

**(Virtual)**

# **Hedge Funds Luncheon Series:**

## **Review of Recent Exam Letters**

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October 5, 2021

Proskauer»

# Examination Information Request List

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## Examination Period

Unless otherwise indicated, the information is requested for the period [ \_\_\_\_ ], 2020 until through \_\_\_\_\_, 2021 (the “**Examination Period**”). Please notify the Staff of material events or activities that occur after the Examination Period, but while the examination is still ongoing, that would result in material information that would be responsive to a request if not for being outside of the Examination Period.

## Organizing the Information to be Provided

Please label the information or electronic files to identify both the corresponding item number in the request list and the general subject matter. Provide the documents on a rolling basis (as available), but **no later than [ \_\_\_\_ ], 2021**. If information provided is responsive to more than one request item, you may provide it only once and reference that request item number when responding to the other request item. If any request item does not apply to your business, please indicate the item is “N/A” (not applicable) in a written response.

# Definition List

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As used in this Initial Request, and in any Additional Requests, the words and phrases listed below shall have the following meanings:

1. **“Adviser,” “Firm,” or “Registrant”** means the registered investment adviser(s) subject to the current examination as outlined in the cover letter to this request list.
2. **“Access Person”** means any supervised person who has access to nonpublic information regarding clients’ purchase or sale of securities, or nonpublic information regarding the portfolio holdings of any reportable fund, or is involved in making securities recommendations to clients, or who has access to such recommendations that are nonpublic (defined in Rule 204A-1(e) of the Advisers Act of 1940 (the “Advisers Act”)).
3. **“Affiliate” or “Affiliated”** means a person or entity that directly or indirectly Controls, is Controlled by, or is under Common Control with another person or entity.

## Definition List (cont'd)

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4. “**Client**” means any of your Firm’s investment advisory clients. This term includes clients from which your Firm receives no compensation, such as family members of your supervised persons. If your Firm also provides other services (e.g., accounting services), this term does not include clients that are not investment advisory clients.
5. “**Common Control**” refers to two or more persons or entities under the control of the same person or entity.
6. “**Communication**” means any correspondence, contact, discussion, e-mail, instant message, or any other kind of oral or written exchange or transmission of information (in the form of facts, ideas, inquiries, or otherwise) and any response thereto between two or more persons or entities, including, without limitation, all telephone conversations, face- to-face meetings or conversations, internal or external discussions, or exchanges of a document or documents.
7. “**Contract**” means an arrangement, or understanding, formal or informal, oral or written, between two or more persons.

## Definition List (cont'd)

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8. **“Control”** has the same meaning ascribed to the term in the Glossary of Terms to the Form ADV, specifically: the power, directly or indirectly, to direct the management or policies of a person, whether through ownership of securities, by Contract, or otherwise.
- a. Each of your Firm’s officers, partners, or directors exercising executive responsibility (or persons having similar status or functions) is presumed to control your Firm.
  - b. For purposes of your response to these requests, a person controls a corporation if the person: (i) directly or indirectly has the right to vote 25 percent or more of a class of the corporation’s voting securities; or (ii) has the power to sell or direct the sale of 25 percent or more of a class of the corporation’s voting securities.
  - c. A person controls a partnership if the person has the right to receive upon dissolution, or has contributed, 25 percent or more of the capital of the partnership.
  - d. A person controls a limited liability company (“LLC”) if the person: (i) directly or indirectly has the right to vote 25 percent or more of a class of the interests of the LLC; (ii) has the right to receive upon dissolution, or has contributed, 25 percent or more of the capital of the LLC; or (iii) is an elected manager of the LLC.
  - e. A person controls a trust if the person is a trustee or managing agent of the trust.

## Definition List (cont'd)

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9. “**Employee**” of the Adviser includes not only employees on the Adviser’s payroll, but also, as defined in Form ADV instructions, independent contractors who perform advisory functions on the Adviser’s behalf.
10. “**Related Person**” means an Affiliate and includes all Employees, officers, directors, and partners of the Adviser.
11. “**Separately Managed Account**” or “**SMA**” includes all Client accounts other than the funds.
12. “**Staff**” means the staff of the U.S. Securities & Exchange Commission.
13. “**Supervised Person**” has the same meaning ascribed to the term in Section 202(a)(25) of the Advisers Act, specifically: any partner, officer, director (or other person occupying a similar status or performing similar functions), or Employee of the Adviser, or other person who provides investment advice on behalf of the Adviser and is subject to the supervision or Control of the Adviser.

