ADVERTISING REVIEW TOOL

How-to Guide

The Advertising Review Tool (ART) is a platform that is fully integrated with ClientWorks and provides the ability to submit, track, review, and archive your retail and institutional communications and public appearances.
This tool offers a paperless solution to meet your branch advertising file review requirements.

New: Third Party Marketers – Provide ART access to unaffiliated users (p.40)

Third Party Marketers who are not affiliated with LPL can be given access to a version of ART through which they will be able to submit material for the advisor groups that they support.

New: Non-Promotional Materials (p.6)

Non-promotional materials can be submitted into the Advertising Review Tool and used immediately without waiting for MRR pre-use approval. Non-promotional materials generally refers to marketing materials that do not include a financial or investment recommendation or otherwise promote a product or service of the firm.
It's important that you and those who submit content on your behalf, understand when marketing materials are appropriate for this process and how to submit them properly.
Please see the ClientWorks Resource Center page "Non-Promotional Materials" for more information.

New: Prospect Submissions (p.45)

Supervisors or their delegates can submit onboarding material for prospects joining your group.

New: Hybrid RIA Certification Program (p.43)

Certified designees can approve RIA-only material for advisors themselves and submit to ART post use for record-keeping.

Contents

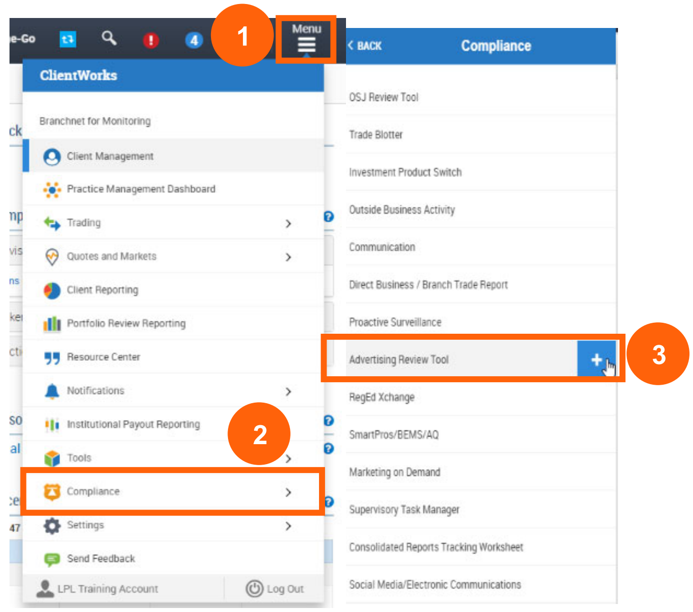
Access the Advertising Review Tool

There are two ways to access the Advertising Review Tool (ART): from the Menu or from the Client Management Home Page.

From the Menu

1. From Client Management, click the **Menu**.
2. From the ClientWorks menu, click **Compliance**.
3. From the Compliance menu, select **Advertising Review Tool**

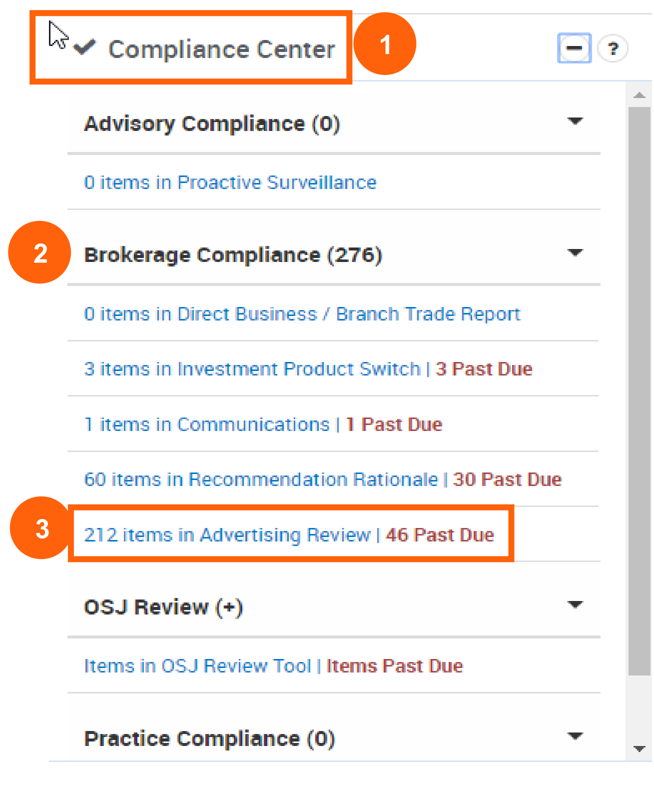
- You'll land on the **Advisor Submission tab** on the ClientWorks – Advertising Review page. You can view all of the items in Pending My Review that require your action or launch a New Submission.



From the Client Management Home Page

1. On the Client Management home page, the Compliance Center provides access to your compliance tools.
2. Click the **Brokerage Compliance** arrow to expand the category.
3. Click Items in Advertising Review

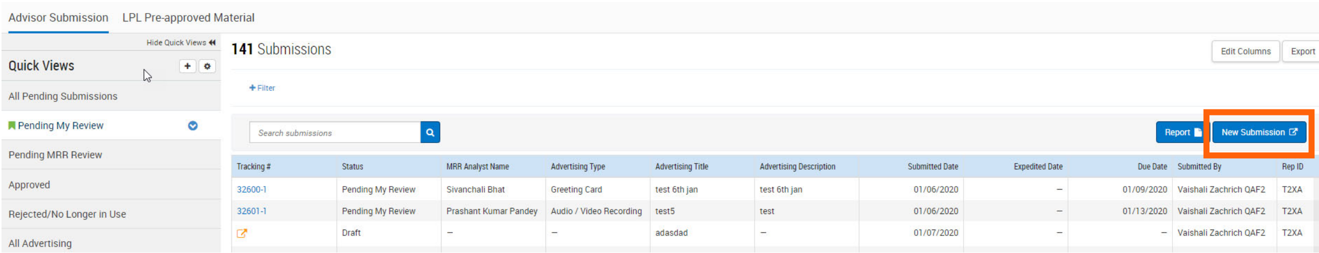
You'll land on the **Advisor Submission tab** on the ClientWorks – Advertising Review page. You can view all of the items in Pending My Review that require your action or launch a New Submission.



Create a New Advertising Submission

New Submission

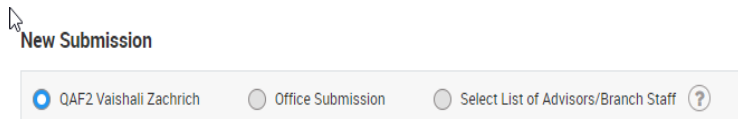
Click **New Submission** to create a New Advertising Submission.



Submission Details Required

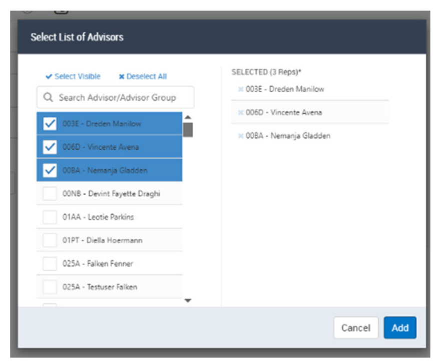
The New Advertising Submission page opens. The first step is to indicate the advisors/admins that will use this piece. You now have three options for submission:

1. **Default to you as the submitter.** This assumes you are submitting the piece for yourself.

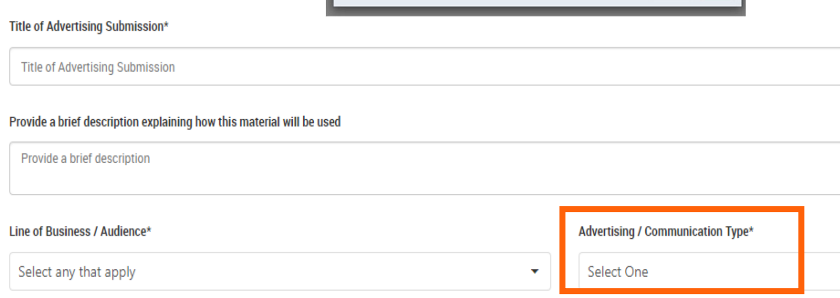


2. **Office Submission**: This should be used for common pieces for everyone in the office. An example is a fax cover sheet or a generic website.

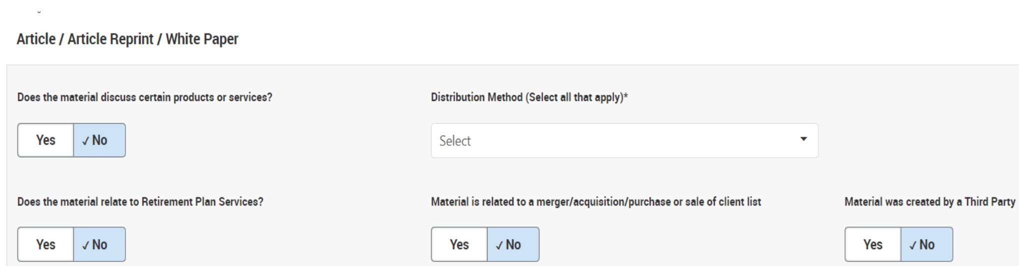
3. **Select List of Advisors/Branch Staff**: This option allows you to select a list of advisors who will be using this advertising piece. Use this option to submit on behalf of someone else or a group of people.



Now it's time to complete the form. You will give a **Title**, **Description (optional)**, **Line of Business,** and **Advertising Type**. Please use a title and description that properly describe the submission, as this may be used to find the advertising submission in the future.



Once you select the Advertising Type, you'll receive the detailed form. The form will vary based on the Advertising Type. As an example, Article / Article Reprint / White Paper would have the questions shown to the right.



Some of the questions will be pre-populated with either “Yes” or “No”. Please review all the questions and make changes as appropriate. For example, if you are working from pre-approved source material, you should indicate “Yes” for the pre-approved question. Aditional details about the pre-approved material will be requested, which may result in you being able to use the material immediately without having to wait for it to be reviewed after submitting. For more information, see the “Pre-Approved Content” section of this guide.

Non-Promotional Materials

Does the material include any financial or investment recommendation or otherwise promote a product or service of the firm?

Yes No

The last two questions on the form are not pre-populated with a “Yes/No” answer.
The key question you need to answer is: *Does the material include any financial or investment recommendation or otherwise promote a product or service of the firm?*

- If you answer **yes**, your materials will be routed to an MRR analyst for review and approval prior to use
- If you answer **no**, you will receive a message in the Advertising Review Tool for you to confirm the information you provided meets the guidelines for non-promotional materials, and you can use the piece immediately.
- If you're not sure if the material qualifies as non-promotional based on this guidance, simply answer "Yes" to the referenced question to submit for MRR pre-use review

Note: It’s very important that you’re accurate in responding to these questions to ensure that your piece is properly supervised. Inaccurate responses could result in the need for corrective action, which may include additional costs to you and delay further use of the materials.

Click on the information icon to see additional information about this question.

- **1. a.** Answer “No” for general market commentaries or economic discussions that are not used for the purpose of promoting a product or service of the firm.
- **1. b.** Answer “Yes” if additional comments describing what the advisor is doing for clients are included, whether or not it is in response to the information in the commentary.
- **2. a.** Answer “No” for general brand communications intended to raise awareness of the advisor’s practice. It may include the fact that financial services are offered.
- **2. b.** Answer “Yes” if there are marketing messages beyond the brand awareness (advisor or DBA).
- **3. a.** Answer “No” for informational updates about a product a client currently owns, such as changes to its portfolio or information about how the product has responded to changes in market conditions. Also included would be a post-sale transaction summary for a buy or sell of a security or product that does no more than state the facts of the transaction.
- **3. b.** Answer “Yes” if the material recommends additional purchases of the same or a new product or investment.
- **4. a.** Answer “No” for educational materials that are intended to promote financial literacy, including explanations of factual information. Examples include: Financial markets, types of securities, IRAs, qualified plans, 401(k)/403(b). Specific products are excluded (the XYZ Fund, the ABC stock.)
- **4. b.** Answer “Yes” if there is any language that creates desirability, such as investment merits, benefits or objectives of an investment, product, or service. This would also include advisor comments on how they use or would use the subject matter with clients.
- **5. a.** Answer “No” for ERISA or DOL required notices, including those about investment options within plans that do not recommend or promote new investment options.
- **6. a.** In addition to the considerations above, answer “Yes” if the message promotes the following services.
    - Financial Planning
    - Retirement Accounts
    - Retirement Planning
    - Retirement Income Strategies
    - Tax Planning

- College Savings Planning
- Asset Allocation
- Investment Strategies
- Cash Management Strategies
- Any other services

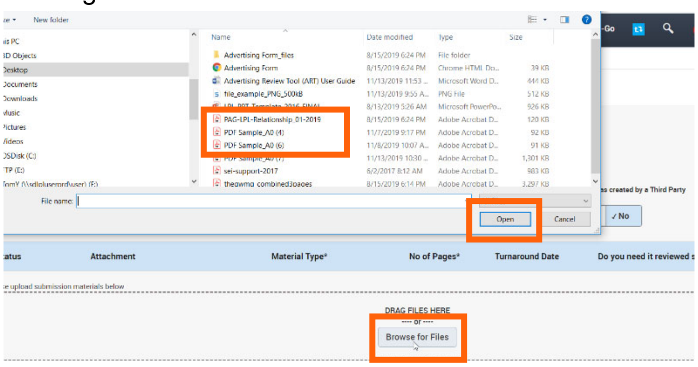
Your answer to the products/services question and the confirmation that appears if you answer “No” to the products/services question will help us determine if the material can be deemed “Non-Promotional” and will be available to be used immediately after you submit.

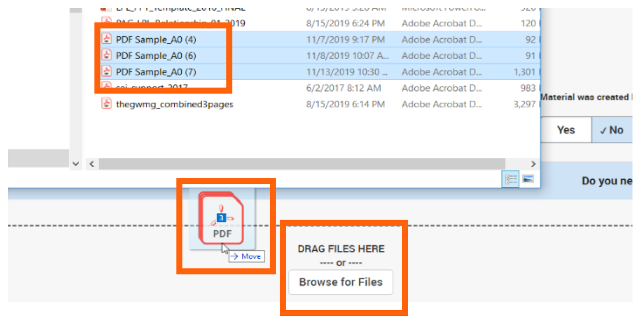
There is more information and a FAQ about Non-Promotional Materials on the ClientWorks Resource Center.

Attach the Files

Attach your file/s by:

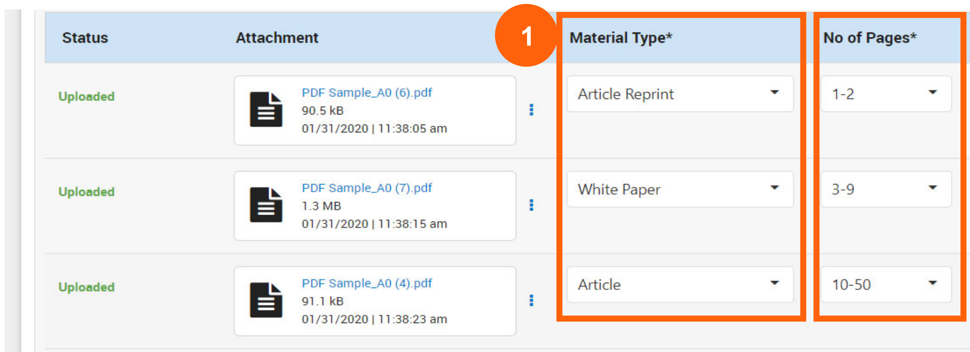
Clicking **Browse for Files** OR Attach your file/s via the **Drag & Drop** method





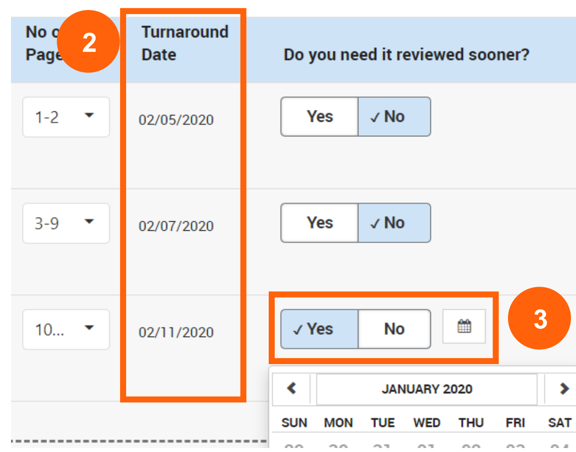
Once the documents are loaded, you'll need to answer a few more questions related to the document.

1. Indicate the **Material Type** and ART will automatically calculate the number of pages or minutes.



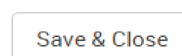
2. The expected **Turnaround Date** for completing the review will display after you indicate the number of pages.

3. If you need to expedite the review, select "Yes" under the **Do you need it reviewed sooner?** question and select the date you need it by from the pop-up calendar. The options available will not include the date of the submission or the turnaround date, but will give you the days in between submission and turnaround.



4. Once the documents are loaded, click **Submit** to complete the submission on the bottom right of the submission form. If you don't see the Submit button, make sure to scroll to the bottom right of the form.

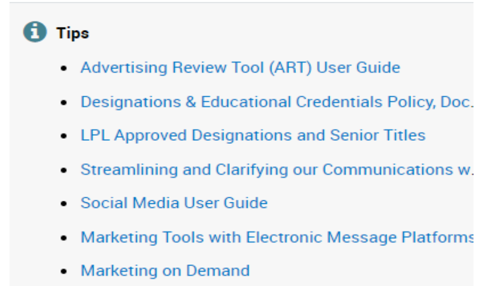
5. To save a partially completed submission, click **Save & Close** at the bottom right.



Partially completed submissions that have been saved can be accessed from the **All Pending Submissions** Quick View within the **advisor Submission** tab.

An Advertising Review analyst will be assigned to your submission and the review will be completed on or before the due date indicated. The due date is determined by the page count.

There are links to guides, tools, and other resources on the **Tips** area at the top right of the submission form. To open these without sacrificing your progress, right click the hyperlink and choose **Open link in a new tab**.



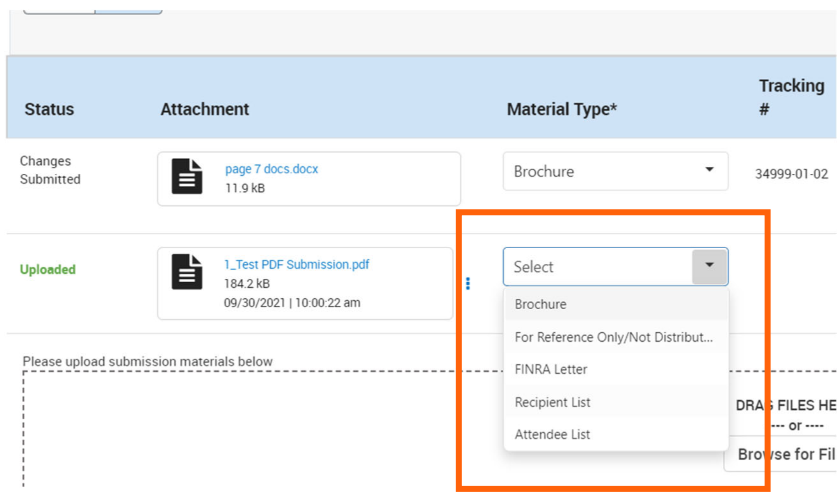
Reference Documents

Reference documents – such as seminar attendee lists, recipient lists, and FINRA Letters — can be uploaded to new submissions, as well as previously created and approved advertising submissions. Reference documents themselves do not require approval by an MRR analyst, but the analyst may need to see the reference document in order to approve your material that is accompanying it.

