



**Christopher S.  
Avellaneda**  
*Partner*

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## Contact

+1 212.756.2028

[christopher.avellaneda@srz.com](mailto:christopher.avellaneda@srz.com)

919 Third Avenue  
New York, NY 10022

**Advises private fund managers on regulatory and compliance matters with a particular focus on the Investment Advisers Act of 1940.**

Chris works with clients on a variety of regulatory matters, including SEC investment adviser registration, operating effective compliance programs, managing conflicts of interest, assessing cross-border applications of US regulatory requirements, review of marketing materials, compliance with trading-related laws and handling the regulatory implications of management company restructurings and transactions. He also regularly leads training sessions for clients, including on topics such as marketing private funds, SEC rule proposals and trading-related matters.

Chris works closely with clients undergoing SEC examinations and responding to deficiency letters and enforcement referrals. He also leads compliance testing and review projects with private fund managers to

identify material risks and evaluate the measures in place to address those risks. He has advised private fund managers on regulatory issues relating to blockchain technology and digital assets his entire career and actively practices in that space.

Chris actively participates in industry-related initiatives and events, and is a member of the Private Funds Subcommittee of the Federal Regulation of Securities Committee of the Business Law Section of the American Bar Association.

He is a member of the firm's Diversity, Equity and Inclusion Committee and the Latin Affinity Group.

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## Practices

**INVESTMENT MANAGEMENT**

**BLOCKCHAIN TECHNOLOGY AND DIGITAL ASSETS**

**CYBERSECURITY AND DATA PRIVACY**

**REGULATORY AND COMPLIANCE**

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## Bar Admissions

New York

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## Education

Harvard Law School, J.D.

- Managing Editor, *Harvard Business Law Review*

The George Washington University, B.A.

- *summa cum laude*
- Phi Beta Kappa

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# Publications

- “Marketing Rule FAQ – Impact of Subscription Lines of Credit on Presentation of Net IRRs” *Schulte Alert*, March 7, 2024
- “SEC Division of Examinations Releases 2024 Examination Priorities – What Private Fund Managers Should Know,” *Schulte Alert*, Oct. 31, 2023
- “SEC Adopts Sweeping Final Private Fund Disclosure Rule,” *FundFire*, Aug. 23, 2023 (quoted)
- “The SEC’s AI Proposal: Regulating Everything Everywhere All at Once?,” *Schulte Alert*, Aug. 2, 2023
- “SEC Marketing Rule Update: Additional Focus Areas in Examinations,” *Schulte Alert*, June 23, 2023
- “SEC Form PF Reporting Changes Effective Dec. 11, 2023, and June 11, 2024,” *Schulte Alert*, June 21, 2023
- “Hedge Fund Digital Communications, Marketing in SEC Exam Crosshairs,” *FundFire*, June 14, 2023 (quoted)
- “Crypto Custody Rule Change Reignites Commodity vs. Security Debate,” *IFLR*, March 21, 2023 (quoted)
- “Parsing the Significance of the SEC’s FAQ on the Presentation of Gross and Net Performance,” Hedge Fund Law Report, March 2, 2023 (interview)
- “SEC’s ‘Hammer’ Approach to Custody Revamp Worries Money Managers,” *Bloomberg Law*, Feb. 27, 2023 (quoted)
- “Proposed Custody Rule Would Hit Small- and Midmarket Hardest,” *Private Funds CFO*, Feb. 23, 2023 (quoted)
- “Hedge Funds Brace for Deeper SEC Exams, New Custody Proposal,” *FundFire*, Feb. 22, 2023 (quoted)
- “Crypto Regulation Looms, But Bitcoin Rallies. Here’s Why,” *MarketWatch*, Feb. 16, 2023 (featured)

- “5 SEC Exam Priorities Private Fund Managers Must Address,” *Law360*, Feb. 16, 2023
- “The SEC’s Staff Issues a New Marketing Rule FAQ on Net Performance Requirements,” *Schulte Alert*, Jan. 18, 2023
- “SEC Marketing Rule Update: What Private Fund Advisers Should Be Thinking About as the November 4 Compliance Date Approaches,” *Schulte Alert*, Sept. 20, 2022
- “SEC Custody Rule Update: Takeaways from Recent Enforcement,” *Schulte Alert*, Sept. 19, 2022
- “SEC Examinations: What Private Fund Managers Can Expect in 2022,” *Schulte Alert*, April 19, 2022
- “SEC Proposes Cybersecurity Risk Management,” *Schulte Alert*, Feb. 10, 2022
- “SEC Proposes New Rules for Private Fund Managers,” *Schulte Alert*, Feb. 9, 2022
- Securities Enforcement Quarterly, *Schulte Publication*, April 2021
- “SEC Examinations Update: 2021 Examination Priorities,” *Schulte Alert*, March 4, 2021
- “SEC Proposes Advertising and Cash Solicitation Rules Overhaul,” *Schulte Alert*, Nov. 6, 2019; republished in *The Hedge Fund Journal*, November/December 2019
- *Hedge Funds: Formation, Operation and Regulation* (ALM Law Journal Press), 2018 (contributor)
- “Sovereign Immunity Implications for Investment Advisers,” *Compliance Corner*, October 2017 (co-author)
- “United States Fundraising,” *The Private Equity Review* (Law Business Research Ltd.), 2017 (co-author)
- “Reminder: TIC SHC Reports Due by March 3, 2017,” *Schulte Client Alert*, Feb. 14, 2017 (co-author)
- “New Form ADV: The Impact on Private Fund Advisers,” *Schulte Client Alert*, Sept. 19, 2016 (co-author); republished in *The*

- “SEC Examinations of Private Fund Advisers,” *The Review of Securities & Commodities Regulation*, June 17, 2015 (contributor)
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## Speaking Engagements

- “Private Funds Advisers Rule: Fund Terms and Preferential Terms,” 33rd Annual Schulte Private Capital Forum, January 2024
- “The Heightened Scrutiny of the SEC,” Schulte London Investment Management Hot Topics, May 2023
- “SEC Proposed Rule: Service Provider Due Diligence & Monitoring for Registered Investment Advisors,” Convergence Inc and Schulte Webinar, February 2023
- “Marketing Rule Update,” Schulte 32nd Annual Private Investment Funds Seminar, January 2023
- “Intro to Hedge Funds and Investment Management,” Harvard Association for Law and Business Webinar, October 2020
- “New Form ADV: The Impact on Private Fund Advisers,” New York State Society of CPAs Investment Companies and Investment Management Committee Meeting, New York, October 2016