## Regulatory & Compliance Update

May 2016 Recap

## Routing

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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**

## <u>EVENTS</u>

- DEADLINE: Monthly FOCUS filing due June 23rd, 2016
- **DEADLINE:** Monthly SIS filing due June 28<sup>th</sup>, 2016

## **ITEMS IN THIS EDITION**

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- FINCEN Treasury Announces Key Regulations and Legislation to Counter Money Laundering and Corruption, Combat Tax Evasion Page 6

## Service Spotlight: Fixed Income Compliance

RRS conducts in-depth examinations of your firm's corporate, municipal and other fixed income business operations, supervisory procedures and compliance programs including testing of supervisory control procedures. This service may be used to meet FINRA's annual internal inspection requirements as set forth in FINRA Rules 3110 and 3120. RRS' team of experts has designed fixed income compliance examinations that are as stringent as the regulators. These compliance services include a comprehensive examination of your firm's overall fixed income business, or focused reviews covering specific aspects of your business for SEC, FINRA and MSRB rule compliance.

Contact:

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## <u>SEC</u>

## SEC Announces:

Agenda for the Advisory Committee on Small and Emerging Companies (Link)

Insider Trading Charges in Case Involving Sports Gambler and Board Member (Link)

## SEC Charges:

Unregistered Brokers with Pocketing Investor Money (Link)

Father, Son, Others in Tribal Bonds Scheme (Link)

Shell Factory Operators with Fraud (Link)

Two Attorneys with Defrauding Escrow Clients (Link)

## SEC Final Rules:

Changes to Exchange Act Registration Requirements to Implement Title V and Title VI of the JOBS Act (<u>Link</u>)

Retail Foreign Exchange Transactions (Link)

### Nashville Firm Schemed to Collect Extra Fees from Hedge Funds

The SEC charged a Nashville, Tenn.-based investment advisory firm and its owner with scheming to collect extra monthly fees from a pair of hedge funds they managed. (Link)

### SEC: Financial Adviser Defrauded Pro Athletes and Lied to SEC Examiners

The SEC announced fraud charges against a Pittsburgh, Pa.-based financial adviser accused of taking money from the accounts of several professional athletes in order to invest in movie projects and make Ponzi-like payments. (Link)

## Agencies Invite Comment on Proposed Rule to Prohibit Incentive-Based Pay that Encourages Inappropriate Risk-Taking in Financial Institutions

Six federal agencies are inviting public comment on a proposed rule to prohibit incentive-based compensation arrangements that encourage inappropriate risks at covered financial institutions. (Link)

### **Investment Banker and Plumber Charged With Insider Trading**

The SEC announced insider trading charges against an investment banker and his close friend, a plumber who allegedly helped remodel his bathroom and put cash in his gym bag in return for illicit tips about upcoming mergers and acquisitions. (Link)

## Silicon Valley Executive Settles Insider Trading Charges

A Silicon Valley executive has agreed to pay more than a half-million dollars to settle charges that he traded on inside information received from a board member at a Minnesota-based company that was trying to solicit a competing bid in advance of a merger. (Link)

## SEC and Law Enforcement Partners Crack Stock Promotion and Kickback Schemes

The SEC announced fraud charges against 10 individuals involved in schemes to trick investors into buying shares of a particular company stock. (Link)

## **Compliance Tips**

For check and application way business – go to the issuers that you have selling agreements with and request that they not process applications that do not evidence supervisory approval. Some of the larger issuers will do this to assist your compliance function; however, it is your responsibility to adequately review all applications. This would simply be an added back-up if something slipped through as you cannot rely on the issuer to conduct your suitability reviews.

## SEC Adopts Amendments to Implement JOBS Act and FAST Act Changes for Exchange Act Registration Requirements

The SEC has approved amendments to revise the rules related to the thresholds for registration, termination of registration, and suspension of reporting under the Securities Exchange Act of 1934. (Link)

## Whistleblower Earns \$3.5 Million Award for Bolstering Ongoing Investigation

The SEC announced a whistleblower award of more than \$3.5 million to a company employee whose tip bolstered an ongoing investigation with additional evidence of wrongdoing that strengthened the SEC's case. (Link)

## <u>Statement on Trade Reporting in the U.S. Treasury</u> <u>Market</u>

The U.S. Department of Treasury and the SEC announced that they are working together to explore efficient and effective means of collecting U.S. Treasury cash market transaction information. (Link)

