

Best Practices Consulting Group has been in business 8 years. We provide services to SEC-registered RIAs, hedge funds and California-registered RIAs. We set up new advisory firms and provide ongoing compliance consultations and program reviews.

Best Practices' principal, Wendy Phillippay and its senior consultant, Lucienne Dilworth, each have been practicing law in California for over twenty years. Prior to starting Best Practices, Ms. Phillippay worked in the Office of the General Counsel for the Pacific (Stock) Exchange and was in charge of the Exchange's membership department, arbitration program and floor trading committees. Prior to her position with the Exchange, she was a corporate litigator for fifteen years at two large national law firms located in Los Angeles. Prior to joining Best Practices, Ms. Dilworth was a corporate and securities lawyer with two prominent San Francisco law firms.

Once firms are fully established with comprehensive compliance and operations policies and procedures, their need for Best Practices consulting input and review falls off to an average of a few hours of routine consulting time per month. Often, based upon the regulatory calendar, this time is concentrated into a few concurrent months of consultations followed by several months without. The numbers change for clients who are visited by their regulator for an examination as we make ourselves available on request, to help the client prepare for the examination. Luckily, for most clients, this is a once-in-five-years occurrence.

To every extent possible, we have a "drop everything" policy for clients receiving notice of a regulatory exam. We will endeavor to clear our calendars and come in to assist in preparing for an exam . . . weekends included. Our presence during the actual exam is subject to client needs.

We charge an hourly fee and bill in increments of tenths of an hour (six minutes increments). For the first few projects, until our clients get to know our services and billing structure, we prepare a scope of work that outlines the exact tasks we are undertaking to perform and provides a time estimate of the anticipated billable time. This prevents "mission creep" and allows the client to keep track of billings. Ongoing compliance consultations typically involve less than three hours per month on average and are comprised of random client inquiries so these are not made the subject of separate scopes of work.