

William Pat Wright
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COMPLIANCE OFFICER

Action-oriented Compliance Officer with demonstrated success and a diversified background in Investment Advisor and Broker Dealer Compliance.

PROFESSIONAL EXPERIENCE

Consultant / Courtlandt Securities Corporation **3/21 - Present**
Westlake Village, CA

- Define and integrate sales practice compliance workflow requirements into the development of a proprietary DST investment platform.
- Advise on regulatory and system requirements with respect to new product rollouts.
- Define and implement compliance requirements for monitoring and archiving internal and third-party electronic correspondence.
- Advise on 15c3-1 issues with respect to subordinated loans and expense sharing agreements.

Principal Examiner / FINRA **8/04 - 6/20**
Los Angeles, California

- Lead, participated in, and provided guidance regarding complex broker dealer examinations including Financial Technology (“Fintech”) based broker dealers and mentored junior staff.
- Selected as FINRA participant for a 15c3-1 regulatory sweep, the scope of which involved top-down net capital analysis across multiple firms, including detailed reviews of the FOCUS II, general and sub ledgers, netting procedures, and calculation of allowable asset, haircuts and minimum net capital requirements.
- Testified as a Principal Witness in Federal Court for the FBI in the trial of the “United States vs Todd Ficeto et al.” which resulted in a guilty conviction on July 12, 2019, as part of a \$200M Securities and Investment Advisor fraud.

Financial and Operations (“FINOP”) Principal Analyst / FINRA **8/03 - 8/04**
Washington, D.C.

- Provided a high level of service to FINRA District Offices and member firms through interpretative guidance and support for regulatory and accounting issues surrounding the 1934 Act.
- Maintained written updates to FINRA’s interpretation guide to SEA Rules 15c3-1 (Net Capital) and 15c3-3 (Customer Protection).
- Compiled statistical data on member firms and industry practices to support regulatory concerns and prepared management reports based on applicable findings.

Compliance Officer / Artisan Partners L.P. **1/03 - 6/03**
Milwaukee, Wisconsin

- Reviewed and filed Artisan Funds marketing materials with FINRA.
- Participated in implementation of portfolio compliance and Code of Ethics compliance systems.
- Ensured compliance with SEC and FINRA rules for the Distributor of Artisan Funds.

**Manager Compliance / Strong Capital Management, Inc.
Milwaukee, Wisconsin**

7/00 - 1/03

- Defined fixed income compliance system requirements including workflow, business rules and data warehouse specs.
- Managed portfolio compliance exceptions through to resolution.
- Approved futures, options and ISDA agreements.
- Implemented controls and trained Accounting Staff with respect to monitoring derivative positions.
- Proactively identified and strategized recommendations regarding notable trends in industry practices, products and procedures.

**Senior Compliance Officer / Western Asset Management, Inc.
Pasadena, California**

7/96 - 7/00

- Implemented business technology needs for the Compliance Department of a global fixed income management firm, including SEC, DOL, CFTC, UCITS regulated portfolios.
- Collaborated with IT, Compliance, Portfolio Management and Operations Staff to implement the Charles River Development rules-based portfolio compliance and reporting system.
- Enhanced proprietary data repository to meet compliance testing requirements.
- Created Investment Company Act - Section 18 algorithm, which was integrated into the firm's middle office process to monitor derivative / leverage exposure.
- Performed compliance systems presentations to clients and prospects.
- Mentored less senior Staff on interpreting client guidelines and Investment Policy Statements.

SYSTEMS AND APPLICATIONS

Charles River Development, Bloomberg Global Data License, CRD, EDGAR, Morningstar, HubSpot, Asana, Annuity Intelligence, Microsoft Office, Global Relay.

EDUCATION AND LICENSES

B.S. Finance, San Diego State University
FINRA Series 3, 7, 24