### SEC Awards More Than \$5 Million to Whistleblower

The SEC announced that it will award between \$5 million and \$6 million to a former company insider whose detailed tip led the agency to uncover securities violations that would have been nearly impossible for it to detect but for the whistleblower's information. (Link)

## Mayor in Illinois Settles Muni Bond Fraud Charges

The SEC announced that the mayor of Harvey, Ill., has agreed to pay \$10,000 and never participate in a municipal bond offering again in order to settle fraud charges. (Link)



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## Two Individuals Share Whistleblower Award of More Than \$450,000

The SEC announced it will jointly award more than \$450,000 to two individuals for a tip that led the agency to open a corporate accounting investigation and their assistance once the investigation was underway. (Link)

## SEC Prevents Trader's Profits from False Filing

The SEC has obtained a court order to freeze the profits of a trader who allegedly manipulated a technology stock through a false regulatory filing traced to a computer in Pakistan. (Link)

### Mortgage Company and Executives Settle Fraud Charges

The SEC announced that a California-based mortgage company and six senior executives agreed to pay \$12.7 million to settle charges that they orchestrated a scheme to defraud investors in the sale of residential mortgage-backed securities guaranteed by the Government National Mortgage Association (Ginnie Mae). (Link)

## **RRS COMPLIANCE ASSESSMENTS**

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### SEC Halts Ponzi Scheme Aimed at Middle Class

The SEC has charged two California men and their investment firm with operating a Ponzi scheme as they purported to specialize in serving middle-class investors and securing exorbitant returns by investing in hot pre-IPO stocks. The agency also obtained a court-ordered asset freeze against them. (Link)

## <u>FINRA</u>

#### **Regulatory Notices:**

<u>16-16</u> 2016 GASB accounting support fee to fund the governmental accounting standards board

<u>16-17</u> FINRA reminds firms of their obligations when reporting large options positions

 $\frac{16-18}{100} \text{ SEC approves rule requiring delivery of an educational communication to customers of a transferring representative}$ 

<u>16-19</u> FINRA issues guidance regarding the use of stop orders during volatile market conditions

<u>16-20</u> SEC Approves OATS Amendments to Require Identification of Non-FINRA Member Broker-Dealers

## Information Notices:

<u>05-16-16</u> Elimination of Continuing Education Delivery at Testing Centers

## FINRA Fines Investment Firm \$17 Million for Systemic Anti-Money Laundering Compliance Failures

FINRA announced that it has fined an investment firm a total of \$17 million for widespread failures related to the firms' anti-money laundering (AML) programs. (Link)

## FINRA Sanctions Life Insurance Company for Negligent Misrepresentations and Omissions in Connection With Variable Annuity Replacements

FINRA announced that it has fined a life insurance company \$20 million and ordered it to pay \$5 million to customers for making negligent material misrepresentations and omissions on variable annuity (VA) replacement applications for tens of thousands of customers. (<u>Link</u>)

## FINRA Fines Investment Firm \$900,000 for Inadequate Supervision of Research Department "Flash" Emails

FINRA announced that it has censured an investment firm, of Little Rock, Arkansas, and fined the firm \$900,000 for inadequately supervising firm-wide internal "flash" emails sent by its research analysts to convey information about companies and industries the firm covered. (Link)

## FINRA Files Complaint Charging Financial Firm, CEO With Fraudulent Municipal Bond Sales, and Charging CEO With Misuse of Customer's Charitable Trust Funds

FINRA announced that it has filed a complaint against a Phoenix-based firm, and the firm's President and Chief Executive Officer, charging them with securities fraud in connection with the sale of millions of dollars of municipal revenue bonds to customers. (Link)

## FINRA Offers What Investors Should Know about Crowdfunding

Investors will be able to buy securities in early-stage companies but should first take time to consider the risks that may be involved in investing in these small businesses, according to a new alert from FINRA. (Link)

## Emotions Increase Susceptibility to Fraud in Older Adults: Research from Stanford, FINRA Foundation and AARP

With funding and research participation from the AARP Fraud Watch Network and the FINRA Investor Education Foundation, psychologists at Stanford University found that inducing emotions in older adults increased their intention to buy falsely advertised items. (Link)

## <u>MSRB</u>

## MSRB Regulatory Notices for April 2016:

 $\underline{2016\text{-}15}$  MSRB to Amend Rules to Define Two-Day Settlement Cycle



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2016-16 MSRB to Launch Permanent Series 50 Exam

### MSRB Upcoming Events:

Georgia Municipal Association Annual Convention. (Link)

