

Wendy E. Cohen

Managing Partner, New York

Financial Markets and Funds

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Wendy Cohen, managing partner of Katten's New York office, understands the business realities and challenges of the competitive world of asset management. For three decades, asset managers have turned to her to navigate the minefield of regulation that governs the structuring and operation of private investment funds. From the largest and most established hedge funds to innovative players with alternative strategies, clients rely on Wendy to handle all legal issues that touch their businesses.

Customizing practical plans

Wendy knows that asset managers don't fit a single mold. She understands each of her client's businesses, and uses that understanding to suggest practical strategies that are commercial while minimizing the risk of regulatory violations. Those clients have rewarded her with their loyalty. A founder of an investment management firm noted, “We have worked with Wendy on all aspects of fund creation and financial market representation for over 30 years. She is truly exceptional. While expert in the law and with deep business knowledge, it is her personal representation and advocacy for her clients that sets her above and apart.” In an industry where personal connections matter, Wendy forges fast and long-standing relationships with clients large and small.

Wendy has amassed extensive knowledge on the laws most relevant to her client base of private investment funds whether the investment portfolio includes securities, futures or cryptocurrencies. She has particular experience on issues relating to the formation and ongoing operation of fund management, including domestic and offshore offering requirements, futures regulation, investment adviser rules and broker-dealer regulation. She also stays in front of new and changing legal issues that touch other aspects of fund operations — among them cryptocurrencies, cybersecurity rules, US and EU privacy regulations and ERISA-related matters.

What separates Wendy, however, is her ability to account for her clients' unique needs in a manner that reflects an understanding of their businesses, while minimizing regulatory risk. When an investment

Practices

- Broker-Dealer Regulation
- Corporate
- Cryptoassets and Blockchain Technology
- Financial Markets and Funds
- Futures and Derivatives
- Investment Management and Trading
- Quantitative and Algorithmic Trading
- Regulated Funds

Industries

- Entrepreneurial Ventures
- Finance and Financial Markets
- Private Client Services

Education

- JD, New York University School of Law
- BA, University of Pennsylvania, *magna cum laude*

Bar Admissions

- New York
- Connecticut

Professional & Community Involvement

- American Bar Association
- *Law360*, New York Editorial Board, 2026
- Managed Funds Association
- New York City Bar Association
- 100 Women in Finance, co-chair Legal Peer Advisory Group
- Hedge Funds Care

manager client wanted to adopt a highly complex compensation structure for its multiple families of funds, for instance, she was able to distill the concepts and craft easily understandable disclosures that would enhance the client's marketing efforts. Sometimes she simply helps clients navigate regulatory obstacles, as she has done for clients that want to manage funds for their employees' IRAs. She helps guide them through the complex web of US Department of Labor rules, including receiving an exemption for one client that could not fit within established protocols.

Wendy's wide-ranging practice frequently touches on cutting-edge issues. She launched one of the earliest investment funds focused on cryptocurrencies, a rapidly changing area fraught with risk. She created comprehensive offering documents that allowed the manager to enter this dynamic new investment space with materials that were compliant with applicable regulation.

Whether it is in law or finance, Wendy is passionate about empowering women. She is active in Katten's Women's Leadership Forum, which supports the strategic retention and advancement of women attorneys at the firm through mentoring and professional development programs. She also has a long-standing relationship with 100 Women in Finance as an Angel Member. Wendy routinely hosts roundtable programs and other events in Katten's New York office on behalf of the 100WF, bringing exceptional speakers from the finance world and facilitating networking opportunities.

Recognitions

Recognized or listed in the following:

- *Best Lawyers in America*
  - Private Funds / Hedge Funds Law, 2024–2027
- *Chambers Global*
  - Hedge Funds, USA, 2024–2026
- *Chambers USA*
  - Hedge Funds, 2023-2026
- *Crain's New York Business*
  - Notable Leaders in Accounting, Consulting & Law, 2024
  - Notable Women in Law, 2021
- *HFM US Services Awards*
  - Best Onshore Law Firm, 2022
  - Best Onshore Law Firm – Start Ups, 2020

> ***"I have been working with Katten for years. They are by far the best firm. I used to spread my work, but their expertise is so strong across the board and they collaborate so well that I keep it all with them. Wendy Cohen is the partner I work with on everything, and she cares as much about protecting our interests as we do!"***

