

NEWS & INSIGHTS

FIRM NEWS

SRZ Submits Comment Letter on SEC's Proposed Amendments to Form ADV and Investment Advisers Act Rules

August 11, 2015

SRZ on Aug. 11, 2015 submitted comments to the U.S. Securities and Exchange Commission on the agency's proposed amendments to Form ADV and the corresponding rules under the Investment Advisers Act. SRZ's comment letter addresses confidentiality concerns about the proposal's obligation for advisers to make detailed disclosure of proprietary information regarding separately managed accounts. The firm also makes suggestions regarding the SEC's proposal to incorporate "umbrella registration" into Form ADV, particularly for foreign advisers.

SRZ's comment letter was submitted by the firm's regulatory & compliance practice, which is carefully following the SEC's development of rules affecting advisers to private funds and SMAs.

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Attachments

 $\stackrel{\downarrow}{-}$ Download Comment Letter