



Accordo is a life-cycle partner to financial services firms and enterprises. Our compliance professionals advise financial services firms on all aspects of regulatory compliance, including: structuring and implementing effective compliance programs and controls, performing mock audits to detect gaps in existing compliance programs and create practical, cost effective solutions; helping entrepreneurs with registrations; reviewing promotional materials; training compliance personnel on complex regulatory matters; and helping firms through regulatory examinations.

PROFESSIONAL BIOGRAPHIES

Raymond Mandra, Senior Consulting Advisor

Mr. Mandra's career spans seventeen years working in the financial services industry. Most recently, Mr. Mandra worked at S&P Global in their compliance examinations unit where his duties entailed designing testing methodologies and inspecting adherence to company policy and regulation. Mr. Mandra joined AllianceBernstein as a Senior Compliance Analyst in May 2008. His responsibilities ranged across a broad array of topics on Investment Adviser and Broker-Dealer compliance matters. Most notably, he led firm-wide initiatives to implement regulatory projects for adherence to the disclosure requirements of Form ADV Part 2B and a global beneficial ownership reporting system. He was also responsible for regulatory filings for the SEC (13F/G, 13H), FINRA (Form BR), and NFA (Form PR), branch inspections (FINRA 3110), and buy-side control room activities. Beginning his career at Dreyfus Service Corporation, he began by working in the Lion Account retail brokerage back-office supporting new account and financial operations. Continuing at Dreyfus, Mr. Mandra moved into Compliance and was responsible for testing of Rule 206(4)-7 of the Investment Adviser Act.

His certifications include FINRA Series 24, 7, 63, and the Investment Adviser Compliance Certificate Program (IACCP).

Robert Palleschi, Compliance Expert

Mr. Palleschi is an experienced compliance risk officer with broad expertise in both retail and institutional investment products, investment advisory and all aspects of broker-dealer compliance. He brings over twenty-eight years of financial industry compliance experience to Accordo. Mr. Palleschi was formerly a Senior Vice President and Deputy Compliance Director at Morgan Stanley, and Director and Senior Control Officer at UBS. During his twenty-five year affiliation with Morgan Stanley, Mr. Palleschi served various functions in both the Law and Compliance Departments. From 1994 to 2005, he served as Deputy Director of Compliance responsible for all aspects of product compliance, including the trading desks and product departments.

Mr. Palleschi is also a FINRA Arbitrator and former member of both the CBOE Advisory and NYSE Disciplinary Panels. He also serves as a litigation consultant providing expert witness testimony.

Steven Metz, Compliance Expert

Mr. Metz has been a consultant since 2009. He is a specialist in Securities and Commodities Compliance and Law, Anti-Money Laundering Compliance and Risk Management. He has expertise on Bitcoins and swaps, and has helped foreign companies become registered as Broker-Dealers.

Mr. Metz was Senior Counsel, Chief Compliance and AML Officer at Man Financial from 2006-2009 when he retired. His responsibilities included preparing and amending Compliance and AML manuals, and developing and conducting training programs. He also conducted internal audits and represented the Firm with Regulators.

From 1984-2006, Mr. Metz worked for various subsidiaries of Prudential Financial, either as Senior Counsel and/or Compliance Officer, including Chief Compliance Officer, Privacy Officer and AML Officer. Mr. Metz also conducted internal investigations, reviewed managed money activities, advertising, reviewed books and records policy, reviewed employee trading and worked with IT in developing a new account profiling system. He also represented Prudential as Counsel as well as testified in arbitrations and regulatory hearings. Mr. Metz's international experience included reviews conducted in Firms located in Canada, England and Hong Kong.

Mr. Metz's worked for several other brokerage firms and has expertise in the following areas: Securities, Futures, Foreign Exchange, Municipal Bonds, and Corporate Bonds. He has been a frequent speaker at Industry Conferences and has held executive positions in industry-wide associations.

Mr. Metz is accredited with ACAMS and has Series 8, 23 and 99 licenses.

Ronald Jamison, Compliance Expert

Mr. Jamison is a Senior Regulatory Compliance Attorney/ Manager working with executives, leading successful efforts in developing and executing legal, compliance, regulatory and risk solution strategies. Mr. Jamison has thorough knowledge of the Securities Act of 1933, the Securities Act of 1934, the Investment Advisers Act of 1940 and FINRA rules. He leads, manages and enhances the risk and compliance function of investment adviser and broker-dealer activities while simultaneously working on multiple enterprise wide initiatives. He has been charged with executing investment adviser compliance plans and annual compliance risk assessments, and provides related compliance advice. Mr. Jamison also:

- designs and performs risk assessments, compliance audits, and assists in implementing any changes
- reviews, updates and files regulatory forms (i.e. Form ADV)
- assists with managing assessments, exams, and audits by internal and external parties (e.g. SEC, FINRA)
- designs, establishes, implements and revises compliance systems, policies and procedures
- designs and leads compliance training sessions and special projects
- creates and implements new highly efficient and effective resolution processes
- develops and institutes new product review committees and metrics for risk assessments

Mr. Jamison has also been the primary Compliance Officer for a pension consulting investment advisory business and Lead Counsel for the sale and distribution of mutual fund products and separate account

programs. Mr. Jamison holds the Series 24 and 7 licenses and is a former Queens Assistant District Attorney.

