Regulatory & Compliance Update

December 2017

ROUTING

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- Supervisory Principals
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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:** Quarterly FOCUS filing due January 25th, 2018
- DEADLINE: Quarterly Form Custody due January 25th, 2018
- DEADLINE: Monthly SIS filing due January 30th, 2018
- DEADLINE: Quarterly SSOI filing due January 30th, 2018
- **DEADLINE:** Quarterly OBS filing due February 1st, 2018

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SERVICES SPOTLIGHT: Supervisory Controls

RRS provides a full range of services to assist with your firm's compliance with FINRA Rules 3110, 3120 and 3130, including:

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

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SEC

SEC Charges:

Biopharmaceutical Company With Failing to Properly Disclose Perks for Executives (Link)

SEC Halts:

ICO Scam (Link)

List of No Action Letters:

Securities Act of 1933 – Rule 486(b) PIMCO Dynamic Income Fund (Link)

Investment Company Act of 1940 – Section 17(f); Rule 17f-6 LCH Limited and LCH. Clearnet LLC (<u>Link</u>)

Investment Company Act of 1940 – Section 17(f); Rule 17f-6 ICE Clear Credit LLC (<u>Link</u>)

Investment Company Act of 1940 – Section 17(f); Rule 17F-6 Chicago Mercantile Exchange (<u>Link</u>)

SEC Events:

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 us at (561) 368-2245

SEC Continues Crackdown on Brokers Defrauding Customers

The Securities and Exchange Commission continued its crackdown on brokers who defraud customers, charging two New York-based brokers with making unsuitable trades that were costly for customers and lucrative for the brokers. (Link)

Broker Charged With Defrauding Investors

The Securities and Exchange Commission charged a registered representative in Pennsylvania with operating a long-running offering and investment advisory fraud. (Link)

Broker Charged With Giving Special Access to IPOs for Cash Kickbacks

Securities and Exchange Commission charged a Wall Street stockbroker with illegally accepting more than \$1 million in undisclosed kickbacks for giving certain customers preferential access to lucrative IPOs, enabling them to reap major trading profits in the secondary markets. (Link)

Audit Firm Charged With Fraud Relating to Auditing of Penny Stock Companies

A California-based audit firm is being charged with conducting flawed audits and reviews of financial statements, which are critical sources of information for investors. (Link)

Digital Display Advertising Firm, Executives Charged With Bilking Investors

The Securities and Exchange Commission charged a Seattle-area outdoor digital signage advertising company and two of its senior executives with stealing more than \$2 million from retail investors. (Link)

Former Company Insider Earns More Than \$4.1 Million for Whistleblower Tip

The Securities and Exchange Commission announced an award of more than \$4.1 million to a former company insider who alerted the agency to a widespread, multi-year securities law violation and continued to provide important information and assistance throughout the SEC's investigation. (Link)

Daniel Michael Named Chief of Enforcement Division's Complex Financial Instruments Unit

The Securities and Exchange Commission announced that Daniel Michael has been named chief of the Enforcement Division's Complex Financial Instruments Unit. (<u>Link</u>)

SEC Modifies Approach to Form N-PORT Filing Requirements

In recognition of the importance of sound data security practices and protocols for sensitive, nonpublic information, the Securities and Exchange Commission modified its approach to the pending requirement for registered investment companies to file Form N-PORT electronically while the agency continues its previously announced review and uplift of its EDGAR and other systems. (Link)

Company Halts ICO After SEC Raises Registration Concerns

A California-based company selling digital tokens to investors to raise capital for its blockchain-based food review service halted its initial coin offering (ICO) after being contacted by the Securities and Exchange Commission, and agreed to an order in which the Commission found that its conduct constituted unregistered securities offers and sales. (Link)

Stock Trader Charged in Insider Trading Ring

The Securities and Exchange Commission charged a former day trader with making more than \$1 million in illegal insider trading profits as part of a ring that allegedly stole confidential information from investment banks and clients so they trade in advance of secondary stock offerings. (Link)

SEC Appoints New Chairman and Board Members to PCAOB

The Sarbanes-Oxley Act of 2002 established the PCAOB to oversee the audits of public companies and broker-dealers to protect the interests of investors and further the public interest in the preparation of informative, accurate, and independent audit reports. (Link)

