

RISK MANAGEMENT QUESTIONNAIRE

Please provide additional details in support of a response to any question on a separate attachment.

1. TRAINING AND SUPERVISION

- a) Does the Firm maintain a training program for new associates? Yes No
- b) Are all associates of the Firm under the direct supervision of a partner or officer? Yes No
- c) Are all associates of the Firm subject to periodic, formalized review? Yes No

2. MANAGEMENT

- a) Is the Firm managed by a management/executive committee? Yes No
- b) Does the Firm employ an administrator? Yes No
- c) Does the Firm (or departments within the Firm) conduct periodic meetings involving all lawyers of the Firm (or department)? Yes No
- d) Is a designated partner or officer of the Firm responsible for every matter in the office? Yes No
- e) Does the Firm use a peer review system to evaluate the performance of its partners or officers? Yes No
- f) Are departing lawyers' files reviewed by a partner or officer of the Firm? Yes No

3. INTERNAL CONTROLS

- a) Does the Firm have written partner/shareholder compensation guidelines? Yes No
- b) Does the Firm have a written partner/shareholder agreement? Yes No
- c) Do suits for collection of fees have to be approved by a committee or at least two partners or officers? Yes No
- d) Does the Firm have a system requiring complaints by either a client or other counsel to be reviewed by a partner or officer other than the lawyer about whom the complaint is made? Yes No

4. OUTSIDE INTERESTS (Check N/A where appropriate if the Firm does not permit such outside interest)

- a) Does the Firm have a policy governing the trading and/or investing by its lawyers in securities of clients and the disclosure of such trading and/or investing to the Firm? N/A Yes No
- b) Does the Firm have a policy governing transactions for clients when its lawyers own or serve as fiduciaries, directors, officers, trustees, consultants, employees or partners of, or exercise any fiduciary management control over, such clients? N/A Yes No
- c) Does the service on a client's Board of Directors have to be approved by a committee or at least two partners or officers of the Firm? N/A Yes No

5. NEW BUSINESS

- a) Does the Firm outline and reduce to writing its billing policy and procedures when agreeing to represent a new client? Yes No
- b) Are new clients subject to the approval of a committee or designated partner or officer other than the lawyer generating the business? Yes No
- c) Does the firm have a procedure for evaluating prospective client's financial strength, management expertise, reputation, and history of changing lawyers? Yes No
- d) Is information as to all new clients made available on at least a weekly basis to all lawyers of the Firm? Yes No
- e) Does the Firm use scope of service letters when taking on new matters for existing clients? Yes No

6. MISCELLANEOUS

- a) Does the Firm require independent review of high exposure work product, such as third-party opinion letters, securities issuances and settlement advice? Yes No
- b) Does the Firm have formal, written procedures regarding the maintenance of custodial accounts? Yes No
- c) Does the firm have formal, written procedures regarding the maintenance of and use of escrow funds? Yes No
- d) Does the Firm have a computer back-up system or some other form of emergency back-up system in the event of a disruption or interruption of business? Yes No
- e) Does the Firm engage independent contractors and/or per diem lawyers to render service on behalf of the Firm? If yes please provide details of such engagements on a separate attachment. Yes No

Signature of Owner, Partner or Officer of Firm	Date
Name of Firm	