Application of MSRB Rule G-37 on Political Contributions and Prohibitions on Municipal Advisory Business to Municipal Advisors, and Related Amendments to MSRB Rules G-8 and G-9. (<u>Link</u>)

# Stage set for shortened trade settlement cycle for municipal securities

MSRB has received approval from the SEC to move toward a shortened settlement cycle for municipal securities. The MSRB was the first regulator to advance a rule change proposal in support of an industry-wide initiative to reduce the time between trade execution and settlement of the transaction by one business day. (Link)

## **Municipal Securities**

The RRS solutions for Municipal Securities Broker-Dealers include a wide range of preventative compliance services designed to reduce the potential for deficiencies during regulatory examinations. MSRB compliance services include examination, testing and support in the following critical areas:

- Trade Reporting (RTRS)
- Political contributions
- Underwriting activities
- Section 529 sales practices
- Official Statement Delivery
- Books and records
- Pricing
- Order Handling and Execution
- Customer confirmations
- Trade comparison and confirmation
- Supervisory Controls
- Written supervisory procedures

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

## MSRB to accept additional board applications for specific category

MSRB, the self-regulatory organization that oversees the \$3.7 trillion municipal securities market, announced that it is accepting applications

for its Board of Directors from banks and broker-dealers with specific municipal market expertise. (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 <u>BartMcDonald@RRSCompliance.com</u>

## MSRB names head of legislative affairs

MSRB announced that Susan Collet will be joining the organization as Head of Legislative Affairs. (Link)

## <u>NASAA</u>

## NASAA Releases for Public Comment Proposed Model Rule and Uniform Notice Filing Form for Federal Crowdfunding Offerings

In a step toward providing guidance to issuers and promoting uniformity, NASAA announced that its Board of Directors has approved the release for public comment of a proposed model rule and uniform notice filing form for federal crowdfunding offerings. (Link)

## <u>NASDAQ—NASDAQ-TRADER—</u> OTCBB

### **Equity Regulatory Alert:**

<u>2016 – 3</u> Guidance on Test Stock Usage

2016 - 4 NASDAQ Makes Preparations to Shorten Settlement Cycle from T+3 to T+2

<u>2016 – 5</u> Updated Guidance on Test Stock Usage

### **Equity Trader Alert:**

2016–92 NASDAQ Test Opportunity

2016–93 NASDAQ to Begin Listing Global X Exchange Traded Fund

<u>2016–95</u> Information Regarding Merger Transaction between VBI Vaccines Inc. and SciVac Therapeutics Inc.

# RRS Research Services

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<u>2016–96</u> Reverse Split and CUSIP Change for Cinedigm Corp. Class A Common Stock (CIDM)

2016–97 NASDAQ to Begin Listing Global X Exchange Traded Funds

<u>2016–98</u> NASDAQ to Begin Listing First Trust Exchange Traded Fund

<u>2016–99</u> Reverse Split and CUSIP Change for SMART Technologies Inc. (SMT)

## 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 Louis Dempsey at (561) 368-2245 or LouisDempsey@RRSCompliance.com

<u>2016–100</u> Reverse Split and CUSIP Change for Cytori Therapeutics, Inc. (CYTX)

<u>2016–101</u> NASDAQ Modifies Functionality for Orders Received in Halted and IPO Securities

<u>2016–102</u> Reverse Split and CUSIP Change for Unilife Corporation (UNIS)

<u>2016–103</u> Information Regarding Corporate Reorganization of Charter Communications Inc. (CHTR)

2016–104 NASDAQ to Begin Listing Recon Capital Advisors Exchange Traded Fund

2016–105 Reverse Split and CUSIP Change for Net Element, Inc. (NETE)

2016–106 NASDAQ U.S. Markets will be closed on Monday, May 30, 2016

<u>2016–107</u> NASDAQ Announces Upcoming Fee Changes for Trading Applications and FINRA/NASDAQ TRF

<u>2016–108</u> Reverse Split and CUSIP Change for China Recycling Energy Corporation (CREG)

2016–109 Reverse Split and CUSIP Change for Vical Incorporated (VICL)

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2016–110 NASDAQ Updates Maximum Allowable Order Updates

2016–111 Reverse Split and CUSIP Change for Cyclacel Pharmaceuticals, Inc. (CYCC)

<u>2016–112</u> Reverse Split and CUSIP Change for Onconova Therapeutics, Inc. (ONTX)

2016–113 NASDAQ to Begin Listing State Street Exchange Traded Fund

2016–114 NASDAQ and PSX Pricing Updates

2016–115 NASDAQ Test Opportunity

#### **Data Technical News:**

<u>2016 – 14</u> NASDAQ Options Market Announces New Multicast IP Addresses for Proprietary Data Feeds