***U.S. News – Best Lawyers®* 2023 "Best Law Firms" (Private Funds / Hedge Funds Law) survey response**

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- *The Legal 500 United States*
  - Recommended Attorney, 2016–2026

News

- Katten Attorneys Recognized in 2027 *Best Lawyers* Guide (August 20, 2026)
- Katten Climbs in *Chambers USA* 2026 Rankings (June 4, 2026)
- Five Katten Partners Named as Members of *Law360* 2026 Editorial Boards (April 10, 2026)
- *Corporate Counsel* Names Wendy Cohen as a 2026 Women, Influence & Power in Law Award Finalist (February 19, 2026)
- Katten Earns Top Rankings in *Chambers Global 2026* (February 12, 2026)
- Katten Named Among *Crain's New York Business*'s Largest Law Firms (October 29, 2025)
- Wendy Cohen Shares Return-to-Office Strategies at NYSBA Event (October 21, 2025)
- Katten Celebrates 101 Attorneys Honored by *Best Lawyers*® (August 21, 2025)
- Katten Adds Tax Partner Loren Lembo in New York (July 22, 2025)
- Katten Receives High Marks in the Legal 500 US 2025 Guide (June 11, 2025)
- Katten Advises Monarq Asset Management in Strategic Investment From FalconX (June 6, 2025)
- *Chambers USA* 2025 Ranks Katten as Leading Law Firm (June 5, 2025)
- Katten Scores High Marks in *Chambers Global 2025 Guide* (February 13, 2025)
- *Crain's New York Business* Honors Wendy Cohen and Deepro Mukerjee as 2024 Notable Leaders in Law (December 10, 2024)
- *Business Journals* Profile Three Katten Partners Named to Their 2024 Women of Influence Lists (November 21, 2024)
- Katten Attorneys Named to 2024 New York Super Lawyers, Rising Stars Lists (October 29, 2024)
- *Business Journals* Name Three Katten Partners to 2024 Women of Influence Lists (October 7, 2024)

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- Katten Attorneys Recognized as *Best Lawyers*® and *Best Lawyers: Ones to Watch*® Award Recipients (August 15, 2024)
- Katten Highly Ranked in Legal 500 United States 2024 (June 12, 2024)
- Katten Receives High Marks in *Chambers USA* Guide 2024 (June 6, 2024)
- *Chambers Global* Publishes Financial Markets and Funds Team Overview on US Investment Funds (February 28, 2024)
- Katten Ranked as Leader in *Chambers Global Guide* 2024 (February 15, 2024)
- Wendy Cohen Profiled in *Law.com*'s 'How I Made Office Managing Partner' Series (January 16, 2024)
- Financial Markets and Funds Team Authors *Chambers* Overview on Alternative Funds (November 27, 2023)
- Katten Attorneys Distinguished by *Best Lawyers*® (August 17, 2023)
- Katten Lauded in The Legal 500 United States 2023 (June 9, 2023)
- Katten Boosts Rankings in *Chambers USA Guide 2023* (June 1, 2023)
- Wendy Cohen's Path to New York Managing Partner Featured in *Law360* (May 19, 2023)
- Katten Names Female Investment Management Partner With Untraditional Career Path to Lead New York Office (May 18, 2023)
- Wendy Cohen's New Role as New York Managing Partner Featured in *Law360* (May 9, 2023)
- *New York Times* Discusses Hedge Fund Industry Success With Wendy Cohen (February 15, 2023)
- Katten Named Best Onshore Law Firm for Hedge Fund Client Services (September 14, 2022)
- Katten Awarded Top Ranking in Structured Finance: Securitization in The Legal 500 United States 2022 (June 8, 2022)
- Katten Named 2022 "Best Law Firm" for Quant Client Service (February 10, 2022)
- Insights From Wendy Cohen on Hedge Fund Crypto Investments, Diversity at Katten (January 28, 2022)
- Coronavirus (COVID-19) Resource Center (November 10, 2021)
- Katten Receives High Marks in Derivatives, M&A and Securitization in The Legal 500 United States 2021 Guide (June 10, 2021)

