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Summary

Accomplished Compliance Officer with strong expertise in fixed income, equities and derivative securities. Headed compliance department for investment banks, investment advisors and hedge funds. Proven manager having supervised a staff of 15 employees.

Background and Experience

**2014-
Present**

Thornapple Associates, Inc. Associate

Expert consultation and testimony as a Wall Street professional with 44 years experience as Head of compliance and internal audit departments for major investment banks, investment advisors and hedge funds, as well as positions as Chief Financial Officer, Chief Administrative Officer, Registered Options Principal and former NASD investigator and NASD/NCC coordinator with strong expertise in fixed income, equities, options and other derivative securities.

**2011-
Present**

Redburn Partners, Chief Administration Officer and Chief Compliance Officer

Enhanced and strengthened procedures for cross border equity trades, research regulations and anti-money laundering regulations

**2003-
2010**

Jefferies & Co., Inc./Depha First Albany Securities LLC/First Albany Capital Inc., Director of Compliance, Managing Director

Direct responsibility for the support of equities, corporate bonds, municipals, mortgages, research, Investment banking and investment advisor. Drafted research conflict of interest policy, wall crossing procedures, political contribution controls and pay for play guidelines. Developed AML/OFAC program.

**2002-
2003**

Cargil Securities Corp., Compliance Director

Start up equities division of financial services firm. Established policies for trading, sales, research and associated 15a-6 broker exemption activity.

**1996-
2002**

J.P. Morgan Chase Securities/Robert Fleming Inc., S.V.P., Compliance Director, Corporate Secretary

Coordinated all securities and investment management compliance activities for North and South America. Primary focus includes: equities, derivatives, mutual funds, wrap programs, separately managed accounts, venture capital, hedge funds, risk arbitrage, high yield bonds, capital markets and private banking. Member of Administration, Risk, Audit, Equity Operating Group, and Conflicts Committees. Supported equities and fixed income desks for Private Bank.

**1994-
1996**

Natwest Securities Corp./Natwest Futures Inc./Natwest Investment Management Inc., Vice President, Compliance Manager

Enhanced overall compliance procedures contributing to a Federal Reserve ratings upgrade. Provided and coordinated compliance advice for investment advisory and futures entities. Designated exception reports to monitor fixed income activities.

**1992-
1994**

J.P. Morgan Investment Management Inc., Vice President, Compliance Manager

Provided guidance with ERISA principles. Formalized order flow and allocation procedures. Developed employee trading policies to conform with Investment Company Institute standards.

**1991-
1992**

**Mabon Securities Corp./Cedar Street Securities Corp., Senior Vice President,
Compliance and Internal Audit Manager**

Developed surveillance reports to monitor trading and sales activities. Supervised examinations of branch offices. Directed audit of computer equipment purchases which uncovered fraudulent billing practices

1991

Fletcher Capital Markets, Inc., Chief Financial & Compliance Officer

Coordinated application for NASD membership. Prepared books and records along with net capital computations.

**1988-
1991**

**BT Securities Corp./BT Brokerage Corp./BT Futures Corp., Senior Vice President, Compliance
Manager**

Coordinated the submission of firm policies and procedures to the Federal Reserve Board to obtain expanded equity and corporate bond powers. Implemented and monitored Federal Reserve Board's Firewall restrictions. Enhanced Chinese Wall procedures and employee trading policies. Uncovered and spearheaded investigation of NYSE floor practices.

**1976-
1988**

Salomon Brothers, Inc., Vice President, Compliance Manager

Developed daily surveillance reports to monitor firm and customer activity. Established a Compliance Department in London in response to the "Big Bang" of the United Kingdom. Negotiated futures, new account agreements with institutional customers and their attorneys. Disseminated newly issued regulations and firm policies throughout the firm. Conducted both formal and informal seminars to teach same. Manager of all branch office internal audits. Oversight of trading and sales unit reviews. Coordinated financial and operational audits to conform with record keeping requirements. Selected to analyze troubled money market fund.

**1971-
1976**

National Association of Securities Dealers, Inc., NASD/NCC Coordinator

Analyzed members' financial and operational monthly reports to detect negative trends. Developed and implemented special surveillance systems which uncovered stock manipulations and concentrated positions. Monitored over forty firms to net capital compliance. Conducted on-site examinations of sales practices and operational conditions. Presented examination results to NASD District Business Conduct Committee

**1970-
1971**

Shields & Co., Option Trader

Liaison between put and call dealers and sales force in the execution of customer orders.

Licenses

NYSE Compliance Manager, NASD Principal, NYSES Branch Office Manager, Registered Options Principal, Registered Representative, Registered Investment Adviser.

Education

**MBA Finance, Pace University
BBA Marketing, CCNY, Baruch**