# Privilege Claims

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For any document or Communication responsive to a request, but being withheld by the Adviser based on the claim of privilege, please provide a privilege log. The log should identify each document or portion of a document that is being withheld, and provide sufficient information to support the claim of privilege. It should include: (1) the identity and position of the creator(s) of the document; (2) the identity and position of all persons or entities known to have been furnished the document or a copy of the document or informed of its substance; (3) the creation date; (4) a brief description of the document including its subject-matter; and (5) the reason the document or portion of the document is not being produced or is being redacted, including the specific privilege being claimed, e.g., attorney-client or work product. In addition, where only a portion of a requested document or Communication is privileged, please provide the document or Communication with the privileged information redacted.

# Organizational Structure and Service Providers

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Information to be provided by [ \_\_\_\_ ], 2021

- 1. Organization Chart.** The Adviser's organization chart and/or schedule showing:
  - a. The Adviser and all Affiliated entities, including all entities Controlling (directly or indirectly), Controlled by, or under Common Control with the Adviser, and each entity's owners and ownership percentages. (Please also identify any changes in ownership within the last year);
  - b. A description of the relationship between the Adviser and its Affiliated entities; and
  - c. A description of the products or services provided by the Affiliated entities.
- 2. Remote Offices/Branches.** A list of all offices (including the address), other than the Adviser's principal place of business, where 1) advisory books and records are kept; 2) advisory services are performed; or 3) the Adviser's Supervised Persons interface or transact with Clients or investors (collectively, "remote offices"). If the Adviser or any of its Supervised Persons conduct business under a different name in any of these remote offices, also provide the name under which services are provided ("DBA name").



# Organizational Structure and Service Providers (cont'd)

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- 3. Supervised Persons.** Preferably in Excel, a list of the Adviser's Supervised Persons employed by, or active with, the Adviser during the Examination Period, including the following information for each:
- a. Title/Position with the Adviser;
  - b. Areas of responsibility, including (if applicable) committees on which the Supervised Person sits;
  - c. Position held with Affiliated entities (if applicable);
  - d. Office location (if there are multiple locations), and DBA name the Supervised Person works under (if applicable);
  - e. Hire date (if date is prior to the Examination Period, it is acceptable to provide only the year);
  - f. Whether the Adviser deems the individual an Access Person for purposes of its Code of Ethics, and whether the individual is exempt from any of the Adviser's other compliance policies and procedures;
  - g. Whether the individual performed a role for a publicly traded company or served on a creditor's committee, including the name of the company and/or committee and the dates of service;

## Organizational Structure and Service Providers (cont'd)

- h. Whether the Supervised Person departed the firm during the Examination Period, and if yes, the departure date, whether it was a result of a resignation or termination, the reason for resignation/termination, and copy of any executed separation agreement; and
  - i. Whether the Supervised Person filed or stated complaints against the Firm or its Employees, alleging actual or potential violations of securities laws as the cause for the resignation or termination.
- 4. **Committees.** A list of all committees including a description of each committee's responsibilities, meeting frequency, and a list of the members of each committee. Please also indicate whether the committees keep written minutes.
- 5. **Service Providers.** The names and location of all Affiliated and unaffiliated key service providers and the services they perform. Include a list of outside legal counsel and any external compliance or other consultants retained or terminated during the Examination Period and a description of the services provided.

# Organizational Structure and Service Providers (cont'd)

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- 6. Other Business Arrangements.** A description of any joint ventures in which the Adviser or its Supervised Persons participate, and any outside businesses that employ or are owned more than 5%, directly or indirectly, by the Adviser's Supervised Persons. In addition, please indicate whether any Client or investor has invested, and/or has been solicited to invest, in any of these joint ventures or outside businesses.