- Katten Named Best Law Firm During HFM US Quant Awards 2021 (March 1, 2021)
- Wendy Cohen Selected by *Crain's New York Business* to 2021 Notable Women in Law List (December 23, 2020)
- Katten Named Among Best Law Firms in Hedge Fund Industry During HFM US Service Awards 2020 (September 17, 2020)
- Katten Praised in The Legal 500 United States 2019 Guide (June 11, 2019)
- Katten Distinguished by *The Legal 500 United States* (June 14, 2018)
- Katten Distinguished by *The Legal 500 United States* 2017 (May 31, 2017)
- Eighteen Katten Practices and 70 Attorneys Recognized by *The Legal 500 United States* 2016 (June 17, 2016)
- Katten Partners Explain CFTC's Final Rules Regulating CPOs and CTAs in *Journal of Investment Compliance* (June 18, 2012)
- Katten ERISA Seminar Covered by *The Hedge Fund Law* Report (March 30, 2012)
- Katten Elects 14 New Partners (July 5, 2011)

Publications

- Financial Markets and Funds *Quick Take* | Issue 54 (September 2026)
- Financial Markets and Funds *Quick Take* | Issue 53 (August 2026)
- Financial Markets and Funds *Quick Take* | Issue 52 (July 2026)
- Financial Markets and Funds *Quick Take* | Issue 51 (June 2026)
- Financial Markets and Funds *Quick Take* | Issue 49 (April 2026)
- Financial Markets and Funds *Quick Take* | Issue 48 (March 2026)
- Financial Markets and Funds *Quick Take* | Issue 47 (February 2026)
- Financial Markets and Funds *Quick Take* | Issue 46 (January 2026)
- Financial Markets and Funds *Quick Take* | Issue 45 (December 2025)
- Financial Markets and Funds *Quick Take* | Issue 44 (November 2025)
- Financial Markets and Funds *Quick Take* | Issue 43 (October 30, 2025)

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- Financial Markets and Funds *Quick Take* | Issue 41 (August 2025)
- Financial Markets and Funds *Quick Take* | Issue 40 (July 2025)
- Financial Markets and Funds *Quick Take* | Issue 39 (June 2025)
- Financial Markets and Funds *Quick Take* | Issue 37 (April 2025)
- Financial Markets and Funds *Quick Take* | Issue 36 (March 2025)
- Financial Markets and Funds *Quick Take* | Issue 35 (February 2025)
- Financial Markets and Funds *Quick Take* | Issue 33 (December 2024)
- Financial Markets and Funds *Quick Take* | Issue 30 (September 12, 2024)
- Financial Markets and Funds *Quick Take* | Issue 29 (August 2024)
- Financial Markets and Funds *Quick Take* | Issue 28 (July 2024)
- Financial Markets and Funds *Quick Take* | Issue 27 (June 2024)
- Financial Markets and Funds *Quick Take* | Issue 26 (May 2024)
- Financial Markets and Funds *Quick Take* | Issue 25 (April 2024)
- Financial Markets and Funds *Quick Take* | Issue 24 (March 2024)
- Action Required: Impact of Corporate Transparency Act on Investment Managers (February 29, 2024)
- Financial Markets and Funds *Quick Take* | Issue 23 (February 2024)
- Financial Markets and Funds *Quick Take* | Issue 22 (January 2024)
- Women on the Move 2023: Navigating the Path to Your Success (December 2023)
- Financial Markets and Funds *Quick Take* | Issue 21 (December 2023)
- Financial Markets and Funds *Quick Take* | Issue 20 (November 2023)
- Financial Markets and Funds *Quick Take* | Issue 19 (October 2023)
- Financial Markets and Funds *Quick Take* | Issue 18 (September 2023)
- SEC Adopts Controversial and Sweeping Changes to Private Fund Rules; Requires Documentation of Annual Compliance Reviews (August 25, 2023)
- Financial Markets and Funds *Quick Take* | Issue 17 (August 2023)
- Financial Markets and Funds Quick Take | Issue 14 (May 30, 2023)