 $\underline{2016-15}$  MaxPoint Interactive, Inc. to Begin Listing and Trading on NASDAQ

#### **Options Trader Alert:**

2016 – 13 NOM Updates Pricing

#### **Options Regulatory Alert:**

<u>2016 – 15</u> Advertising Review

<u>2016 – 16</u> NOM and BX Options Bid/Ask Differentials for "PCLN" Options Class

<u>2016 – 17</u> PHLX Bid/Ask Differentials for "NDX" and "PCLN" Option Classes

### **UTP Vendor Alert:**

2016 - 04 Initial Bandwidth Recommendations for the Enhanced INET Platform Migration

2016 – 05 Quarterly Failover Testing Schedule

## <u>NYSE - EURONEXT – AMEX</u>

#### **NYSE EURONEXT Announcements:**

The results of the company's 2016 Annual Meeting of Stockholders, which was held in Atlanta. (Link)

\$0.85 per share dividend for the second quarter of 2016. (Link)

Mayur Kapani to Chief Technology Officer. (Link)

### NYSE Weekly Program-Trading Data Releases:

## Intercontinental Exchange Reports Record First Quarter 2016 Adj. Diluted EPS of \$3.68, +20% y/y; \$1.2B Revenues, less Transaction-based Expenses

NYSE: ICE, reported financial results for the first quarter of 2016. For the quarter ended March 31, 2016, consolidated net income attributable to ICE was \$369 million on \$1.2 billion of consolidated revenues less transaction-based expenses. (Link)



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## Intercontinental Exchange reports ICE & NYSE April 2016 statistics

NYSE:ICE, reported April 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)

## ICE Announces Development of New Funds Rate Futures Contract and Product Advisory Committee

NYSE:ICE, announced an innovative interest rate contract that will facilitate term financing arrangements, such as repos. Consummated transactions in ICE's Funds Rate contract will offer real-time transparency into the interest rate funding markets in a variety of currencies. (Link)

# COMPREHENSIVE COMPLIANCE SOLUTIONS

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## Intercontinental Exchange recognized for data excellence at Inside Market Data's 2016 Awards

NYSE:ICE, announced it received three awards in the 2016 *Inside Market Data* Awards. The honors were announced at the Awards Dinner in New York, hosted by *Inside Market Data* and *Inside Reference Data*, which are part of Incisive Media. (Link)

## NYSE Governance Services and FTI Consulting Announce 16th Annual Corporate Law Firms Rankings

Given the volatility that can occur during an election year, coupled with the current concerns on global economies and an ever-evolving regulatory climate, trusted outside legal counsel is of utmost importance to CEOs, boards and general counsel. (<u>Link</u>)

## US Foods Holding Corp. Lists IPO on the New York Stock Exchange

US Foods Holding Corp. (US Foods), a leading foodservice distributor in the United States, began trading on the NYSE under the ticker symbol "USFD," after its initial public offering. (Link)

## **FINCEN**

## <u>Treasury Announces Key Regulations and Legislation</u> to Counter Money Laundering and Corruption, Combat <u>Tax Evasion</u>

The U.S. Department of the Treasury announced several actions to strengthen financial transparency and combat the misuse of companies to engage in illicit activities. (Link)

## FinCEN awards recognize partnership between law enforcement and financial institutions to fight financial crime

The FinCEN presented its second annual Law Enforcement Awards in a ceremony at the U.S. Department of the Treasury. These awards are presented to law enforcement agencies that use Bank Secrecy Act reporting provided by financial institutions in their criminal investigations. (Link)



# Bank of England and Financial Services Bill given royal assent

Parliament has passed the Bank of England and Financial Services Act 2016, confirming the Bank of England's status at the centre of the UK's economic and financial systems. (Link)

## **Confirmation of changes to the Monetary Policy Committee meeting schedule**

The Bank announced that the Monetary Policy Committee (MPC) would move promptly to a schedule of eight regular meetings a year once the Bank of England Bill had received Royal Assent. (Link)

## <u>Culture in financial services – a regulator's</u> perspective - speech by Andrew Bailey

In a speech given at the City Week 2016 Conference, Andrew Bailey discussed how the culture in financial service has a major influence on the outcome that matter regulators. (Link)

# Bank of England maintains Bank Rate at 0.5% and the size of the Asset Purchase Programme 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 ending, the MPC voted unanimously to maintain Bank Rate at 0.5%. (Link)