Division of Trading and Markets Deputy Gary Barnett Director to Retire

The Securities and Exchange Commission announced that Gary Barnett, Deputy Director in the Division of Trading and Markets, will retire from the agency at the end of the year. (Link)

SEC Names Kenneth A. Johnson as Chief Operating Officer

The Securities and Exchange Commission announced that Kenneth A. Johnson has been named the agency's Chief Operating Officer (COO). Mr. Johnson has served as Acting COO since February 2017. (Link)

Marc P. Berger Named Director of New York Regional Office

The Securities and Exchange Commission announced that Marc P. Berger has been named Director of the New York Regional Office. He will join the agency in January. (<u>Link</u>)

Anti-money Laundering Programs

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For more information contact us at (561) 368-2245

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customers preferential access to lucrative IPOs, enabling them to reap major trading profits in the secondary markets. (<u>Link</u>)

Gerald Hodgkins, Associate Director of the SEC's Enforcement Division, to Leave the Agency After 20 Years of Service

The Securities and Exchange Commission announced that Gerald W. Hodgkins, an Associate Director of the Division of Enforcement, will leave the agency at the end of this year for private practice. (Link)

Commission Staff Provides Regulatory Guidance for Accounting Impacts of the Tax Cuts and Jobs Act

The Securities and Exchange Commission announced publication of staff guidance for publicly traded companies, auditors, and others to help ensure timely public disclosures of the accounting impacts of the Tax Cuts and Jobs Act (the Act). (Link)

Annual Staff Reports on Credit Rating Agencies Show Improvements

Credit rating agencies under Securities and Exchange Commission oversight show improved compliance, increased information technology resources, and continued competition, according to two SEC staff reports released on nationally recognized statistical rating organizations (NRSROs). (Link)

Ask about Our Order Handling and Best Execution Surveillance Solutions Contact John Pinto at (202) 463-6575

JohnPinto@RRSCompliance.com

FINRA

Regulatory Notices:

17-42 FINRA Requests Comment on Proposed Amendments to the Codes of Arbitration Procedure Relating to Requests to Expunge Customer Dispute Information <u>17-43</u> Guidance on Reporting Short Interest Positions Held in Master/Sub-Accounts or Parent/Child Accounts)

<u>18-01</u> Guidance on Reporting Short Interest Positions Held in Master/Sub-Accounts or Parent/Child Accounts)

Information Notices:

2018 Holiday Trade Date, Settlement Date and Margin Extensions Schedule (<u>Link</u>

FINRA Conference & Events:

FINRA Fines \$2 Million for Failing to Reasonably Supervise Email Communications

The Financial Industry Regulatory Authority (FINRA) announced it has \$1.25 million for failing to conduct timely or adequate background checks on approximately 8,600, or 95 percent, of its nonregistered associated persons from January 2009 through May 2017. (Link)

Did you know? IA AML Obligations...

Investment Advisers (including registered and unregistered hedge funds) should keep in mind that although the Patriot Act does not specifically apply to them, they are responsible if one of their clients is on any of the SDN or OFAC lists. OFAC has jurisdiction over any individual, regardless of citizenship, who is physically located anywhere in the US, and American citizens and permanent resident aliens located anywhere in the world. If a hedge fund opens an account for a person or firm sanctioned by the US or residing in a country sanctioned by the US, the Fund would be violating US laws. Therefore, such firms need to have robust OFAC procedures even though they are not specifically subject to the AML requirements under the Patriot Act (yet).

FINRA Fines \$1.4 Million for Supervisory Deficiencies Related to Extended Settlement Transactions

The Financial Industry Regulatory Authority (FINRA) announced that it has fined the firm \$1.4 million for failing to establish a reasonable supervisory system and procedures to identify and evaluate extended settlement transactions, and for related rule violations. (Link)

FINRA Fines \$2.8 Million for Customer Protection Rule Violations and Supervisory Failures

To ensure that customers could recover their assets in the event of the broker-dealer's insolvency, the Customer Protection Rule requires a broker-dealer, which maintains custody of customer securities, to obtain and maintain physical possession or control over certain of those securities. (Link)

FINRA Requests Comment on Proposed Changes to Expungement of Customer Dispute Information

The Financial Industry Regulatory Authority (FINRA) issued a Regulatory Notice requesting comment on changes to the expungement process. FINRA proposes to establish a roster of arbitrators with additional training and specific backgrounds or experience from which a panel would be selected to decide requests for expungement of customer dispute information in settled cases and in cases brought for the sole purpose of seeking expungement. (Link)

