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Reviewing Sales Practices

Reviewing sales practices of the firm's top producers is instrumental in helping to identify potential "gaps" in a compliance program. Consider conducting an in-depth analysis of:

- Sales activities based on volume of business;
- Advisers with the highest number of "red flags" on surveillance reports;
- Advisers on pre-approval; and
- Top producers who have been with the firm less than a year.

Analyzing trends and patterns and further investigating adviser marketing efforts, including e-mail communications, will help you in assessing the firm's supervisory control systems and allow you to promptly enhance procedures as necessary.

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