

## ATTORNEYS IN THIS PRACTICE

William P. Barry  
Eva Marie Carney  
Audrey Laning Ingram  
Paul A. Leder  
Jeffrey A. Lehtman  
Morgan G. Macdonald  
Michael D. Mann  
Gianna C.T. Quach  
Lee S. Richards, III  
Sarah P. Swanz  
Catherine M. Turgeon  
Kimberly M. Versace  
Carl Winkworth

## RELATED PRACTICES

Corporate Governance  
Evaluation of Regulatory Risk  
Lawyers and Ethics Compliance  
Operational Advice  
Regulation and Compliance  
Securities Regulation Advice and Training

## Trading/Ethical Policies and Compliance

Our clients' complex business operations and trading activities give rise to equally complex risks. Our clients often engage RK&O to tailor compliance policies and procedures designed to address the myriad rules and regulations that govern their domestic and international conduct as they seek to protect their franchises against legal, regulatory and reputational risks.

We routinely assist clients in drafting or revising codes of conduct and other policies and procedures concerning insider trading, personal trading, the Foreign Corrupt Practices Act, anti-money laundering legislation and the Investment Advisers Act. We frequently help clients to develop and implement, in conjunction with in-house legal and compliance staff, specialized training programs covering the above matters. From the initial development and implementation of compliance and training regimes to best practice enhancements and situation-specific approaches to regulatory or trading issues, our lawyers develop strategies built on market-based pragmatism.

### PUBLICATIONS

"A Loan Trader's Guide to Commercial Real Estate Loans" by Jon Kibbe, Paul B. Haskel, Michael Friedman and Kenneth Werner

"Proposed SEC Rules on Uniform Fiduciary Standard Expected Soon" by Arthur S. Greenspan, published in Bureau of National Affairs *Securities Regulation & Law Report*

"Clamping Down on Kleptocrats" by William Barry and Sarah Swanz published by *Risk Management*

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

"Credibly Defending Against Insider Trading Allegations: *SEC v. Rorech*" by Eva Marie Carney

"Big Boys Don't Cry: How 'Big Boy' Provisions Can Help Hedge Fund Managers Avoid Liability for Insider Trading Violations" by Brian Fraser published in *The Hedge Fund Law Report*

William Barry Contributes to "U.S. and International Anti-Money Laundering Developments" in *The International Lawyer*

"Navigating Anti-Bribery Restrictions to Win Business in the Global Marketplace" by William Barry and Jeffrey Lehtman

"Compliance Strategies for Investment Businesses and Global Corporations - International Anti-Corruption Regulation" by Michael Mann and William Barry

"Challenges For Operating Cross-Border Investment Businesses: Meeting Compliance Expectations on a Global Scale" by Michael Mann and William Barry

## TRADING/ETHICAL POLICIES AND COMPLIANCE (Cont.)

"Developments in the Internationalization of Securities Enforcement Part II" by Michael Mann and William Barry

*The International Lawyer, Winter 2005; Volume 39; Number 4; ABA Section of International Law*

"Developments in the Internationalization of Securities Enforcement" by Michael Mann and William Barry

*The International Lawyer, Fall 2005; Volume 39; Number 3; ABA Section of International Law*

## PRESENTATIONS

James Walker presents "LinkedIn, Facebook and Twitter, Oh My! Ethics & Privacy in Social Media" hosted by the LSTA

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

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

Jon Kibbe speaks at the 15th Annual Conference of The Loan Syndications and Trading Association

William Barry speaks at the New York State Bar Association Annual Meeting

William Barry presents "Current Issues in Export Controls and the Foreign Corrupt Practices Act" at the Juris Conference on Managing Business Disputes and Legal Risk in Latin America

## NEWS &amp; ANNOUNCEMENTS

Eva Marie Carney quoted in *Hedge Fund Law Report* article "Dual-Hatting: Benefits, Challenges and Recommendations for Persons Simultaneously Serving as General Counsel and Chief Compliance Officer of a Hedge Fund Manager"

Eva Marie Carney quoted in *Hedge Fund Law Report* article "How Hedge Fund Managers Should Approach Preparing for, Conducting and Documenting the Annual Compliance Review"

U.S. News-Best Lawyers awards RK&O "Law Firm of the Year" in White Collar-Government Investigations Law and recognizes firm's other practice areas

Eva Marie Carney quoted in *The Hedge Fund Law Report* article "Use by Hedge Fund Managers of Restricted Lists, Watch Lists and Ethical Walls to Prevent Insider Trading Violations"

Richards Kibbe & Orbe LLP names Jeffrey Lehtman a partner and Catherine Turgeon and Ryan Jackson counsel

"SEC Examinations of Investment Advisers" webcast, co-presented by Eva Marie Carney, covered in *The Hedge Fund Law Report*

William Barry quoted in the *Silicon Valley Mercury News* article "HP Investigation Sheds Light on Challenges of the Modern Businessworld"

William Barry quoted in *Compliance Week* article "DoJ Tells Pharma to Brace for FCPA"

William Barry provides commentary in BNET article "Changing The Focus Of The Foreign Corrupt Practices Act"



TRADING/ETHICAL POLICIES AND COMPLIANCE (Cont.)

William Barry quoted in *The Wall Street Journal Law Blog* article "The 'Catch 22' Bust: Some Early Takeaways for FCPA Junkies"