ADVICE-ONLY™ SAMPLE EVIDENCE PACKET

# Illustrative Referral and Compensation Record

Fictional evidence with explicit limits on what it establishes.

**FICTIONAL TRAINING MATERIAL.** All people, firms, dates, balances, and events are invented. This is not an official assessment, legal advice, or a guarantee of any finding.

## E-12 — Outside-professional discussion

The advisor records that the clients asked about tax review of a Roth-conversion scenario. The advisor suggested their existing tax preparer, another CPA or enrolled agent, or a state professional association directory. No paid referral agreement or reciprocal-referral arrangement for this case was identified.

## E-13 — Firm principal attestation, May 25

“I reviewed the agreement, invoice, payment ledger, relevant CRM entries, and available referral records for AO-SAMPLE-026. Based on those records and my knowledge, the firm did not receive a client-specific commission, referral payment, AUM fee, platform payment, or implementation-linked credit from this engagement. The review did not independently audit every affiliate, external provider, or communication channel.”

## Evidence limits

- A firm insider’s attestation is a representation, not independent evidence merely because it is signed.
- No identified referral agreement does not prove that no informal reciprocal arrangement existed.
- Trace relevant relationships, affiliates, revenue pathways, referral records, and information-use practices.
- If risk indicators suggest hidden incentives or off-record arrangements, perform proportionate enhanced procedures.

## Public representation check

The fictional services page says the firm offers fixed-fee planning, does not require asset transfer, and does not implement recommendations under the one-time agreement. Compare the archived page, engagement-specific representations, actual agreement, and actual conduct.