

BEKKER COMPLIANCE CONSULTING PARTNERS, LLC

BEKKER COMPLIANCE INSTITUTE (BCI)

19360 Rinaldi Street, Suite 453

Porter Ranch, CA 91326

Phone: 818/836-1291

www.bccp-llc.com • cbekker@bccp-llc.com

Senior Consultants, Subject Matter Experts & Trainers Worldwide!



CARRIE F. BEKKER
ENTREPRENEUR, FOUNDER & CHIEF EXECUTIVE OFFICER

Carrie Bekker is Founder and Chief Executive Officer of Bekker Compliance Consulting Partners, LLC (“BCCP”), a full-service consulting firm that specializes in providing customized global solutions to the financial services industry worldwide, including: Regulatory Compliance, Risk Management, Governance, Ethics, Auditing, Technology, Financial and Nonfinancial Due Diligence, and Training.

Carrie is a global financial services veteran with 28 years legal and regulatory compliance experience that she derived over the course of her illustrious career. Carrie spend the first 15 years of her profession as Corporate/Securities Law Senior Paralegal/Supervisor, Legal Executive, and Global Offshore Incorporations Supervisor positions in law firms, corporate law departments, and trust companies, both in the United States and internationally. Over the past 12 years, Carrie has held diverse high-ranking positions, including Assistant Vice President, Anti-Money Laundering Compliance Officer, and Compliance Director of several well-known global financial services conglomerates, including: AEGON/Transamerica (where she served as AVP and AML Compliance Officer for the entire Fund Complex), Pacific Life Insurance Company (Compliance Project Manager), and AIG Sunamerica Retirement Markets (Director of Variable Annuity Compliance).

Over the past 28 years, Carrie has managed hundreds of complex financial transactions, including mergers and acquisitions, initial public offerings, and bond issuances. She was also responsible for coordinating all legal and regulatory compliance filings with US federal, 50-state, and international regulatory authorities to assure that all such requirements were fulfilled so that the transactions could be consummated within the prescribed timeframes. Carrie also played an instrumental role in launching a Luxembourg-based mutual fund complex with offices in Switzerland, Germany, Italy, Taiwan, and Canada. In 2006, Carrie turned her attention to several entrepreneurial ventures, including creating, nurturing,



expanding -- and then catapulting Bekker Compliance Consulting Partners, LLC into a formidable global player, competing against and winning contracts over the Big 4 consulting firms and major worldwide government contractors.

Carrie is an active member of Arab Bankers and North America Association (ABANA), Hedge Fund & Private Equity Resource Center (HFPE), 100 Women in Hedge Funds, National Association of Compliance Professionals (NSCP), Association of Certified Anti-Money Laundering Specialists (ACAMS), and LinkedIn member of 50 online groups, including several proprietary BCCP/BCI Global Compliance Groups, where she regularly networks with thousands of her colleagues and ad hoc business partners.



Professional Highlights

2006 - Present

Bekker Compliance Consulting Partners, LLC (BCCP)

Bekker Compliance Institute (BCI)

Los Angeles, California – *Founder, Chief Executive Officer, Managing Member*

- BCCP is a full-service consulting firm that specializes in providing the following customized global solutions to the financial services industry worldwide:
 - Regulatory compliance
 - Risk management
 - Governance
 - Auditing
 - Technology
 - Due diligence
 - *Training**
- **BCI is the education and training division of BCCP*
- Our Senior Consultants, Subject Matter Experts, and Trainers specialize in the following sectors:
 - Alternative investment vehicles, including:
 - Exchange traded funds (ETFs)
 - Commodities futures, including gold, silver, steel, pearls, currency, and oil
 - Derivatives
 - Private equity
 - Venture capital
 - Hedge funds
 - Mutual funds
 - Institutional investors
 - Broker/dealers
 - Investment advisers
 - Insurance companies
 - Banking institutions, including MSBs
 - Governmental agencies
 - Central banking authorities
- For more information, please visit our website at www.bccp-llc.com.

2005 - 2006

AIG SunAmerica Retirement Markets

Woodland Hills, California – *Director of Variable Annuity Compliance*

- Responsible for running the auditing function of Rule 38a-1 of the Investment Company Act of 1940. Position involves analyzing risk by performing periodic risk assessments, determining the appropriate auditing methodology for each procedure (e.g., via walkthrough, forensic testing, or both), and auditing each of the 66 compliance procedures according on the frequency specified in the risk assessment and audit plan. In an effort to ease the burden of fellow departments having to contend with overlapping auditing walkthroughs/testing, I took the initiative to develop close relationships with the SOX Team and Internal Audit, in order to explore synergies among the three teams by meeting regularly, sharing information where appropriate, and streamlining walkthroughs and testing whenever possible.
- Also responsible for creating, implementing and maintaining 38a-1 test plans, narratives, and audit reports; performing walkthroughs and testing; and working closely with senior management in communicating auditing results and recommendations, to build consensus and to implement any necessary action plans to ensure that recommendations are carried out in a timely fashion.
- Work closely with the CCO, AVP and other intra-department colleagues in developing auditing results disclosure for the annual report presented to the Board of Directors.
- As part of the Life Companies' "culture of compliance," explored over time various marketing concepts which ultimately resulted in the "birth" of a Compliance mascot, motto and overall campaign. The Compliance Mascot's name is now the moniker for "The Buzz," a bimonthly electronic publication featuring a different compliance topic in each issue.
- Handle industry-related research, focusing on industry practices, competitor information, and regulatory updates.

