

David Dickstein, Richard Marshall and Phillip Koh Assist LSTA With Fiduciary Standard Comment Letter

August 27, 2018

On behalf of The Loan Syndications and Trading Association (LSTA), Financial Services partners David Dickstein, Richard Marshall and associate Phillip Koh prepared a comment letter on the Securities and Exchange Commission's package of proposals relating to the standards of conduct for registered investment advisers and the delivery of Form CRS to their advisory clients. The comment letter argued for an exception from the Form CRS requirement for investment advisers dealing only with "qualified clients" under Investment Advisers Act Rule 205-3. The letter also supported other recommendations made by the Investment Advisers Association (IAA). ("[LSTA Submits Comment Letter on SEC Fiduciary Standard Proposal](#)," August 9, 2018)

CONTACTS

For more information, contact your Katten attorney or any of the following attorneys.



David Y. Dickstein

+1.212.940.8506

david.dickstein@katten.com



Richard D. Marshall

+1.212.940.8765

richard.marshall@katten.com



Phillip S. Koh

+1.212.940.8566

phillip.koh@katten.com

Attorney advertising. Published as a source of information only. The material contained herein is not to be construed as legal advice or opinion.

©2026 Katten Muchin Rosenman LLP.

All rights reserved. Katten refers to Katten Muchin Rosenman LLP and the affiliated partnership as explained at [katten.com/disclaimer](https://www.katten.com/disclaimer).