Uploading reference documents with a new submission:

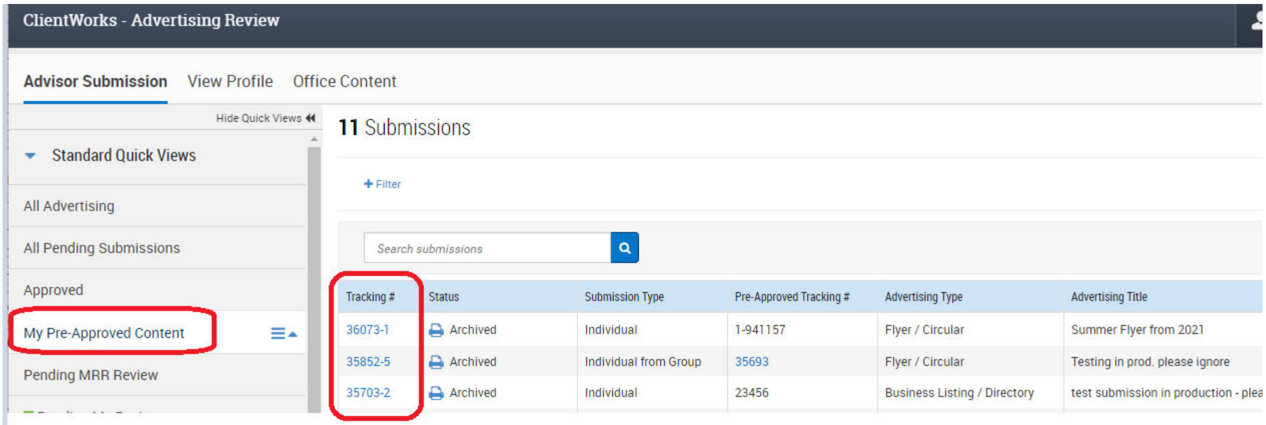
Reference Documents are uploaded to a new submission like any other document; the "Material Type" in the drop down menu must be set to one of the following:

- For Reference Only
- FINRA Letter
- Recipient List
- Attendee List

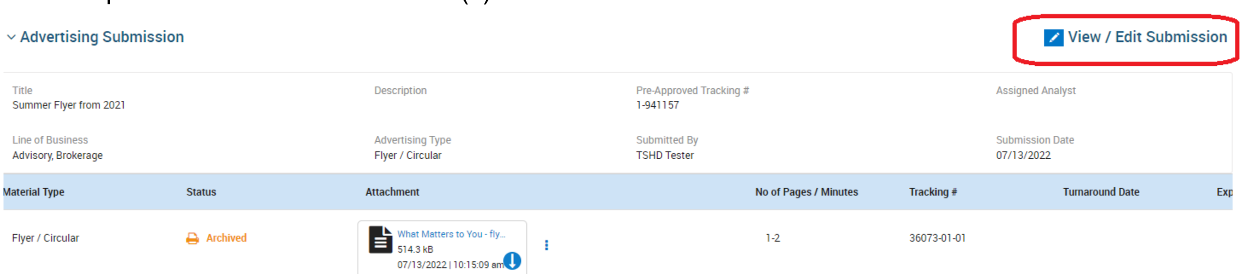


Reference documents will not route for analyst review; instead they will immediately be archived for recordkeeping purposes.

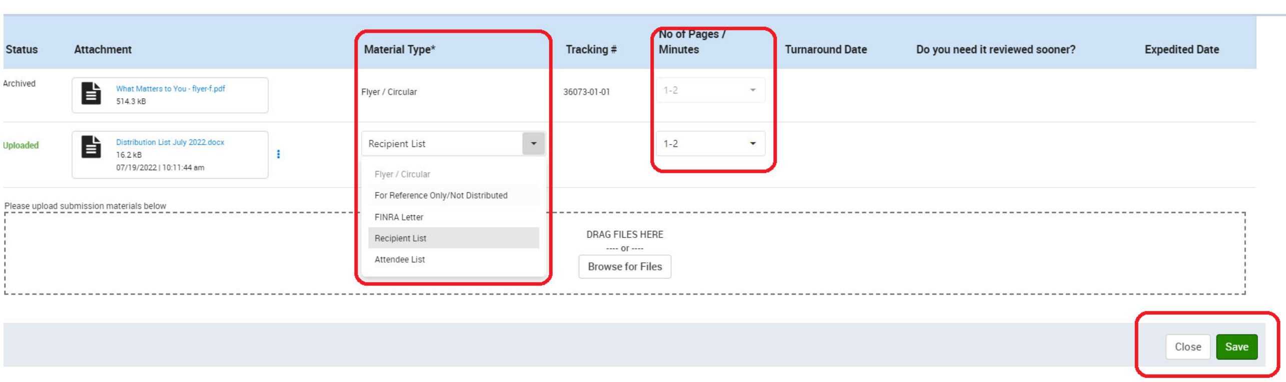
Uploading reference documents for "Approved" or "Pre-Approved" material:
For your submissions identified as "Pre-Approved" at the time it was submitted, use the "My Pre-Approved" quick view on the left to find the submission. If you submitted the material for someone else or if it was not pre-approved at the time of submission, it will not appear in your own "My Pre-Approved" quick view; instead you can find it in the "All Advertising" or "Approved" quick views.



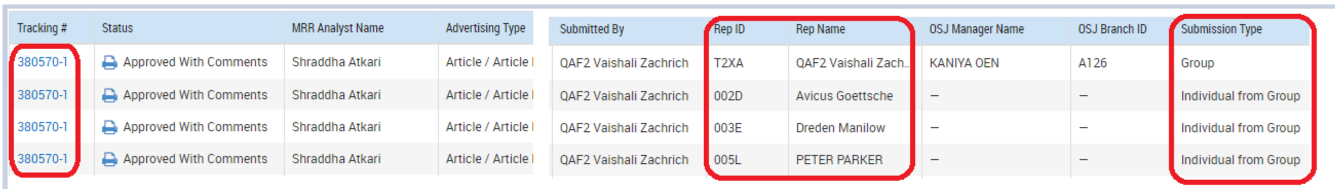
By selecting the tracking number, scrolling down, and then clicking the "View/Edit Submission" button, you will be able to upload the reference document(s).



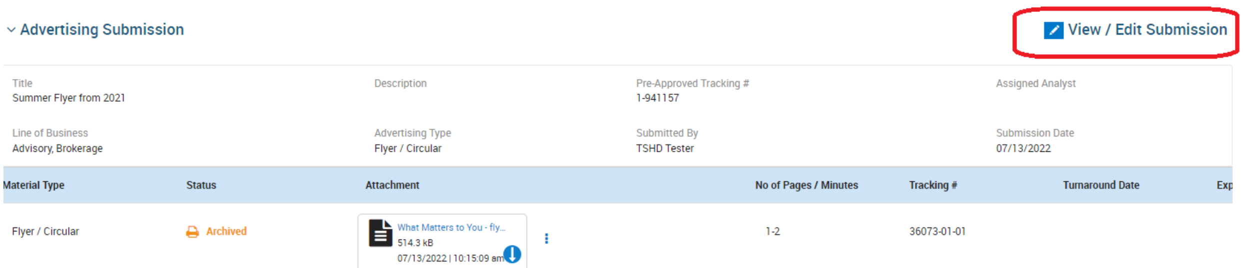
Choose "Distribution List" or other appropriate material type, indicate the number of pages, and press the "Save" button at the bottom right.



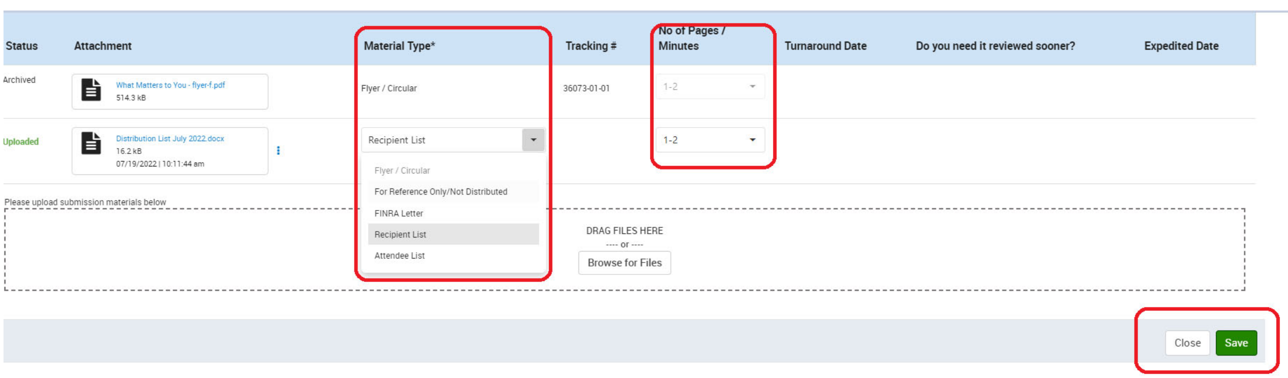
Uploading reference documents for one person who was included in a Group submission:
Locate the material in the "All Advertising" quick view. Note that the group submission and each advisor it was approved for has a separate entry in the dashboard, but the same tracking number. To identify which item to upload the material to, look at the name or rep ID in the "Rep ID" and "Rep Name" column.



By selecting the tracking number, scrolling down, and then clicking the "View/Edit Submission" button, you will be able to upload the reference document(s).



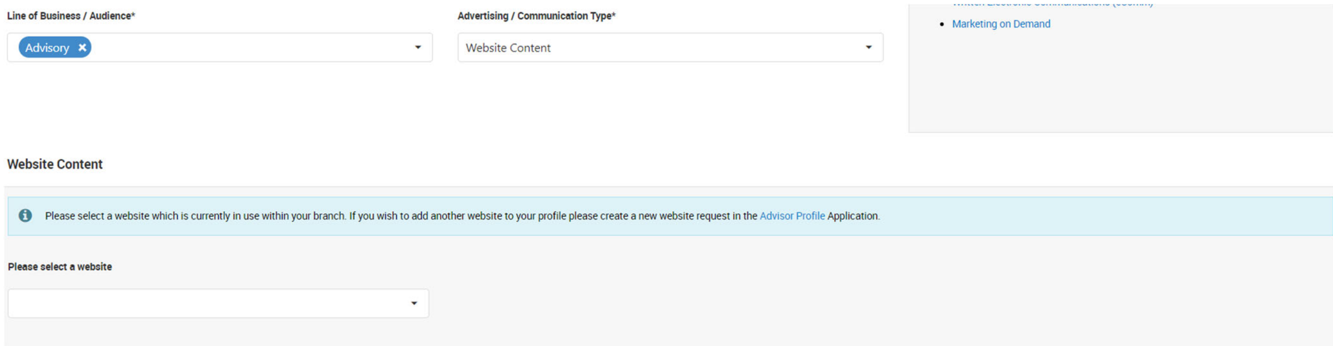
Choose "Distribution List" or other appropriate material type, indicate the number of pages, and click the "Save" button at the bottom right.



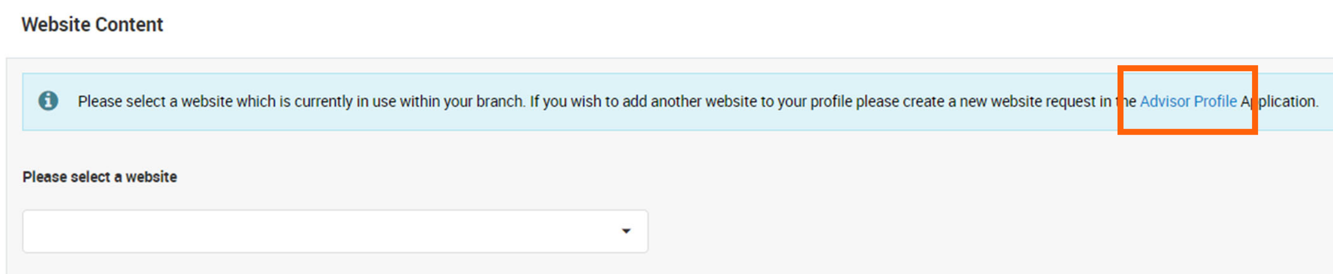
Uploading reference documents to Office Content when you are using the material yourself:
Locate the material by clicking on the "Office Content Tab." Check the box next to the Submission you would like to use, click the "Use This Item" button, and select the appropriate choice.

- No Changes – You will only be able to upload reference documents and you can use the material immediately.
- Non Material Changes – You have to describe the changes and upload the changed content, and can upload any reference documents as needed. You can use the material immediately.
- Material Changes – You have to describe the changes and upload the changed content, and can upload any reference documents as needed. The changed content will route to an analyst for required review prior to use.

Website Content Submission and Website URLs



When submitting website content and website layouts for Marketing Regulatory Review, users of ART will first need to select website URLs from the list of URLs that have been approved.

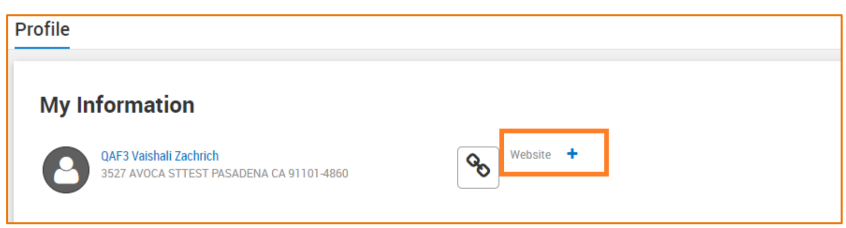


If you do not see the website URL you will be using in the drop-down menu, a website URL will need to be added to your Advisor Profile, which can be accessed by clicking the link **Advisor Profile** within the submission. (See the following section Website URLs Approval – Advisor Profile for more information.)

Website content can then be added to the Advertising Submission for review by the MRR analyst.

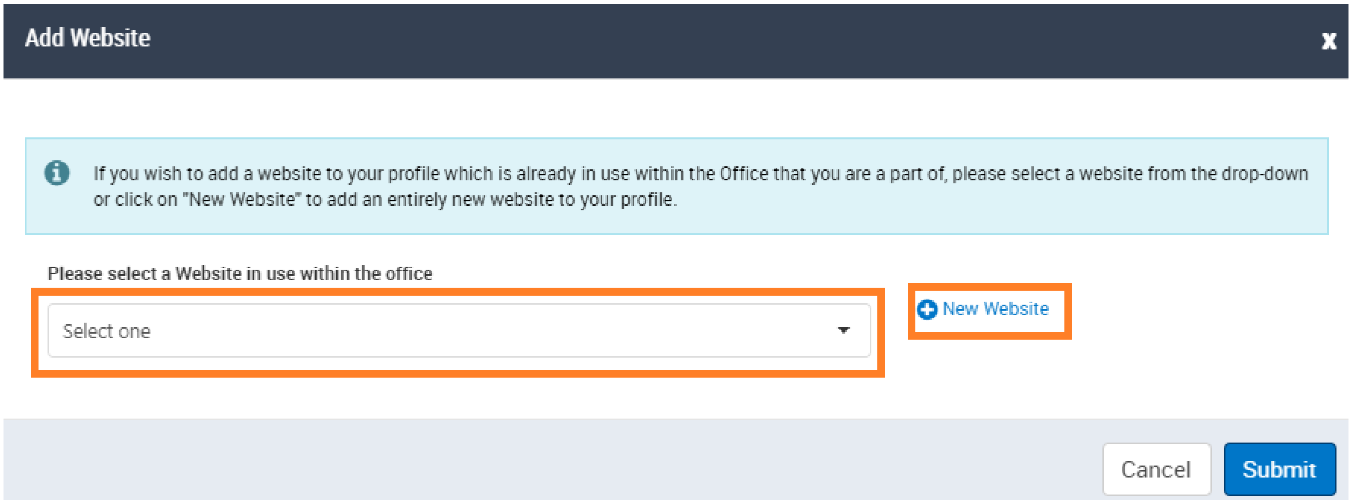
Website URL Approval – Advisor Profile

Adding a Website URL is performed on the **Advisor Profile. Access Advisor Profile from the Advisor Compliance Tool.**



1. To add a new Website URL, select the **Website "+"** add button in the **My Information** section.
2. Select the website you would like to add to your profile from the drop-down list.
3. All website URLs that have been approved for use in your branch or office will be displayed when you click the "select one" drop-down menu.
4. If the URL you'd like to add is not in the drop-down list, click the "+ website" button and add it by typing the URL using the "www.websitename.com" format.
5. Click the "Submit" button to have the URL reviewed by an MRR analyst.

6. If you need to add website content right away, you will now be able to do it by submitting the website content through the Advertising Review Tool (ART).



Acceptable File Types

ART will allow large files of up to 5GB to be uploaded. The system will not allow any files larger than 5 GB. The following are the acceptable document types that can be loaded into the ART system: **".docx," ".xlsx," ".pptx," ".jpg," ".pdf," ".mp3," ".mp4," ".ogg," ".webm," ".png."**.

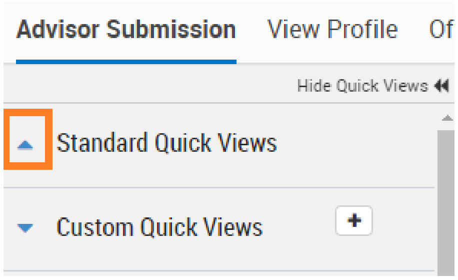
Audio Files:
.mp3 (Note: Please use lowercase.mp3 when you save your file, as uppercase .MP3 will cause a reject.)
Video Files:
.mp4 (Note: Please use lowercase.mp4 when you save your file as uppercase .MP4 will cause a reject.)
WebM,

Tip: The older Microsoft document types are not currently available: .doc, .xls, .ppt
Tip: Documents (even PDFs) containing picture files will not render those pictures in ART or the document may not upload at all. Use your browser to "print" and save as a new PDF to allow the file to be uploaded and render the picture.

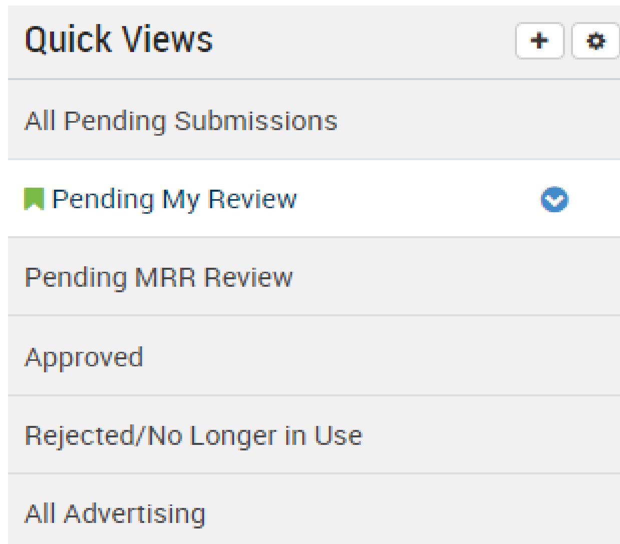
Locating a Submitted or Saved Item in ART

All submitted items can be located under the **Advisor Submission** tab. Depending on the status, you can locate the items by selecting the appropriate Quick View and filtering the grid results.

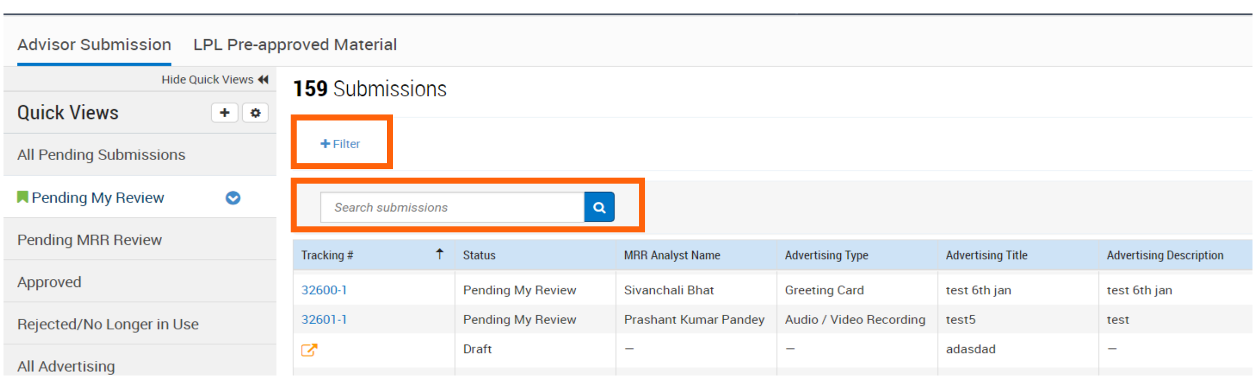
Start by expanding the Quick Views on the left side of your screen.



- **The Advisor Submission** tab displays six Quick Views: All Pending Submissions: Draft (saved) items that have not been submitted yet.
- Pending My Review (default): Items that have been reviewed and are waiting for information from your office and Draft (saved) items that have not been submitted yet.
- Pending MRR Review: Submitted items that are being reviewed by an Advertising Review analyst.
- Approved: Submissions that contain at least one document that has been approved and is ready for use.
- Rejected/No Longer in Use: Items that are not approved, or no longer approved for use.
- All Advertising: Any submissions, regardless of the status, can be located here.

