

Investment Management Regulatory Update - May 2016

May 27, 2016 | Client Update

SEC Rules and Regulations

- SEC Proposes Higher Net Worth Threshold for Qualified Clients under the Advisers Act
- SEC Staff Grants No-Action Relief under Section 206(3) of the Advisers Act for Certain Purchases of Fractional Shares from Advisory Client Accounts by Advisers and Their Broker-Dealer Affiliates
- SEC Staff Grants No-Action Relief under the Custody Rule to Sub-Adviser for Not Obtaining Surprise Examination of Custodian Affiliate
- Incentive Compensation for Financial Institutions: Reproposal

Industry Update

- Financial Stability Oversight Council Releases Update on Review of Asset Management Products and Activities
- SEC Chair Mary Jo White Delivers Opening Remarks at the Compliance Outreach Program for Investment Companies and Investment Advisers

Litigation

- Second Circuit Rules that Criminal Liability for Violation of Section 206 of the Advisers Act Does Not Require Proof of Intent to Harm
- SEC Charges Accounting Firm with Conducting Deficient Surprise Exams

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