



2020 Annual Compliance Attestation

Please read and answer each question in this Annual Compliance Attestation carefully. Explanations are included to assist you. Sign and return the Attestation to the Sowell Management (Sowell) Compliance Department within 10 business days.

Name of Employee:
CRD # (if applicable):
Adviser Company Name:

Acknowledgements:

Read the following statements and check the boxes beside each of them to indicate your agreement with them.

I have read and understood Sowell's Compliance Manual and I am responsible for complying with the policies contained in this Manual.	Yes	No
I have read and understood Sowell's Code of Ethics and I understand I am responsible for complying with all of its requirements to including but not limited to its reporting requirements.		

Electronic Communications:

Read the following statements and check the boxes beside each of them to indicate your agreement with them.

I understand that all electronic communications on my designated computer system are subject to monitoring by authorized representatives of Sowell. Such monitoring may include reading and printing incoming, outgoing and stored electronic communications on this system.	Yes	No
I have been advised and understand that electronic communication may be considered advertising under the Advisers Act. I agree to comply with all rules with regard to electronic communication set forth by Sowell, the SEC and other regulatory entities.		

Websites and Social Media

Do you utilize a website or social media in your business?		
If yes, have you provided written notice to Sowell's Compliance Department?		
If yes, please list all websites and social media that you use for your business, even if you have previously discussed these sites. (Please do not list any websites or social media sites which are exclusively personal.)		

Covered Accounts and Personal Securities Transactions

I have a direct or indirect ownership interest in or discretionary trading authority over securities accounts at the following firms (even if this information has been previously disclosed):

Name of Custodian(s) (Broker/Dealer/Banks)
Account Name(s)
Account Number(s)

	Yes	No
1. Are duplicate statements and confirmations currently being sent to Sowell for all Covered Accounts listed above?		
2. If not, am I providing personal securities transactions reports on a quarterly basis and an annual holdings report?		
3. I will immediately notify the Chief Compliance Officer of Sowell, if at any time in the future I have trading authorization over, or direct or indirect interest in, securities or commodities accounts with any other Covered Accounts.		
4. Do you, your spouse, your dependent children or any other person to whom you provide financial support have an interest in a securities account at another securities firm?		
5. While associated with Sowell have you been engaged in any other business enterprise?		
6. While associated with Sowell have you ever received compensation from any person or entity where Sowell has not approved the arrangement?		

7. While associated with Sowell have you ever been associated with another Registered Investment Advisor or a Broker/Dealer, not affiliated with the Firm?		
8. If the answer is yes to any of the above questions (4 through 7), have you reported it to the Firm?		
Please disclose the details to yes answers to question 4 through 7.		

Updates to Form U-4:

You are required to make sure the information on your Form U-4 is current. Upon the occurrence of any event listed in this section you must notify the Chief Compliance Officer in writing immediately.

Address Changes	Yes	No
Has your home address changed in the last year?		
If yes, have you provided written notice to Sowell's Compliance Department?		
Has your business address changed in the last year?		
If yes, have you provided written notice to Sowell's Compliance Department?		
Name Changes		
While associated with the Firm, have you legally changed your name?		
If yes, have you provided written notice to Sowell's Compliance Department?		
Criminal Disclosures		
Since becoming associated with the Firm have you been arrested, indicted, arraigned or charged with a crime? (You may exclude minor traffic violations.)		
Since becoming associated with the Firm have you been convicted of or pled guilty or 'no contest' to a felony in a domestic, foreign or military court?		
Based on activities that occurred while you exercised control over it, has an organization ever been charged with a felony or been convicted, pled guilty or no contest to a felony in a domestic or foreign court?		
Since becoming associated with the Firm have you been charged with a misdemeanor in a domestic, foreign or military court involving: investments or an investment-related business or any fraud, false statements or omissions,		

wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?		
Since becoming associated with the Firm, have you been convicted of or pled guilty or no contest to any of the following offenses: fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?		
Based on activities that occurred while you exercised control over it, has an organization ever been charged, convicted of, pled guilty or pled no contest to any of the following offenses: fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?		
If the answer is 'yes' to any of the above Criminal Disclosure questions, has it been reported to Sowell?		
Regulatory Disciplinary Actions		
Since becoming associated with Sowell have you been the subject of an inquiry, complaint, investigation, or administrative or civil action by any regulator?		
Since becoming associated with Sowell have you been subject to a disciplinary action by a regulator?		
Since becoming associated with Sowell has your authorization to act as an attorney, accountant or federal contractor been revoked or suspended?		
If the answer is 'yes' to any of the above Regulatory Disciplinary Actions questions, has it been reported to the Firm?		
Civil Judicial Actions		
Since becoming associated with Sowell have you been involved in any investment related arbitration, civil litigation or administrative proceeding?		
If the answer is 'yes', has it been reported to Sowell?		
Customer Complaints		
Since becoming associated with Sowell have you been the subject of any oral or written customer complaint that you have not reported to Sowell?		
If the answer is 'yes', has it been reported to the Firm?		
Bankruptcies/Liens		

Since becoming associated with the Firm have you or any organization you controlled filed for voluntary bankruptcy, been the subject of an involuntary bankruptcy petition or made a compromise with creditors?		
Since becoming associated with the Firm have any judgments or liens been filed against you?		
If the answer is 'yes' to the Bankruptcies/Liens questions, has it been reported to Sowell?		

Please attached relevant documentation, if applicable.

I will immediately notify the Sowell Compliance Department, in writing, if at any time in the future the above information changes. I hereby acknowledge and attest that answers given above are true and correct.

Respondent Signature: _____ Date: _____

Respondent Name: _____