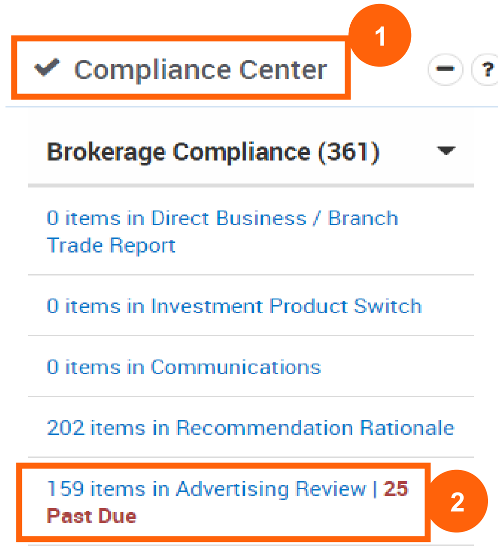


1. You can also locate items by using the filter or search feature on the Advisor Submission tab. Select the appropriate Quick View and then type your search term in the search box.

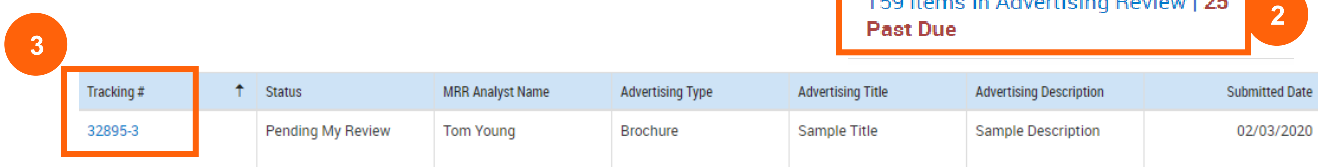


Find Analyst Comments and Make Required Changes

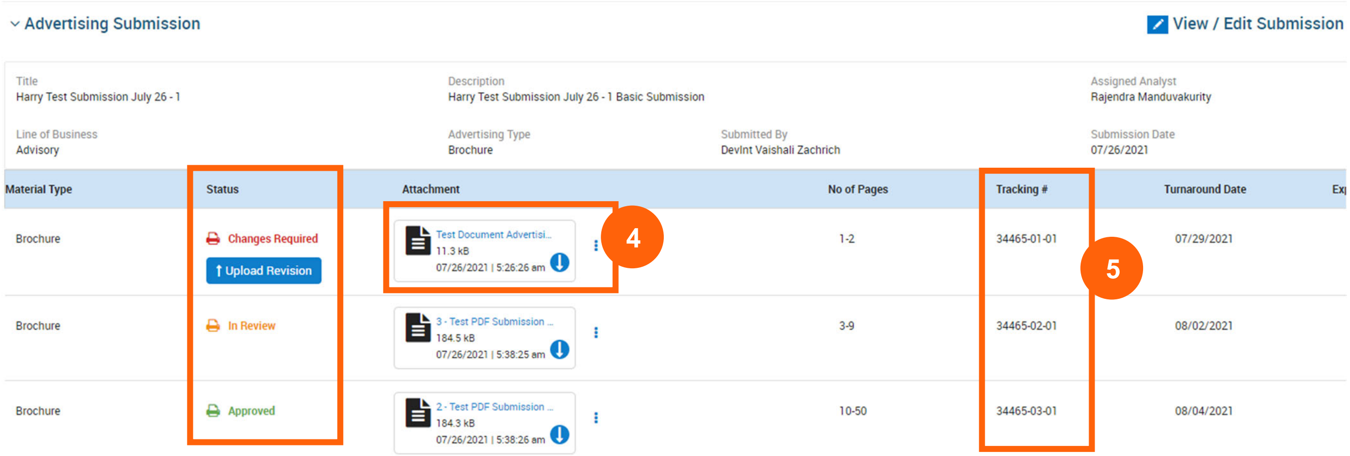
If an analyst requires changes to any one of the documents within a submission, you'll receive an indicator in the **Compliance Center (1)** that changes are required. You can access the submission via the Compliance Center alert **(2)** and then open it from within the **Advisor Submission** tab by clicking on the **tracking ID (3)**.



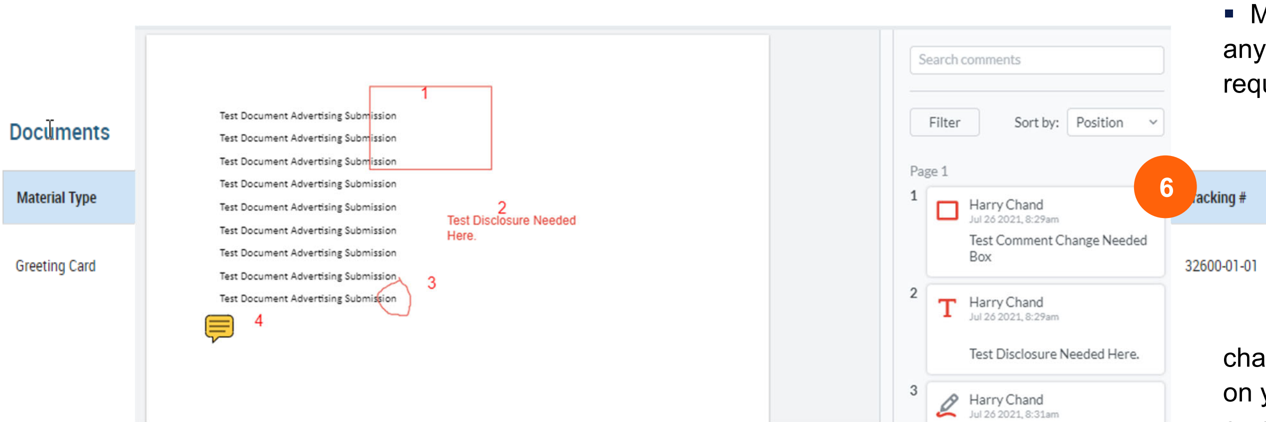
- The analyst may still be reviewing some of the documents, while requesting changes on other documents. Some documents with a submission may be approved for use, while others require changes or are still being reviewed.
- Note the status of each document within the submission and any analyst comments before using it.



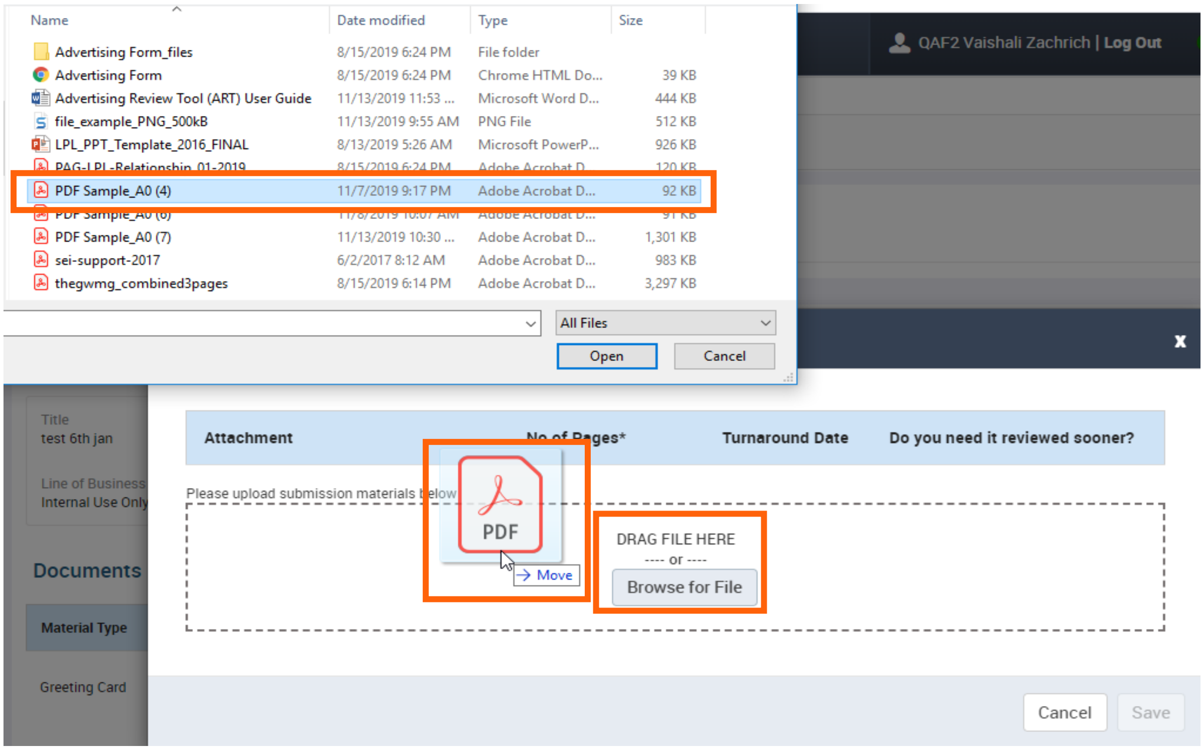
- Each document will display its own status **(4)** and have a unique subtracking ID **(5)**. The analyst may have sent a question or response via the ART communication tool (scroll to the very bottom of the submission). To view analyst comments or required changes for a specific document, click on the document to open it.

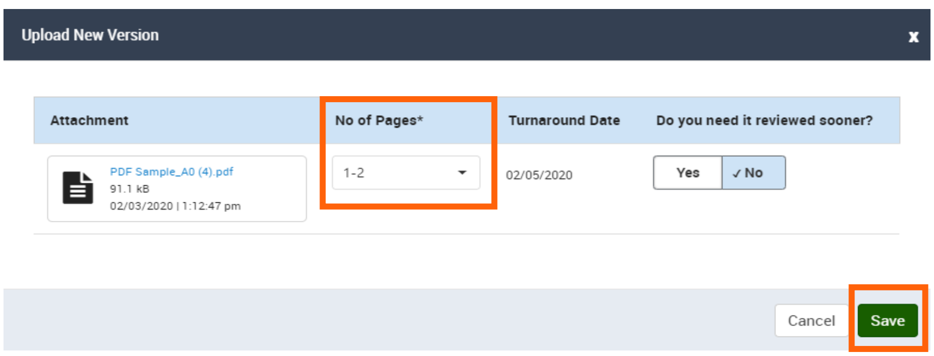


- The comments or required changes will be evident on the right side of your screen **(6)**. When you select a specific annotation, it will highlight on the submitted document.

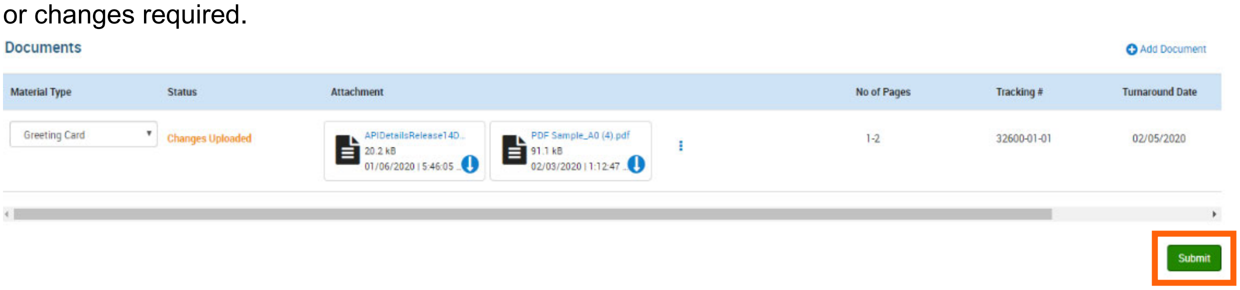


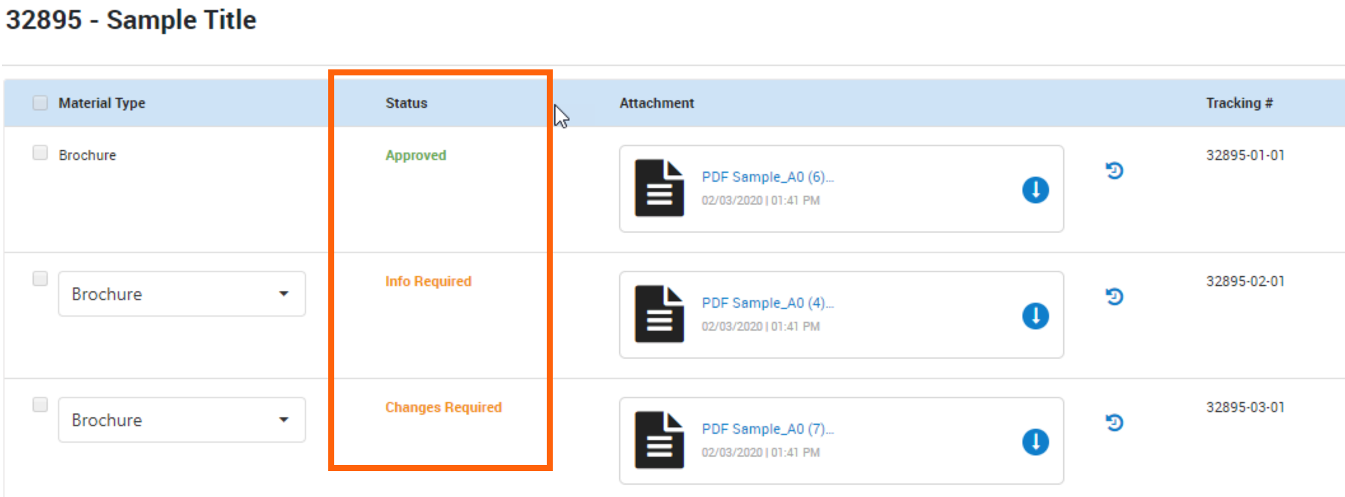
- Make any required changes on your own saved version of the document and upload the changed document by clicking **Upload** next to the original document. Note that the tracking ID will change accordingly, to indicate a new version of the item has been uploaded.





Click on the green **Submit** button (bottom right) after you have uploaded all of the documents for any info required or changes required.



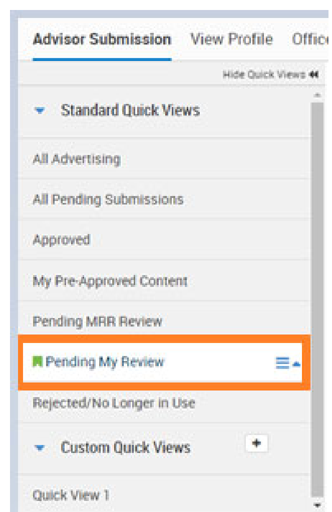


Submitting Audio and/or Video

Follow the instructions in this guide for creating a new submission. When you get to the section for uploading files, you can drag and drop or upload your audio or video files.

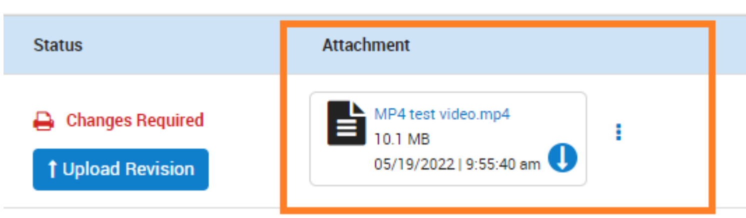
ART will allow large files of up to 5GB to be uploaded
Acceptable Audio file types: .mp3
Acceptable Video file types: .mp4, WebM,

Reviewing Analyst Comments on Audio and Video Submissions



MRR analysts will add comments and annotations directly onto the audio or video file. To review analyst comments for audio or video submissions, locate the submission. It will likely be in the "Pending My Review" or "All Advertising" Quick View.

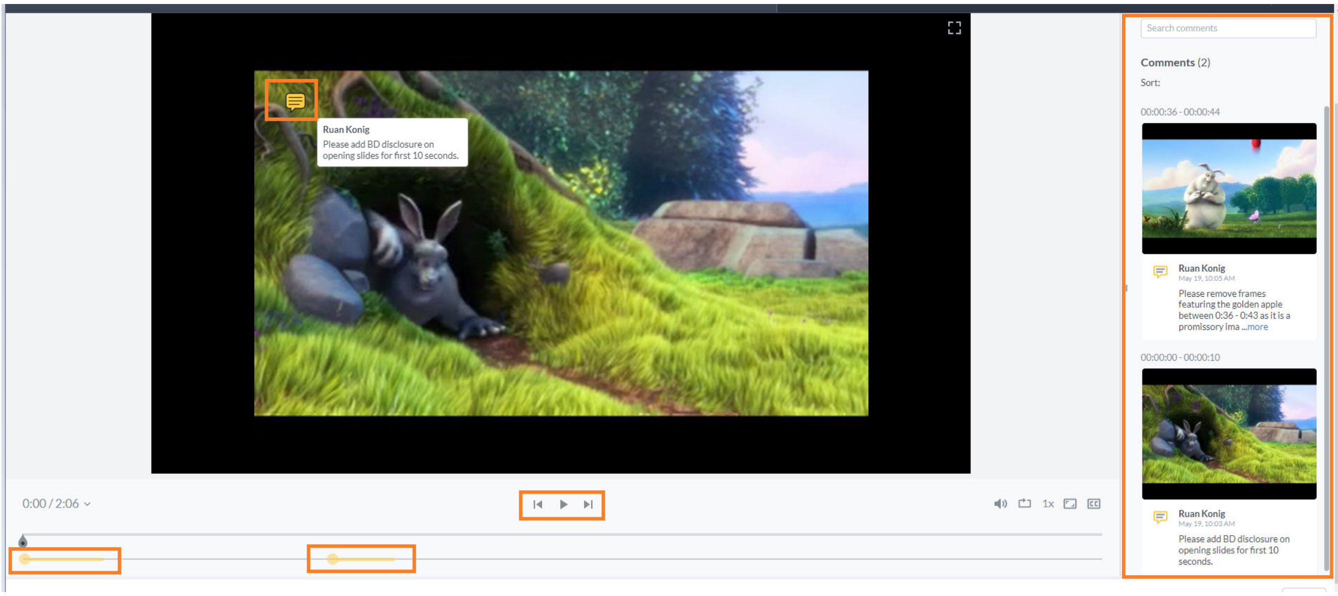
Open the submission by clicking on the tracking number.
Then scroll through the submission to the bottom where the files are attached.
Click on the **file name** that you uploaded as indicated below.



If you need to download the native file without the analyst annotations, you can do so by hitting the arrow

Video – Reviewing Analyst Comments

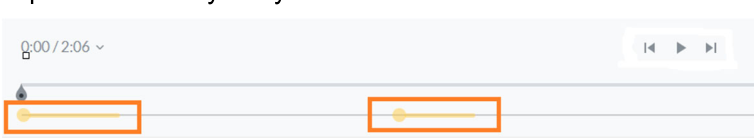
ART will display the uploaded video file. Rendering large video files may take a few seconds or minutes to load.

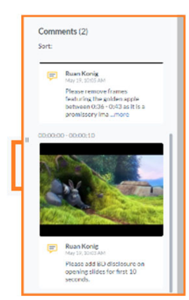


You do **not** have to play through the recording to see the comments. Analyst comments will be displayed on the right-hand side of your screen. You will have to scroll through them if there are more than one. The comments will be in **reverse** "place" order, with the last comment on the video appearing at the top of the list, and the first comment on the video appearing at the bottom of the list. You may want to start at the bottom of the list and work your way to the top.

By selecting any one of the comments, you can read the details on that comment. In addition, a yellow text bubble will appear on screen. If you hover your mouse over the yellow text bubble, the comments will appear on screen as well.

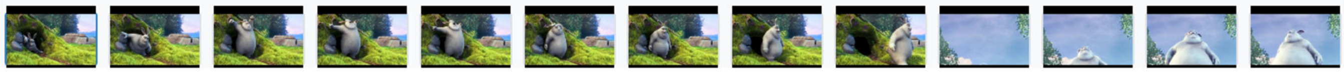
You can also click on the colored areas of the timeline at the bottom of your screen. Each analyst comment will have a colored (usually yellow) indicator here. The comments will appear in the correct "place" order, so the first comment on the video will be the furthest to the left, and the last comment will be furthest to the right. By clicking on each in turn, the rendered image video will jump to the frames where the analyst left their comments. This is a good way to review all the comments in the order that they appear on the recording. It is most effective if the video is paused before you try this.





You can also see the analyst annotations when you play through the video, and you can pause as you get to them. By hovering over the yellow text bubble you will see the comments. They might not be on screen very long, so this is not the best way to review them. You can play, pause, and skip forward or backward.