# Fund Information and Disclosures

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1. **Fund Information.** An Excel spreadsheet with the following information as of [ \_\_\_\_ ], 2021 for each Fund managed by the Adviser during the Examination Period:
  - a. Name as shown in organizational documents (as amended);
  - b. Domicile (country);
  - c. Date the Fund began accepting investors;
  - d. Whether the Fund is currently closed to new investors and when it closed;
  - e. Number of investors;
  - f. Total net assets;
  - g. Short description of investment strategy;
  - h. Amount, if any, of Adviser's equity interest in the Fund;
  - i. Amount, if any, of Adviser's affiliated persons' interest in the Fund;
  - j. Each custodian used by the Fund;
  - k. Primary Fund counsel;
  - l. Auditor of the Fund;

# Fund Information and Disclosures (cont'd)

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- m. Whether the Fund is currently above its high-water mark;
- n. Lock-up periods for both initial and subsequent investments;
- o. If the Fund is part of a master/feeder fund structure, whether it is a master or feeder fund, and if it is a feeder fund, the full name of its master fund;
- p. The management fee charged for the most recent billing period;
- q. The date the most recent management fee was charged;
- r. The performance fee (if applicable) charged for the most recent billing period;
- s. The date the most recent performance fee was charged.

# Fund Information and Disclosures (cont'd)

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For each Fund, provide the following information or documents:

- a. A copy of the Fund's organizational documents, including the management agreement, limited partnership agreement or operating agreement, whichever is applicable, and its private placement memorandum;
- b. A copy of the Fund's most recent audited financial statements;
- c. In Excel, the monthly and annual performance returns for the past four years, or since inception, whichever is shorter;
- d. A list of investors, their account balances as of December 31, 2020 and [ \_\_\_\_ ], 2021 and whether they are related to the Adviser.

## Fund Information and Disclosures (cont'd)

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2. **Advisory Contracts.** A copy of each version of the Adviser's advisory Contract effective during the Examination Period and any standard fee schedule if separate from the Contract. If there are multiple versions of the Contract, please provide an indication of which Clients are subject to each version of the Contract (this may be added as an additional field to the Client list request in the item above). If material amendments were made to the standard advisory Contract or fee schedule during the Examination Period, please provide details on the amendment and when it occurred.
3. **Brochure Supplement.** A copy of all versions of Form ADV Part 2B (Brochure Supplement) furnished to Clients during the Examination Period.
4. **Brochure Delivery.** Documentation demonstrating the Adviser's initial delivery of its Form ADV, Part 2A (Brochure) to its SMA Clients, and any subsequent delivery of the Brochure, or a summary of its material changes, after material changes occurred. In addition, if the Adviser delivers any alternative disclosure document in conjunction with or in lieu of Form ADV Part 2A, a copy of such alternative disclosure document.

# Fund Information and Disclosures (cont'd)

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- 5. Client/Investor On-Boarding and Portfolio Analysis Presentations.** A representative example of any materials presented to Clients or investors in one-on-one meetings prior to becoming a Client/investor, or during the on-boarding process, pertaining to 1) obtaining information on Client objectives, risk tolerance, and suitability; and 2) recommendations or analysis on the Client's portfolio, along with any scripts or guidelines that Supervised Persons follow during these meetings. Also, include a description of the disclosure documents that are provided during these meetings, and copies of these disclosure documents that have not been provided in response to other requests.



# Compliance and Code of Ethics

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- 1. Adviser's Compliance Policies and Procedures.** All written compliance and operational policies and procedures, and the code of ethics in effect for the Adviser during the Examination Period. If any material amendment was made to these policies and procedures during the Examination Period, please describe the amendment and when it became effective.
- 2. Relevant Risks and Conflicts.** A current list of conflicts and other compliance factors relevant to the Adviser's particular operations that create risk exposure for the Adviser and its Clients and form the basis for the Adviser's compliance policies and procedures. Please note any changes made to this list during the Examination Period and the dates of the changes.
- 3. Annual Review.** Any reports and documentation generated to evidence the Adviser's most recent annual compliance review performed pursuant to Rule 206(4)-7 of the Advisers Act.
- 4. Compliance Consultant Reports.** Any written reports or findings issued by a compliance consultant resulting from a mock examination or a review of the Adviser's compliance policies and procedures, operations, or any of the Adviser's books and records.
- 5. Compliance Testing.** A list of all compliance testing performed, internal control analyses, and/or forensic and transactional tests performed during the Examination Period and the dates and/or frequency of such testing.

