



2018 New York Region Member Forum

December 6, 2018 | New York, NY

Chief Compliance Officer's (CCO's) Role in Cybersecurity

Thursday, December 6

10:50 a.m. – 11:35 a.m.

Increased use of technologies such as mobile devices, social media and cloud computing has increased the risk posed by cyber criminals. As a result, in addition to other compliance matters, the CCO is now also responsible for assisting—and protecting—company information technology (IT) systems. During this session, panelists discuss the role CCOs can play in a firm's cybersecurity program.

Moderator: Justin Triolo
Associate District Director, Sales Practice
FINRA New York District Office

Panelists: Kevin Bogue
Regulatory Principal, Sales Practice
FINRA Chicago District Office

John Brady
Vice President and Chief Information Security Officer
FINRA Technology, Cyber & Information Security

John Gardini
Chief Compliance Officer
American Capital Partners, LLC

Joshua Hergan
2nd Vice President and Chief Compliance Officer
Park Avenue Securities

Chief Compliance Officer's (CCO's) Role in Cybersecurity Panelist Bios:

Moderator:

Justin Triolo is Associate District Director with FINRA's District 10 New York office and has been with FINRA since April 2004. In his role, Mr. Triolo manages approximately 25 staff members, including Examination Managers and Examiners, who are responsible for conducting cycle and branch office examinations of member firms. Mr. Triolo started his career in Regulation as an Examiner with the Sales Practice Review Unit of NYSE Regulation. Prior to joining FINRA, Mr. Triolo was a Senior Analyst for Novations, and responsible for quality assurance testing, curriculum development and training for the Competitive Positions Group of the NYSE. Mr. Triolo has a Bachelor of Arts degree from Gettysburg College.

Panelists:

Kevin Bogue joined FINRA in January 2017 as a Regulatory Principal in the Chicago District Office. Mr. Bogue is a member of the Sales Practice Cybersecurity team responsible for examining firms' controls over their protection of sensitive client and firm information. Prior to joining FINRA, Mr. Bogue has more than 17 years of information technology (IT) and security experience working as a technology consultant with Accenture, as an internal Global IT auditor, IT Compliance Manager and SOX Program Manager with Abbott Laboratories, as an IT Compliance Manager with Brunswick and as an internal IT Audit Manager with CDW. Mr. Bogue earned an MS in Information Systems from DePaul University in Chicago, IL and a BS in Psychology from Iowa State University in Ames, IA.

John Brady is Vice President in Technology for Cyber and Information Security for FINRA, and is the organization's Chief Information Security Officer (CISO). In this capacity, he is responsible for all aspects of FINRA's information and cyber security programs, as well as ensures compliance with related laws and regulations. He oversees staff focused in four primary information security areas: security architecture and controls, security management tools, application security, and identity management. Mr. Brady, along with counterparts in FINRA's Data Privacy Office, establishes policy and technical controls to ensure information is appropriately protected throughout its lifecycle. He began his career with FINRA more than 10 years ago as the Director of Networks and Firewalls. He then broadened and deepened his technical knowledge by taking on responsibility for server and storage infrastructure, where he led system engineering efforts to expand capacity and performance of Market Regulation systems in response to data volumes growing more than 40 percent year over year. Mr. Brady recently led the establishment, design, and implementation of FINRA's new data centers and the seamless migration of more than 175 applications from an outsourcer to those new data centers. Prior to the commencement of his work with FINRA in October 2002, Mr. Brady was Director of Networks at VeriSign from 2000 to 2002 and Network Solutions from 1998 to 2000. From 1995 to 1998, he built and operated Citibank's Internet Web and email services as Vice President, Internet Services. From 1993 to 1995, Mr. Brady worked for Sun Microsystems as Senior Consultant, where he built integrated network systems for prominent customers. Mr. Brady began his professional career as a member of technical staff at The Aerospace Corporation from 1987 to 1993, designing satellite systems and command and control networks for the Air Force Space Command. Mr. Brady holds a bachelor's degree in Computer and Electrical Engineering from Purdue University of West Lafayette in Indiana, and a master's degree in Industrial Engineering and Operations Research from the University of California at Berkeley. He also is an (ISC)² Certified Information Systems Security Professional (CISSP).