CARRIE F. BEKKER
CEO Profile (cont'd)
September 9, 2009



2004

Pacific Life Insurance Company

Newport Beach, California – *Senior Project Compliance Analyst*

- Responsible for overseeing all aspects of compliance-related projects involving the company's variable annuity products. Such projects included: Section 38a-1 of the 1940 Act, USA PATRIOT Act, Sarbanes-Oxley, and SEC Regulation S-P (privacy). Created, implemented and documented all compliance-related project plans. Also facilitated communication with all project plan participants during the entire project life cycle.
- Handled pilot testing of Aquilan Patriot Manager, an automated anti-money laundering compliance program designed to detect suspicious activity in variable insurance products and retail mutual funds. Analyzed and documented testing results, including recommendations for program adjustments, the reports for which were provided directly to Pacific Life's Chief Financial Officer.

1999- 2004

AEGON/Transamerica

St. Petersburg, Florida – *Assistant Vice President, Anti-Money Laundering Compliance Officer, Compliance Supervisor*

- Initially responsible for rewriting 15 variable universal life and annuity product prospectuses, from legalese into plain English, in order to comply with the SEC's Plain English mandate. Also handled all aspects of creating new and updating existing variable product prospectuses, including certain aspects of the fund prospectuses (including fund of funds).
- Over time, responsibilities were expanded to include analyzing and tracking fund-related SEC regulations – from reviewing the proposed rule, participating in industry-related conference calls and comment letters, and listening to SEC rulemaking webcasts, to analyzing the final SEC rule published in the Federal Register. Also took the lead in working with the business units to create and implement policies, procedures and training materials to assure full compliance before the rule's compliance deadline. Example: Analyzed final mutual fund rules implementing USA PATRIOT Act Sections 314, 326 and 352; created comprehensive, risk-based AML policies, procedures and training materials; investigated suspicious activities, and, if necessary, creating and filing the SARs with FinCEN.
- Took the lead in coordinating with Law Department personnel, outside counsel, senior management and departmental staff in gathering, analyzing and submitting electronic data in response to periodic SEC requests.
- Hedge fund private placements: Drafted private placement memoranda and subscription documents. Created PowerPoint presentations and related written communications geared towards registered representatives. Assisted with broker/dealer presentations during AEGON/Transamerica's annual registered representative conference. Handled due diligence to determine proper licensing of registered representatives; also served as custodian of incoming/outgoing private placement memoranda and subscription documents.

1996 - 1999

Harney, Westwood & Riegels/HWR Services Limited

British Virgin Islands -- *Legal Executive, Offshore Incorporations and Mutual Funds Compliance Units*

- Department head of high-volume offshore incorporations trust company, servicing clients in Europe, the Americas, and the Far East.
- Responsibilities included constant verbal and written communication with overseas clientele; devising departmental forms and written procedures to boost efficiency and accuracy; supervising departmental staff in the day-to-day operations; and training and mentoring staff to ensure stateside-style quality service to the trust company's clientele.

CARRIE F. BEKKER
CEO Profile (cont'd)
September 9, 2009



1981 - 1996

Berman Wolfe & Rennert, P.A., Miami, Florida • Farella Braun & Martel, San Francisco, California • Johnson, Pope, Bokor, Ruppel & Burns, LLP, Clearwater, Florida -- *Paralegal Manager and Senior Corporate Securities Paralegal*

- Specialized in all aspects of public offerings, private placements, SEC, state securities, FINRA, and stock exchange compliance; transactional, including mergers and acquisitions; and domestic/offshore corporate finance matters, from inception to liquidation.
- Authored course materials for continuing legal education publications and newsletters for client use. Also developed and delivered in-house educational training programs covering real estate, corporate, and securities law matters.
- Drafted offering documents, SEC reports, agreements, and closing documents. Also created and coordinated broker/dealer and investment adviser registrations.
- Performed extensive legal research pertaining to federal and state regulatory requirements, including documentation of results. Also handled and documented client and target company due diligence.
- Frequently presided as a guest speaker for local paralegal association meetings. Topics included federal and state securities law developments. Also created written materials for attendees.

Continuing Education

- 1981 -- A.S. Degree, Business/Legal, cum laude, St. Petersburg College, Clearwater, Florida. Curriculum included general business, business law, business writing, and accounting courses.
- Regularly attend conferences to stay abreast of regulatory compliance developments in the financial services industry, including trends and best practices. Conferences attended included the following sponsors:
 - Global Alternative Investment Management (GAIM)
 - Hedgeworld
 - Institutional Investor
 - California 1940 Acts Compliance Group
 - Complinet
 - Wall Street Journal
 - American Law Institute/American Bar Association (ALI-ABA)
 - Investment Company Institute (ICI)

Professional Memberships

- 100 Women in Hedge Funds
- National Association of Compliance Professionals (NSCP)
- National Investment Company Services Association (NICSA)
- Association of Certified Anti-Money Laundering Specialists (ACAMS)
- California 1940 Acts Compliance Group
- National Association of Variable Annuities (NAVA)
- Alternative Investment Management Association (AIMA)
- Institute of Management Consultants USA (IMCUSA)
- Arab Bankers and North America Association (ABANA)

CARRIE F. BEKKER
CEO Profile (cont'd)
September 9, 2009



Other Memberships

- Porter Valley Country Club
- Surfrider Foundation
- Metropolitan Museum of Art

Credentials & Licenses

- FINRA Series 6 and 26 licenses (inactive).
- CLA (Certified Legal Assistant) since 1988. (CLA designation awarded by the National Association of Legal Assistants Certification Board after passing a two-day written examination. Areas tested included communications, human relations, ethics, legal research and writing, as well as five substantive law areas: general, corporate, contractual, administrative, and criminal law.)