To select and view a specific frame in a video, select the “eyeball” at the top-left corner of the screen. This will allow you to toggle frames at the bottom of your screen on or off.
Note that advancing quickly through the frames tends to be “glitchy.” If you experience flashing frames, please toggle the “eyeball” to “off.”



Audio – Reviewing Analyst Comments

- When you open the uploaded audio file, ART will present a graphic representation of the recording on screen.

- You do <u>not</u> have to play through the recording to see the comments. Analyst comments will be displayed on the right-hand side. You will have to scroll through them to see all of them if there are more than a few.

- The comments will be in **reverse** “place” order, with the last comment on the recording appearing at the top of the list on your right, and the first comment on the video appearing at the bottom of the list. You may want to start at the bottom of the list and work your way to the top.

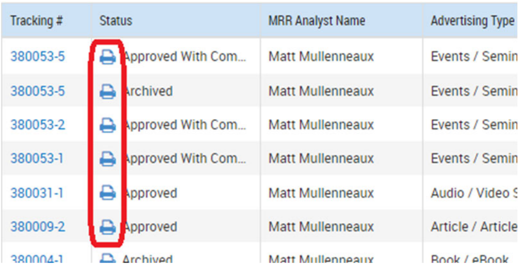
- You can also click on the colored areas of the timeline at the bottom of your screen. Each analyst comment will have a colored (usually yellow) indicator here.

- The comments will appear in the correct ”place” order, so the first comment on the recording will be the furthest to the left, and the last comment will be furthest to the right. By clicking on each in turn, the comment on the right side of your screen will be highlighted.

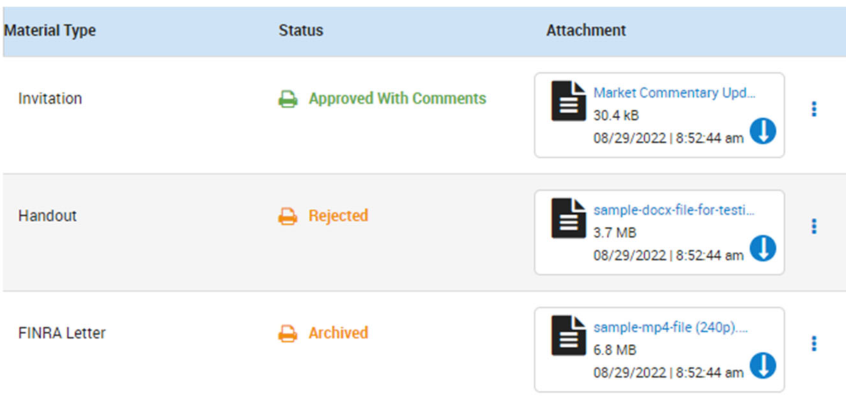
You can use the familiar Play, Pause, Skip Forward, and Skip Back buttons to listen to the recording. Unlike video, the analyst comments will not appear on screen as you play through the recording.

Printing Analyst Annotations and Comments

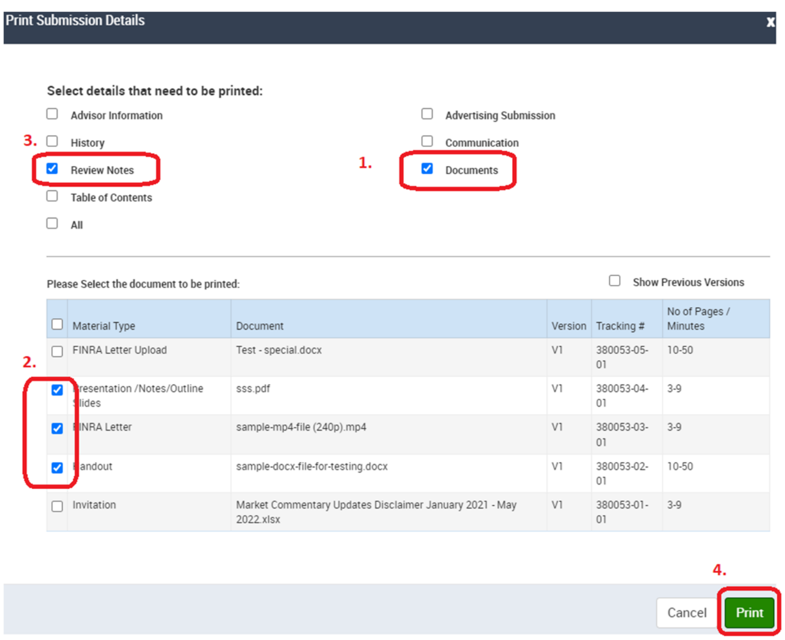
Print hard copies of documents or “print” to save them as a PDF.
You can print directly from the dashboard without opening the submission. Look for the printer icon on the dashboard for each submission. This is a good way to print all of the documents in the submission at the same time.



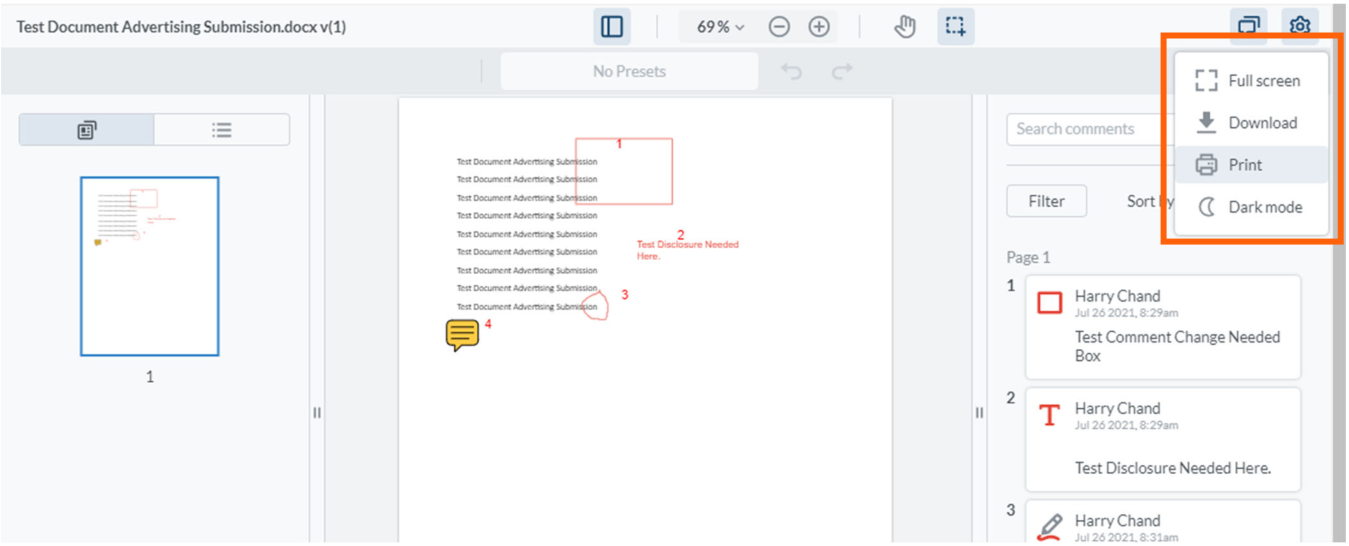
First select the documents that need to be printed from within the print window, then you will be able to select “Review Comments” to include the analyst’s comments in your printout.



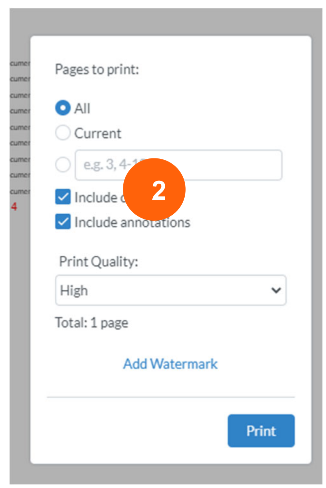
You can also print from within the submission. Find the submission and click on the tracking number. You can then click on the printer icon by the status of any of the documents you’d like to print.



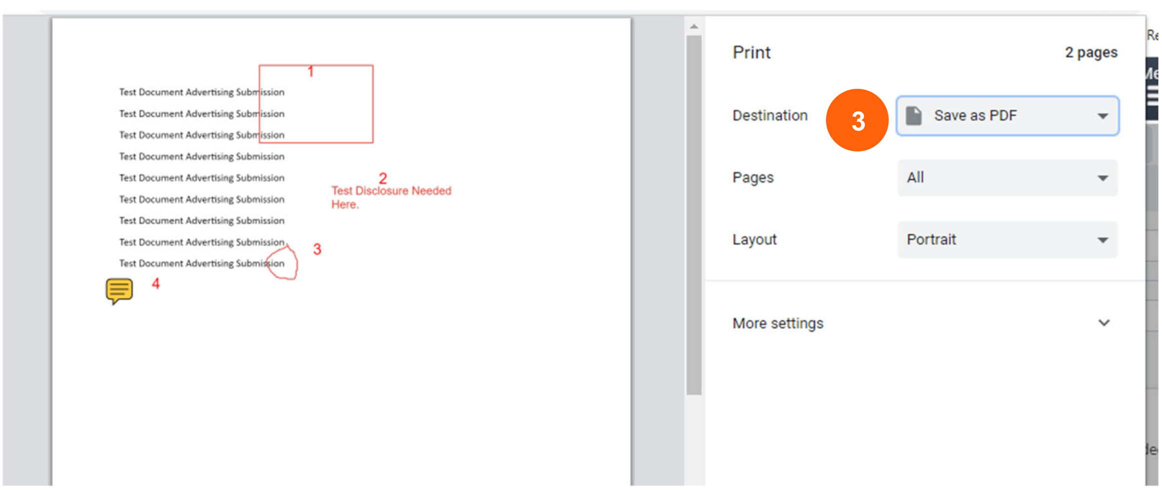
To print after you have opened a document, click on the GEAR icon that appears toward the top right. Select the **Print (1)** option.



On the print pop-up box, check **All** pages and check **Include Comments (2),** then click on **Print.**



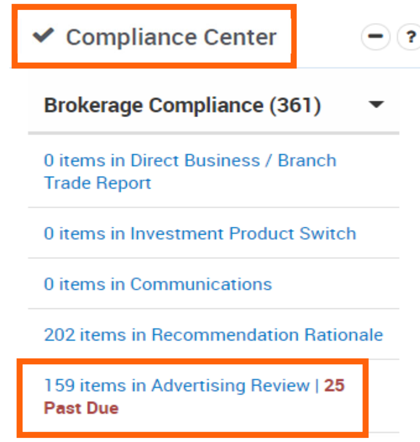
After your printer's print options appear, change the **Destination** to **Save as PDF (3),** and click **Save**.



Compliance Center, Email Notification, and ClientWorks Notifications

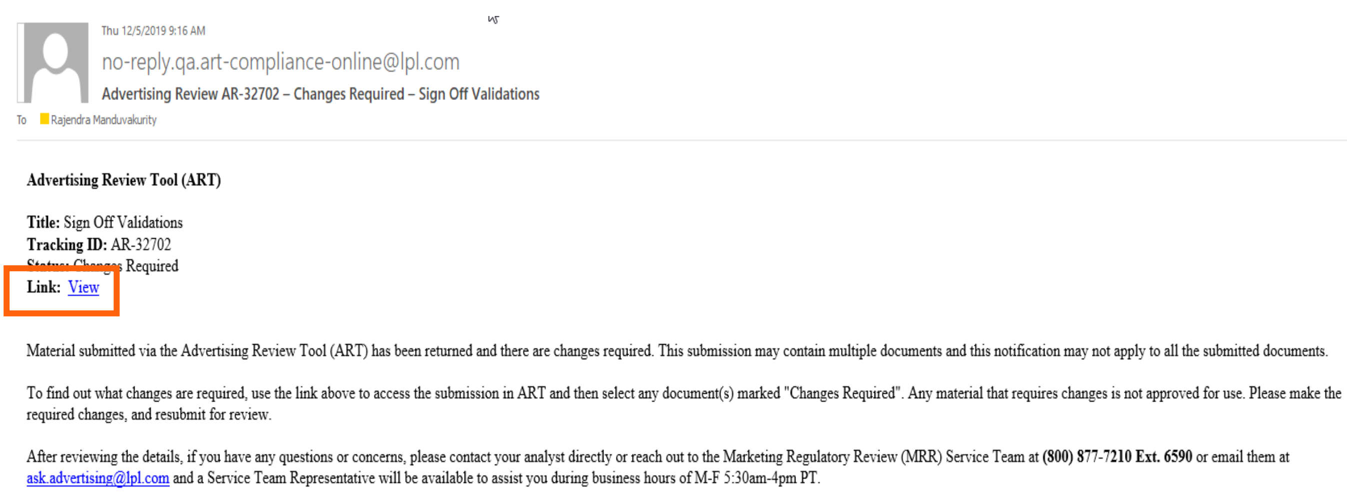
ART uses a combination of notifications through the ClientWorks **Compliance Center** and email notifications to both the submitter and the person it was submitted for (advisor/owner). Look for the following notifications:

- Compliance Center Notification to the advisor and the submitter if the analyst requires action on the submission:
  - Changes Required
  - **Submission Communication** (not a status; please see the Submission Communication section of this guide)



- An email notification will be sent to the submitter (but not to the advisor/owner, unless the submitter was also the advisor) if there is any status change or communication:
  - Changes Required
  - Approved
  - Rejected
  - Review Not Applicable
  - **Submission Communication** (not a status; please see the Submission Communication section of this guide

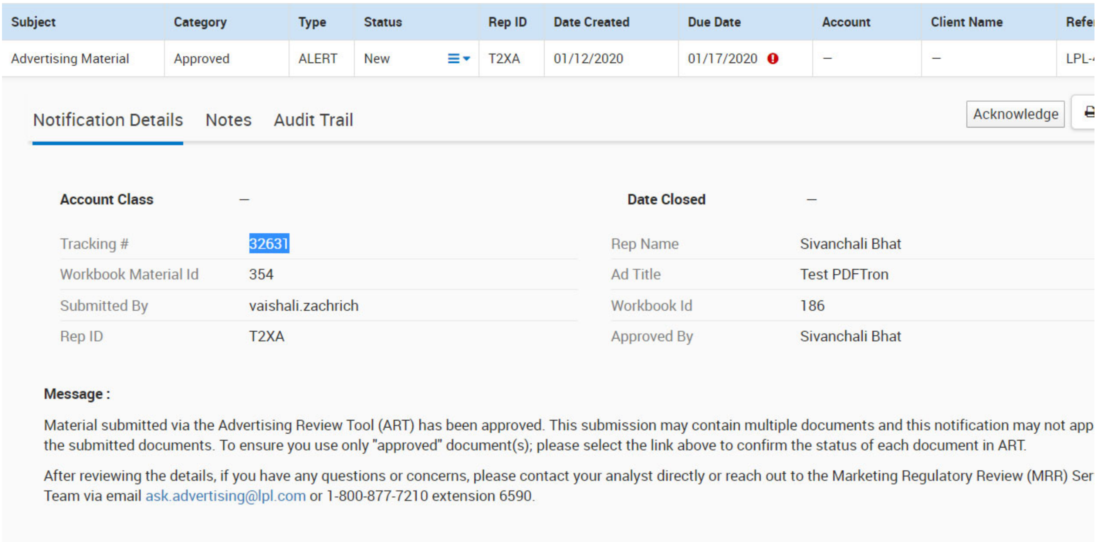
An example of an Approved email notification is below. If you click on the **Link:** View, it will route to the Advertising Review Tool and into the approved submission.



The email notification will identify the submission and provide the status and other important information. Click on the **View** hyperlink in the notification to open the submission that the notification applies to in ART.

You will only get ClientWorks notifications for the final statuses of:

- Approved
- Rejected
- Review Not Applicable



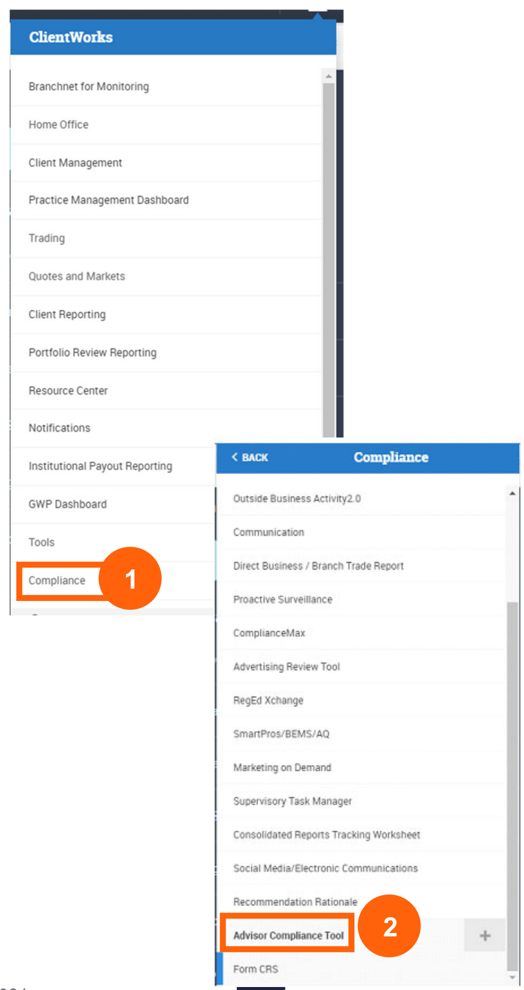
Compliance Center Viewing Contacts

LPL Marketing Regulatory Review analyst contact information now appears in in the ClientWorks – Advisor Compliance Tool – Office Contacts Page.

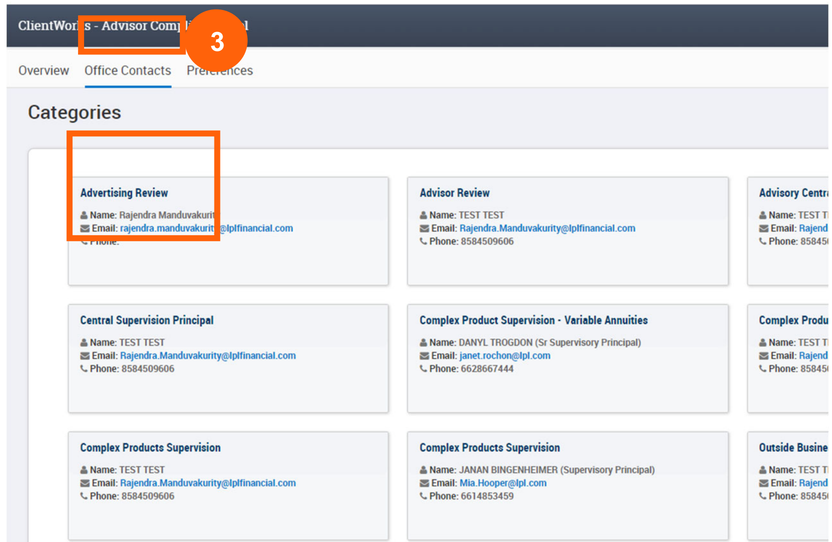
To access this list:

1. Navigate to **Compliance** on the ClientWorks menu

2. Choose **Advisor Compliance Tool** from the Compliance Menu



3. Click on **Office Contacts** tab on the upper left side of the screen



Delegation

OSJ managers, non-OSJ managers and program managers can now appoint delegates to perform office-level advertising material submissions.

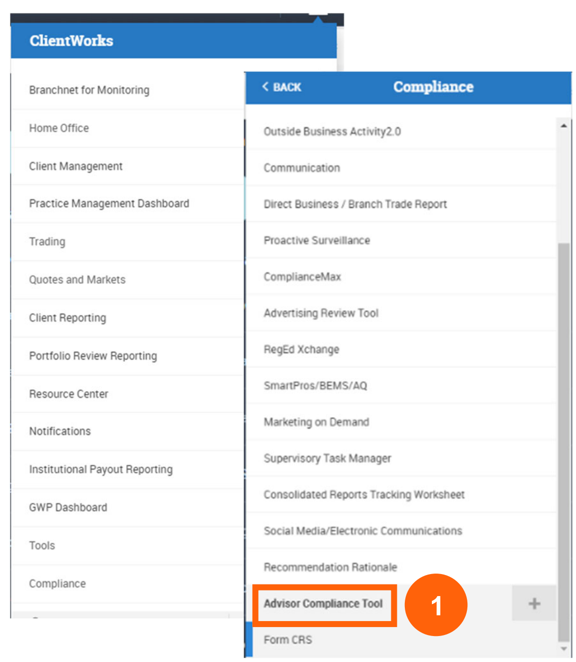
A delegate could be anyone in the office — a licensed individual or a non-licensed individual.

This allows delegates to make office submissions for OSJ offices, non-OSJ offices or financial institutions.

