

FCA

FIDUCIARY COMPLIANCE ASSOCIATES

WHO WE ARE

Charles Lerner is the Founder and Principal of Fiduciary Compliance Associates LLC (FCA) a compliance-consulting firm located in New York City that assists investment advisers to establish and operate their compliance program to comply with the US federal securities laws. Charles has more than 30 years' experience in compliance and regulatory matters in the financial service industry. He was a Managing Director and Chief Compliance Officer of Duff Capital Advisors and UBS Dillon Read Capital Management, both hedge fund investment advisers. He has been a Managing Director for compliance and fiduciary risk at Bankers Trust Company and Deutsche Bank and responsible for portfolio compliance at Blackrock Financial Management.

His prior positions were as an attorney and senior counsel in the Division of Enforcement at the Securities and Exchange Commission in Washington, DC and Director of ERISA Enforcement at the Pension and Welfare Benefits Administration at the US Department of Labor (the predecessor agency to the Employee Benefits Security Administration) which has regulatory and enforcement responsibility for the fiduciary, reporting and prohibited transactions provisions of the Employee Retirement Income Security Act of 1974 for private sector pension plans.

He is a frequent speaker on compliance issues and was lead editor for "The US Private Equity Fund Compliance Guide" (2010); "The US Private Equity Fund Compliance Companion" (2012); "The US Private Real Estate Fund Compliance Guide" (2012); and "The US Private Equity Fund Compliance Guide: Volume III (2015), published by PEI Media Ltd.

Charles graduated with a BS from Cornell University and received a JD from Brooklyn Law School. He is admitted to the practice of law in New York and Maryland. He is affiliated as a Senior Adviser and Regulatory Consultant with Milne Legal, a law firm located in Zurich, Switzerland and an affiliate office in Paris, France.

WHY CHOOSE US

We take pride in our personal service and being responsive to our client's needs. We provide guidance that is specifically designed for your firm given its size and business, as there are no off-the-shelf or one-size-fits-all solutions. Our services are designed to meet your firm's unique requirements and in-line with other similarly situated firms gained from our relationships with your peers.

WHAT WE DO

FCA will work with its clients to design a compliance program specific to the firm's size and needs. We will work with you to:

REGISTRATION AND COMPLIANCE PROGRAM DEVELOPMENT

- Analyze and make recommendations to improve your existing compliance program.
- Prepare an initial and updated registration with the SEC on Form ADV Part 1 and Part 2.
- Prepare and update your existing Compliance Manual and Code of Ethics.
- Develop specialized procedures for expert networks, trade monitoring, valuation, allocation of expenses, cyber security, business continuity, political contributions, gifts and entertainment, etc.
- Develop a compliance calendar and risk matrix.
- Ensure the practical application of industry best practices

ONGOING ASSISTANCE

- Design and assist the CCO in compliance monitoring and reviews.
- Review and comment on marketing materials.
- Assist with personal securities trading and email reviews.
- Assist in preparation of responses to due diligence requests and presentations.
- Work with the CCO to respond to new regulatory developments.
- Conduct annual training on compliance policies and regulatory developments.
- Conduct and prepare a report for the SEC required annual compliance review.
- Conduct a mock SEC examination.
- Support the CCO during a SEC examination.
- Be on call to provide compliance assistance.

