



Outsourced Chief Compliance Officer

Meet some of our OCCOs

Meet some of our OCCO's

Click on the images to view bio's



Denise Alfieri
Chief Compliance Officer
ACA Group



Marvin Barge
Chief Compliance Officer
ACA Group



Curtis Flippen
Chief Compliance Officer
ACA Group



Stacey Gillespie
Chief Compliance Officer
ACA Group



Gregory W. MacCordy
Chief Compliance Officer
ACA Group



Guy Talarico
Chief Compliance Officer
ACA Group



Rita Tholt
Chief Compliance Officer
ACA Group



Denise Alfieri

Chief Compliance Officer

ACA Group

Denise.Alfieri@acaglobal.com

+1 724 935 6772

Denise Alfieri is a Director at ACA Group and has worked in the securities industry for over twenty-five years. For over a decade, she has provided consulting services to investment advisors, including private equity and hedge fund managers, on a wide variety of investment management topics, including risk management, compliance with SEC regulations, regulatory examinations, and evaluation of compliance programs.

Prior to joining ACA, Denise was a Managing Director at Hardin Compliance Consulting specializing in the development, ongoing maintenance, and testing of compliance programs, drafting of policies and procedures, compliance training, review of marketing materials, annual compliance reviews, as well as regulatory filings. She also served as a Senior Compliance Examiner for Federated Hermes for over seven years specializing in the development and implementation of testing and oversight of the Firm's internal and external sales team and service providers. Before that, Denise served as the Compliance Coordinator for two broker-dealers and was responsible for all aspects of compliance including maintenance of the Firm's supervisory procedures and oversight of the branch activities.

Denise leads ACA's Blue-Sky Team which provides Form D, Blue-Sky and Section 13 filing services and serves as an outsourced CCO for several clients including private funds and wealth managers. Denise is also a contributor to the Private Equity Law Report, NSCP Currents, JP Supra and Thompson Hine on various private fund related topics. She holds Series 7, 24, and 63 securities licenses, as well as the designation Investment Adviser Certified Compliance Professional (IACCP®) from National Regulatory Services, Inc.



Marvin Barge

Chief Compliance Officer

ACA Group

Marvin.Barge@acaglobal.com

+ 1 770 559 4830

Marvin Barge provides compliance consulting services to registered investment advisors, assisting chief compliance officers and their staff with all aspects of compliance from initial registration to ongoing management of their compliance programs. He has experience across a range of clients including institutional money managers, pension consultants, wealth managers, and private funds to name a few. Prior to joining ACA, Marvin served as Founder and CEO of Barge Consulting, LLC. The firm serves the financial securities industries on regulatory and compliance matters. Marvin has consulted with hundreds of firms across the country on how to better prepare for SEC examinations, adhere to investment guidelines, establish a compliance culture, implement procedures and conduct Code of Ethics training.

Prior to starting his own firm, Marvin served as Director of Compliance Consulting for Ashland Partners LP (1999-2000), an international accounting firm, Senior Compliance Consultant for Dover International Inc. (1998-1999), a global compliance and operational consulting firm, and CCO for The Henssler Equity Fund and two of Henssler's Investment Advisers (1997-1998). Responsibilities in these various capacities covered issues concerning the Investment Advisers Act of 1940, The Investment Company Act of 1940, and the Employee Retirement Income Security Act of 1974 (ERISA). In addition, Marvin was employed as a Senior Compliance Examiner, and later as a Staff Accountant, for the U.S. Securities and Exchange Commission Atlanta District Office (1994-1998). There, he conducted on-site examinations of investment advisers, investment companies, fund administrators, broker-dealers and various other financial securities firms.

Marvin has earned a Bachelor of Science degree from Tuskegee University (1987), a Master of Business Administration from Mercer University (1994), and the Certified Securities Compliance Professional ("CSCP") designation. He is a regular speaker at industry conferences, and a member of the Gwinnett Medical Center Foundation, where he chairs the investment committee. He is also a member of The Investment Management Consultants Association, The National Society of Compliance Professionals, and the National Association of Securities Professionals.



