

Election Law Partner Mark Renaud Advises Compliance Preparedness Despite Delay in SEC Pay-to-Play Provision

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Mark Renaud, a partner in Wiley Rein's Election Law & Government Ethics Practice, discussed a delay in a pay-to-play deadline affecting mutual fund firms in a *Compliance Reporter* article. Compliance officers at these firms have taken advantage of a nine-month delay in the deadline of a Securities and Exchange Commission (SEC) provision involving third-party solicitors. As reported, the rule prohibits investment advisers from "providing paid advisory services for two years if the adviser or certain of its executives or employees make a political contribution above a *de minimis* threshold to an elected official who can influence the selection of the adviser." Mr. Renaud advised that "while investment companies have been given a reprieve, they should still ramp up their compliance policies for third-party solicitors now." He continued, saying that "even if technically the SEC's rule doesn't apply until next year, in many instances there are bans on placement agents in state or local laws that affect the political activities of those marketers."

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Practice Areas

Election Law & Government Ethics