Email and marketing recordkeeping: a one-page checklist for small RIAs

For owners and CCOs of small SEC-registered RIAs.

Last reviewed: October 17, 2026

R = rule text. S = what examiners ask for or found. Untagged = suggestion.

1. Records

☐ **Keep** copies of sent and originals of received written communications on advice, funds, orders, performance. [R1]

☐ **Keep** most records at least five years after the fiscal year of the last entry. [R3]

☐ **Keep** advertisements and the records behind their performance figures at least five years after the fiscal year last disseminated. [R3]

☐ **Keep** records in an appropriate office for the first two years of each period. [R3]

2. Electronic storage (if used)

☐ **Store** a separate duplicate copy of each record. [R4]

☐ **Check** that procedures reasonably safeguard records from loss, alteration or destruction. [R4]

☐ **Check** you can promptly give examiners a legible, true, complete copy. [R4]

3. Supervision

☐ **Adopt** and implement written policies and procedures reasonably designed to prevent violations. [R5]

☐ **Designate** a supervised person as CCO to administer them. [R5]

☐ **Review** policies and procedures at least annually, for adequacy and effectiveness of implementation. [R5]

☐ **Keep** policies in effect now or in the past five years, plus annual-review records. [R6]

☐ **Log** each annual review. If the owner is also CCO, **name** a backup reviewer. [suggestion]

Examiners typically request. **Have ready:**

☐ Tests performed: compliance reviews, quality control analyses, surveillance. [S1]

☐ A record of compliance exceptions. [S1]

☐ The process for monitoring client complaints and correspondence, including electronic communication. [S1]

4. Marketing

☐ **Keep** a copy of each advertisement; oral advertisements and compensated oral testimonials may be kept another way: see the rule. [R2]

☐ **Keep** the records behind any performance shown in an advertisement or other outside communication. [R2]

Also requested. **Have ready:**

☐ Copies of website and social media advertisements. [S1]

Staff found some advisers kept no copies of social media posts. [S2]

What counts as an advertisement is for your CCO and counsel; see Rule 206(4)-1(e)(1).

Sources

17 CFR 275.204-2: **[R1]** (a)(7). **[R2]** (a)(11), (a)(16). **[R3]** (e)(1), (e)(3)(i). **[R4]** (g)(2)-(3). **[R6]** (a)(17)(i)-(ii). https://www.ecfr.gov/current/title-17/section-275.204-2

[R5] 17 CFR 275.206(4)-7(a)-(c): https://www.ecfr.gov/current/title-17/section-275.206(4)-7

See also 17 CFR 275.206(4)-1(e)(1): https://www.ecfr.gov/current/title-17/section-275.206(4)-1

[S1] SEC risk alert, Sept. 6, 2023, initial request list. https://www.sec.gov/files/risk-alert-ia-risk-and-requesting-documents-090623.pdf

[S2] SEC Marketing Rule risk alert, Apr. 17, 2024. https://www.sec.gov/exams/announcement/risk-alert-041724

Checked against eCFR text as of October 15, 2026. Not legal advice: a checklist, not a compliance determination. Not an SEC publication.

Turret archives sent and received email and reviews outbound email for small RIAs. No setup fee. **getturret.com**