

MEMO# 1097

April 10, 1989

OKLAHOMA ADOPTS PROPOSED PERMANENT INVESTMENT ADVISER RULES

April 10, 1989 TO: INVESTMENT ADVISERS COMMITTEE NO. 19-89 RE: OKLAHOMA ADOPTS
PROPOSED PERMANENT INVESTMENT ADVISER RULES

The Oklahoma Securities Commission has recently adopted proposed permanent rules concerning investment advisers and investment adviser representatives. The proposed permanent rules are not official until the Oklahoma legislature approves them. A copy of the relevant proposed permanent rules are attached. The proposed permanent rules would make changes to the existing investment adviser rules in Oklahoma. For example, the rules would coordinate Oklahoma's renewal procedure with the SEC's procedure by requiring advisers to renew registration by submitting a copy of Form ADV-S. Another change would require advisers to submit a completed Form ADV, including Schedules A through G (previously, only Schedules A through C and E through G were required). In the books and records area, advisers would be required to keep its books and records "in a central location." The proposed permanent rules would also amend the existing standards of ethical practices for investment advisers to make them applicable to investment adviser representatives. Finally, the proposed permanent rules would include a rule that sets forth the Oklahoma Securities Commission's position of the applicability of the investment adviser provisions of the Oklahoma Securities Act to financial planners and other persons who provide investment advisory services as an integral component of other financial related services. This rule would make it clear that all those individuals or entities who hold themselves out to the public as financial planners would be required to be registered as investment advisers. If you have any comments on the proposed permanent rules in Oklahoma, please contact the undersigned by April 26, 1989. Robert L. Bunnen, Jr. Assistant General Counsel

Attachment