

# Kenneth L. Greenberg

## Partner

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Ken Greenberg counsels investment companies, investment advisers, transfer agents and broker-dealers regarding investment management regulatory matters. For more than 20 years, he has provided guidance concerning compliance matters arising under the Investment Company Act of 1940, the Investment Advisers Act of 1940, the Securities Act of 1933, the Securities Exchange Act of 1934, FINRA Conduct Rules, and state “blue sky” securities and state escheatment laws.

He provides advice regarding the formation and registration of investment advisers and investment companies; the organization of Cayman Island blocker companies; the preparation of disclosure documents (including Form ADV, Form N-1A, Form N-2, Form N-CSR and Form N-14); proxy materials; service provider contracts; compliance manuals and policies, and advertising; and the reorganization of investment companies.

Over the years, Ken has led numerous large and complex mutual fund reorganizations and has been involved in the reorganization of more than 25 different mutual fund complexes involving over 500 separate mutual fund portfolios.

## RESULTS

- assisted an investment company complex acquire 19 equity and bond mutual funds with approximately \$3.6 billion in assets
- assisted an investment company complex acquire four money market and bond funds with \$4.7 billion in assets
- organized a new investment company complex with 26 equity and bond funds, and acquired \$2.6 billion in assets through a shell fund reorganization, including the negotiation of all service provider contracts, the creation of fund compliance policies and procedures, and the obtaining of funds-of-funds and manager of managers exemptive relief
- assisted an investment company with a comprehensive review of its compliance policies and procedures
- provided guidance regarding use of blue sky state securities registration exemptions and obtained no-action relief from various blue sky state securities regulators regarding the use of certain state securities registration exemptions

(continued)

## FOCUS

Registered Investment Companies  
Investment Advisers  
Investment Management Mergers & Acquisitions  
Investment Management  
Broker-Dealer Regulatory  
Cyber Insurance

## BAR ADMISSIONS

Pennsylvania

## EDUCATION

J.D., Harvard Law School  
B.A., *summa cum laude*, Albright College

## MEMBERSHIPS

Stradley Ronon Technology Committee



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- provided comprehensive guidance regarding state escheatment triggers
- assisted an investment company and its investment adviser in receiving an SEC-approved document destruction plan approved pursuant to Rule 31a-2(f)(4) under the Investment Company Act of 1940
- assisted a money market fund convert from a \$1.00 stable net asset value per share fund to a floating net asset value per share through a reverse stock split

## PUBLICATIONS

Ken frequently authors articles on important developments in the investment management industry, including cybersecurity, through the firm's *Adviser Alert*, topics have included:

- "Cybersecurity Troubles at Financial Firms – Seven Regulatory Actions to Consider"
- "What Information Will Be Requested by the SEC's Office of Compliance Inspections and Examinations During an Examination?"
- "What Should In-House Counsel Think About Following a Data Breach?"
- "Takeaways From the Recent SEC Cybersecurity Roundtable"
- "SEC Announces Scrutiny for Investment Companies and Investment Advisers"

He also serves as editor of the following publications that are published by R. R. Donnelley Financial and Stradley Ronon:

- Mergers of Investment Companies
- The Registration of Mutual Funds
- The Investment Company Act of 1940 and Investment Advisers Act of 1940
- Mutual Fund Record Retention Reference Guide and
- The Regulation of Commodity Pool Operators and Commodity Trading Advisors Under the Commodity Exchange Act: Regulatory Materials Relevant to the 1940 Act Practitioner

## SPEAKING ENGAGEMENTS

- Presenter, "Mutual Funds at a Glance: Cybersecurity Best Practices and Industry Regulatory Updates" Stradley Ronon and Grant Thornton webinar
- Speaker, "Cybersecurity Developments," Investment Adviser Association Cybersecurity Working Group Conference Call
- Speaker, "Cybersecurity in a New World," 2014 RR Donnelley 2014 FundSuiteArc 10th Annual User Conference
- Speaker, "Cybersecurity Developments," Sack Consulting Webinar