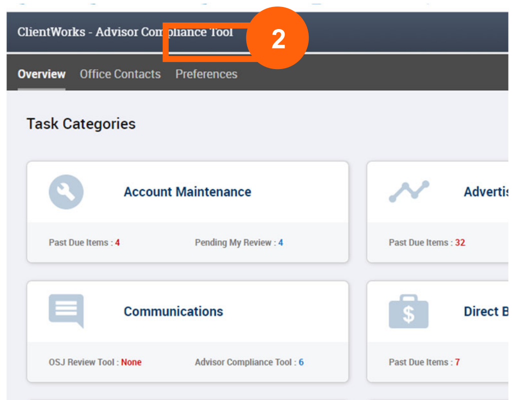
When a delegate enters a submission OSJ managers/non-OSJ managers/program managers will be able to see all advertising submissions for their organization.

To set up a delegate:

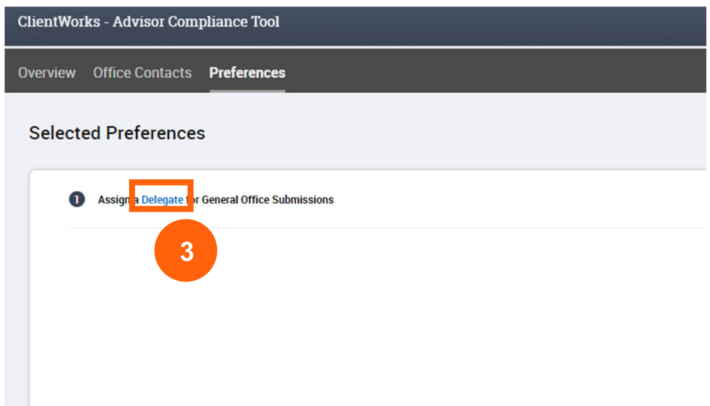
1. Navigate to the **Advisor Compliance Tool** in ClientWorks.



2. Choose **Preferences**

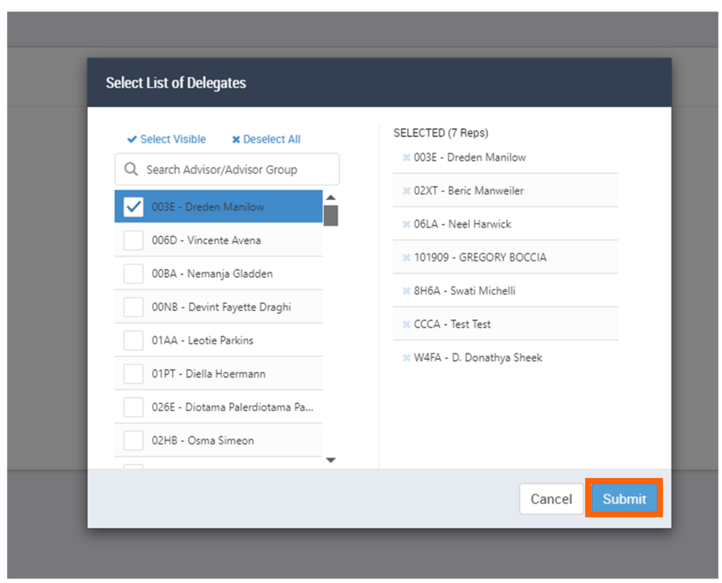


3. Click on **Delegate**



4. You will be able to add and remove delegates from the **Selection List of Delegates** window.

Click on **Submit** to accept the changes to your list of delegates.



Submission Communications

The Submission Communication tool allows the advisor and analyst to communicate directly with each other within an ART submission (look for it at the very bottom of each submission). This is a useful tool to ask/answer questions or make suggestions. If your analyst sends a message via the Submission Communication tool, you will receive a notification (see the Notifications section of this guide).

Submission Communications are not instant messages, so responses from the analyst won't be immediate.

Turnaround Times

The **Standard Turnaround Times** are listed below. This will be calculated for you in the new system.

Page Count	Standard Turnaround Time
1–2 pages (including stationery)	3 business days
3–9 pages	5 business days
10–50 pages	7 business days
Over 50 pages	TBD*

*Analyst will contact the advisor for consultation and discuss the due date.

Further Information Submitted, Submitted for FINRA Filing, and Revisions Submitted statuses have the following Alternate Turnaround Times.

Page Count	Alternate Turnaround Time
1–2 and 3–9 page submissions	1–2 business days
10–50 and over 50-page submissions	4 business days

Office Submissions for Branch Offices

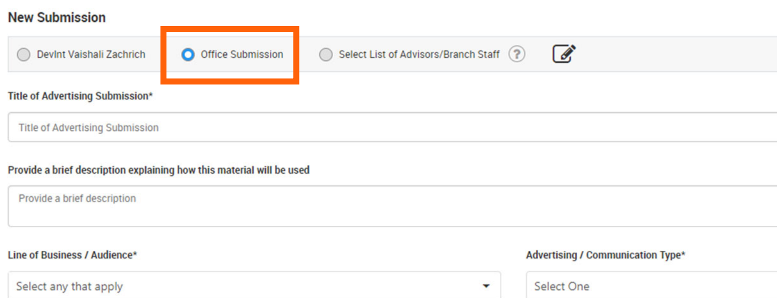
Submissions can be made for branch offices so that anyone in that office can use the item once it is approved.

Office Submissions are useful for things like websites that everyone in the office appear on, a template with no advisor information, or a generic fax cover sheet that anyone in the office can use.

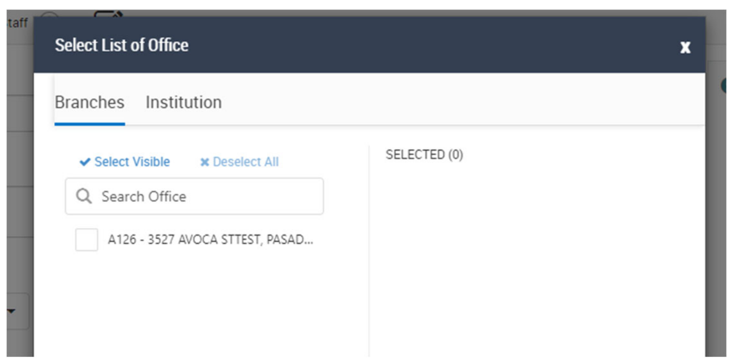
Do not use Office Submissions if the submission is meant for a specific person or a select group of advisors only; in these cases an **individual** or **group** submission would be appropriate instead.

OSJ branch managers can submit for their OSJ office or any non-OSJ office under them.
A non-OSJ branch manager can only submit for their non-OSJ branch office.

When creating a new office submission select the **Office Submission** radio button.



A pop-up box will appear with a listing all of the offices that you can choose to include on the submission.



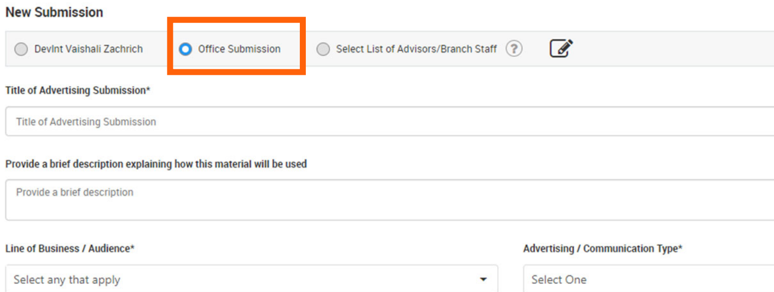
Office Submissions for Financial Institutions (Banks and Credit Unions)

A program manager can submit advertising material for an institution so that anyone in that institution can use that material without having to submit their own copy.

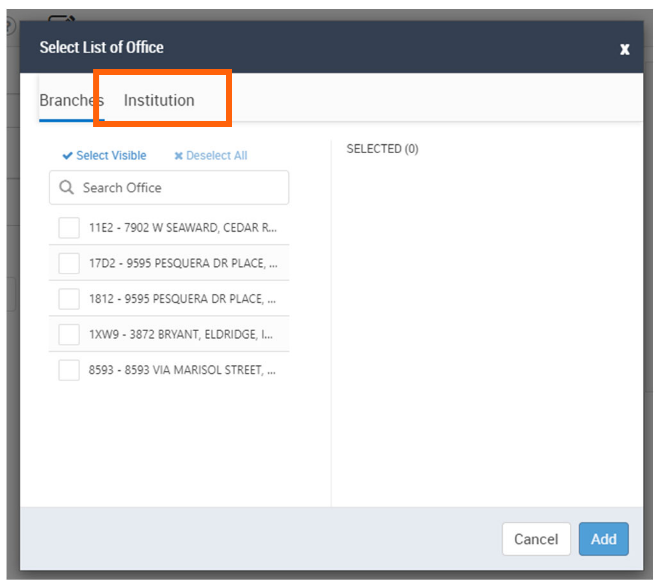
Please consider the content carefully: Office submissions should only be used for content that can be used by anyone in the selected branch and does not feature or apply to specific advisor or group of advisors. Examples: Generic fax cover sheets, websites, and templates with no specific advisor information.

Do not use Office Submissions if the submission is meant for a specific person or a select group of advisors only; in these cases, an **individual** or **group** submission would be appropriate instead.

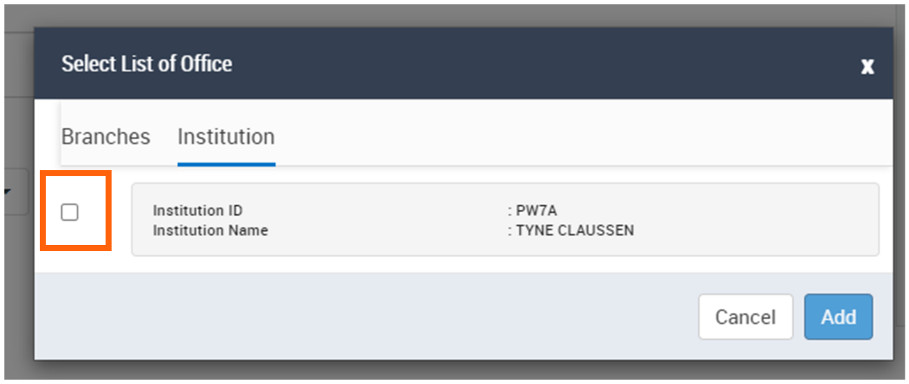
As a program manager, when creating a new submission, select the **Office Submission** radio button.



A pop-up box will appear; click on the **Institution** tab



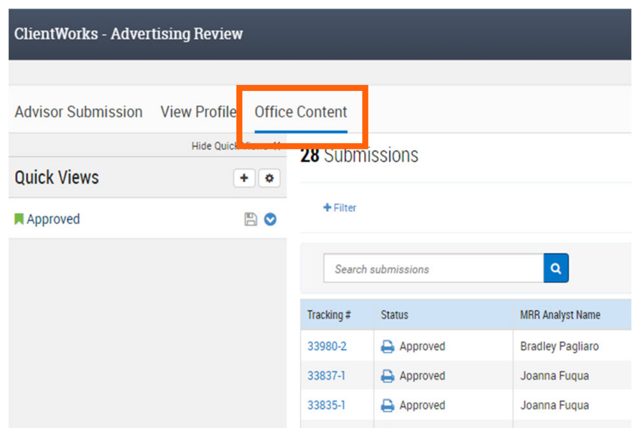
Next the **Select List of Offices** box will appear – choose the Institutions for the Advertising Submission by clicking on the check box.



Office Content Library

A library of previously approved submissions is now accessible from with the Advertising Review Tool under the **Office Content** tab.

This is material that is available and approved for use by your office. All previously approved material can be viewed and downloaded, as described in more detail in the following sections.



Office Content with **no changes** or **non-material changes** once submitted within ART can be used immediately without MRR analyst review. Advisors will be able to use previously approved content immediately without waiting for an advertising analyst's review and approval.

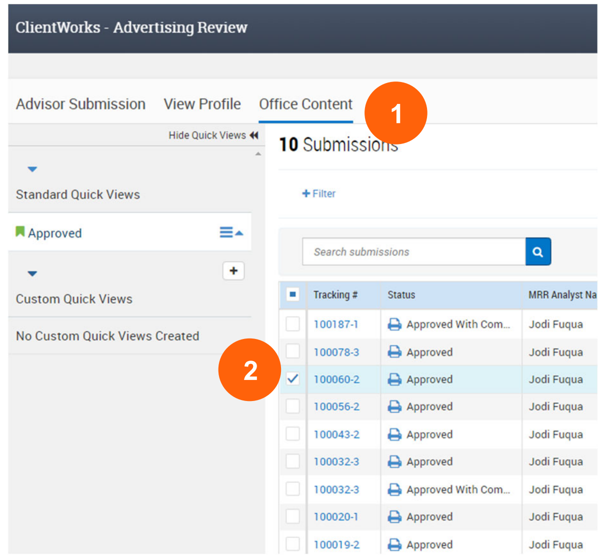
Office Content with **material** changes will be sent by ART to an advertising analyst for review and approval before use.

Using Office Content with No Changes

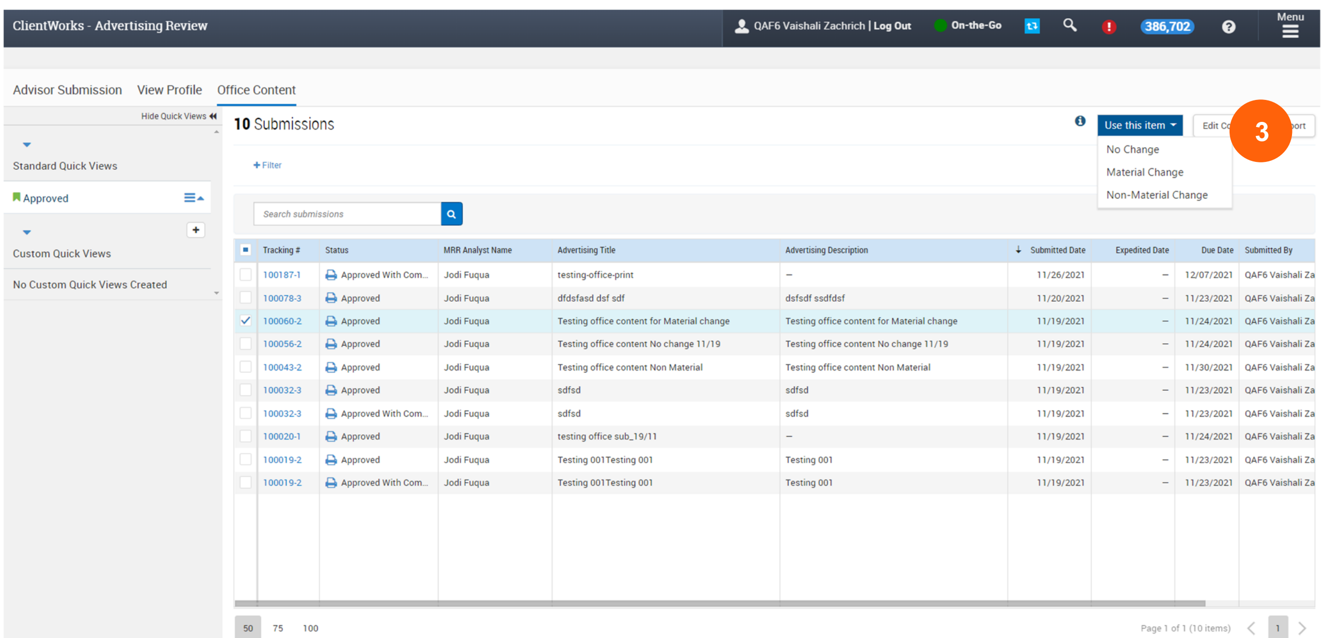
To use material from the Office Content library with no changes:

1. Click on the Office Content tab

2. Check the box next to the Submission you would like to use



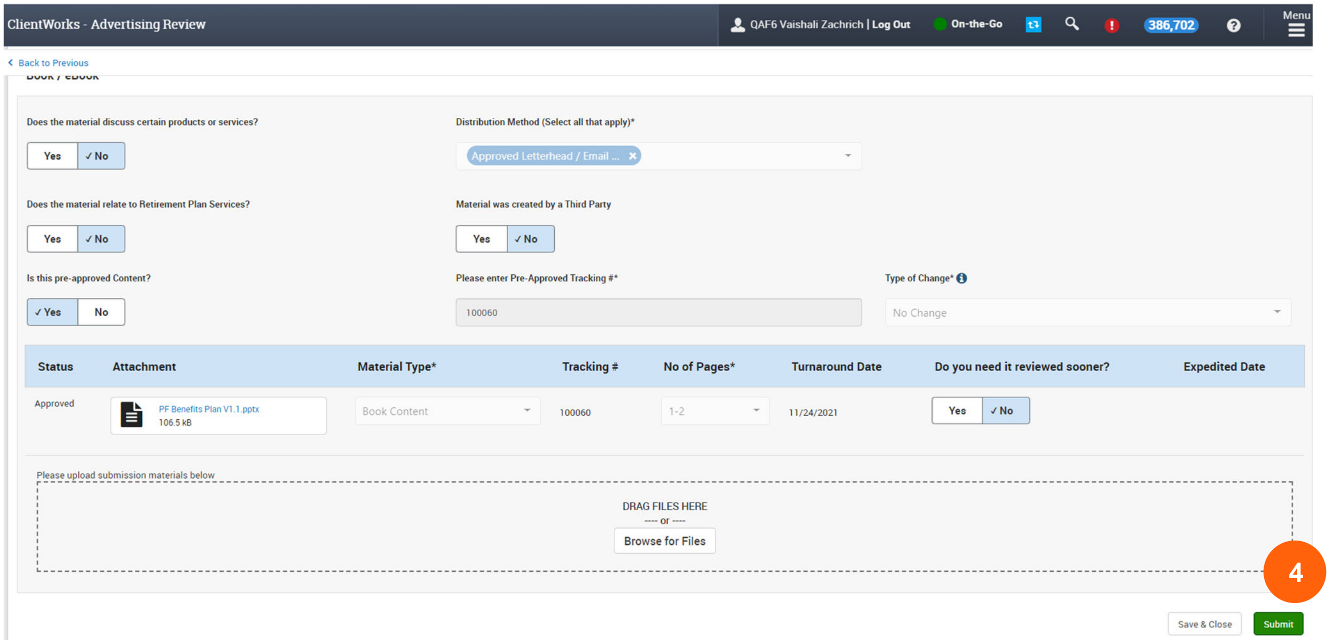
3. On the right side of the screen, click on the “Use this item” drop-down menu and choose “No Change.”



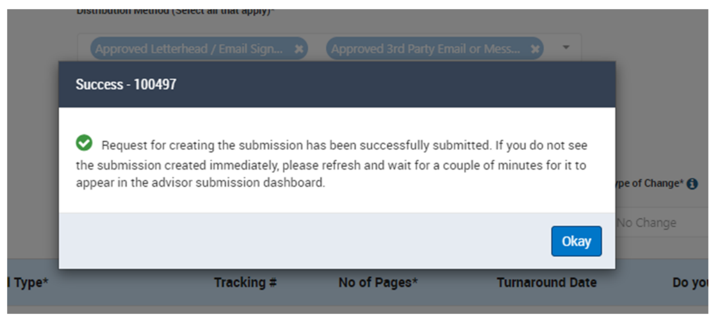
The selected item will open and you will to be view, but not change, any of the selections that describe the submission.

From this screen, the only action you will be able to take is to upload a Reference Document if you have one to upload at this time.

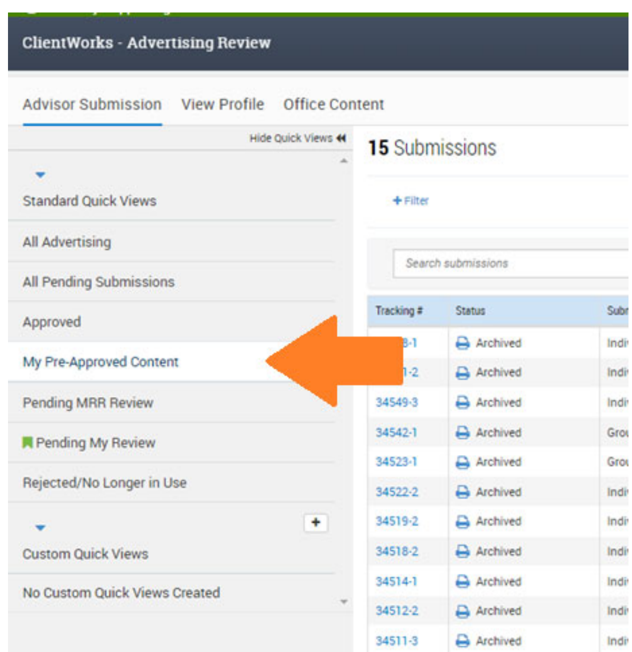
4. Click on “Submit”



You will receive a pop-up message with the item’s new tracking number.