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- Financial Markets and Funds Quick Take | Issue 13 (April 25, 2023)
- Financial Markets and Funds Quick Take | Issue 11 (February 21, 2023)
- Privacy, Data and Cybersecurity *Quick Bytes* | Issue 1 (January 17, 2023)
- Financial Markets and Funds Quick Take | Issue 10 (January 13, 2023)
- Financial Markets and Funds Quick Take | Issue 9 (December 13, 2022)
- December 9 Looms as Compliance Date for Private Investment Funds and Certain Investment Advisers to Comply With New Cybersecurity Requirements (December 6, 2022)
- Financial Markets and Funds Quick Take | Issue 8 (November 14, 2022)
- Financial Markets and Funds Quick Take | Issue 7 (October 12, 2022)
- Financial Markets and Funds Quick Take | Issue 6 (September 15, 2022)
- Financial Markets and Funds Quick Take | Issue 5 (August 16, 2022)
- Financial Markets and Funds Quick Take | Issue 4 (July 19, 2022)
- Financial Markets and Funds Quick Take | Issue 3 (June 14, 2022)
- Financial Markets and Funds Quick Take | Issue 2 (May 11, 2022)
- Financial Markets and Funds Quick Take | Issue 1 (April 13, 2022)
- What to Worry About With the SEC's Move to Regulate Private Funds (March 24, 2022)
- Fintech 2022 Guide (March 24, 2022)
- SEC Staff Observes Practices of Private Fund Advisers That Raise Concerns (February 11, 2022)
- SEC Proposes Radical Changes to Practices for Private Funds (February 11, 2022)
- It's Time Once Again: SHC Report of US Ownership of Foreign Securities Due March 4 (February 3, 2022)
- SEC Increases Registered Investment Adviser Performance Compensation Net-Worth and Assets-Under-Management Tests (August 13, 2021)

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- ESG Remains a Priority: SEC Asset Management Advisory Committee Adopts ESG Disclosure Recommendations (July 22, 2021)
- ESG Issues Become Leading Concern for SEC and CFTC: SEC Warns Investment Advisers and Funds About ESG Disclosures (April 27, 2021)
- ESG is in the (SEC) House: SEC Exams, Enforcement and Regulations are Coming (March 8, 2021)
- New York Adopts New Registration and Examination Requirements for Certain Investment Adviser Related Personnel and Solicitors (January 28, 2021)
- SEC Proposal to Exempt Certain "Finders" from Broker-Dealer Registration May Allow Significant Capital Raising Activities by Non-Registered Persons (October 19, 2020)
- Alternative Funds 2020 Guide (October 13, 2020)
- LIBOR Preparedness Exams Are Coming – Is Your Firm Ready? (June 6, 2020)
- Business Unusual For Financial Services Firms – Returning to New Variations of "the Workplace" (May 19, 2020)
- SEC Enforcement Actions Against Fund Advisers Continues (May 15, 2020)
- New York Proposes New Rules to Modernize Securities Filings Affecting Private Funds and Significant Exam and Registration Requirements on "Finders" (May 8, 2020)
- Revising Initial Expectations: CFTC Proposes Substantial Amendments to Form CPO-PQR and Related Requirements (April 16, 2020)
- The CARES Act: An Overview of Programs Impacting Financial Businesses (March 27, 2020)
- COVID-19: Considerations for Private Investment Fund Managers (March 17, 2020)
- Amendments to FINRA New Issue Rules 5130 and 5131 Effective January 1, 2020 (January 9, 2020)
- What Private Fund Advisers and Regulated Entities Should Do About the California Consumer Privacy Act (December 24, 2019)
- SEC Proposes Principles-Based Changes to Investment Adviser Advertising and Solicitation Rules, Seeks Industry Reaction by February 10 (December 13, 2019)

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- SEC Warns Advisers to Up Their Game on Proxy Voting (September 10, 2019)
- DC Circuit Decision Against Investment Adviser Leaves Many Unanswered Questions (May 15, 2019)
- Not So Secure: OCIE Identifies Regulation S-P Compliance Issues (April 25, 2019)
- SEC Sues Asset Managers for Using Untested, Error Filled Quantitative Investment Models (September 24, 2018)
- GDPR—One Month to Go: Considerations for US Asset Managers (April 25, 2018)
- SEC Publishes Inspection Priorities for 2018 (February 27, 2018)
- A Review of the SEC Participating Affiliate No-Action Letters' Relief From Investment Advisers Act of 1940 Registration for Foreign Investment Advisers (December 26, 2017)
- The EU PRIIPs Regulation for Fund Managers (December 1, 2017)
- Department of Labor Finalizes 18-Month Extension for Simplified Compliance With the BIC Exemption Under the ERISA Fiduciary Advice Rule (November 30, 2017)
- Sign of Future Changes? DOL Proposes 18-Month Extension of Transition Period for Compliance With ERISA "Fiduciary Investment Advice" Rule (August 11, 2017)
- SEC Warns That Digital Tokens May Be Securities (August 3, 2017)
- Compliance With the ERISA Fiduciary Advice Rule for Private Investment Fund Managers and Sponsors and Managed Account Advisers: Beginning June 9, 2017 (June 6, 2017)
- SEC Issues Update for Advisers Relying on the *Unibanco* No-Action Letters (April 10, 2017)
- Registered Investment Advisers Take Note: New SEC Custody Rule Guidance (March 7, 2017)
- Significant Changes to Form ADV and Performance Advertising Rules Adopted (September 6, 2016)
- Public Company Sanctioned by SEC for Including Illegal Anti-Whistleblower Provisions in Severance Agreements (August 17, 2016)
- SEC Proposes Rule Requiring Investment Advisers To Adopt Business Continuity and Transition Plans (July 13, 2016)

