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Newsletter

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Finra Scrutinizes Brokers Who Took PPP Loans for Potential Violations

The Financial Industry Regulatory Authority is examining certain registered representatives who took aid program funds, including forgivable Paycheck Protection Program (PPP) loans for coronavirus relief. The regulator is probing whether the recipients had violated federal securities laws or Finra rules, particularly its prohibition on undisclosed outside business activities, according to a copy of a letter sent to a broker by Finra's National Cause and Financial Crimes Detection Program and signed by Nicole Floyd, associate principal investigator.

[Read On.](#)

SEC Sharpens Focus on RIA Compliance Programs

The staff of the Examinations Division issued two risk alerts that, in our view, offer particularly helpful information that is important reading for anyone who is responsible for regulatory compliance of a federally-registered investment adviser.

[Read On.](#)

What the CFTC's Settlement with Vitol Inc. Portends about Enforcement Trends

Given the CFTC's aggressive approach to bringing enforcement actions involving foreign corruption, and its stated intention to continue to do so, it is particularly important that companies regulated by the CFTC assess and update their compliance programs to meet the standards set forth in the guidance on evaluating compliance programs that the CFTC issued in September 2020. Moreover, in light of the multi-agency targeting of conduct involving foreign corruption, such companies should also make sure that their compliance programs meet the standards of other agencies, such as DOJ.

[Read On.](#)

SEC Staff Rationalizes Treatment of Institutional Family Offices under Regulation BI and Form CRS

The Institutional Family Office no-action letter provides welcome relief not only for Institutional Family Offices, which might otherwise not have received the same coverage it received pre-Regulation BI under the FINRA suitability standard, but also for broker-dealers that were surprised to find in the course of Regulation BI implementation that such family offices otherwise came within Regulation BI and Form CRS.

[Read On.](#)