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## What's Going On? Uncertain data and uncertain outcomes - speech by Martin Weale

In a speech given at the University of Liverpool, Martin Weale discuss of the uncertainty in the forecast. (<u>Link</u>)

# Monetary policy expectations and long term interest rates - speech by Gertjan Vlieghe

In a speech given at the London Business School, Gertjan Vlieghe discussed the importance of the long-term interest rates play's in the monetary policy. (Link)

# First phase of a global code of conduct for currency markets published

The first phase of the Global Code of Conduct for the Foreign Exchange Market and principles for adherence to the new standards were released in New York by the Foreign Exchange Working Group (FXWG). (Link)

## Broker-dealer Compliance Support

RRS' regulatory and compliance consulting and support solutions for broker-dealers' includes:

- SEC/FINRA compliance examinations
- AML program development and reviews
- Annual compliance meetings
- Written supervisory policies and procedures
- Regulatory mandates
- Compliance programs and training
- Code of ethics

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

## <u>FCA</u>

## Two convicted of insider dealing in Operation Tabernula trial

In a case brought by the FCA and following a three-month trial at Southwark Crown Court, two defendants – a senior investment banker and a Chartered Accountant – have been convicted of conspiring to insider deal between November 2006 and March 2010. (<u>Link</u>)

# Financial Conduct Authority's regulatory sandbox opens to applications

The FCA, opened its regulatory sandbox to firms. The sandbox is a 'safe space' in which businesses can test innovative products, services, business models and delivery mechanisms while ensuring that consumers are appropriately protected. (Link)

## Insider dealers sentenced in Operation Tabernula trial

In a case brought by the FCA, a senior investment banker, and a Chartered Accountant, have been sentenced at Southwark Crown Court to 4.5 years and 3.5 years imprisonment, respectively, having been convicted of conspiring to insider deal between November 2006 and March 2010. (Link)

# FCA fines and bans financial adviser for insider dealing

The FCA has fined, a financial adviser,  $\pm$ 36,285 and banned him for a period of at least two years for engaging in market abuse. (Link)

## FCA reviews find mortgage firms lending responsibly but scope for improvement on competition

Firms have positively applied the responsible lending requirements, which came into force as part of the Mortgage Market Review (MMR); however, there is scope for improving consumers' ability to make better choices about mortgage deals. (Link)

# The FCA bans an investment firm former compliance officer

The FCA has banned, former compliance officer of an Investment firm, from performing any function in relation to any regulated financial activity and publicly censured him. Were it not for his serious financial hardship, the FCA would have fined him £200,000. (Link)

## Over 55s at heightened risk of fraud, says FCA

FCA urges caution as study reveals increasing risk of retirees being scammed via investment fraud Low interest rates cited as a key driver as investors seek higher returns. (Link)

## FCA proposes cap on early exit charges

The FCA has proposed that for existing contract-based personal pensions, including workplace personal pensions, exit charges will be capped at 1% of the value of a member's pot. (Link)

## <u>Megan Butler appointed permanent Director of Supervision –</u> <u>Investment, Wholesale and Specialists</u>

The FCA announced that Megan Butler has been appointed permanently to the role of Director of Supervision – Investment, Wholesale and Specialists (SIWS). (Link)

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# **Resource Links**

Government	SRO
<ul> <li>U.S. Securities &amp; Exchange Commission – <u>WWW.SEC.GOV</u></li> <li>North American Securities Administrators Association - <u>WWW.NASAA.ORG</u></li> <li>FINCEN - <u>WWW.FINCEN.GOV</u></li> <li>Commodity Futures Trading Commission – <u>WWW.CFTC.GOV</u></li> <li>Financial Conduct Authority - <u>WWW.FCA.GOV.UK</u></li> <li>Prudential Regulatory Authority – <u>WWW.BANKOFENGLAND.CO.UK</u></li> </ul>	<ul> <li>FINRA - <u>WWW.FINRA.ORG</u></li> <li>NASDAQ - <u>WWW.NASDAQ.COM</u></li> <li>New York Stock Exchange - <u>WWW.NYSE.COM</u></li> <li>Municipal Securities Rulemaking Board - <u>WWW.MSRB.ORG</u></li> <li>National Futures Association <u>WWW.NFA.FUTURES.ORG</u></li> </ul>

## Industry

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

\*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**

то:	Louis Dempsey			RE: May 2016
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LOUIS DEMPSEY, PRESIDENT

## BART MCDONALD, EXECUTIVE VICE PRESIDENT

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