

## ATTORNEYS IN THIS PRACTICE

William P. Barry  
Eva Marie Carney  
Michael D. Mann  
Kimberly M. Versace

## RELATED PRACTICES

Business Operations Agreements  
Corporate and Business Transactions  
Fund Formation  
Investment Advisers Act Advice  
Investment Management

## Compliance Manuals and Training

Drawing on the Firm's extraordinary depth in regulatory, enforcement and transactional matters, we work side-by-side with clients to devise and implement strong compliance regimes, best-practice enhancements and approaches to investments and trading situations that satisfy both regulatory requirements and business needs. Our familiarity with current market practice helps us address the novel regulatory and trading issues our clients often confront.

We offer tailored advice on securities regulatory, trading and other compliance matters, with a particular emphasis on trading policies and procedures, information barrier arrangements, anti-money laundering policies and procedures, disclosure, corporate governance and Foreign Corrupt Practices Act compliance. We design and conduct training programs that address these issues. We also offer real-time trading advice, drawing on our knowledge of Rule 10b-5, Rule 144, Section 13, Section 16, short-selling and other issues. We help clients anticipate, manage and resolve emerging international financial regulatory and enforcement issues.

We base our advice on real-world experience, including extensive dealings with U.S. and international regulatory matters at the SEC and in private practice. We work with clients to navigate cross-border regulatory issues, building on our partners' involvement in the founding and early implementation of the SEC's international enforcement and regulatory programs. We draw on the Firm's experienced litigators and transactional lawyers – including some who have dealt with issues directly from the trading floor – to shape our regulatory and trading counsel and strategy. This combination of strengths produces the comprehensive and workable advice our clients need.

### PUBLICATIONS

"Registering Investment Advisers Take Note: Drafting Your Compliance Manual is Just the First Step Toward Satisfying the Compliance Rule" by Michael Mann, Eva Marie Carney and Kimberly Versace

"Buying a Majority Interest in a Hedge Fund Manager: An Acquirer's Primer on Key Structuring and Negotiating Issues" by Scott Budlong, Eva Marie Carney, Thao Do, Eric O'Meara, William Orbe and Kenneth Werner published in *The Hedge Fund Law Report*

"Fund managers: Prepare for Bribery Act" by Carl Winkworth and William Barry published in *Financial Times*

### PRESENTATIONS

RK&O partners participate in the panel discussion "Receiving Information, Managing Risk, and Preserving Liquidity: Strategies for the Current Regulatory Landscape" at the Financial Services General Counsel Luncheon in San Francisco



COMPLIANCE MANUALS AND TRAINING (Cont.)

RK&O partners present "Receiving Information, Managing Risk and Preserving Liquidity: Strategies for the Current Regulatory Landscape" at the Alternative Asset Management General Counsel Luncheon in New York City