

Common & Collective Trust Funds

We assist banks, trust companies, investment managers, and other service providers in structuring, distributing and operating collective investment trusts (CITs), including common and collective trust funds and group trusts, in accordance with federal and state banking, securities, tax law requirements and ERISA.

- **Structuring:** We work with clients to structure CITs in compliance with OCC Regulation 9, applicable state banking and trust laws, the Securities Act of 1933, the Investment Company Act of 1940, Revenue Ruling 81-100 (or other applicable tax structure) and ERISA. We assist with devising simple or complex structures to meet the client's needs, drafting entity documentation and making any necessary regulatory filings.
- **Distributing:** We assist clients in offering and marketing CITs, including drafting any applicable offering documents and advising on offering and marketing the vehicles in accordance with SEC restrictions.

- **Operating:** We provide initial and ongoing advice on operating CITs, including the respective roles of the bank or trust company and affiliated or unaffiliated investment managers, and operational issues that may arise under OCC Rule 9.18.

Stradley Ronon Stevens & Young, LLP
www.stradley.com

Lawrence P. Stadulis
Partner & Co-Chair, Fiduciary Governance
202.419.8407 | lstadulis@stradley.com

George Michael Gerstein
Counsel & Co-Chair, Fiduciary Governance
202.507.5157 | ggerstein@stradley.com

John M. Baker
Counsel
202.419.8413 | jbaker@stradley.com