February 2016 Recap

Manage Through Change

Routing

- Legal & Compliance
- Senior Management
- Supervisory Principals
- Operations
- Internal Audit
- Registered Representatives
- Registration & Licensing
- Training

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The Regulatory & Compliance
Update is published by Renaissance
Regulatory Services for its clients' legal,
compliance, senior management, and
supervisory personnel.

This memorandum is distributed to RRS clients at no charge and includes "hot topics" of focus by regulators and of interest to compliance professionals. The document is intended to provide reminders of regulatory matters that were released or issued during the previous month.

The information contained in this publication was compiled from various regulatory releases and is believed to be true and correct as of the date of distribution. Many regulatory issues are subject to interpretations that can change as industry rules and regulations change, and as compliance issues evolve. Readers are cautioned to consider their individual situations and are encouraged to contact RRS staff for guidance on any issues. The information is not intended as legal or accounting advice, which can only be provided by a duly qualified attorney or certified public accountant.

Hot Topics

EVENTS

- **DEADLINE:** Monthly FOCUS filing due March 23rd, 2016
- **DEADLINE:** Monthly SIS filing due March 29th, 2016
- NASAA: NASAA May 15-16 2016 annual conference in Washington, DC

ITEMS IN THIS EDITION

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- MSRB MSRB Webinar: MSRB Rule G-42 on Duties of Non-Solicitor Municipal Advisors – Page 3
- NASAA NASAA Members Adopt Model Act to Protect Seniors and Vulnerable Adults – Page 4

Service Spotlight: AML Program Testing

The USA PATRIOT Act, FINRA and the Bank Secrecy Act (BSA) require an independent testing of a broker dealer's or Investment Company's antimoney laundering (AML) compliance program. RRS' AML compliance testing service offers an in-depth review of your firm's AML program to measure its effectiveness in monitoring and detecting suspicious activity. Our AML compliance testing service includes: OFAC and CIP compliance, review of the firms' written AML policies and procedures, and review of applicable FinCEN requirements. With our experienced personnel and Certified Anti-Money Laundering Specialist (CAMS) we can help you Manage through Change by meeting your AML independent testing requirement.

Contact:

John Pinto (202) 463-6575

JohnPinto@RRSCompliance.com

Renaissance Regulatory Services, Inc.



Regulatory & Compliance Update

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<u>SEC</u>

SEC Announces:

Cross-Border Security-Based Swap Rules adopted (Link)

Muni-Underwriter Sweep Completed (Link)

SEC Charges:

Software Company Charged with FCPA Violations (Link)

Lending Company and Brokerage Firm Charged with Fraud (Link)

Company Executive uses Insider Trading for own Benefit (Link)

Accounting Fraud committed by Biopesticide Company and Former Executive (Link)

SEC Final Rules:

Security-Based Swap Dealer De Minimis Exception (Link)

SEC and FINRA Hold Regional Compliance Programs for Broker-Dealers

Beginning in the spring, the SEC and FINRA will provide forums to discuss current regulatory issues and exchange ideas for effective compliance programs. (<u>Link</u>)

Anti-Money Laundering Protocols Violated by Brokerage Firm

Miami based firm violated anti-money laundering laws by allowing foreign entities to purchase and sell securities without verification. (Link)

SEC awards whistleblower more than \$700,000 for detailed analysis

C. Dabney O'Riordan and Alka Patel have been deemed the new Associate Directors for Enforcement in the agency's Los Angeles Regional Office. (<u>Link</u>)

RRS Compliance Administrator

Cut Compliance Costs without
Cutting Effectiveness
Call (561) 368-2245

JohnPinto@RRSCompliance.com

Jane Jarcho; Deputy Director of National Exam Program

The agency's Office of Compliance Inspections and Examinations named Jane Jarcho the new Deputy Director. (<u>Link</u>)