# Compliance and Code of Ethics (cont'd)

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- 6. Automate d Compliance Tools.** A list and description of any automated systems or tools used to carry out compliance-related oversight functions and/or reporting obligations.
- 7. Compliance Exceptions.** A record of any non-compliance with the compliance policies and procedures by the Adviser's supervised persons including the date of the non-compliance, a description of the matter, any action taken as a result of such non-compliance, and the resolution date.
- 8. Cybersecurity.** A list of all cybersecurity incidents or breaches that occurred during the Examination Period. If applicable, provide a description of each incident (e.g., ransomware, phishing, etc.), including the date of occurrence; date discovered; whether the cybersecurity incident resulted in harm to investors (e.g., monetary, disclosure/theft of personally identifiable information, etc.); and whether the incident has been resolved, including a description of any remediation efforts undertaken in response.
- 9. Compliance Training.** Written guidance the Adviser provided to its Employees regarding the compliance program and documents evidencing Employee compliance training during the Examination Period.

# Compliance and Code of Ethics (cont'd)

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- 10. Complaints.** Any client or investor complaints against the Adviser or its supervised persons, including the following: the date of the complaint, date(s) of alleged conduct, description of topics addressed in the complaint, and the resolution with resolution date. If none, please provide a written statement to that effect. In addition, information about the process used for monitoring client/investor correspondence and/or complaints.
- 11. Litigation, Arbitration, and Administrative Proceedings.** A description of any threatened, pending or settled litigation or arbitration involving the Adviser, including a description of the allegations, the status, and a brief description of any “out of court” or informal settlement. Also include any threatened, pending, or settled litigation or arbitration involving any Supervised Person of the Adviser (if the matter relates to the Supervised Person’s association with the Adviser or a securities-related matter). If none, please provide a written statement to that effect.
- 12. Regulatory Correspondence.** Any correspondence with the Staff (except for the Commission’s welcome letter to new advisers), or other regulatory agencies, including foreign agencies and governments. This would include, but is not limited to, no-action letters, examination disposition letters and responses, inquiries or investigations initiated by another regulator and/or government entity that involves the Adviser or any Supervised Person (if the matter relates to the Supervised Person’s association with the Adviser or a securities-related matter). If applicable, include a description and status of the other inquiries/investigations.

# Compliance and Code of Ethics (cont'd)

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**13. Electronic Communications.** Please explain the steps taken by the Adviser to monitor, review, and retain electronic Communications related to the Adviser's business. Electronic Communications include, but are not limited to, email, text messages, messaging apps, instant messages, Bloomberg messaging, and private messaging on social media sites. Please address the following: (1) whether supervised persons are permitted to use personal devices for firm business or are permitted to use any form of electronic Communication other than Adviser email accounts for business purposes; (2) if so, what steps the Adviser takes to approve the use of such personal devices or additional means of electronic Communications; and (3) what steps the Adviser takes to ensure that supervised persons only use approved means of electronic Communications to conduct firm-related business. Please also explain the Adviser's policies on use of Dropbox, Google Drive, and other forms of cloud storage by supervised persons.

# Portfolio Management and Trading

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1. **Trade Blotter.** A trade blotter (i.e., purchases and sales journal) for January 1, 2020 – [ \_\_\_\_ ], 2021, that lists transactions (including all trade errors, cancellations, re-bills, and reallocations) in securities and other financial instruments held or reported by a qualified custodian for 1) current and former Clients; 2) proprietary and/or trading accounts, and 3) Access Persons. The preferred format for this information is in Excel using CSV format as indicated in the enclosed IA/IC NEAT request template.
2. **Securities Cross Reference.** Names of securities held in all Client portfolios (aggregate position totals for all instruments) for each quarter-end of the Examination Period. The preferred format for this information is in Excel and should include:
  - a. security name;
  - b. CUSIP (or other identifier);
  - c. Client name;
  - d. Client account number;
  - e. quantity or principal/notional amount owned by each Client;
  - f. cost basis;
  - g. whether the position was fair valued; and
  - h. market value of the position.

