

Compliance Management Experience:

During my time with **SunPower**, I was involved in the creation, implementation and testing of their first Compliance Monitoring System (CMS) which involved the following types of systems and activities to be created:

- Creation of a Compliance Risk Assessment (CRA) to identify areas of concern and rate the effectiveness of any existing controls
- Review of existing policies and procedures to identify issues and ensure their alignment with business and regulatory requirements.
- Creation of new policies and procedures related to Financial Crimes Compliance (FCC) required by our Banking-as-a-Service partner to bring the company in line with their partner requirements.
- Quarterly testing of CMS, including review of data, root-cause analysis and following up with business areas or the data analytics team with questions regarding the data provided.
- Creation of training programs covering all aspects of Consumer Lending, Banking and Financial Crimes Compliance to ensure we had all regulatorily required training assigned to and completed by necessary employees.
- Providing monthly reports to executive leadership and quarterly reports to the board of directors regarding compliance activities, including but not limited to financial compliance, regulatory compliance, training compliance, fraud risks and investigations and state-by-state tracking of dealer issues.

With **Structure Financial**, I was responsible for all Compliance, Risk and Legal activities in conjunction with our on-retainer attorney. Structure Financial is an app-based digital asset platform where you could exchange digital assets for others, or for tokenized real-world-assets such as fractional shares of Apple, Google or Microsoft.

- Creation of a Compliance Risk Assessment for the business structure and activities as a whole prior to operation or onboarding any customers.
- Responsible for creation of all written supervisory policies, procedures and guidance memos for all other employees
- Creation of our specific training materials which included providing detailed regulatory training to all employees on an annual basis.
- Gathered and analyzed data provided on a monthly basis regarding our customer, trading and net market activity to the Financial Services Commission of the British Virgin Islands where our entity was registered.
- Handled all entity creation, company onboardings to vendors, reviewing Terms of Service, Disclosures, Legal Disclaimers with outside Counsel.
- Creation of a regulatory and legal repository which all employees could access to find information regarding our policies and procedures in easy to understand language.

- Daily, weekly, monthly and quarterly data reviews of all customer activity including account creation, KYC attempts, onboarding, location issues, activity reviews and Sanctions/OFAC/AML/PEP screening as needed.

While I was with **Goldman Sachs** I worked on the Compliance integration of a newly purchased Registered Investment Advisor (RIA) which they were combining with their Private Wealth Management (PWM) line of business. I also oversaw the Seattle PWM branch office of Goldman Sachs.

- Daily, weekly, monthly reviews of financial advisor activity (trading, communications, violations, etc) via the CMS.
- Provided monthly new-hire training to all new employees of the combined line of business related to financial services rules and regulations from FINRA and the SEC.
- Lead the Compliance Risk Assessment for the RIA line of business in 2020 and 2021 to identify any control weaknesses, evaluate existing controls and then determine the residual risk that would need to be managed by compliance policies and procedures.
- Created and assisted in writing policies and procedures for this new line of business to bring them in line with the overall policies and procedure requirements of Goldman Sachs
- Providing monthly reports to local management regarding advisor issues or activities that needed to be addressed by supervision.
- Review of all incoming and outgoing correspondence including client presentations, financial reviews and analysis and solicitations for business.
- Physical review of the office on a regular basis to ensure compliance with data security and privacy, including regular video meetings with employees to ensure compliance in their home offices as well.

During my time with **Merrill Lynch / Bank of America**, I primarily handled branch office supervision and management of financial advisors via our internal CMS.

- Daily, weekly, monthly reviews of financial advisor activity (trading, email)
- Monthly and quarterly reviews of customer accounts and activities triggered by algorithmic alerts regarding trading volume, margin balances, fees paid, etc.
- Physical review of the office on a regular basis to ensure compliance with data security and privacy
- Physical site visits of other offices within our complex (Alaska, Idaho, California, Oregon) to review the office for data security and compliance, along with quarterly monitoring and testing of the books and records, client complaints, cashiering and correspondence in each respective office.
- Provided ongoing and new training to employees including new hires, existing employees and developing training programs for internal audiences related to best practices for adhering to specific FINRA and SEC rules regarding documentation and best interests.

- Review of outside business activities including but not limited to outside employment, volunteering and investments to ensure compliance with company policies and requirements.
- Creation of new KYC and KYB on-boarding procedures to help streamline the onboarding of venture capital and private equity customers.