Members Announced for the Advisory Committee on Small and Emerging Companies

The SEC announced the members for the Advisory Committee on Small and Emerging Companies. (Link)

Agribusiness Agreed to Pay \$80 Million Penalty for Accounting Violations

St. Louis based agribusiness pays \$80 million penalty to settle violated accounting rules and misstated company earnings. (Link)

California Man sells fake stock to pay personal debts

An unregistered California Man fraudulently sold stock in a medical device company, pocketing investors' money. (Link)

Chinese Officials bribed by Tech Company

A Massachusetts-based technology company agreed to pay \$28 million to settle civil and criminal actions involving violations of the Foreign Corrupt Practice Act. (Link)

Personal View goes against Deutsche Bank Analyst's Stock Rating

A former Deutsche Bank Research Analyst certified a stock rating that was inconsistent with his personal view. (Link)

National Exam Program names Daniel Kahl as Chief Counsel

Daniel S. Kahl was named the Chief Counsel of its Office of Compliance Inspections and Examinations. (<u>Link</u>)

<u>Telecommunications Provider to pay \$795 million Global</u> <u>Settlement to be paid for FCPA Violations</u>

In order to win business in Uzbekistan a telecommunications provider must pay to resolve violations of the Foreign Corrupt Practice Act. (Link)

Fee Rate Advisory #4 for Fiscal Year 2016

The SEC determined a mid-year adjustment to Section 31 was not needed. Section 31 fee will remain at \$21.80 per million. (Link)

FINRA

Regulatory Notices:

<u>16-08</u> This Notice is to provide guidance regarding the requirements of SEA Rules 10b-9 and 15c2-4 and to remind broker-dealers of their responsibility to have procedures reasonably designed to achieve compliance with these rules.

16-09 FINRA requests Comments on shortening the settlement cycle for securities from T+3 to T+2

FINRA Conferences & Events:

2016 FINRA Annual Conference (Link)

RRS Research Services

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FINRA Approves Enhanced Price Disclosure to Retail Investors in Fixed-Income Securities

FINRA's Board of Governors approved a proposal designed to help retail customers understand and compare transaction costs in fixed-income securities. (Link)

FINRA Warns High-Yield CD Offers Can Be Bait for High-Commission Investments

Advertisements touting higher-than-average CD yields might actually be a lure to trick investors into buying costly investments, FINRA said in a new Investor Alert. (Link)

SEC and FINRA to Hold Regional Compliance Outreach Programs for Broker-Dealers

The SEC and FINRA announced the opening of registration for their 2016 Regional Compliance Outreach Programs for Broker-Dealers that will take place in New York, Atlanta, Dallas, Boston, Chicago, and San Francisco, beginning in the spring. (Link)

FINRA Bars Two Brokers for Fraudulent Sales of a Hedge Fund

The FINRA announced that it has barred two brokers from the securities industry for fraud in connection with the sale of a hedge fund. (Link)

FINRA Bars Broker for Market Manipulation

The FINRA announced that it has barred a broker-dealer from the securities industry for engaging in a manipulative trading scheme to artificially inflate the market price and trading volume for the common stock of IceWEB, Inc. (OTCBB: IWEB). (Link)

MSRB

MSRB Regulatory Notices for February 2016:

<u>2016-06</u> Amendments to MSRB Rule G-37 on Political Contributions and Prohibitions on Municipal Securities Business and Related Amendments are Deemed Approved under the Securities Exchange Act of 1934

2016-07 Request for Comment on Draft Amendments to MSRB Rule G-30 to Provide Guidance on Prevailing Market Price

 $\underline{2016\text{-}08}$ MSRB Amends its Rule Regarding Calculations for Bonds that Do Not Pay Interest Semi-Annually

MSRB Upcoming Events:

MSRB Webinar: MSRB Rule G-42 on Duties of Non-Solicitor Municipal Advisors (Link)

