

SDDCO Regulatory Services LLC

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The
SDDCO
Group

INVESTMENT ADVISER REGISTRATION & COMPLIANCE

SDDCO Regulatory Services LLC (“SDDCO-RS”) of The SDDCO Group offers wide-ranging compliance solutions to investment advisers. Seasoned professionals can facilitate your registration with the Securities Exchange Commission (“SEC”), fulfill your chief compliance officer role, and/or support your firm’s ongoing compliance with the rules and regulations of the industry.

Adviser SEC Registration Services

SDDCO-RS can lead advisers through fulfillment of their SEC registration requirements:

- Creating and filing Form ADV Parts 1 and 2 and supporting documents
- Developing your customized Written Supervisory Procedures
- Drafting your Code of Ethics, BCP, and Insider Trading Policy
- Developing Solicitors Agreements and Disclosure Statements
- Reviewing planned marketing materials
- Licensing appropriate personnel

Adviser Regulatory Compliance Services

Per the Investment Advisers Act of 1940 (“the Act”) Rule 206(4)-7, SDDCO-RS assists registered investment advisers (“RIAs”) through the development of a customized compliance program, the adoption of written policies and procedures, the designation of a knowledgeable Chief Compliance Officer (“CCO”), and the execution of the annual review.

▲ Compliance Service Overview:

We can provide continued assistance with required functions:

- Administering your IARD system, making yearly amendments to ADV Parts 1 and 2, delivering updated ADV Part 2 within 120 days of fiscal year-end, preparing state notice filings and registrations, and filing an amended ADV upon a material change to your business
- Drafting policies and procedures, updating written supervisory procedures, monitoring insider trading policy, and reviewing marketing/performance material
- Conducting your annual review to test effectiveness of firm compliance and to prepare for regulatory exams

RIA Compliance Service Options:

SDDCO-RS can provide year-round assistance, on a retainer basis, to facilitate ongoing regulatory compliance via two levels of service: RIA Compliance Support and RIA Outsourced CCO.

RIA Compliance Support

SDDCO-RS can be engaged to support your designated, in-house CCO with the responsibilities of administering the firm's compliance policies and procedures pursuant to the requirements of the Act.

SDDCO-RS can assist your CCO to:

- Monitor adviser Policies and Procedures; assist with applications and revisions
- Serve or assist CCO as Web IARD Administrator
- Prepare with CCO routine ADV Amendments, state notice filings, Section 13 filings
- Facilitate with CCO the collection of representative Disclosures and Certifications
- Implement with CCO a Compliance Timeline to foster completion of activities
- Advise CCO on Marketing Material compliance
- Conduct with CCO the Annual Review of effectiveness and draft summary report
- Guide CCO through Regulatory Exams conducted by regulatory authorities
- Draft with CCO Communications and Responses to Regulators
- Provide ongoing Compliance Advice to CCO, management, and staff

RIA Outsourced CCO

An SDDCO-RS consultant can perform with proper knowledge and authority as designated CCO to administer your adviser firm compliance program. Working closely with management and staff, your SDDCO-RS CCO ("SDDCO-CCO") will plan, draft, implement, and maintain your compliance program, provide the annual written compliance report, and handle the matters required of a CCO under the Act.

In addition to the *RIA Compliance Support* services above, your SDDCO-CCO can:

- Proactively maintain and update existing Compliance Manuals
- Obtain periodic Disclosures and Certifications of representatives
- Review and approve adviser Marketing Materials
- Administer the Code of Ethics and Insider Trading Review
- Deliver Privacy Notices in accordance with SEC Regulation S-P
- Organize and chair periodic Compliance Committee Meetings
- Provide Internal Training on relevant compliance topics
- Conduct a Risk Assessment annually with management