# Portfolio Management and Trading (cont'd)

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3. **Initial Positions.** Initial holdings positions as of December 31, 2019 (end of day) for 1) current and former Clients; 2) proprietary and/or trading accounts, and 3) Access Persons. The preferred format for this information is in Excel using CSV format as indicated in the enclosed IA/IC NEAT request template.
4. **Ending Positions.** Ending holding positions as of [ \_\_\_\_ ], 2021 (end of day) for 1) current and former Clients; 2) proprietary and/or trading accounts; and 3) Access Persons. The preferred format for this information is in Excel using CSV format as indicated in the enclosed IA/IC NEAT request template.
5. **Private Investments.** For each private investment held by a client as a result of the recommendation or discretionary authority of the Adviser or its Supervised Persons during January 1, 2020 – [ \_\_\_\_ ], 2021, provide the following information:
  - a. The name of the investment;
  - b. If applicable, the third-party manager or sponsor of the investment;
  - c. A description of the investment (e.g., private fund, majority owned private equity portfolio company, private debt, direct real estate);
  - d. A listing of any co-investors, their interest in the investment, and a list of investors to whom the Adviser offered the opportunity;

# Portfolio Management and Trading (cont'd)

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- e. Total aggregate market value of the investment held by all funds and SMAs as of [ \_\_\_\_ ], 2021;
- f. The names of funds, SMAs, Supervised Persons, or Affiliates invested in the investment, their cost basis in the investment, realized value from the investment during the Examination Period, and the amount of their investment as of [ \_\_\_\_ ], 2021, preferably in Excel;
- g. Whether the Adviser, an Affiliate, or a Supervised Person has a material financial interest in the investment (other than direct investments already noted in response to the item above), or is employed by, holds a director position, or is otherwise in a position to make or influence decisions by the issuer of the investment, and if yes, a description of the financial interest and/or the relationship;
- h. Whether the total aggregate amount invested by the Adviser, its Affiliates, and its Clients constitutes a controlling interest in the issuer of the investment;
- i. Where the investment is held and/or how and where proof of ownership in the investment is maintained.

# Portfolio Management and Trading (cont'd)

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- j. A schedule showing information on each purchase or partial or complete sale of the investment during January 1, 2020 – [ \_\_\_\_ ], 2021 by 1) any client (including the Funds), 2) supervised person, 3) the Adviser, or 4) the Adviser's affiliates. Such schedule should include:
1. the name of the investment;
  2. whether it was a purchase, full sale, or partial sale;
  3. the date of purchase/sale;
  4. the name of the purchaser/seller;
  5. the purchase/sales price;
  6. any type of transaction or deal fees associated with the purchase/sale along with the payer and recipient of such fees; and
  7. where applicable, the cost basis for the amount sold.



# Financial Information

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- 1. Financial Records.** The Adviser's balance sheet, income statement, general ledger, cash receipts and disbursements journal (if it contains additional information not contained in the general ledger), trial balance, and chart of accounts as of the end of its two most recent fiscal years and the most current year to date. Please ensure these financial records reflect, on a separate or consolidated basis, financial activity that pertains to the advisory business of any branch offices, and any "relying advisers" listed on schedule R of the Adviser's Form ADV.
- 2. Proprietary Bank and Brokerage Accounts.** A list of the Adviser's proprietary bank and brokerage accounts, and/or any account Controlled, owned by, or held for the beneficial interest of the Adviser. Include the custodian name and account number, and a description of how the account is used (e.g., pay expenses, collect fees, correct trade errors, perform block trades, and/or make trades for the Adviser (house accounts)).
- 3. Bank and Brokerage Statements.** The last six months of the Adviser's statements for all bank and brokerage accounts Controlled or owned by the Adviser.

# Financial Information (cont'd)

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- 4. Adviser Compensation.** A list of all compensation received by the Adviser, directly or indirectly, during the two most recent fiscal years and the current year-to-date, showing for each period the aggregate amount of fees received for each type of fee, including (where applicable), but not limited to: 1) management fees, 2) performance fees, 3) finder's fees, 4) solicitor fees, 5) consulting fees, 6) transaction fees, 7) monitoring fees, 8) accelerated monitoring fees, 9) board/director's fees, and 10) fees in connection with M&A (add-on acquisitions, refinancing, sales, and similar transactions (please explain)). Please note any amounts credited to funds/SMAs and the basis upon which the amount credited was determined.
- 5. Reimbursed Expenses.** A list of expenses of the Adviser or any of its Affiliates that were reimbursed by a Fund and/or portfolio company during the two most recent fiscal years and the current year-to-date, including the following information:
- a. Fund/portfolio company that provided reimbursement;
  - b. Date of reimbursement;
  - c. Amount;
  - d. Description of the expenses or expense types that were reimbursed; and
  - e. Date when expenses were incurred