Curtis Flippen

Chief Compliance Officer

ACA Group

Curtis.Flippen@acaglobal.com

+1 512 717 4529

Curtis Flippen is a Director in ACA Group’s Regulatory Advisory Practice. He provides advice and guidance in all aspects of fiduciary and regulatory issues to investment advisers managing private funds, public funds, and institutional Separately Managed Accounts (SMAs). This includes forming investment advisers, guidance and support on SEC registration, investment management contracts, reviewing a private fund’s term sheet, Private Placement Memorandum (PPM), partnership agreement and operating agreement, private fund operations, SEC filings, disclosure requirements and documents, SEC audits, establishing compliance programs, drafting, implementation, and ongoing monitoring of firm’s compliance policies, procedures and code of ethics, annual review of the firm’s compliance program, and compliance training (annual and targeted).

Curtis’ responsibilities include serving as outsourced Chief Compliance Officer. In this role, among other responsibilities, he:

- » sets the tone, direction, and overall strategy of the compliance program,
- » designs, implements, administers, monitors and tests the policies and procedures,
- » identifies, assesses, and mitigates conflicts of interest and compliance risks at varying levels throughout the adviser,
- » focuses on finding outcomes that ensure business and operational needs are met as well as compliance with regulatory requirements.

Curtis has more than 20 years of experience in investment and securities legal and regulatory matters. Prior to joining ACA, he held various compliance and legal roles including 5th Level Capital, NovaBlock, QMA/Prudential, Metlife Advisors, Bear Stearns Asset Management, Deloitte, and E&Y. BS,

He was educated at Hampton University, JD, Rutgers Law School.



Stacey Gillespie

Chief Compliance Officer

ACA Group

Stacey.Gillespie@acaglobal.com

+1 484 261 6051

Stacey Gillespie is a dedicated compliance professional who serves as an outsourced chief compliance officer at ACA for several registered investment advisers, mutual funds, and private fund advisers.

Her compliance career spans more than 20 years in the financial services industry. She began her career in 2001 as a compliance officer at JP Morgan Fleming Asset Management and held a number of compliance roles with increasing responsibility throughout her career.

From 2007 through 2015, she served as the Chief Compliance Officer of Boenning & Scattergood, Inc. a Mid-Atlantic 3-billion- dollar dual registrant where she led the compliance program, managed compliance staff and oversaw all compliance initiatives.

She joined Cipperman Compliance Services, LLC in 2015 as a Director and outsourced chief compliance officer, and served as a senior member of the firm's Compliance Committee.

Stacey has been the main liaison for numerous regulatory exams, has spoken on compliance panels and authored white papers on important regulatory issues. She holds the FINRA Series 7, 63, 65, 24, 79 and 53 licenses.



Gregory W. MacCordy

Chief Compliance Officer

ACA Group

Greg.Maccordy@acaglobal.com

+1 203 614 0495

Gregory W. MacCordy is a Director at ACA Group and an experienced compliance, risk and subject matter expert with over 30 years of regulatory and financial services experience. He joined ACA through its merger with Alaric Compliance Services LLC and serves as chief compliance officer or chief risk officer for SEC registered investment advisers and investment companies such as business development companies (BDC) and interval funds. Gregory has a thorough knowledge of the Investment Company and Investment Adviser Acts of 1940, Compliance rules 206 (4)-7 and 38a-1 and Dodd Frank rules for liquidity and derivative usage. His product knowledge includes direct lending and leverage loans, CLO collateral management and trading, BDCs, CDOs, fixed income, mutual funds, private equity, hedge funds and real estate and credit derivatives.

Most recently, he worked at the U.S. Securities & Exchange Commission (SEC) as an Industry Expert and Specialized Compliance Examiner in the Asset Management Unit (Enforcement Division) conducting enforcement investigations of investment companies, investment advisers and mutual funds in the areas of BDCs, CLOs, private equity, hedge funds, real estate, and fixed income trading. Gregory also worked with the SEC's Office of Compliance Inspection and Examination (OCIE) conducting exams of investment advisers and investment companies' compliance policies, procedures and violations of securities laws. While at the SEC, he taught credit and equity modeling valuation and compliance under FASB ASC 820 and the analysis of operating structures and risk for credit products. He participated in several successful enforcement cases under the Advisers and Investment Company Acts of 1940.

