

<p>WHAT HAPPENED?</p>	<p>Speech by SEC Staff: What SEC Registration Means for Hedge Fund Advisers</p> <p>By Norm Champ Deputy Director, Office of Compliance Inspections and Examinations U.S. Securities and Exchange Commission</p> <p>To the New York City Bar May 11, 2012</p>
<p>WHAT WAS IN THE SPEECH?</p>	<ul style="list-style-type: none"> • Provisions of the Dodd-Frank Act which are applicable to private fund advisers, specifically hedge fund advisers: registration, new reporting obligations (Form PF), and the National Examination Program’s (“NEP”) plan for new registrants. • Several key requirements under the Advisers Act and considerations for newly registered hedge fund advisers, such as the rules related to: <ul style="list-style-type: none"> ✓ Compliance Program ✓ Books and Records ✓ Form ADV Updates ✓ Code of Ethics ✓ Marketing • Hedge Fund advisers should be considering their policies and procedures and disclosures related to: <ul style="list-style-type: none"> ✓ Fees/expenses ✓ Conflicts of interest ✓ Risk management
<p>10 THINGS TO BE THINKING ABOUT</p>	<ol style="list-style-type: none"> 1. Review your internal controls and compliance policies and procedures at least annually 2. Assess your reporting obligations under Form PF and begin preparing data 3. Identify your key operational and regulatory risks 4. Expand your knowledge and educate your employees through training 5. Verify client assets 6. Identify circumstances where there may be conflicts of interests with clients/investors and make sure you mitigate and disclose these conflicts 7. Present clear, complete, and accurate disclosure in performance and marketing materials 8. Review portfolios for suitability and compliance with any account restrictions and offering documents 9. Address any complaints quickly according to your procedures and make sure they are resolved 10. Confirm your IT security is in place and protecting assets and sensitive data

For the full text of the speech: <http://www.sec.gov/news/speech/2012/spch051112nc.htm>