The advertising piece is now available and ready for you to use. It is available in the “My Approved Content” Quick View on the main ART dashboard.

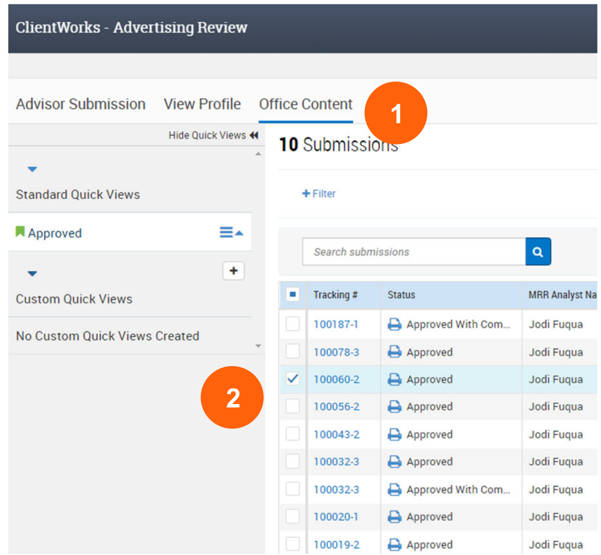


Using Office Content with Non-Material Changes

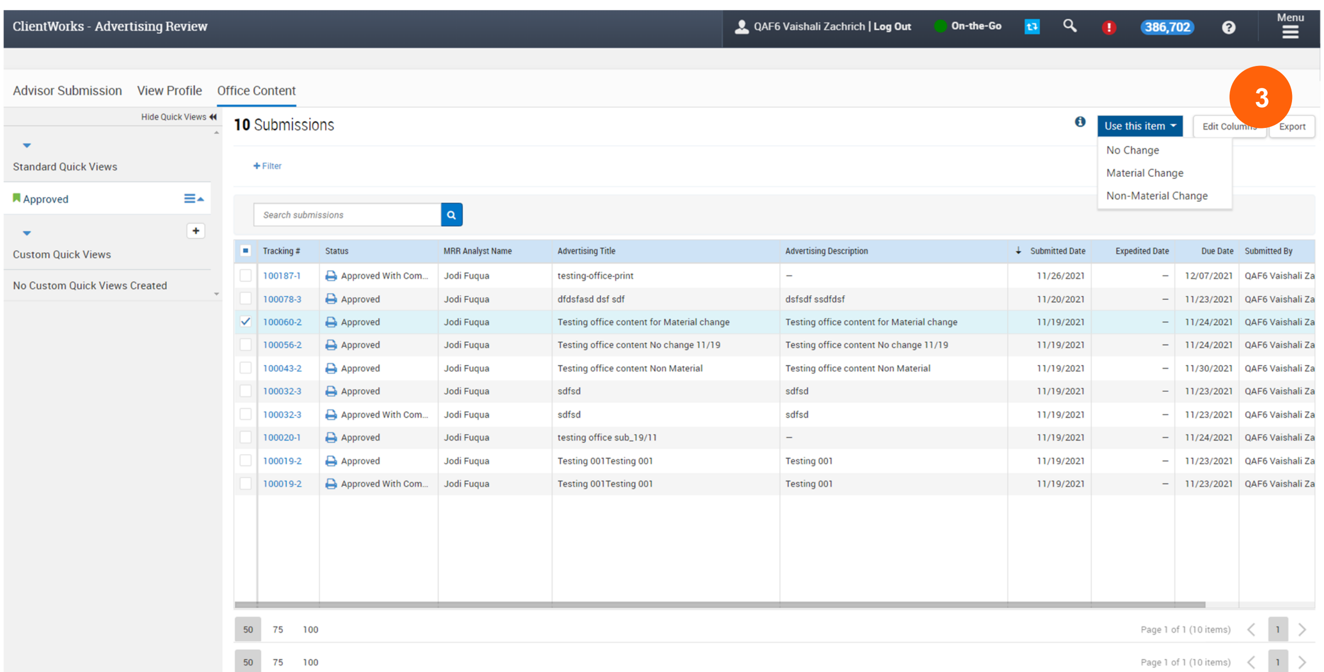
To use material from the Office Content library with Non-Material Changes:

1. Click on the “Office Content” tab

2. Check the box next to the Submission you would like to use



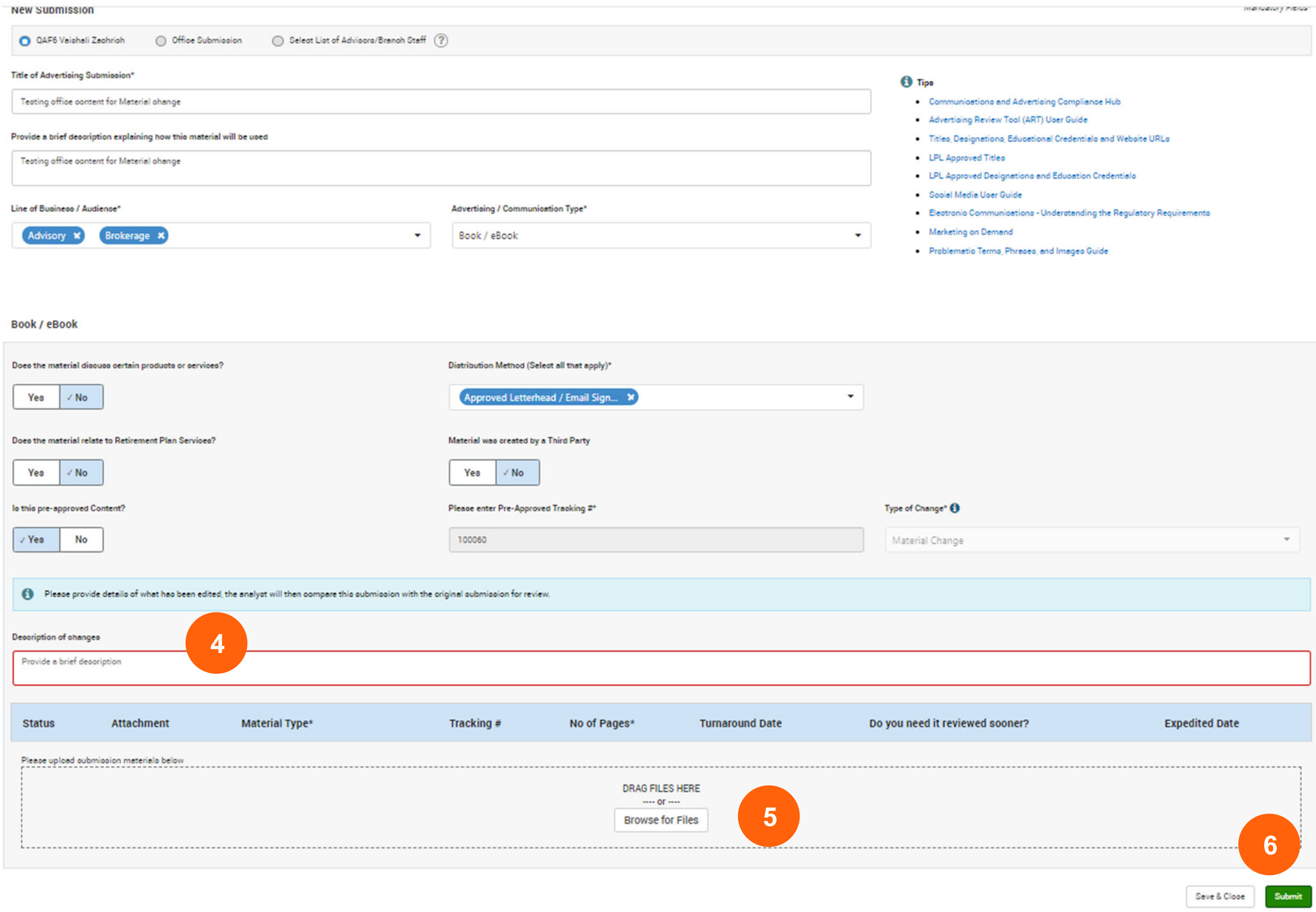
3. On the right side of the screen, click on the “Use this item” drop-down menu and choose “Non-Material Change.”



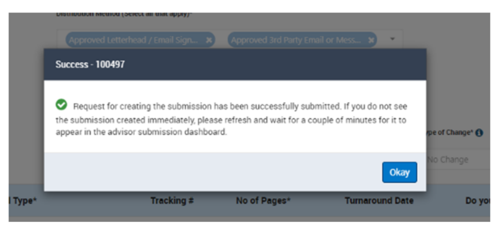
4. The Submission will open. On the Submission, enter a description of the non-material changes you have made to the advertising piece.

5. Upload the changed version of the advertising piece.

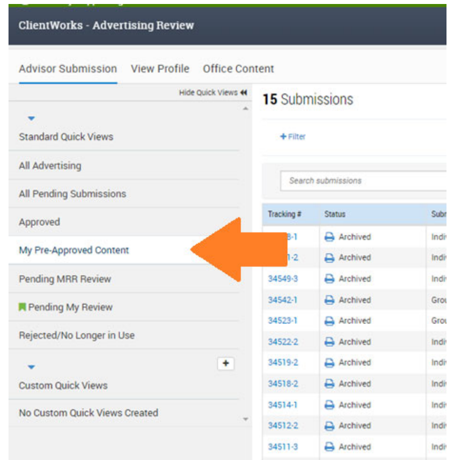
6. Click on “Submit.”



You will receive a pop-up message with the item’s new tracking number.



The advertising piece will now become available and ready for you to use. It is available in the “My Approved Content” Quick View on the main ART dashboard.

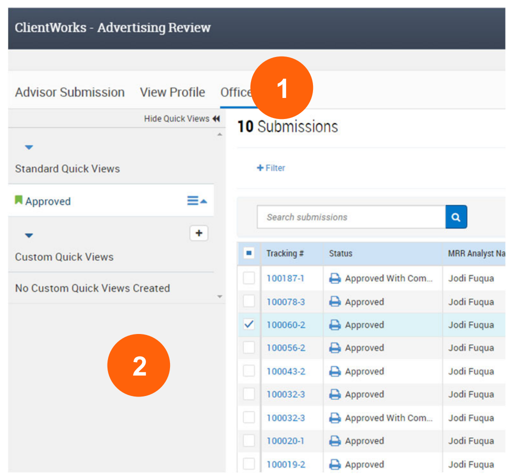


Using Office Content with Material Changes

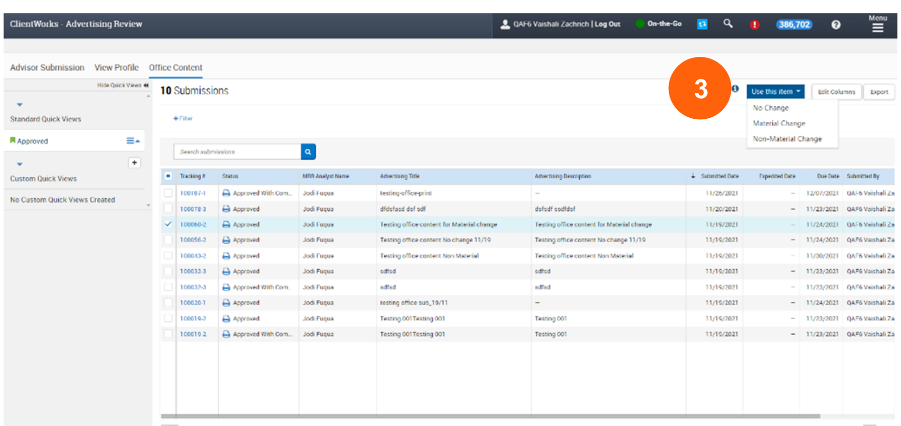
To use material from the Office Content library with material changes:

1. Click on the “Office Content” tab.

2. Check the box next to the Submission you would like to use.



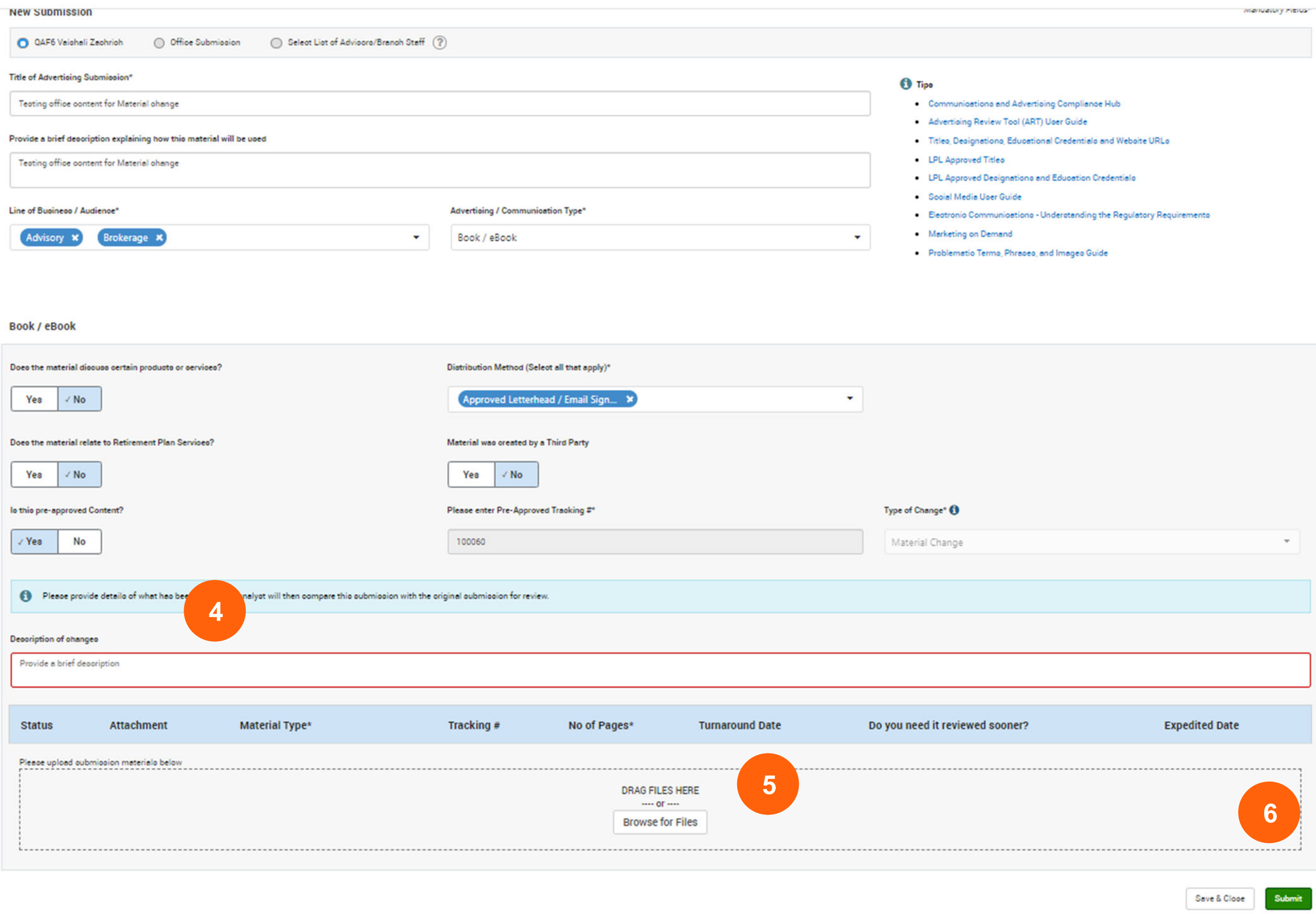
3. On the right side of the screen, click on the “Use this item” drop down menu and choose “Material Change.”



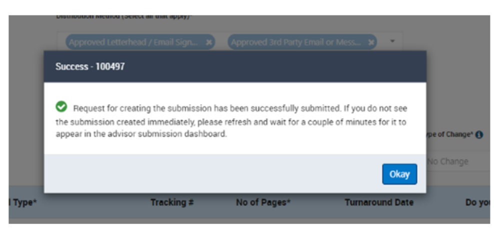
4. The Submission will open. On the Submission enter a description of the material changes that you have made to the advertising piece.

5. Upload the changed version of the advertising piece.

6. Click on "Submit."



You will receive a pop-up message with the item's new tracking number.



The advertising piece is now available and ready for you to use. It is available in the "My Approved Content" Quick View on the main ART dashboard.

Pre-Approved Content

Pre-approved content is approved advertising material that was previously approved by the Marketing Regulatory Review (MRR) team and also content such as LPL Corporate Marketing Material from the Resource Center. This material may have an ART tracking number assigned to it or a ComplianceMAX reference number associated with it.

Similar to Office Content previously described, pre-approved content with **no changes** or with **non-material changes,** once submitted within ART, will be archived by ART and can be used immediately, without requiring MRR Analyst review.

These may be subject to a post-use spot check. If any deficiencies are found post use, you will be notified and the item will be flagged “Deficiencies Found.” Once a pre-approved item is flagged in this way, it is no longer appropriate to use it; please resubmit as a regular submission (not pre-approved) to have it reviewed again.

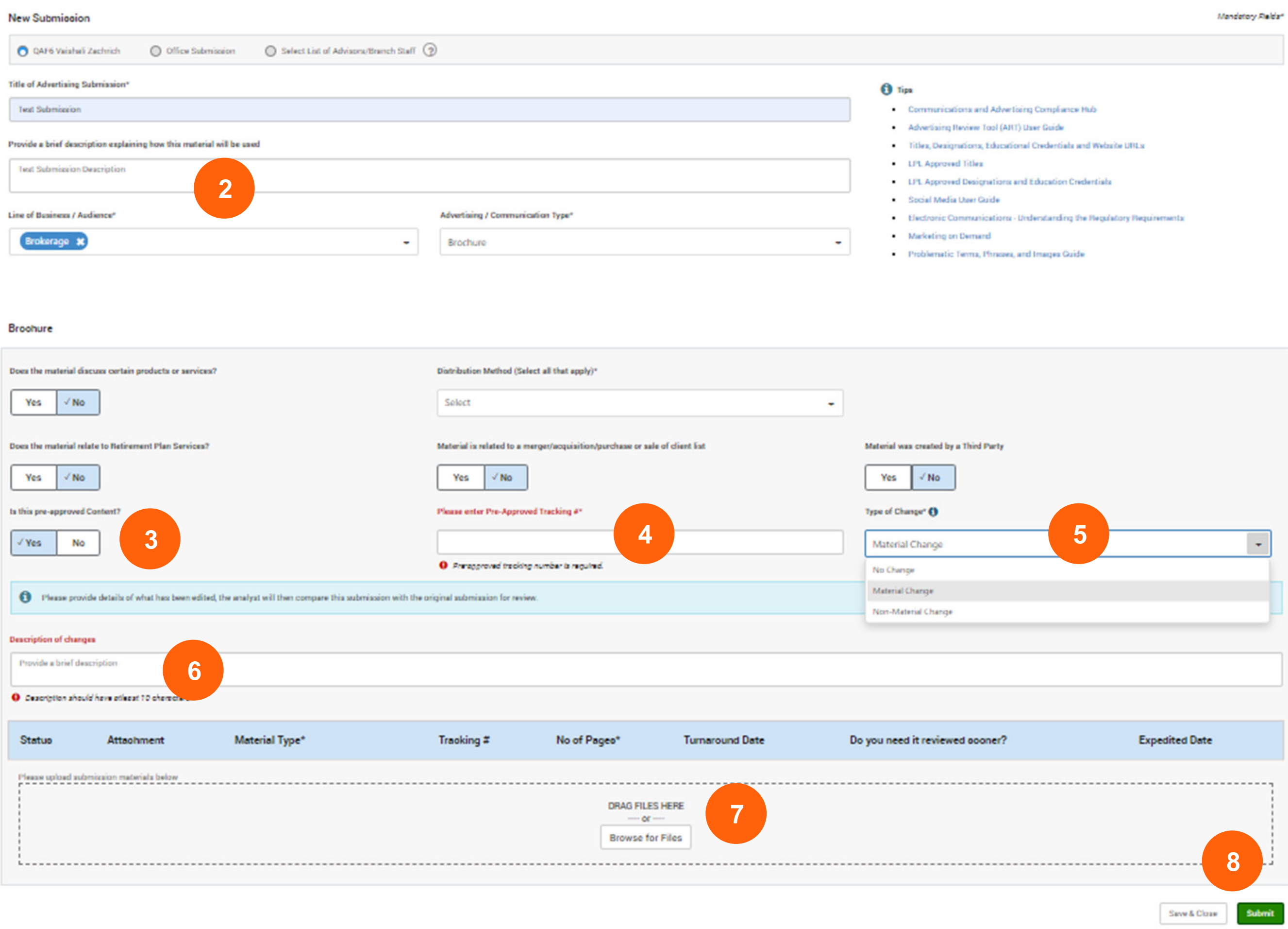
Pre-approved content with **material changes** will be sent to an MRR analyst for review and must be approved before use.