FINRA Warns Investors: Don't Fall for Cryptocurrency-Related Stock Scams

The Financial Industry Regulatory Authority (FINRA) issued an Investor Alert warning investors to beware of potential stock scams when considering the purchase of shares of companies that tout high returns associated with cryptocurrencies, such as bitcoin. (Link)

FINRA and Georgetown University's McDonough School of Business Announce Partnership to Deliver Certified Regulatory and Compliance Professional Program

The Financial Industry Regulatory Authority (FINRA) and Georgetown University's McDonough School of Business announced a partnership to deliver the FINRA Institute at Georgetown Certified Regulatory and Compliance Professional (CRCPTM) Program in Washington, DC. The CRCP program is the premier executive program designed specifically for securities industry regulatory and compliance professionals, and delivers a comprehensive and rigorous course of instruction on the foundation, theory and practical application of securities laws and regulation. (Link)

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The Financial Industry Regulatory Authority (FINRA) announced that it has fined the firm \$1.4 million for failing to establish a reasonable supervisory system and procedures to identify and evaluate extended settlement transactions, and for related rule violations. (Link)

Report from FINRA Board of Governors Meeting – December 2017

FINRA's Board of Governors held its final meeting of 2017 where it approved FINRA's 2018 budget and updated Financial Guiding Principles – both of which FINRA will publish for the first time in early 2018. It also approved advancing several rule proposals and improving the technology supporting FINRA's registration system. (Link)

MSRB

MSRB Regulatory Notices for December 2017:

2017-23 MSRB Extends Comment Deadline on Request for Comment on Providing Compliance Support

2017-24 SEC Approves Amendments to MSRB Form G-45 to Collect Additional Fee Data About ABLE Programs and 529 College Savings Plans

<u>2017-25</u> MSRB to Amend Rule G-34, on CUSIP Numbers, New Issue, and Market Information Requirements

MSRB Upcoming Events:

MSRB Chicago Town Hall: Hosted in coordination with the Municipal Bond Club of Chicago (<u>Link</u>)

MSRB to Amend Requirements for Obtaining CUSIP Numbers

The Municipal Securities Rulemaking Board (MSRB) received approval from the Securities and Exchange Commission to amend MSRB Rule G-34, on obtaining CUSIP numbers.. (<u>Link</u>)

MSRB Announces New Town Hall Series Coming in 2018

The Municipal Securities Rulemaking Board (MSRB) announced that it will hold a series of "Town Hall" meetings in 2018 intended to enhance engagement with municipal market stakeholders and provide a forum for capturing ideas to inform the MSRB's current priorities and long-term strategic initiatives. Market stakeholders will have the chance to communicate directly with MSRB Board members and staff about their expectation of the MSRB, and its current and future initiatives. (Link)

NASAA

NASAA Announces Current and Emerging Investor Threats

A survey of state securities regulators conducted by the North American Securities Administrators Association (NASAA) revealed promissory notes to be the most frequently identified source of current investor complaints or investigations. (Link)

NASAA Statement on Confirmations of Robert Jackson and Hester Peirce to Serve on the U.S. Securities and Exchange Commission

The following is a statement from Joseph P. Borg, President of the North American Securities Administrator Association (NASAA) and Director of the Alabama Securities Commission on the confirmations by the Senate of Robert Jackson and Hester Peirce to serve on the U.S. Securities and Exchange Commission: (Link)

NASDAQ/NASDAQ TRADER/OTCBB

Equity Trader Alert:

<u>2017 – 199</u> Nasdaq to Hold a Moment of Silence for Victims of the Manhattan Attack

<u>2017 – 200</u> Nasdaq Saturday, November 4, 2017, Test Opportunity

<u>2017 – 201</u> Nasdaq to Hold a Moment of Silence for Victims of the Texas Church Shooting

<u>2017 – 191</u> Nasdaq to Begin Listing New Principal ETF

2017 – 192 Nasdaq Limit Up/Limit Down

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 us at (561) 368-2245

Amendment 12 Update

<u>2017 – 193</u> Nasdaq to Begin Listing Two Principal ETFs

<u>2017 – 194</u> Nasdaq to Resume Implementation for Enhancements to the Closing Cross Process