Philip Ciantro, Lead Consultant

Philip Ciantro has a twenty-five year career in the financial markets, serving in various roles as a risk manager, trader and salesperson. Mr. Ciantro joined the National Association of Securities Dealers (NASD) in 2007. Following the merger of the NASD and NY Stock Exchange Regulation to form FINRA, he served as an integral part of FINRA's examination staff. During his six year tenure with FINRA, Phil spent three years as a Principal Examiner, conducting sales practice examinations of FINRA members. He conducted solo examinations of small FINRA members in both New York and London, branch examinations for large clearing firms and served as lead examiner for examinations of the largest FINRA members. In his last three years with FINRA, Mr. Ciantro served as a Principal Regulatory Coordinator for 35 introducing broker-dealers and 10 clearing firms.

Mr. Ciantro founded SineMetu Solutions in 2011 to provide individual and corporate tax preparation, small business accounting, and consulting services. In 2013, the range of services was expanded to include a full range of services to the broker-dealer community. Mr. Ciantro holds an MBA and a Masters in Accountancy from Baruch College and FINRA Series 7, 24 and 27 licenses.

Stephen Zak, Lead Consultant

Mr. Zak has over twenty-five years of experience in the securities industry that has spanned both private companies as well as a government regulator. He has held diverse roles including CCO, CFO and COO.

Mr. Zak began his career at the U.S. Securities and Exchange Commission where he was a Branch Chief in the Broker Dealer Inspection Program before transitioning to the private side. He has held senior roles at BT Alex Brown, Canaccord Financial, Leerink Partners, Cowen & Company and most recently at VTB Capital. At each of these firms he was either directly responsible for or significantly involved in the compliance programs of diverse sets of businesses.

Stephen is a graduate of Rutgers University - Newark and holds his Series 7, 24, 27 and 99 examination licenses. He is also an instructor at the New York Institute of Finance.

Craig Giorgio, Senior Consultant

Mr. Giorgio is a Compliance Officer with more than eleven years of industry experience. Prior to becoming a Senior Compliance Consultant he spent six years working as an AVP Compliance Officer at an SEC registered investment advisor. During that tenure, Mr. Giorgio was responsible for implementing and administering the firm's policies and procedures and identifying compliance risks to provide training, advice, testing and monitoring. Mr. Giorgio was on the front lines during a very tenuous time in the hedge fund industry that resulted in sweeping regulatory changes. Several high profile events including the collapse of Bear Stearns, the fraud perpetrated by Bernie Madoff and the adoption of Dodd-Frank Wall Street Reform now mold what he refers to as "the new age of compliance". Additionally, Mr. Giorgio worked at Credit Agricole Corporate and Investment Bank, where he assisted the Compliance Department on global compliance initiatives for its 9,000+ employees. Prior to that, he worked at Morgan Stanley as a registered representative in their retail brokerage unit.

At Accordo, Mr. Giorgio specializes in providing full-scale compliance support to investment advisers. Having worked with both newly registered and more established investment advisers, he is able to identify the unique need of the client and provide individualized support where needed. His broad support experience includes ADV drafting/revisions, policy drafting, SEC readiness exercises, surveillance functions, audits and best practices recommendations.

Mr. Giorgio holds a Bachelor's Degree in Economics and Political Science from Binghamton University, has held the series 7 and series 24 license, is a level 1 Chartered Market Technician (CMT) and is a Notary Public in the state of New York.

Michelle Karayanis, Senior Consultant

Ms. Karayanis is a Senior Consultant at Accordo. Prior to joining Accordo, she was a FINRA examiner for twelve years. While at FINRA, she spent much of her time in the Cycle Examination Department and lead complex financial and sales practice routine examinations of member broker-dealers. Her duties also included performing supervisory reviews, and mentoring other examiners. Towards the end of her tenure, Ms. Karayanis was in the Membership Application Department and was responsible for reviewing new broker-dealer applications for compliance with FINRA standards. Since leaving FINRA, she has been consulting for broker-dealers in all aspects of compliance including CMAs, NMAs and core compliance support. Ms. Karayanis holds a Bachelor of Science degree from St. John's University.