After submission, pre-approved material can be accessed in a in a new Pre-approved Content Quick View and you can attach a Reference Document (such as a distribution list) to Pre-Approved Content submissions.

To submit and use Pre-Approved Content:

1. Click on the “New Submission” from ART main dashboard to create a new Submission

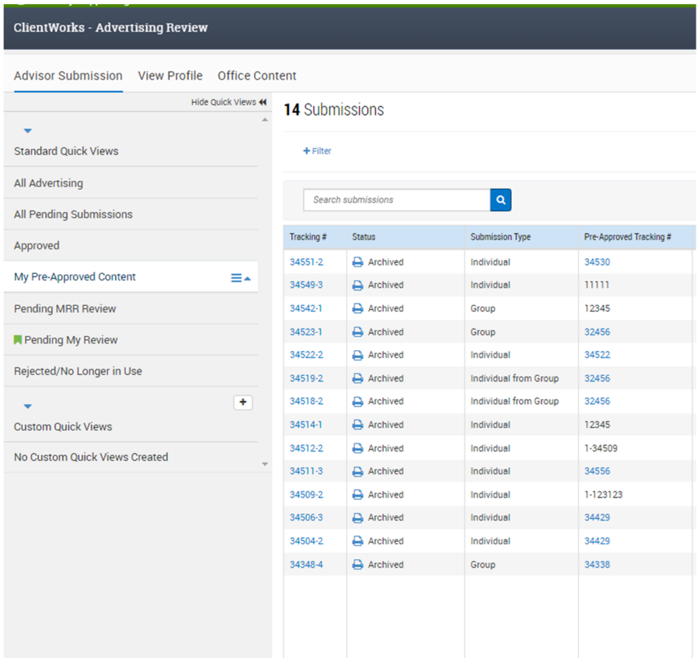
2. Enter the Submission Details
3. Answer the question "Is this pre-approved content?" by clicking on "Yes"
4. Enter the advertising piece's Pre-Approved Tracking Number
5. Indicate the type of change
6. Enter a description of the changes
7. Upload the advertsing piece with the changes
8. Click on Submit



Pre-Approved Content Quick View

The Pre-Approved Content Quick View displays all items from the Office Content Library as well as Pre-Approved Content that you have submitted.

You can open these submission and attach reference documents such as attendee lists or recipient lists.



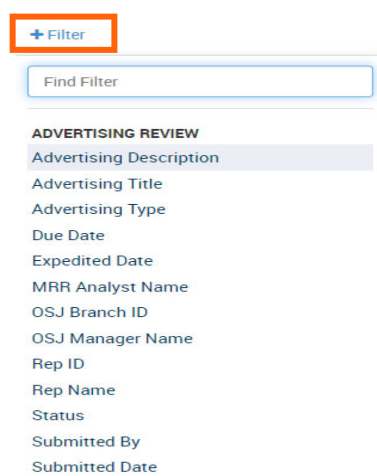
Additional Features

On the Advertising Review Tool page, you can access the following features from the top of the screen:

- Filter
- Edit Columns
- Export

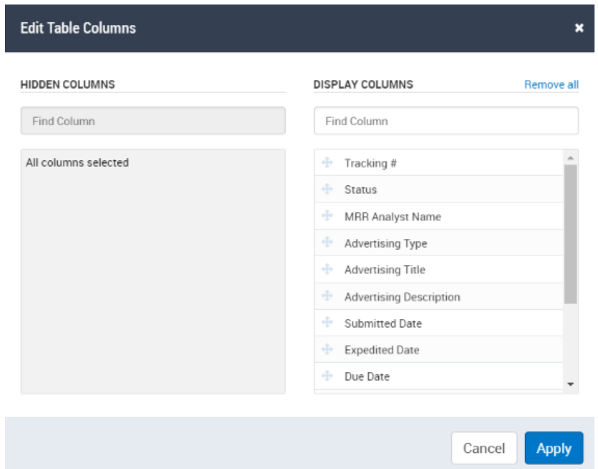
Filter

Click **Filter** to filter the items displayed on the page by searching or selecting an option from the drop-down menu. You can apply more than one filter.



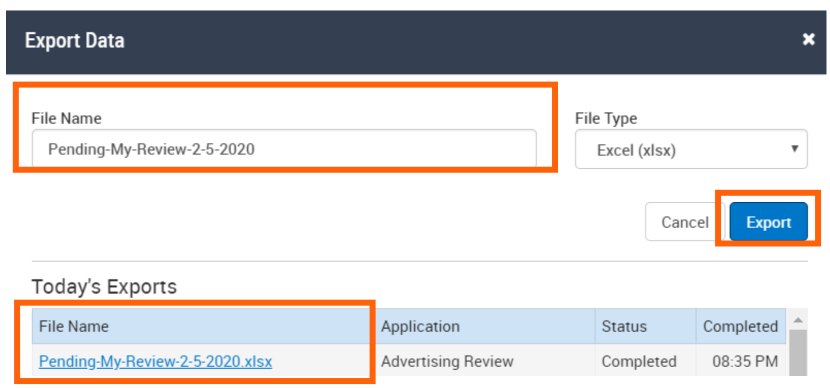
Edit Columns

Click **Edit Columns** to modify the table columns that are displayed.



Export

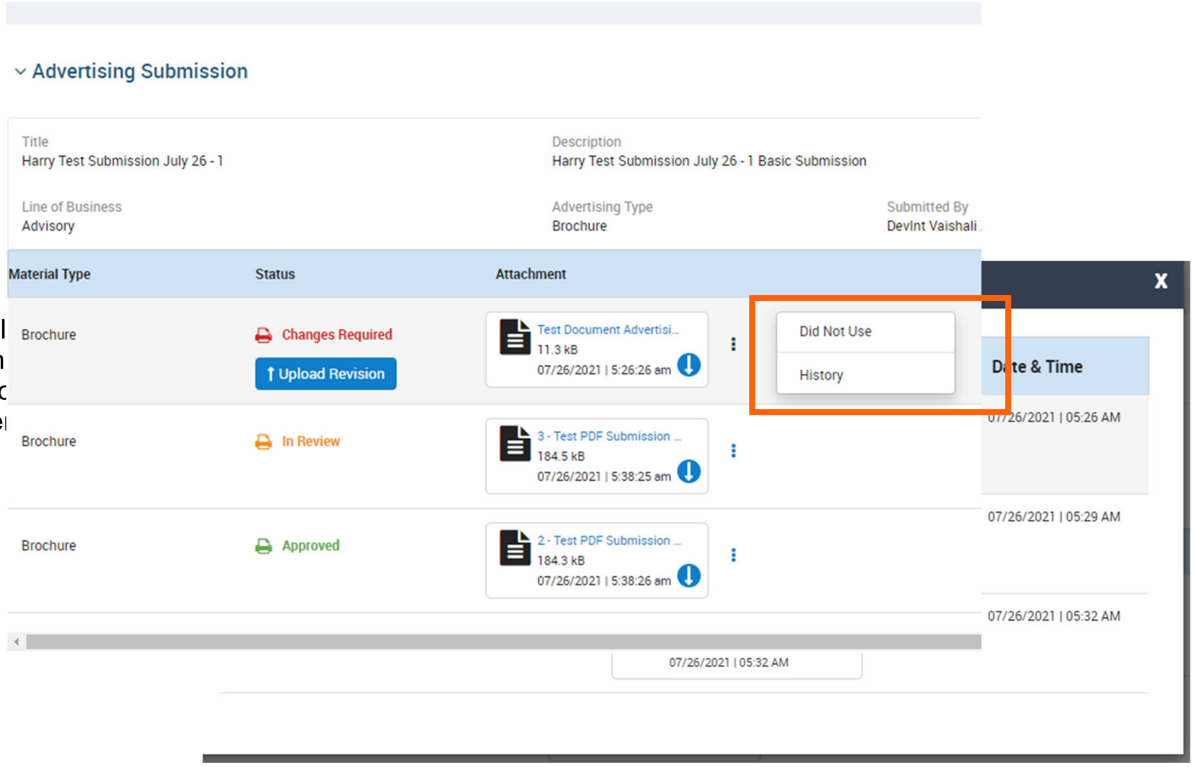
Click **Export** to export all data in the table in Excel sheet format and save it to your computer.



Submission History

From within the Advertising Submission, you can access the history of the document submitted for review by clicking on the three dots to the right of the attached document and clicking on **History**.

A pop-up box will displ
of the document subm
status of the submissic
version of the docume
and submitted.



Third Party Marketer (TPM)

Third Party Marketers who are not affiliated with LPL can be given access to a version of ART through which they will be able to submit material for the advisor groups that they support. Only an OSJ, Program Managers (PM) or Branch Manager can provide ART access to a Third Party Marketer, and the OSJ/PM will be able to dictate which advisors in their group the TPM can submit material for. The OSJ/PM can also provide the TPM with access to all the advisors on their rep list and also allow them to do office or institutional submissions.

Non-OSJ Branch Managers can only provide a TPM with access to the advisors in their own non-osj branch.
OSJs can provide a TPM access to all the advisors in their group.
Program Manager can provide a TPM access to the Bank or Credit Union that is linked to their master ID. If the PM supervises more than one institution, the TPM setup will have to be at the non-OSJ manager level.

Authorizing a TPM – OSJ/PM steps

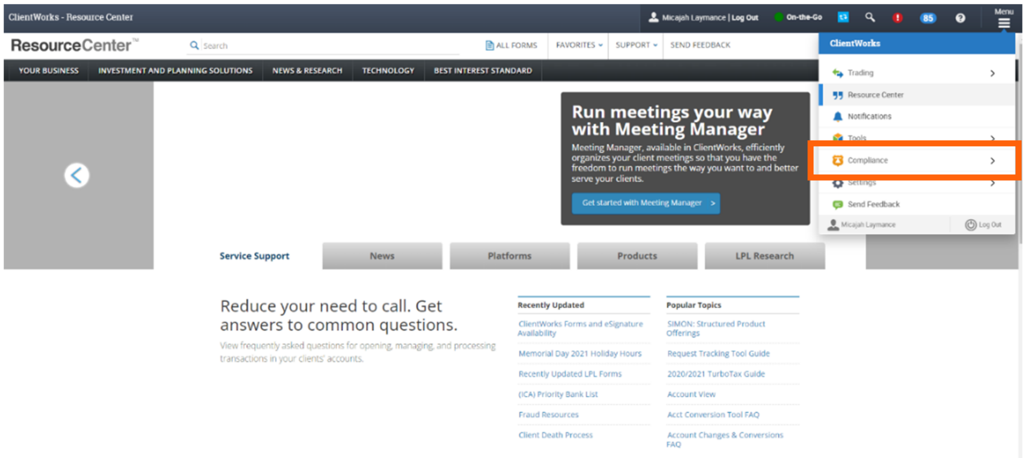
OSJ/PM can add a TPM via the **Add a Third Party Marketer into the system** option under the **Preferences** tab of your **Advisor Compliance Tool**.

You will need the following information about each Third Party Marketer:

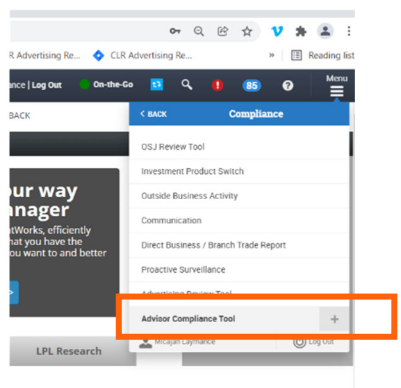
- First Name
- Last Name
- Email address
- Cellphone Number **(this needs to be a cellular phone number for two-factor authentication.)**

1. Accessing the Advisor Compliance Tool

Select “Compliance” from the ClientWorks menu

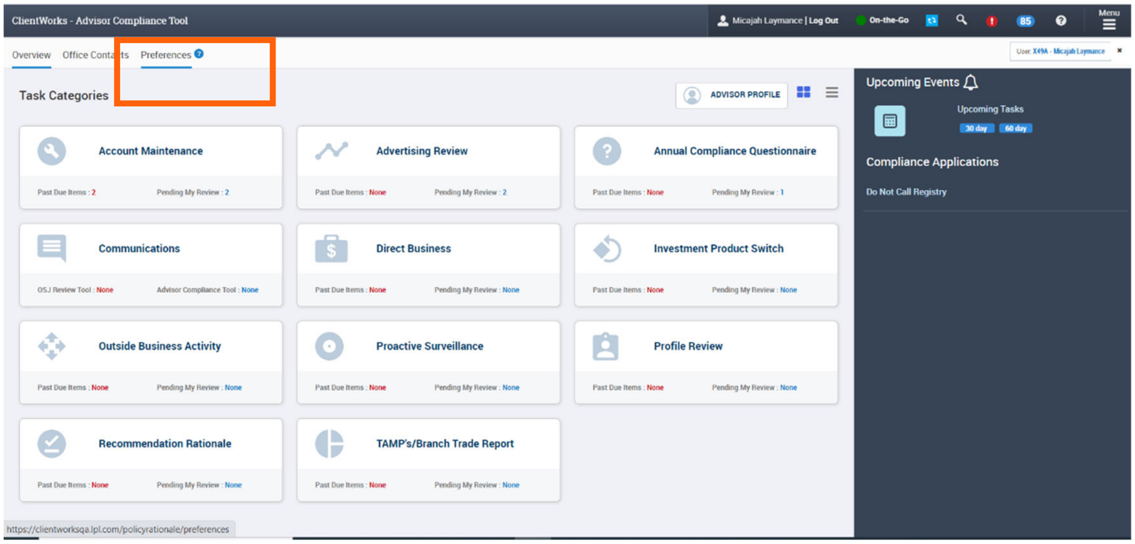


Select “Advisor Compliance Tool”



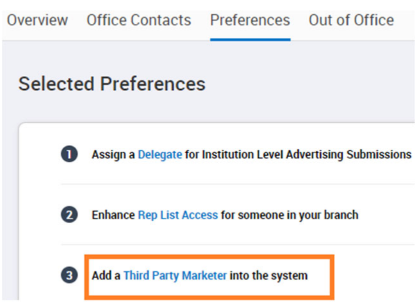
2. Accessing the Preferences Tab

The Preferences Tab is located near the top left of the Advisor Compliance Tool.

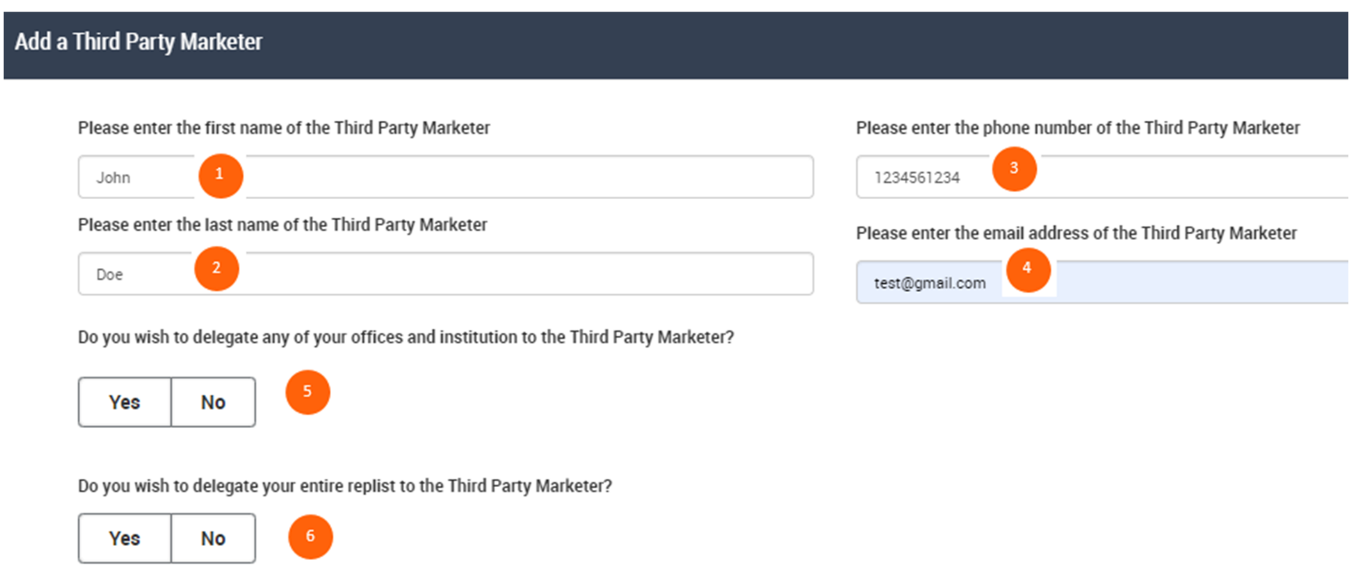


3. Add a Third Party Marketer into the system

Select "Add Third Party Marketer into the system"



4. Fill out the details in the form



1. TPM **First Name**

2. TPM **Last Name**

3. TPM **Cellphon**e Number – **this needs to be a cellular phone number for two-factor authentication.**

4. Email address

5. Branch/Institutional delegation: If you want the TPM to be able to submit office or institutional content that all advisors in your organization can use, then select "**YES**" and choose the branches or institutions, otherwise select "**NO**".

6. Rep List delegation:
YES - If you delegate your rep list by choosing "**YES**", the TPM will be able to submit for anyone in your organization, including new people who join. This is the preferred option if they submit for everyone at your group.

   NO - If the TPM should only be able to submit material for one or more specific advisors, please choose "**NO**", and then select the specific advisors that they need to have access to from your rep list. If new people join your group the TPM will not automatically be able to submit for them.

Third Party Marketer steps required:
The TPM will receive an email from advertisingreviewtool_no-reply_@lplfinancial.com
They will have to click on the "**click here**" hyperlink and then follow the instructions for two-factor authentication and choose a password for ART. After setting up the password they will receive a **text message** to the cellphone number that we have on record with a code that they will have to type in to complete the setup and get access to ART.

Example TPM setup email:

COMPLIANCE, LEGAL, AND RISK COMMUNICATION

Congratulations on getting onboarded to the Advertising Review Tool!
Please click here in order to access the advertising review tool and get started with creating new submissions!
This link will redirect you to the LPL Compliance page and from there you can use your user name (testinprodartuser@gmail.com) and password to login to the advertising review tool.
Have Questions?

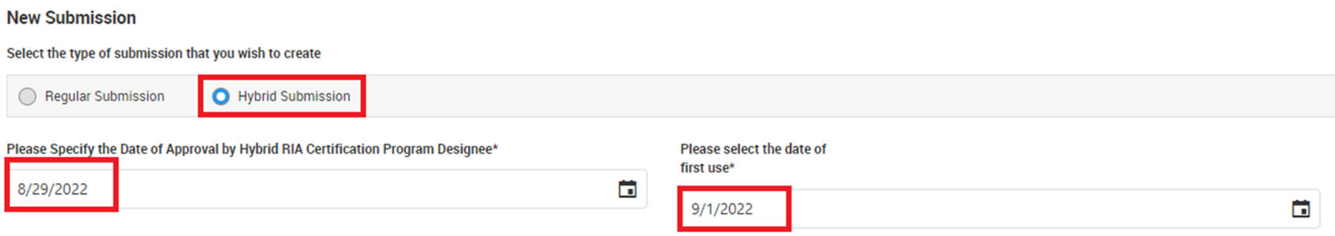
- Please review the third party marketer - Quick Start Guide
- Email Support: AdvertisingReviewTool@lplfinancial.com

Thank you,
The Advertising Review Tool Team
Compliance, Legal, & Risk

The TPM then sets up their own password by clicking the above link from the email and verifying the code sent to their cellphone for the two-factor authentication, they will then be able to access ART and submit material for the advisors in their group.

Hybrid RIA Certification Program

OSJs and designees of Hybrid RIAs who have been approved for the Hybrid Certification Program can submit RIA-only material that the OSJ or designee have approved by choosing “Hybrid Submission” in the submission form. The submitter will also specify the date they approved the material and the date of first use.