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- Proposed CFTC Regulation To Impact Algorithmic Trading and Traders (December 15, 2015)
- When A Victim Of Fraud Gets Sued For Fraud (November 30, 2015)
- Victim of Fraud Sued for Fraud (November 24, 2015)
- Cyber-Attacks and Developments in Cybersecurity (November 18, 2015)
- SEC Enforcement Action Alleges an Adviser Failed to Adopt Adequate Cybersecurity Policies and Procedures; SEC Issues an Investor Alert on Data Theft (September 24, 2015)
- Cyber-Attacks: Threats, Regulatory Reaction and Practical Proactive Measures to Help Avoid Risks (June 24, 2015)
- BEA Filing Deadline Looms For US Persons With Foreign Affiliates (May 29, 2015)
- CFTC Proposes Revised Position Limit Rules (November 12, 2013)
- Marketing Investment Management Services to Public Retirement Systems: Complying with Applicable Laws and Regulations (August 5, 2013)
- SEC Proposes Rule Amendments to Permit General Solicitation in Rule 506 and 144A Offerings, Including Offerings by Hedge Funds and Other Private Funds (September 17, 2012)
- CFTC Adopts Significant Changes to CPO and CTA Registration and Compliance Requirements (June 18, 2012)
- Glimpse Life as a CFTC Registrant in Case Your Firm Must Head This Way (May 28, 2012)
- Managers of Private Investment Vehicles—Including Private Equity, Real Estate and Securitization Vehicles—That Use Futures or OTC Derivatives Should Consider Claiming CFTC 4.13(a)(4) Exemption by April 23, 2012 (April 20, 2012)
- All Advisers to Registered Investment Companies Need to Evaluate Their Exposure to CFTC Regulation After Recent Rule Amendment (February 22, 2012)
- CFTC Adopts Significant Changes to CPO and CTA Registration and Compliance Requirements (February 14, 2012)
- SEC and MSRB Withdraw Municipal Advisor Proposals (October 5, 2011)
- Guide to Investment Adviser Registration (September 12, 2011)

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- Summary and Analysis of Dodd-Frank Rules for Investment Advisers (July 28, 2011)
- SEC Adopts Rules Implementing Core Provisions of Dodd-Frank That Apply to Investment Advisers (June 23, 2011)
- SEC Expected to Consider Extending Adviser Registration and Deregistration Deadlines (April 14, 2011)
- SEC Issues Proposed Rules Requiring Registration of Municipal Advisors (February 24, 2011)
- Comments Due January 24 on SEC's Proposals to Implement $100 Million Asset Threshold, Other Dodd-Frank Changes for Investment Advisers (January 18, 2011)
- Comments Due January 24 on SEC's Proposed Exemptions from Investment Adviser Registration Mandated by Dodd-Frank (January 18, 2011)
- SEC Extends Compliance Date for Certain Advisers to Provide Clients with Brochure Supplements (January 6, 2011)
- SEC Adopts Amendments That Overhaul Form ADV Part 2 (August 25, 2010)
- Financial Reform Bill Reshapes Investment Adviser Regulation (July 29, 2010)
- Senate Passes Financial Regulation Bill Requiring SEC Registration for Hedge Fund Managers with $100 Million or More under Management (May 27, 2010)
- New FBAR Guidance and Proposed Regulations Issued (March 4, 2010)
- SEC Adopts Custody Rule Changes for Investment Advisers (January 11, 2010)
- IRS Announces One-Time Extension for Voluntary Disclosure (September 21, 2009)
- Power of Attorney Law Changes in New York on September 1, 2009 (August 27, 2009)
- IRS Extends FBAR Filing Date (August 12, 2009)
- IRS Will Allow Taxpayers to File the Report of Foreign Bank and Financial Accounts (FBAR) until September 23, without Penalties (June 25, 2009)
- US Investors in Offshore Hedge Funds Should File the Report of Foreign Bank and Financial Accounts (FBAR) (June 16, 2009)

