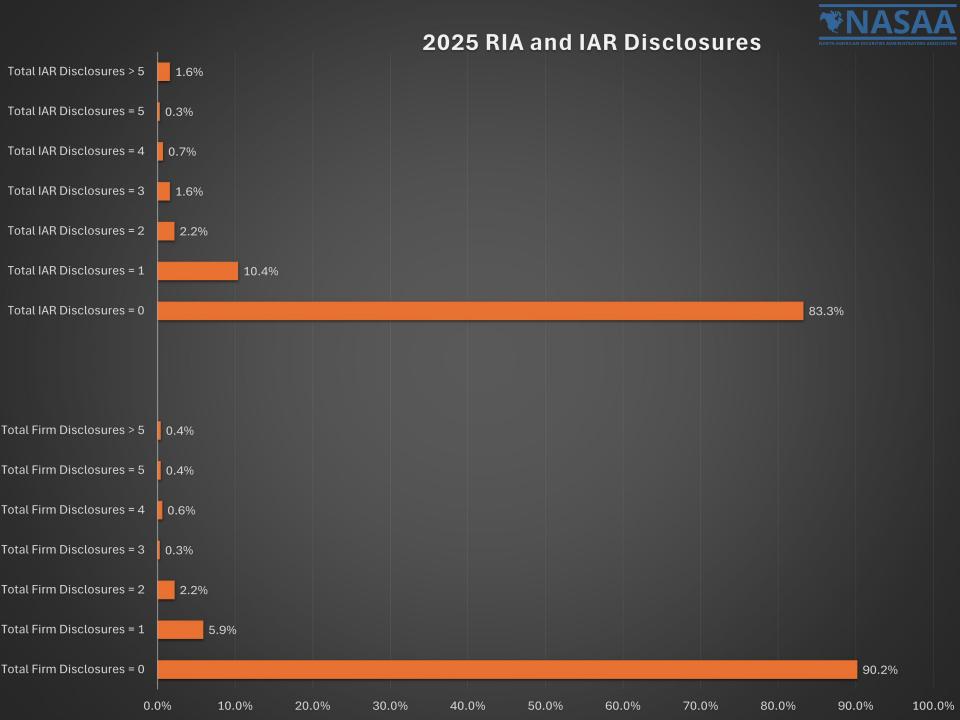






IAR Outside Business Activities in 2025

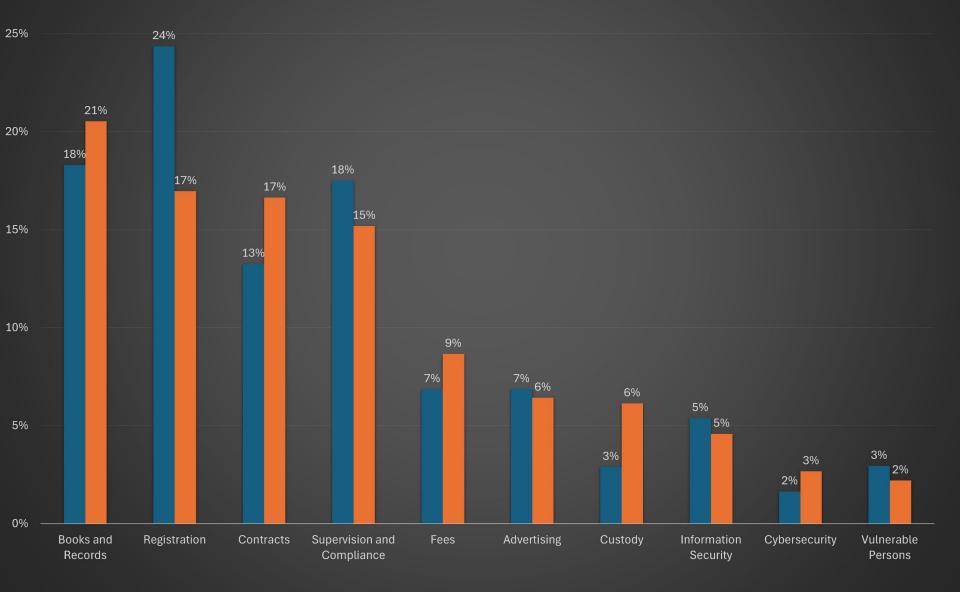






2023 vs 2025 Top Violations







2025 COORDINATED INVESTMENT ADVISER EXAMS

BOOKS AND RECORDS

FINANCIAL MATTERS

REGISTRATION

FEES

ADVERTISING

INFORMATION SECURITY

SUPERVISION/ COMPLIANCE

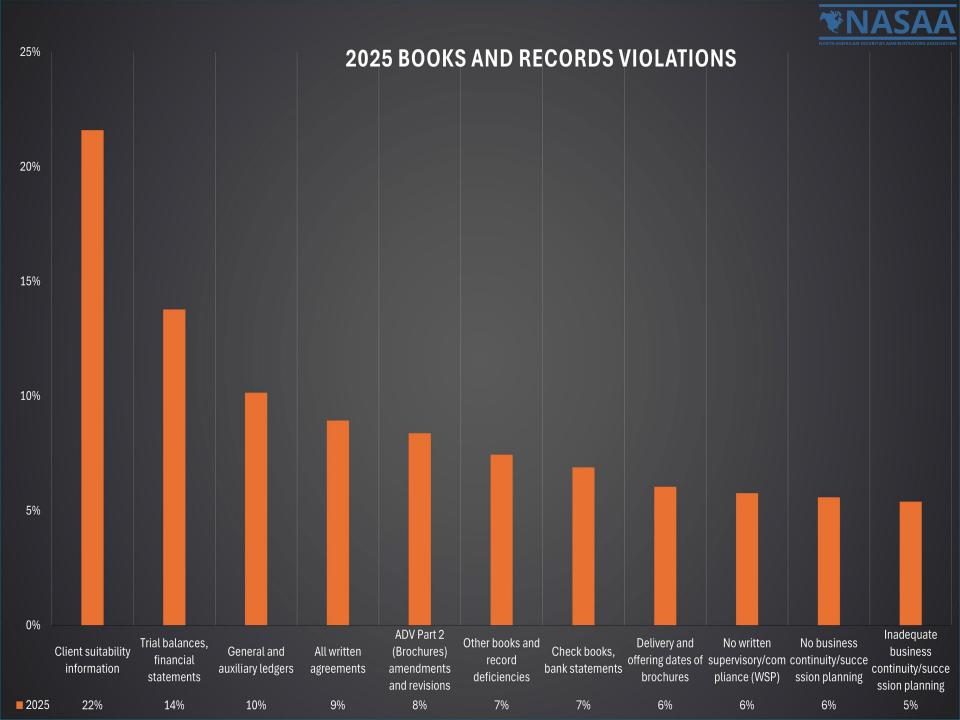
CYBERSECURITY

CONTRACTS

CUSTODY

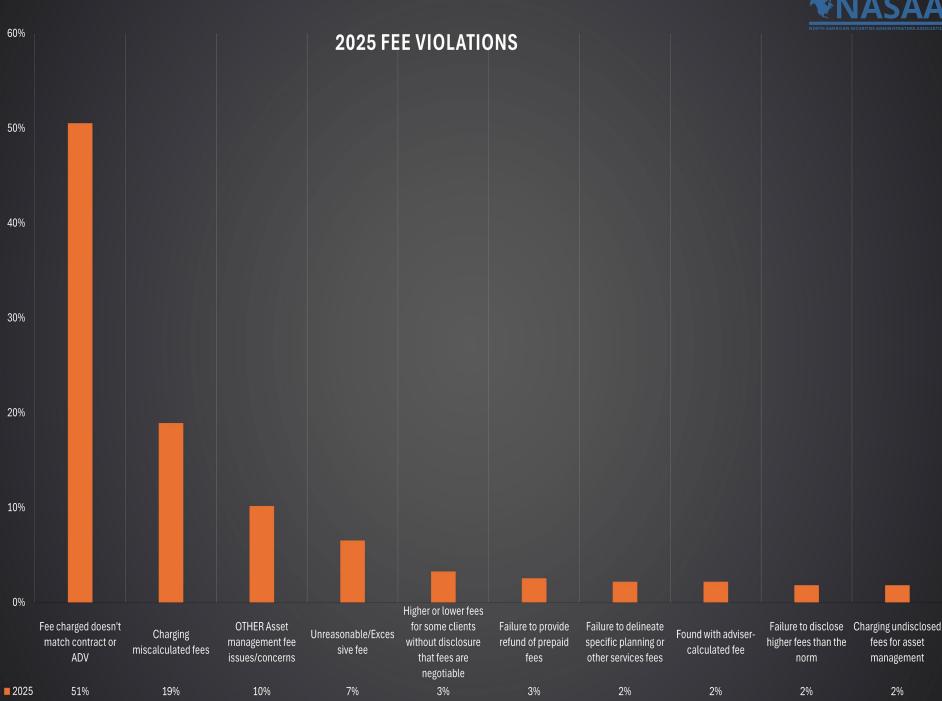
UNETHICAL BUSINESS PRACTICES

VULNERABLE PERSONS



40% **2025 FINANCIAL MATTERS VIOLATIONS** 35% 30% 25% 20% 15% 10% 5% 0% Commingling Poor financial Evidence of Inadequately Inadequate net No audited outside business Inadequate net condition income or Inadequate net prepared audited Insufficient or no worth (Adviser has financial or personal worth (Adviser has (Insolvency or expenses for bond (Adviser has worth (Adviser has Other issues financial no discretion/no