New Submission

Select the type of submission that you wish to create

Regular Submission Hybrid Submission

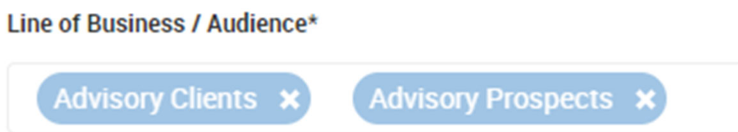
Please Specify the Date of Approval by Hybrid RIA Certification Program Designee*

8/29/2022

Please select the date of first use*

9/1/2022

The rest of the submission form is very similar to a regular submission


Line of Business / Audience*

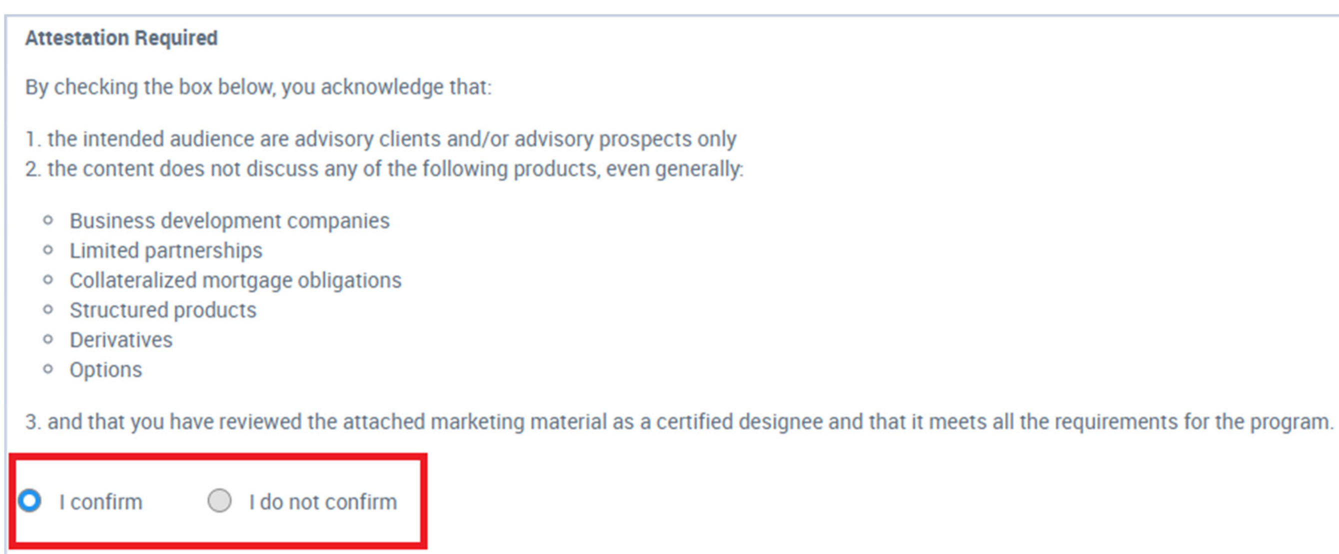
Advisory Clients Advisory Prospects

The “Line of Business/Audience” will default to Advisory Clients and Advisory Prospects, and there is an additional attestation towards the end.

All hybrid certified material is retained under the submitting/approving OSJ or designee’s name, so you do not select the specific advisor on the submission form.

Hybrid certified material may be selected for a post-use spot check, but does not get reviewed or approved by LPL prior to use.

For more information about and limitations of the Hybrid RIA Certification Program, please refer to the Advisor Compliance Manual.


Attestation Required

By checking the box below, you acknowledge that:

1. the intended audience are advisory clients and/or advisory prospects only
2. the content does not discuss any of the following products, even generally:

- Business development companies
- Limited partnerships
- Collateralized mortgage obligations
- Structured products
- Derivatives
- Options

3. and that you have reviewed the attached marketing material as a certified designee and that it meets all the requirements for the program.

I confirm I do not confirm

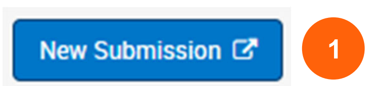
Prospect Submissions

Large groups who have a constant active pipeline of new advisors joining their organization sometimes want to be able to submit material for prospective advisors themselves instead of having LPL Business Transition Partners handle submitting the prospects' onboarding material on their behalf. If you are an OSJ or Program Manager and would like to be able to submit prospect material yourself or delegate someone from your office to do so on your behalf, please reach out to your LPL Business Transitions Partner, to see if this will be possible for your situation. Once Business Transitions enables this for your group, an OSJ or Program Manager will have the ability to submit prospect material, and be able to delegate this ability to another staff member so they can submit prospect material for your group.

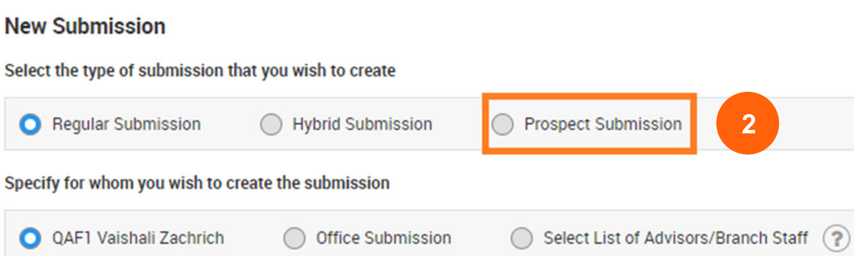
Submitting onboarding material for Prospects

The OSJ or delegate will have an additional "Prospect" radio button available for them once they start a new submission.

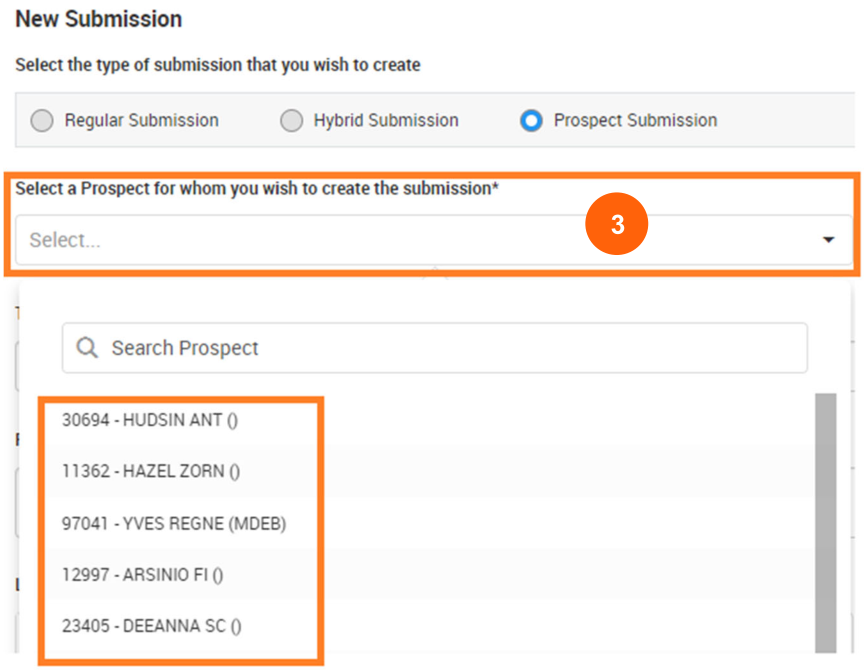
1. Start by pressing the **New Submission** button.



2. Then select the **Prospect Submission** radio button



3. Select the drop-down menu under **Select a Prospect for whom you wish to create the submission**. Then scroll and select their name from the list or use the Search" function to look them up by name.



If your prospect's name is not appearing in the drop-down list, they may not have progressed far enough in the onboarding process for the system to have become aware of them yet. Please check in with your Onboarding Partner from **LPL Business Transitions Partners** to check on the status of your prospect.

After Selecting their name, please fill out the rest of the submission form, attach the material and press the **Submit** button to submit the material. Your prospect submission will always route to an analyst for review and follow the regular process from this point on.

Rep List Self-Service and Access Management

The Rep List Self-Service Access Management function allows for managers, PMs, and delegates to grant access to other advisors and support staff in their offices.

Initially all submitters in ART will have access to submit for anyone on their **Rep List**. Your Rep List will include all NLAs from your own branch automatically, and also any advisors from any branch who have signed the BNKITADO form to provide you with access to their client information in ClientWorks.

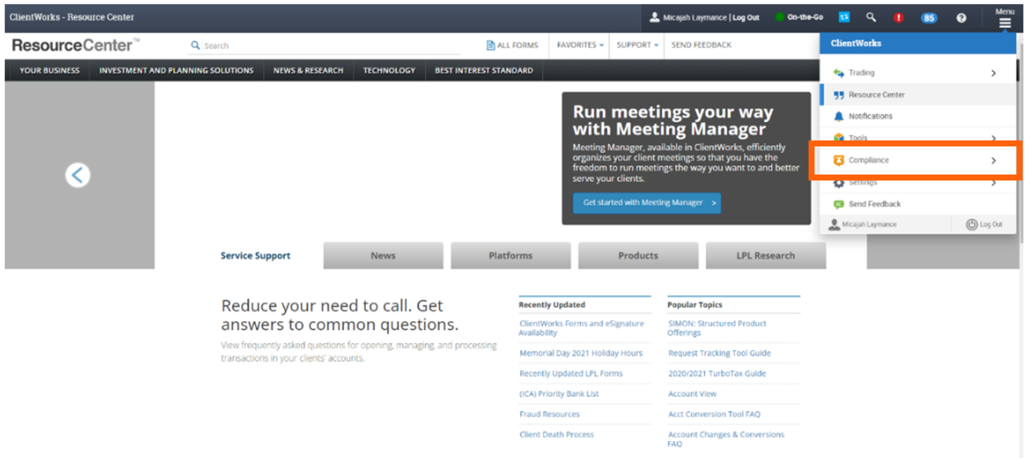
Submitters can obtain the ability to submit for anyone in their organization from their supervisor:

- OSJs, program managers (PMs), and non-OSJ managers have access to submit for anyone in their group.
- Self-Service Access Management allows the OSJ, PM, or non-OSJ manager to grant the same access to other advisors or support staff in their offices.
- OSJs can provide an advisor or NLA the ability to submit for anyone in that OSJ group.
- PMs can provide an advisor or NLA access to submit for anyone in their institution.
- Non-OSJ branch managers can provide access to submit for anyone in their non-OSJ branch.

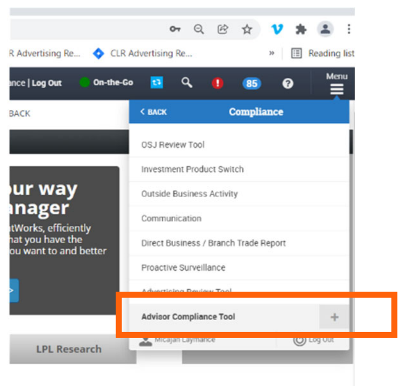
This is accessed through the **Preferences** Tab of the **Advisor Compliance Tool**. Here is how to locate the Rep List Self-Service menu.

5. Accessing the Advisor Compliance Tool

Select “Compliance” from the ClientWorks menu

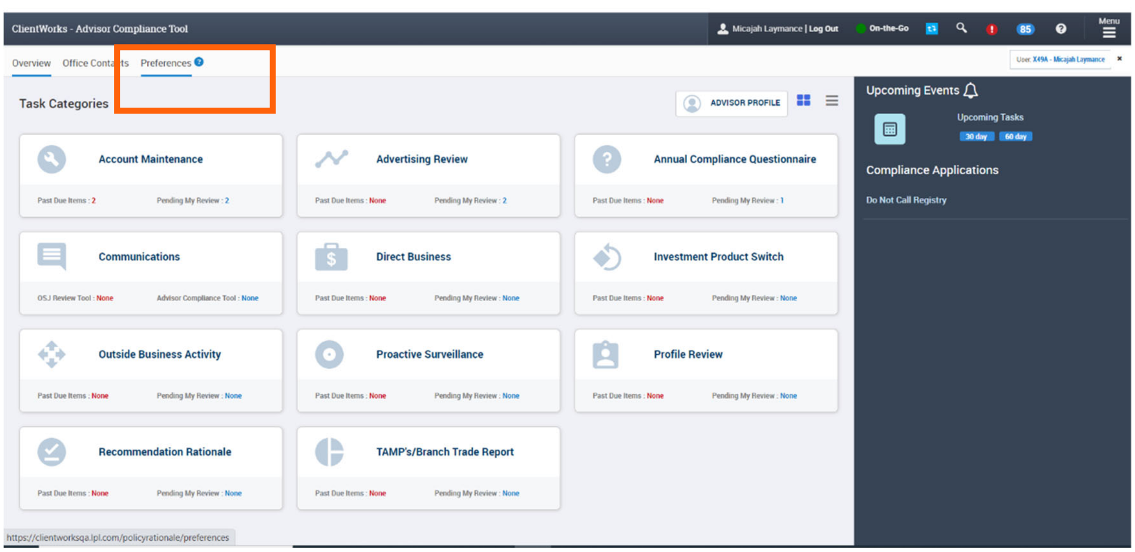


Select “Advisor Compliance Tool”



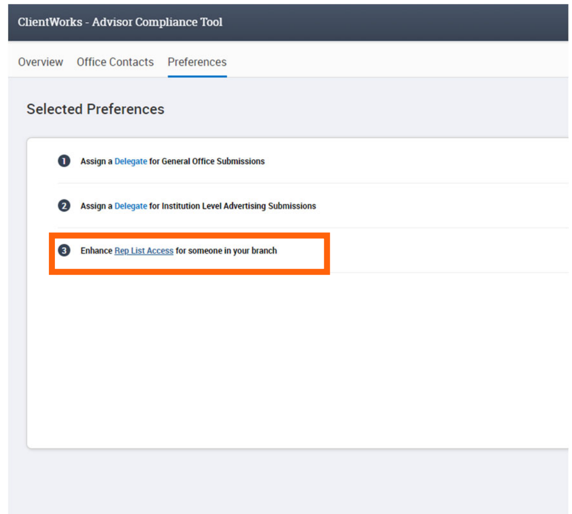
6. Accessing the Preferences Tab

The Preferences Tab is located near the top left of the Advisor Compliance Tool.



7. Rep List Access

Go to the Selected Preferences Tab, and choose **Enhance Rep List Access for someone in your branch**.

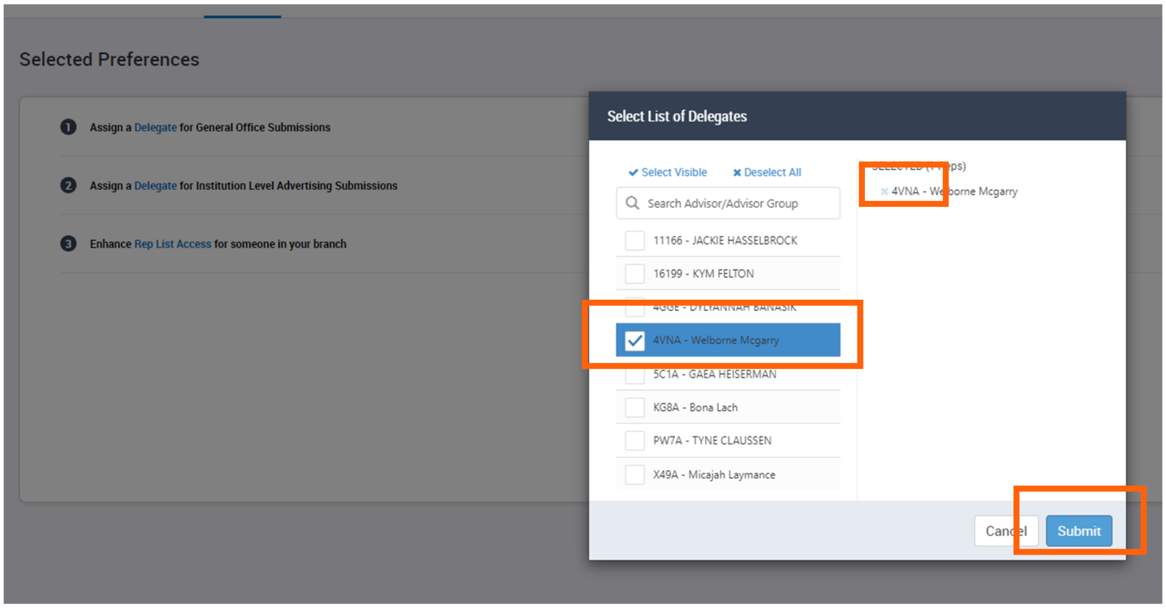


8. Access Management – Rep List Delegate Selection – Add and Remove

A pop up box will appear.

Add delegate access to/for an individual by clicking the check box next to their name and then clicking on “Submit” to save the access change.

Remove delegate access by clicking the “x” to the left of their name and then clicking on “Submit” to save the access change.



Troubleshooting and Known Issues

Document Cannot Be Accessed Error

Issue: An error message displays while trying to open a document or you cannot open a previously uploaded document.
Solution: Open the submission in ART and upload another version of the document via "Add Document" on the Submission. In most cases, using your browser to print a new version of the document as a "PDF" and uploading the new version will resolve the issue. Retract the original file submitted by clicking on the dots located to the right of the document on the ART submission and choosing "Retract."
Please report this issue to the ART mailbox: advertisingreviewtool@lplfinancial.com and include the submission tracking number and document name.

Old Microsoft Files – Not Supported

Issue: Most older versions of Microsoft files created by MS Office application versions from before 2008 are not supported. Old .doc and .xls files can be viewed. However, there may be an issues with some other old MS Office file types such as .ppt.
Solution: Upload either a newer version of the file created using a newer version MS Office and saved in the updated Microsoft file format ending in an "x" (e.g. ".pptx", ".xlsx") or upload a PDF version in ART on the Submission via "Add Document."
Retract the original file submitted by clicking on the dots located to the right of the document on the ART submission and choosing "Retract."

PowerPoint (PPTX) Files Do Not Display the Notes Section

Issue: PPTX files only show the slides on the ART review screen, not the slide note pages.
Solution: Open original PPTX file in MS PowerPoint to access the notes, and print to PDF selecting the option to display notes on the print:

1. Click File
2. Click Print
3. Change the Print Layout from Full Page Slides to Notes Pages
4. Click Print, and choose the Print to PDF option
5. Upload that new file for review into ART.

PowerPoint (PPTX) Files Do Not Display Certain Images

Issue: PowerPoint file does not display all the images: Some may be displayed and others are not.
Solution: Please see the list of **Acceptable File Types** in this guide. If the image inside your PowerPoint document is not an acceptable file, the image will not display and cannot be reviewed by an analyst. Please use only acceptable image types (examples: .jpg, .png.)

Unable to Submit for a Particular Person

Issue: The name of the person I want to submit for does not appear in the list of names I can pick from to submit for.
Solution: Have your branch manager/OSJ/program manager delegate their rep list to you, so you can submit for anyone in your organization. See the **Rep List Self-Service and Access Management** section in this guide.

Submission Status Definitions

Status	Description
Pending MRR Review	Material has been submitted, but review has not yet been completed by an MRR reviewer.
Pending Submitter Review	Material has been returned from an MRR reviewer for further action by the submitter.
Uploaded	The material has been uploaded, but has not yet been submitted to MRR for review.
Submitted	The material has been submitted for MRR review.
In Review	The material submitted is being reviewed by an MRR reviewer.
Changes Required	The MRR reviewer has completed a preliminary review of the material, but changes indicated must be made to the material and uploaded for further review by the MRR reviewer. The material has not been approved for distribution or posting.
Changes Uploaded	The file including the requested changes has been uploaded, but has not yet been submitted to MRR for review.
Changes Submitted	The file including the requested changes been submitted to MRR for review.
Approved	The material submitted has been approved by MRR for distribution or posting.
Approved with Comments	The material submitted has been approved by MRR for distribution or posting, provided that you read and adhere to any comments noted in the submission.
Rejected	The material submitted was not approved by MRR, and cannot be distributed or posted. See the review comments for more details.
Review Not Applicable	The reviewer has determined that MRR review of the material is not necessary. See the reviewer comments for more information.
Retracted	The submitter has elected to remove the material from MRR before a review is conducted, and will not use the material.
Did Not Use	The submitter has determined the material reviewed by MRR will not be used, distributed, or posted.
No Longer in Use	The submitter has determined that although the material has been used, distributed, or posted, there will be no further use, distribution, or posting of the material after this status election is made.