Municipal Advisors to Be Subject To New Pay-To-Play Regulations

The MSRB announced that new regulations to safeguard the \$3.7 trillion municipal securities market against pay-to-play practices—and the appearance of them—when state and local governments hire outside financial professionals go into effect later this year. (Link)

MSRB Publishes Compliance Advisory for Brokers, Dealers and Municipal Securities Dealers

The MSRB published its first Compliance Advisory for Brokers, Dealers and Municipal Securities Dealers, which identifies some of the key compliance risks for dealers that, if not properly addressed, could adversely affect public confidence in the municipal securities market. (Link)

Marcy Edwards Rejoins MSRB Board of Directors

The Board of Directors of the MSRB announced that former Board Vice Chair Marcy Edwards, who served as senior financial policy advisor to the District of Columbia's chief financial officer, has returned to the Board as a public representative through September 30, 2016. (Link)

Supervisory Controls

RRS' provides a full range of services to assist with your firm's compliance with FINRA Rules 3010, 3012 and 3013, including:

- Comprehensive Risk Assessment
- Review of Supervisory Structure
- Written Policies and Procedures Gap Analysis
- Compliance Program Testing
- Report Preparation
- Draft CEO Certification
- Annual Compliance Meetings and Training
- Ongoing Compliance

For more information contact John Pinto at (202) 463-6575 or <u>JohnPinto@RRSCompliance.com</u>

MSRB Holds Quarterly Board Meeting

The Board of Directors of the MSRB held its quarterly meeting January 27-28, 2016 where it discussed initiatives to shed more light on costs and potential risks to investors in the municipal market, and to improve the utility of its Electronic Municipal Market Access (EMMA®) website, among other topics. (Link)

MSRB Publishes Draft Guidance to Support Fair Pricing of Municipal Securities and Dealer Compensation Calculations

The MSRB proposed new regulatory guidance on how municipal securities dealers price bonds and calculate their compensation. (<u>Link</u>)

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MSRB Educates Retail Investors on Ways to Buy Municipal Bonds

To help retail investors weigh their options when buying or selling municipal securities, the MSRB has published a new educational guide outlining the several alternative Ways to Buy Municipal Bonds. (Link)

MSRB Launches Outreach Effort for Issuers on the Municipal Securities Market

The MSRB announced it is launching an outreach effort to remind state and local governments about the free education resources and tools available to support their issuance of municipal bonds. (Link)

NASAA

NASAA Members Adopt Model Act to Protect Seniors and Vulnerable Adults

In a significant step toward providing much needed protection for seniors and vulnerable adults, NASAA announced that its membership has voted to adopt a model act designed to protect vulnerable adults from financial exploitation. (Link)

FINOP Support Services

RRS provides multiple levels of **FINOP support** for your financial reporting obligations. From preparation of full books and records to net capital reviews and FOCUS filing with **FINRA** and the **NFA**, RRS professional staff can help.

RRS services include:

- General Ledger and trial balance preparation.
- Net capital computation with supporting schedules.
- Monthly or quarterly FOCUS filings.
- Net capital interpretive guidance.

For more information contact Bart McDonald at (561) 368-2245 or BartMcDonald@RRSCompliance.com

<u>NASDAQ—NASDAQ-TRADER—</u> OTCBB

Equity Regulatory Alert:

2016 - 1 Filing of Annual Audits

<u>2016 – 2 NASDAQ Announces Regulation SCI BC/DR Testing Date</u>

Equity Trader Alert:

2016 - 23 NASDAQ Updates Retail Attestation Form

2016 – 24 Reverse Split and CUSIP Change for DragonWave Inc

<u>2016 – 25 NASDAQ Enhances ETP Market Quality Incentive Program (MQP)</u>

2016 – 26 NASDAQ guidelines for Testing NextShares

2016 - 27 Reverse Split and CUSIP Change for Biostar Pharmaceuticals, Inc.