statements (If business with the custody without possible inability undisclosed discretion) discretion) statements (If custody) required) IA business net worth waiver) to continue outside business required) activities accounts operations) 2025 35% 18% 10% 10% 7% 6% 6% 3% 1%









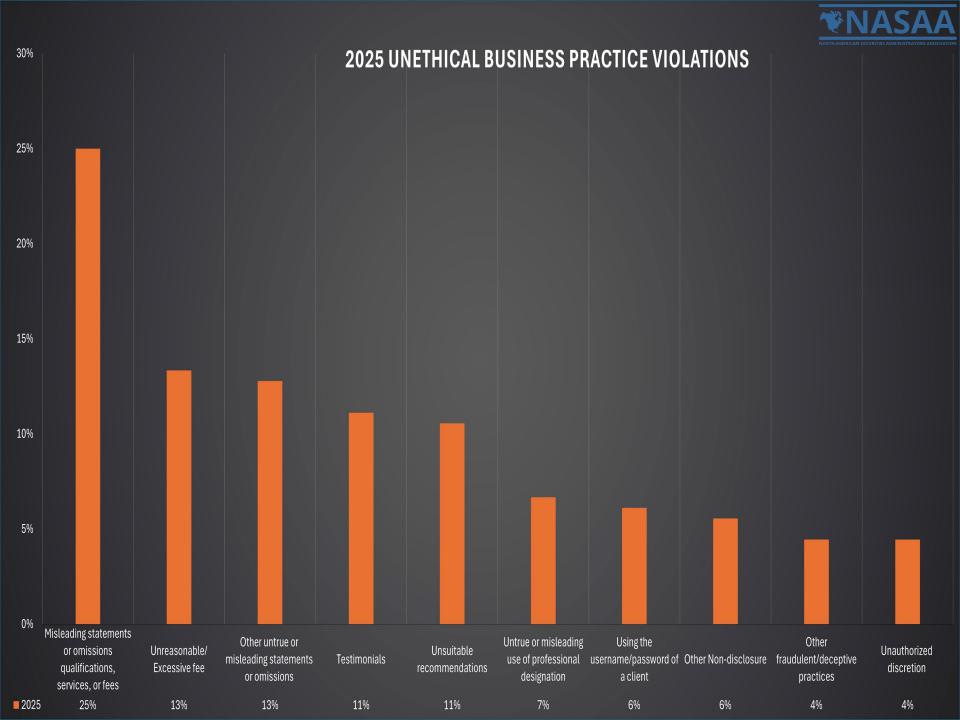
20% **2025 SUPERVISORY VIOLATIONS** 18% 16% 14% 12% 10% 8% 6% 4% 2% 0% No/Inadequate No/Inadequate No/Inadequate No Written No/Inadequate Failure to follow No/Inadequate Other Maintenance Not current/up-to-No/Inadequate: Maintenance of supervisory/compli Updates to Form Protection of Supervisory supervisory/compli Business Compliance Code of Ethics date ADV/Form U4 **Vulnerable Clients** Continuity Plan ance procedures Books and Records Procedures ance issues Procedures **2025** 18% 13% 11% 11% 9% 9% 8% 7% 7% 6%















Best Practices for Investment Advisers

- Review and update on an annual basis client account information, including suitability.
- Review and update all client advisory contracts. Clearly state fees and services.
- Prepare a written compliance and supervisory procedures manual relevant to the type of business to include business continuity plan and information security policies/procedures. 1) Written policy in place 2) Who is responsible 3)
 Defined responsibilities 4) How often performed 5) How evidenced (in writing)
- Calculate and document fees correctly in accordance with contracts and ADV.
 Ensure fees are reasonable for the services provided.
- Review all advertisements, including website and social media, for accuracy.
 Ensure all statements are not misleading or otherwise omit necessary information.
- Keep accurate and current financials. File timely with the jurisdiction. Maintain adequate minimum net worth. Obtain surety bond if required.