<u>2017 – 195</u> Nasdaq to Begin Listing New VictoryShares ETF

2017 – 196 Nasdaq to Test Limit Up/Limit Down

<u>2017 – 197</u> Nasdaq to Begin Listing Select First Trust ETFs

2017 – 198 Nasdaq, BX and PSX Pricing Updates

Data Technical News:

<u>2017 – 29</u> TherapeuticsMD, Inc. to Begin Listing and Trading on Nasdaq

2017 – 30 Daylight Savings Time Ends Soon

<u>2017 – 31</u> Sonus Networks, Inc. (SONS) Business Combination Effective

<u>2017 – 32</u> Nasdaq Announces Additional Field to the MFQS Daily List & Symbol Directory

Options Trader Alert:

<u>2017 – 69</u> Nasdaq Announces Changes to Minimum Quote Size Requirements

<u>2017 – 70</u> Nasdaq ISE, Nasdaq PHLX and Nasdaq BX Options

Options Regulatory Alert:

<u>2017 – 52</u> Nasdaq Introduces New Compliance Report

> <u>RRS Compliance Examinations</u> Save Money on Compliance and Increase Effectiveness Call (561) 368-2245 JohnPinto@RRSCompliance.com

<u>2017 – 53</u> PHLX, NOM, BX, ISE, GEMX and MRX Changes to Obvious and Catastrophic Error Theoretical Price Determinations

<u>2017 - 54</u> PHLX, NOM, BX, ISE, GEMX and MRX Monthly Quote Spread Parameter Relief

<u>2017 – 55</u> PHLX, NOM, BX, ISE, GEMX and MRX Bid/Ask Differentials for "NDX" and "PCLN" Option Classes

UTP Vendor Alert:

2017 – 9 Moment of Silence

NYSE/EURONEXT/AMEX

NYSE Weekly Program-Trading Data Releases:

Intercontinental Exchange Reports November Statistics

Intercontinental Exchange, Inc. (NYSE: ICE), a leading operator of global exchanges and clearing houses and provider of data and listings services, reported November 2017 trading volume and related revenue statistics, which can be viewed on the company's investor relations in the Monthly Statistics Tracking spreadsheet. (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 us at (561) 368-2245

Intercontinental Exchange Recognized for Excellence in Clearing by Risk and FOW

NYSE: ICE, has announced that two of its clearing houses received awards from Risk and FOW for excellence in clearing. (Link)

Intercontinental Exchange Announces Election of Sharon Bowen to ICE Board of Directors

NYSE: ICE, has announced that its Board of Directors has elected Sharon Bowen as a new Director effective December 8, 2017. She fills a newly created seat on the Board. (<u>Link</u>)



Intercontinental Exchange Appoints Boudewijn Duinstra as Head of First Line Clearing Risk for ICE Clear Europe

NYSE: ICE, announced that Boudewijn Duinstra has joined ICE Clear Europe as Head of First Line Clearing Risk. (Link)

Intercontinental Exchange Completes Sale of Trayport to TMX Group, Acquisition of NGX and Shorcan Energy

NYSE: ICE, announced it has completed the sale of Trayport to TMX Group in exchange for NGX, Shorcan Energy and £350 million cash. (Link)

NYSE Extends Global IPO Leadership for Seventh Consecutive Year

NYSE: ICE, continued to build on its leadership as the premier venue for global capital raising with \$31.3 billion in proceeds from 88 transactions in 2017, almost twice the capital raised by any other exchange in the world. The NYSE also listed each of the last 32 IPOs raising \$700 million or more. (Link)

FINCEN

Launches "Fincen Exchange" To Enhance Public-Private Information Sharing

The United States Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) launched the FinCEN Exchange program to enhance information sharing with financial institutions. As part of this program, FinCEN, in close coordination with law enforcement, will convene regular briefings with financial institutions to exchange information on priority illicit finance threats, including targeted information and broader typologies. (Link)

PRA

Minutes Of The RTGS Renewal Programme Working Groups - October 2017

As part of the RTGS Renewal Programme, the Bank will develop and implement the new ISO 20022 messaging standards in the High Value Payment System. The Bank has established two Working Groups focused on ISO 20022, comprising representatives from across the payments industry. (Link) <u>RRS Compliance Administrator</u> Cut Compliance Costs without Cutting Effectiveness Call (561) 368-2245 JohnPinto@RRSCompliance.com

