

PUBLICATIONS

Complying on Pay-to-Play: Tips for CCOs

Compliance Reporter

May 30, 2016

As we move deeper into another election season, investment advisers should consider refreshing their efforts to comply effectively with the Securities and Exchange Commission's rule on their political contributions — known as the pay-to-play rule. Although it's more than five years old, Rule 206(4)-5 has not been easily integrated into many advisers' compliance programs. If your firm allows its covered persons to make political contributions, there is not one simple step to avoid triggering Rule 206(4)-5. A carefully designed program of training, pre-approval and quarterly certifications can help reduce the risk. In this article, partner Marc Elovitz shares 10 tips for compliance that can make the process more effective.

Related People



**Marc
Elovitz**

Partner
New York

Practices

HEDGE FUNDS

INVESTMENT MANAGEMENT

REGULATORY AND COMPLIANCE

Attachments

[!\[\]\(6059a5aa8b4ca7bb793408023d6c6e42_img.jpg\) Download Article](#)