He began his career in the banking industry but was recruited to become a Special Agent with the Federal Bureau of Investigation (FBI), where he conducted financial and counter-intelligence investigations. He gained capital market's experience working at TIAA for 18 years, holding several roles including Managing Director. During his time at TIAA, he built a new credit trading and direct lending business, resulting in his management of a \$13 billion loan/bond portfolio and oversaw several strategic initiatives including the launch and management of \$1B of CLOs. Gregory also worked as co-chair of the investment committee and manager of investment compliance, portfolio management, and valuation at a \$5B multi-strategy hedge fund. In addition, he held roles at a FINRA registered broker-dealer conducting client and new transaction due diligence and consulting for banks in credit compliance for mortgage and RMBS products.

Gregory holds a Bachelor of Science & Business Administration in Accounting from the University of Missouri, an MBA in Finance from New York University Stern School of Business.



Guy Talarico

Chief Compliance Officer

ACA Group

Guy.Talarico@acaglobal.com

+1 201 751 2098

Guy F. Talarico is a Director at ACA Group (ACA). Prior to joining, he was the Founder and Chief Executive Officer of Alaric Compliance Services LLC, one of the nation’s leading regulatory compliance consulting firms. Established in 2004, Alaric Compliance provided consulting, technology solutions, and other services including independent Chief Compliance Officer outsourcing to investment managers registered with the SEC, CFTC, NFA, and FINRA.

Guy has over 30 years of experience in the financial services industry. His background includes serving as the CCO to client firms; the management of a \$45 billion asset management and services group at JP Morgan-Chase; client management of SEC-registered advisors within the Institutional Custody Division of Investors Bank & Trust Company; development of an outsourced SEC regulatory compliance program for registered advisors; and legal compliance support. Prior to founding Alaric Compliance Services, he was the co-CEO of EOS Compliance Services, LLC.

He is a frequent speaker and commenter on compliance-related matters and is an expert witness for the SEC. He served three terms in the New Jersey State Assembly and sponsored numerous laws for regulatory reforms of the insurance and banking industries, He co-sponsored the “Justice for Victims Law” which eliminated the two-year statute of limitations in civil lawsuits for wrongful deaths.

Guy holds a Bachelor of Science from Lehigh University, an MBA from Fairleigh Dickinson University, and a JD from New York Law School.



Rita Tholt

Chief Compliance Officer

ACA Group

Rita.Tholt@acaglobal.com

+1 614 416 9060

Rita Tholt serves as Senior Principal Consultant in the Investment Adviser Consulting practice at ACA Group. She is an attorney with experience as in-house counsel and law firm associate. The primary focus during her tenured career, has been on U.S. registered investment Adviser regulations and compliance requirements.

She has in-depth knowledge of federal securities regulations impacting investment managers and financial services firms and experience with both securities and banking regulators. Rita specializes in the design and implementation of effective regulatory compliance programs. Most recently, she has focused on programs for advisers to registered investment companies/ETFs. She has over thirty years of experience in the financial services industry, significantly as chief compliance officer.

Prior to joining ACA Group, Rita served as Chief Compliance Officer for Nationwide Investment Advisors, LLC. She designed, maintained and implemented the firm's compliance program including risk assessments; internal audits and regulatory exams; regulatory filings and management reporting; compliance policies and training; monitoring and testing activities; assessing the overall effectiveness of the program under Rule 206(4)-7. Rita also served as Senior Compliance Manager for J.P.Morgan Investment Management Corp. (formerly Banc One Investment Advisors) focusing on the compliance program elements and direction for the institutional sales team and equity research, portfolio management and trading teams.

Throughout her career, Rita has been recognized as a valuable compliance leader, partner, and team player by firm management and associates with a keen understanding of regulatory requirements, industry best practices, and the application of each to different advisory business models. She has served as a FINRA Arbitrator (Industry Member) and hold FINRA Series 7 and 24 licenses (with Series 53, 63 and 65 inactive).

Rita Tholt holds a Bachelor of Arts and a Master of Arts from Ohio University and a JD from Capital University Law School.