- IRS Temporarily Relaxes FBAR Filing Requirements for Non-US Persons (June 10, 2009)

Presentations and Events

- Global Angels Celebration (May 14, 2025) | *Moderator*
- Katten RegWatch: SEC Private Funds Rule — Gearing Up for "Preferential Terms" and "Restricted Activities" Compliance (March 22, 2024) | *Speaker*
- Women on the Move 2023: Navigating the Path to Your Success (October 18, 2023) | *Panelist* | *Redefining Success*
- 2023 Crypto with Katten Annual Symposium (September 27, 2023)
- Private Fund Manager or Public Servant? Practical Questions and Answers on the New Private Funds Rule (September 21, 2023)
- 2023 Crypto with Katten London Symposium (March 1, 2023)
- 2022 Crypto with Katten Annual Symposium (October 20, 2022)
- SEC's Proposals on Private Funds — What to Worry About (March 10, 2022)
- JumpStart (May 19–21, 2021) | *Speaker*
- Women on Boards, SPAC Opportunities (April 19, 2021) | *Speaker*
- From A(lgorithm)–Q(uantitative):
  What You Need to Know About Creating a Quantitative Asset Manager (March 18, 2021) | *Speaker* | *Start Your Systems*
- New SEC Rule Replaces the Decades Old Advertising and Solicitation Rules for Advisers (February 18, 2021) | *Speaker*
- Marketing and Distributing Your Fund in the United States: U.S. and Israel Legal and Regulatory Considerations (November 11, 2020)
- A Brave New World: Effective Supervision and Compliance by CFTC and SEC Registrants in the New Business as Usual Environment (June 18, 2020) | *Moderator* | *Best Practices and Challenges to Address Going Forward*
- Outsourcing Services: Why, When and How (November 19, 2019) | *Panelist*
- Tax Reform: Impact on Hedge Fund and Commodity Fund Managers and Investors (February 13, 2018) | *Host*
- Regulation of Digital Tokens in the US: Bitcoin, Blockchain and Insight Into the Views of the CFTC and SEC (August 9, 2017) | *Moderator*

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- Not Losing Sight of Today for Tomorrow: Selected Current Hot Regulatory Topics (March 28, 2017) | *Moderator*
- Funds 101 (March 2, 2017) | *Panelist*
- Women in Compliance (November 15, 2016) | *Speaker*
- Recent Legal Developments on Securities and Derivatives Issues for Sell-Side and Buy-Side Market Participants (July 27, 2016) | *Moderator*
- Gaining the Edge: 2016 Hedge Fund Marketing Leadership Summit, Benefitting Hedge Funds Care and World Pediatric Project (April 28, 2016) | *Moderator* | *How to Gain Clients Outside the US?*
- Cybersecurity: Anticipate and Manage the Unlikely Scenario (November 19, 2015) | *Panelist*
- The Weakest Link: Where Is the Achilles Heel of Your Cybersecurity Program? (June 9, 2015) | *Moderator*
- General Solicitation and Advertising Under the JOBS Act: Practical Considerations for Private Funds (September 25, 2013) | *Presenter*
- Goldman Sachs Fifth Annual Managed Account Seminar (March 26, 2012) | *Speaker* | *Hedge Fund Legal and Tax Update*
- Seminar sponsored by Katten Muchin Rosenman LLP, New York (January 31, 2012) | *Presenter* | *25% Solutions: How to Manage ERISA Plan Assets in a Hedge Fund*
- Infovest21 Seminar sponsored by Katten Muchin Rosenman LLP and Margolin, Winer & Evens LLP, New York (January 17, 2012) | *Presenter* | *Impact of Regulation on Client Reporting and Due Diligence*