Record Of The Financial Policy Committee Meetings Held On 22 And 27 November 2017

Our Financial Policy Committee (FPC) meets to identify risks to financial stability and agree policy actions aimed at safeguarding the resilience of the UK financial system. (<u>Link</u>)

Bank Rate Maintained At 0.50%

The Bank of England's Monetary Policy Committee (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 on 13 December 2017, the MPC voted unanimously to maintain Bank Rate at 0.5%. (Link)

BD and IA Services

RRS provides a full range of services to assist broker-dealers and investment advisers' registration. With renewals ready to begin the first week of November, contact RRS to sign up for our services.

For more information contact us at (561) 368-2245

The Bank Of England's Approach To The Authorization And Supervision Of International Banks, Insurers And Central Counterparties

As discussions on the UK's future relationship with the EU continue the Bank of England is announcing that it is consulting on an updated approach to authorizing and supervising international banks and insurers, and it is issuing guidance on its approach to international central counterparties (CCPs). (Link)

Twenty Years Of Bank Of England Independence: The Evolution Of Monetary Policy Over £320,000 Raised For Our Charities Of The Year

We are pleased to announce that our partnership with our charities of the year 2016/17, Haven House Children's Hospice and Macmillan Cancer Support, will benefit the charities by over £320,000 – the largest amount ever raised by our colleagues. (Link)

FCA

FCA Reveals Next Round Of Successful Firms In Its Regulatory Sandbox

The sandbox allows firms to test innovative products, services or business models in a live market environment, while ensuring that appropriate protections are in place. It is part of Innovate, an initiative kicked off in 2014 to promote competition in the interest of consumers. (Link)

FCA Sets Out Its Approach To Authorization And Its Approach To Competition

When the FCA launched its Mission, it committed to publishing a series of documents that would explain its approach to regulation in more depth. The approach documents are the second and third in this series and follow on from the approach to consumers which was published in November. (Link)

Six Guilty In Relation To £2.7m Boiler Room Scam

A further three defendants had pleaded guilty earlier in the proceedings. The defendants are due to be sentenced at Southwark Crown Court at a later date and confiscation proceedings will follow. Due to reporting restrictions, the defendants cannot yet be named. (Link)

FCA Makes It Easier For People To Compare Bank Accounts

The new information will help customers, comparison websites and the media to make meaningful comparisons of the services different current account providers offer. By encouraging competition, it is expected that the new rules will mean providers will improve their service and performance. (Link)

FCA Consults On How Firms And Individuals Will Transition To The Senior Managers And Certification Regime

The FCA has published a package of proposals on how firms and individuals will move to the Senior Managers and Certification Regime. The aim of the new regime is to make individuals more accountable for their conduct and competence. (Link)

FCA Publishes Update On Proposed New Rules To Help Credit Card Customers In Persistent Debt And Asks For Further Views

FCA has published an updated consultation on rules to help customers in persistent credit card debt. These include firms, at designated timeframes, prompting customers to make faster repayments or proposing repayment plans, as well as intervening earlier if customers are struggling to repay. (Link)

FCA Stops Unlawful Foreign Exchange Investment Scheme

Following an application by the FCA, the High Court yesterday made orders against a number of persons involved in carrying on an unauthorized foreign exchange investment scheme. The scheme took in at least £1.2 million from 65 investors but none of the investors' money was ever used in foreign exchange trading or any other type of investment. (Link)

R.R. Research Services

Resource Links*

Government

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

SRO

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

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.



Reader Survey

"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

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LouisDempsey@RRSCompliance.com

Name:			
Firm:	IA:	BD:	Other:
Phone:	Fax:		

In order for us to better serve the industry with this publication we ask that you provide feedback on this issue.

- Do you read the RCU each month?
- What topics interest you the most?
- o What do you find most useful?
- What would you like to see in future editions?
- Are you a current client of RRS?
- Are you interested in receiving information or a call from our Staff to discuss the products and services offered by RRS?

(Please include your phone number or E-mail address to schedule a conference)

Thank you for your time and effort

BOTTOM LINE - WE WANT TO KNOW!

We want to know how we are doing. If you have any comments, complaints or suggestions then please do not hesitate to call (561) 368-2245 or email:

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