<u>2016 – 28 NASDAQ U.S.</u> equities and options markets will be closed on Monday, February 15, 2016 in observance of Presidents Day.

2016 – 29 NASDAQ to launch new limit-up, limit down pricing pilot

2016 - 30 NASDAQ to Launch Small Cap Market Quality Pilots

<u>2016 – 32</u> NASDAQ Modifies Functionality for Orders Received in Halted and IPO Securities

2016 – 33 Reverse Split and CUSIP Change for TOP Ships, Inc

<u>2016 – 34</u> Reverse Split and CUSIP Change for Odyssey Marine Exploration, Inc.

<u>2016 – 35</u> NASDAQ Implementing Performance Improvements & Equity Data Feed Impact

<u>2016 – 36</u> Symbol Directory Files to include new fields in conjunction with NextShares

<u>2016 – 37</u> NASDAQ to Begin Listing Two Janus Exchange Traded Funds

2016 – 38 NASDAQ to Begin Listing First NextShares

2016 - 39 NASDAQ Updates Pricing

 $\underline{2016-40}$ Trading Reporting OTC Transactions in NextShares to the FINRA/Nasdaq TRF

<u>2016 – 41</u> Reverse Split and CUSIP Change for Paragon Shipping Inc.

<u>2016 – 42</u> Reverse Split, Ratio Change, and CUSIP Change for China TechFaith Wireless Communication Technology Limited

2016 – 43 BX Equities Updates Pricing

Data Technical News:

2016 - 7 Iteris, Inc. to Begin Listing on NASDAQ

RRS Research Services

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Options Trader Alert:

 $\underline{2016-3}$ NOM, BX Options, and PHLX introduce external kill switch functionality

2016 - 4 BX Options Introduces a Select Symbol Program

2016 – 5 PHLX Changes Minimum Quote Size Requirement in DRIP

2016 - 6 PHLX Pricing

Options Regulatory Alert:

2016 - 5 NASDAQ Announces Regulation SCI BC/DR Testing Date

2016 - 6 PHLX - Unbundling of Orders

2016 - 7 NOM Bid/Ask Differentials "PCLN"Options Class

2016 – 8 PHLX Bid/Ask Differentials for "NDX" and "PCLN" Option Classes

2016 - 9 PHLX-FBMS 2.0, Market Access Rule Compliance

UTP Vendor Alert:

2016 - 1 SIP Launch of Enhanced INET Platform Scheduled for Q4 2016

NYSE - EURONEXT - AMEX

NYSE EURONEXT Announcements:

2017 Holiday and Early Closings Calendar. (Link)

ICE Endex announces results of gas storage auction. (Link)

Interactive Data to Provide Measurement of Fixed-Income Trade Best Execution and Transaction Cost Analysis for AllianceBernstein

NYSE: ICE announced that its subsidiary, Interactive Data, will work with AllianceBernstein L.P. (AB) to help the firm evaluate its trade execution quality and perform transaction cost analysis (TCA). (Link)

<u>Intercontinental Exchange reports ICE & NYSE January</u> **2016** statistics

NYSE:ICE, reported January 2016 trading volume and related revenue statistics, which can be viewed on the company's investor relations website at http://ir.theice.com/ir-resources/supplemental-information in the Monthly Statistics Tracking spreadsheet. (Link)

Intercontinental Exchange Reports Record Fourth Quarter 2015 Adjusted EPS of \$3.27, +26% year-overyear; Record Full Year 2015 Adjusted EPS of \$12.15, +26% year-over-year

NYSE:ICE reported financial results for the fourth quarter and full year 2015. For the quarter ended December 31, 2015, consolidated net income attributable to ICE was \$370 million on \$875 million of consolidated revenues less transaction-based expenses. (<u>Link</u>)

IA Compliance Programs

RRS provides a full range of services to assist with your firm's compliance with SEC Rule 206(4)-7, including:

- Comprehensive risk assessment
- Written policies and procedures assessment
- Document review and forensic testing
- Supervisory controls examinations
- Financial statement review
- · Best practices assessment
- Implementation assistance
- Ongoing compliance support

For more information contact John Pinto at (202) 463-6575 or JohnPinto@RRSCompliance.com

Intercontinental Exchange increases quarterly dividend 13% to \$0.85 per share

NYSE: ICE announced its first quarter dividend will be \$0.85 per share, up 13% from \$0.75 per share in the fourth quarter of 2015. (Link)

Intercontinental Exchange Chairman and CEO to present at Credit Suisse Financial Services Forum

NYSE: ICE announced that Jeffrey C. Sprecher, Chairman and CEO, will speak at the Credit Suisse Financial Services Forum. The presentation will be broadcast live over the Internet and can be accessed in the investor relations section of the ICE website at www.theice.com. (Link)

ICE Clear Canada receives third-country central counterparty recognition under EMIR

NYSE:ICE announced that ICE Clear Canada has been recognized as a third-country central counterparty (CCP) in accordance with the European Market Infrastructure Regulation (EMIR). (<u>Link</u>)

NYSE Arca expands market making program for ETPs to deliver deeper liquidity

NYSE:ICE announced the addition of Royal Bank of Canada's RBC Capital Markets as a Lead Market Maker (LMM) on NYSE Arca, deepening the pool of liquidity for ETPs. (Link)

<u>Intercontinental Exchange sets date for 2016 Annual Meeting of Stockholders</u>

NYSE:ICE will hold its 2016 Annual Meeting of Stockholders on May 13, 2016 at 8:30 a.m. ET at The St. Regis Atlanta. The proxy statement and admission procedures will be available in early April for stockholders of record as of March 15, 2016. (Link)

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COMPREHENSIVE COMPLIANCE SOLUTIONS

Www.Rrscompliance.Com

FINCEN

The Egmont Group of Financial Intelligence Units Reinforces Its Efforts in Combating Terrorist Financing

The increasing actions of terrorists and terrorist organizations such as ISIL, al-Qaida and their respective affiliates, as demonstrated by recent terrorist acts in Indonesia, Egypt, France, Lebanon, Mali, Saudi Arabia, Turkey and the United States, and the proliferation of Foreign Terrorist Fighters (FTFs), poses serious threats to security and international financial stability. (Link)

Notice Regarding the Withdrawals of Findings and Proposed Rulemakings under Section 311

The FinCEN is withdrawing three findings and related proposed rulemakings under Section 311 of the USA PATRIOT Act, after having determined that the subjects of the rulemakings no longer pose a money laundering threat to the U.S. financial system. (Link)

<u>FinCEN Penalizes Florida's large Private Bank for</u> Willful Anti-Money Laundering Compliance Violations

The FinCEN announced the assessment of a \$4 million civil money penalty (CMP) against a large private bank and Trust Company, for willfully violating federal AML laws, known collectively as the Bank Secrecy Act. (Link)

PRA

PRA fines and bans the CEO of a large insurance company, for serious regulatory breaches and also fines £2,863,066

The PRA has imposed a £25,173 fine on the CEO of the insurance company and has banned him from holding any controlled functions at any PRA-authorized firm. (Link)

Bank of England maintains Bank Rate at 0.5% and the size of the Asset Purchase Program at £375 billion

The Bank of England's MPC sets monetary policy to meet the 2% inflation target and in a way that helps to sustain growth and employment. At its meeting the MPC voted unanimously to maintain Bank Rate at 0.5%. (Link)

<u>Credit: Can trees grow to the sky? - Speech by Jon</u> Cunliffe

In a speech given at the British Property Federation Annual Residential Investment Conference, London, Jon Cunliffe discuss how "Credit" is growing broadly in line with GDP. (<u>Link</u>)