## Financial Information (cont'd)

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- 6. Outside Compensation to Supervised Persons.** A list of all compensation or non-monetary benefits received directly or indirectly by any of the Adviser's Supervised Persons (other than compensation reflected in the Adviser's financial records provided in response to the item above) that resulted directly or indirectly from 1) an advisory Client's transactions or investments (including non-security investments or investments the Adviser does not include in its assets under management); or 2) fees and expenses paid by an advisory Client, including the Fund(s) (even if not paid by the Client pursuant to the advisory agreement). Please include the Supervised Person's name, the source of the compensation or benefit, a description of the benefit if it is non-monetary, and the total dollar amount or market value of the benefit received in each year during the Examination Period and year-to-date.
- 7. Loans.** A list of loans, loan guarantees, or lines of credit between Clients and/or third parties and the Adviser or its Affiliates, as well as any lending arrangements between Clients and the Adviser's Supervised Persons held during the Examination Period. For each such arrangement, provide the terms of the loan (and guarantee, if applicable), the participating parties and their roles, the initial amount, and the current amount outstanding.

## Financial Information (cont'd)

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- 8. Auditor Engagement Letters, Opinions, and Findings.** If applicable, engagement letters with auditors contracted by the Adviser to perform audit or attestation work pertaining to the Adviser or its Clients, and the most recent opinion or internal control findings issued by such auditor. If applicable, provide any letters from the auditor to the Adviser expressing independence or other ethics issues, disagreements with management of the Adviser, significant delays in obtaining documentation from the Adviser, financial statement misstatements, or other difficulties in conducting the audit.

# Custody

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- 1. Custodians.** Provide the account number and contact information (e.g., name, mailing address, phone number and e-mail address) for the entities that maintained custody of the cash and securities of each Client's account during the Examination Period. The Staff may request that the custodian(s) of specific Client accounts provide the Staff directly with a confirmation of all positions, including cash, short positions, and loans, held as of particular dates.
- 2. Surprise Examination.** If applicable, provide copies of all documents related to any surprise examinations conducted during the Examination Period, including engagement letters, description of surprise examination process, a list of Client accounts provided to the accountant, and reports of results and/or recommendations.

# Other Agreements and Business Arrangements

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- 1. Sub-Advisers.** A copy of all sub-advisory agreements executed with other investment advisers, and a description of the Adviser's process for conducting initial due diligence and ongoing oversight of the sub-adviser (and/or reference to relevant policies and procedures provided in response to a previous request).
- 2. Referrals to Third-Party Managers.** A list of all third-party money managers recommended to Clients, and copies of all agreements governing these relationships.
- 3. Third-Party Investment Platforms.** Names of any third-party investment platforms used for Clients, information on the platform's investment options used by the Adviser, a schedule of any fees or expenses Clients pay through the platform, and a copy of any associated agreements.
- 4. Other Agreements.** Unless provided in response to a previous request, a copy of any Contract or a description of any unwritten arrangement effective any time during the Examination Period that either 1) sets forth compensation, directly or indirectly, to the Adviser or 2) that the Adviser, an Affiliate, or a Supervised Person has or had with any broker-dealer, investment adviser, insurance company, or other financial firm that pertains to, or has any effect on, Client investments (including non-security investments or investments the Adviser does not include in its assets under management) or fees or expenses paid by Clients. This includes, but is not limited to revenue sharing or fee-splitting agreements, solicitor agreements, sales agreements, and incentive program agreements.

## Other Agreements and Business Arrangements (cont'd)

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- 5. Cross Transactions.** A list of cross transactions (including both agency and non-agency cross transactions, which are transactions between two of the Adviser's Clients placed pursuant to the Adviser's recommendation or discretionary authority regardless of whether the Adviser acted as a brokerage agent on the transaction). For each transaction, please provide a description of the transaction, the participating parties and their roles, the date, the amount, how the price was determined, and the reason for the transaction.

# Additional Topics Not in Initial Document Requests

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1. Alternative Data
2. ESG



# Contact Information

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# Proskauer's Global Presence





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