Steven Marsh

Chief Compliance Officer

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SUMMARY

Chief Compliance Officer with 15 years in investment adviser compliance, now leading the program for a registered investment adviser with $9B in assets. Applies SEC regulations and the Investment Advisers Act of 1940 to daily business decisions, leads SEC examinations, and gives the executive team clear, practical advice.

EXPERIENCE

Chief Compliance Officer 06/2020 - Present

Back Bay Wealth Partners Boston, MA

Registered investment adviser with $9B in assets and 140 employees.

- Lead a compliance team of 5 and report to the CEO and board on firm-wide regulatory risk.
- Direct **2** SEC examinations to closure with no deficiency letter in the second exam.
- Complete the annual Rule 206(4)-7 review and update 45 policies for the SEC marketing rule.
- Approve Form ADV filings, client disclosures and 300 marketing pieces a year before release.

Senior Compliance Manager 03/2015 - 05/2020

Commonwealth Street Advisors Boston, MA

Institutional asset manager with $22B in assets.

- Ran a forensic testing program of 18 tests covering trading, valuation and code of ethics.
- Managed a 2018 SEC exam, delivering 1,200 documents in the requested timeframe.
- Advised portfolio managers on 150 conflicts and allocation questions a year in writing.

Compliance Analyst 07/2011 - 02/2015

Beacon Hill Investment Management Boston, MA

Mutual fund adviser and distributor.

- Monitored trading for 25 funds against investment restrictions and prospectus limits.
- Drafted board reports on compliance testing results for 4 quarterly fund board meetings.
- Reviewed 120 employee personal trading reports a quarter under the code of ethics.

SKILLS

- **SEC Regulations**
- **Investment Advisers Act of 1940**
- **SEC Examinations**
- **Form ADV**
- **Compliance Testing**
- **Code of Ethics**
- **Marketing Rule**
- **Risk Management**
- **Leadership**
- **Sound Judgment**

EDUCATION

Juris Doctor

Suffolk University Law School

Law

Boston, MA

05/2011

CERTIFICATES

Investment Adviser Certified Compliance Professional (IACCP)

National Regulatory Services

09/2016