Bank of England and The Times Interest Rate Challenge reaches area finals stage

Some of the keenest economics and business studies students from UK secondary schools are in the final days of preparation for the area finals of the Bank of England and The Times Interest Rate Challenge. (Link)

Target Two Point Zero area final results

From a field of 271 teams, the 42 winning teams from the regional heats of the Interest Rate Challenge, held in November, are now undertaking their next test, the area finals, in four locations around the UK. (<u>Link</u>)

The Central Banking Qualification: training the central bankers of the future

The Bank of England, in partnership with Warwick Business School (WBS), has launched a new postgraduate qualification in Central Banking and Financial Regulation. (Link)

Establishing Shari'ah compliant central bank liquidity facilities – consultation paper

The Bank of England announces the publication of a consultation paper on establishing Shari'ah compliant liquidity facilities. The paper presents the preliminary findings of the feasibility study it commenced in the second half of 2015, and seeks stakeholders' views on the options identified. (Link)

A changing world; is global still good? - Speech by Clara Furse

In a speech given at the Institue of Chartered Accountants of Scotland, Edinburgh, Clara Furse discuss about how international and global financial centres have historically played a crucial role in promoting both growth and stability. (Link)

The UK Economy Post Crisis: A Series of Unfortunate Events? - Speech by Jon Cunliffe

In a speech given at the Centre for International Business Studies, London South Bank University, Jon Cunliff discuss how the slow healing story can still explain where we are and provide a guide to our future prospects. (Link)

PRA and FCA statement on compliance with the EBA guidelines on Sound Remuneration Policies

The PRA and (FCA have notified the European Banking Authority (EBA) that the regulators will comply with all aspects of the EBA Guidelines on Sound Remuneration Policies, except for the provision that the limit on awarding variable remuneration to 100% of fixed remuneration, or 200% with shareholder approval (the bonus cap), must be applied to all firms subject to the Capital Requirements Directive (CRD). (Link)

RRS Research Services

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FCA

The FCA takes disciplinary action against five individuals and three firms in relation to solicitors' professional indemnity insurance and other insurance schemes' failures

The FCA has fined five individuals and two firms a total of £15.5m, in addition to banning four of those individuals, for significant integrity and competence failings. (Link)

FCA confirms accountability rules for wholesale traders and interim rules on regulatory references

The FCA has published the final rules confirming their approach to improving individual accountability for those carrying out wholesale activities, such as algorithmic and high-frequency trading, in banks, building societies, and PRA designated investment firms. The rules also provide clarity on aspects of the Regime's territorial application. (Link)

FCA fines former Head of large bank £792,900 for failing to be open and co-operative

The FCA has fined the head of large bank, in the role he was responsible for a number of portfolios, including the synthetic credit portfolio, at the time of what became known as the 'London Whale' trades. (Link)

£2.9 million to be returned to investors following FCA prosecution

Southwark Crown Court ordered almost £2.65 million to be returned to investors who had invested in a fraudulent collective scheme established and operated. (Link)

FCA publishes Call for Input on the review of retained provisions of the Consumer Credit Act

The review will consider whether particular CCA provisions remain appropriate or should be modified, updated, or replaced by FCA rules or guidance in order to maintain the right degree of consumer protection for today's market. (Link)

Advice firms demonstrate some good practice on due diligence but greater consistency needed

Financial advice firms are seeking to achieve positive outcomes for their clients when it comes to undertaking research and due diligence, a thematic review by the FCA has found. (Link)

FCA encourages firms to do more to support ageing population

A Discussion Paper published today by the FCA is encouraging firms to do more to support the UK's ageing population and ensure that consumers can access the financial products and services they need at every stage of their life. (Link)

FCA fines and restricts large brokerage firm for market abuse risks

The FCA has fined large brokerage firm for £1.2million. The firm is also restricted for a period of 72 days from taking on new clients in its corporate broking division. (Link)

Anti-money Laundering Programs

RRS provides a comprehensive suite of services to aid in AML compliance, AML Program development, testing, training and surveillance for broker-dealers, investment advisers, and other financial institutions.

