

**GA PINCUS FUNDS, LLC**

## **WRITTEN SUPERVISORY PROCEDURES (WSP)**

**Adopted:** January 1, 2024

**Last Updated:** February 18, 2026

**Chief Compliance Officer:** Gabriel Pincus

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### **SECTION 1 — PURPOSE**

These Written Supervisory Procedures (“WSPs”) establish supervisory controls designed to ensure compliance with applicable federal and Tennessee securities laws and to fulfill the Firm’s fiduciary obligations.

Because GA Pincus Funds is a single-member firm, supervisory responsibility rests solely with Gabriel Pincus in his capacity as Chief Compliance Officer (“CCO”).

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### **SECTION 2 — SUPERVISORY STRUCTURE**

#### **2.1 Responsible Individual**

Gabriel Pincus serves as:

- Investment Adviser Representative
- Chief Compliance Officer
- Sole Supervisor

All supervisory reviews are documented and retained.

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### **SECTION 3 — CLIENT ONBOARDING SUPERVISION**

#### **3.1 Account Opening Review**

Before providing advisory services, the CCO shall verify:

- Signed advisory agreement
  - ADV delivery acknowledgment
  - Privacy notice delivery
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- Investment objectives documented
- Risk tolerance documented
- Fee structure correctly stated

Documentation shall be maintained in client file.

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### **SECTION 4 — FEE BILLING SUPERVISION**

Because the Firm deducts advisory fees:

#### **4.1 Quarterly Fee Review**

Prior to fee deduction, the CCO shall verify:

- Fee calculation matches agreement
- Correct billing rate applied
- Correct account balance used
- No billing on excluded assets

A Fee Billing Worksheet shall be completed and retained.

#### **4.2 Trustee Accounts**

For trust accounts:

- Confirm dual-signature distribution requirement remains in place
- Confirm no unilateral authority exists
- Confirm custodian statements delivered directly

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### **SECTION 5 — CUSTODY SUPERVISION**

The Firm has custody due to fee deduction and trustee status.

#### **5.1 Custody Safeguards Review (Annual)**

The CCO shall:

- Confirm assets held at qualified custodian (Schwab)
- Confirm statements delivered directly

- Review trust documents for authority limitations
- Reconfirm surprise exam exemption analysis

A Custody Analysis Memo shall be retained annually.

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## SECTION 6 — PERFORMANCE ADVERTISING SUPERVISION

The Firm distributes a quarterly newsletter showing historical performance.

### 6.1 Pre-Approval Requirement

Before distribution, the CCO shall review:

- Net-of-fee calculation
- Accuracy of returns
- Proper disclosure language
- Risk-of-loss disclosure
- No cherry-picking
- No misleading presentation

A Performance Advertising Review Checklist shall be completed and retained.

### 6.2 Recordkeeping

Copies of each newsletter and supporting calculations shall be retained for five (5) years.

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## SECTION 7 — TRADING SUPERVISION

### 7.1 Daily/Periodic Review

The CCO shall review:

- Trade blotter
- Allocation fairness
- Suitability of trades
- Best execution consistency

Documentation of review shall be maintained.

## 7.2 Trade Errors

If an error occurs:

- Client made whole
  - Error documented
  - Root cause analyzed
  - Corrective action noted
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## SECTION 8 — BEST EXECUTION REVIEW

At least annually, the CCO shall evaluate:

- Custodian execution quality
- Commission reasonableness
- Service quality

Review documented in Annual Compliance Memo.

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## SECTION 9 — COMMUNICATIONS SUPERVISION

### 9.1 Email Review

Because the Firm is a single-member practice:

- All business communications must occur through Firm email
- MFA must be enabled
- Email archive maintained
- Periodic self-review of communications conducted

### 9.2 Prohibited Communications

The Firm shall not:

- Guarantee performance
  - Make misleading claims
  - Use testimonials or endorsements
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## **SECTION 10 — CLIENT COMPLAINTS**

Upon receipt of a complaint:

- Log complaint
- Investigate facts
- Document findings
- Respond appropriately
- Determine if ADV amendment required

Complaint file retained for minimum five (5) years.

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## **SECTION 11 — CODE OF ETHICS SUPERVISION**

As sole supervised person:

- Personal trading shall not disadvantage clients
- Conflicts disclosed
- Annual Code certification completed
- Personal trading activity reviewed for conflicts

Certification retained annually.

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## **SECTION 12 — PRIVACY SUPERVISION**

The CCO shall verify:

- Privacy notice delivered annually
  - Client NPI stored securely
  - Secure destruction of sensitive documents
  - Vendor access limited
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## **SECTION 13 — CYBERSECURITY SUPERVISION**

## 13.1 Annual Risk Assessment

The CCO shall:

- Review threat landscape
- Evaluate safeguards
- Review vendor cybersecurity
- Update incident response procedures

## 13.2 Incident Monitoring

If a cybersecurity incident occurs:

- Activate Incident Response Plan
- Document containment
- Evaluate notification obligations
- Maintain incident file

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## SECTION 14 — BUSINESS CONTINUITY SUPERVISION

The CCO shall:

- Review BCP annually
- Confirm alternate work capability
- Confirm data backup integrity
- Confirm emergency contact list current

Review documented annually.

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## SECTION 15 — ADV & REGULATORY FILINGS

The CCO shall:

- Review ADV for accuracy prior to annual filing
- Confirm custody disclosures accurate
- Confirm performance advertising disclosures consistent

- Confirm no undisclosed conflicts
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### **SECTION 16 — VENDOR SUPERVISION**

Annually review vendors with access to client data:

- Security controls
- Confidentiality provisions
- SOC reports (if available)

Vendor review memo retained.

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### **SECTION 17 — BOOKS & RECORDS SUPERVISION**

The CCO shall verify retention of:

- Advisory agreements
- Performance records
- Billing records
- Complaint files
- Custody documentation
- ADV filings
- Cyber risk assessments

Retention period: minimum five (5) years.

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### **SECTION 18 — ANNUAL SUPERVISORY CERTIFICATION**

Gabriel Pincus shall annually certify:

- Review of WSP
  - Completion of required supervisory reviews
  - Accuracy of disclosures
  - Confirmation of custody safeguards
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Certification retained in compliance file.