- Program Development
- Customer Identification
- Enhanced Due Diligence
- OFAC Compliance
- BSA Compliance
- Suspicious Activity Surveillance
- SAR/CTR Reporting
- Program Testing
- Training Plans and Presentations

For more information contact John Pinto at (202) 463-6575 or <u>JohnPinto@RRSCompliance.com</u> Manage Through Change

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Resource Links

Government

- U.S. Securities & Exchange Commission WWW.SEC.GOV
- North American Securities Administrators Association - WWW.NASAA.ORG
- FINCEN <u>WWW.FINCEN.GOV</u>
- Commodity Futures Trading Commission <u>WWW.CFTC.GOV</u>
- Financial Conduct Authority WWW.FCA.GOV.UK
- Prudential Regulatory Authority WWW.BANKOFENGLAND.CO.UK

SRO

- FINRA <u>WWW.FINRA.ORG</u>
- NASDAQ WWW.NASDAQ.COM
- New York Stock Exchange <u>WWW.NYSE.COM</u>
- Municipal Securities Rulemaking Board WWW.MSRB.ORG
- National Futures Association WWW.NFA.FUTURES.ORG

Industry

- Alternative Investment Management Association "AIMA" WWW.AIMA.ORG
- Bank Insurance & Securities Association "BISA" WWW.BISANET.ORG
- Complinet <u>WWW.COMPLINET.COM</u>
- Florida Securities Dealers Association "FSDA" WWW.FLORIDASECURITIES.COM
- Financial Market Association "FMA" WWW.FMAWEB.ORG
- Financial Services Institute "FSI" WWW.FINANCIALSERVICES.ORG
- Investment Adviser Association "IAA" WWW.INVESTMENTADVISER.ORG
- Investment Company Institute "ICI" WWW.ICI.ORG
- Managed Funds Association "MFA" WWW.MANAGEDFUNDS.ORG
- National Society of Compliance Professionals "NSCP" WWW.NSCP.ORG
- Securities Industry and Financial Markets Association "SIFMA" WWW.SIFMA.ORG

*This list is provided for information purposes only. RRS does not specifically endorse any group noted.

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"Find It - Before the Regulators"

The RRS' staff continually strives to ensure that the services and support we provide to our clients are the most up to date and comprehensive available. Frequently, we are able to forecast regulatory trends based on our extensive regulatory experience and the information our clients provide regarding new products, services or marketing trends. This "Find It - Before the Regulators" insight enables us to develop customized compliance solutions so that our clients can address any regulatory deficiencies before the regulators do. If you have question or suggestions, please speak with your account representative or call us at (561) 368-2245.

READER SURVEY FAX RESPONSE

| TO: | Louis Dempsey | | | | RE: February 2016 | | |
|---------------|--------------------------------|------------------------|------------------|--------------------|-------------------|-------------|-----------------------------|
| | Fax: (561 | 1) 807-5442 | | | | | |
| | LouisDempsey@RRSCompliance.com | | | | | | |
| FRON | 1 : _ | | | | _ | | |
| FIRM | NAME: _ | | | IA | BD | OTHER_ | |
| PHON | NE: _ | | | FAX: | | | |
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| What | topics inte | erest you the most? | | | | | |
| What | do you fin | d most useful? | | | | | |
| What | would you | ı like to see in futur | e editions? | | | | |
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| (Pleas | se include y | your phone number | or E-mail addre | ess to schedule a | confere | nce) | |
| | | | Thank you | for your time ar | nd effort | : | |
| | | | Bottom Lin | ne - We Want t | to Knov | w! | |

We Want to Know How We're Doing. If You Have Comments, Complaints or Suggestions Please Do Not hesitate to call (561) 368-2245 or email:

LOUIS DEMPSEY, PRESIDENT

BART McDonald, Executive Vice President

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