John C. Gardini, 46, has been a registered representative for 25 years and principal for 21 years, joining American Capital Partners, LLC as Compliance officer in June 2003 and has been their Chief of Compliance since October 2012. His responsibilities at American Capital Partners include assuring regulatory compliance for all firm activities, liaison between the home office and branch offices, trade surveillance and updating and maintaining the Written Supervisory Procedure Manual. Mr. Gardini is also an Anti Money Laundering officer for American Capital Partners. He is a principal and compliance officer for Partners Capital Services, Inc. a registered investment advisor since 2006. Prior to joining American Capital Partners, Mr. Gardini was an Assistant Treasurer of Compliance for Bank Julius Baer & Co. Ltd./Julius Baer Securities Inc. As a manager in the compliance department his responsibilities included customer account surveillance for suitability, trading activity and document management. His duties also

included updating and maintenance of the bank and securities manuals as well as submission of regulatory filings. Mr. Gardini received a Bachelor of Science in Business Administration from the State University of New York at Stony Brook in 1994. He obtained the Series 7 in 1993, the Series 24 in 1996, and has held the Branch Manager and Operations Manager positions in boutique firms in previous positions.

Josh Hergan serves as Second Vice President and Chief Compliance Officer for Park Avenue Securities, Guardian Life's wholly-owned multi-billion-dollar broker-dealer and registered investment adviser. He first joined Guardian's Law Division in 2013, where he served as lead counsel for Park Avenue. In his current role at Park Avenue, Mr. Hergan is responsible for managing the overall compliance framework for the firm's broker-dealer and registered investment adviser. He works to ensure the firm's compliance with all FINRA, SEC, ERISA and state-specific rules and regulations by providing necessary guidance pertaining to the firm's activities. In this capacity, he also oversees the design, documentation and execution of the firm's compliance policies and controls. Mr. Hergan is regularly involved in the review and implementation of new regulatory initiatives impacting Guardian and Park Avenue Securities and provides expertise to senior firm leadership on regulatory compliance. Prior to joining Guardian, Mr. Hergan was Director and Counsel for AXA Financial, where he advised business executives on legal and regulatory issues of AXA Advisors, LLC, the affiliated broker-dealer and investment advisor of AXA Equitable. He also provided counsel for AXA Advisors President, COO and other senior executives on structuring, distribution, business development, operations, sales and marketing matters. Previously, Mr. Hergan was a Senior Associate at McCormick & O'Brien, LLP, where he counseled broker-dealers, registered representatives, investment advisors, hedge funds and other securities professionals regarding SEC, FINRA and CFTC registration along with other compliance-related issues. He joined McCormick & O'Brien upon his departure from Bernstein Levine Cherney, LLP, where he similarly advised clients of the broker-dealer and investment advisor services group on compliance with securities laws and regulatory requirements. Prior to attending law school Mr. Hergan was a registered representative at Neuberger Berman Group LLC. He holds a J.D., with honors, from New York Law School and a B.A. in Economics from the University of Colorado at Boulder.

2018 New York Region Member Forum
December 6, 2018 | New York, NY

Chief Compliance Officer's (CCO's) Role in Cybersecurity



Panelists

■ Moderator

- **Justin Triolo, Associate District Director, Sales Practice, FINRA New York District Office**

■ Panelists

- **Kevin Bogue, Regulatory Principal, Sales Practice, FINRA Chicago District Office**
- **John Brady, Vice President and Chief Information Security Officer, FINRA Technology, Cyber & Information Security**
- **John Gardini, Chief Compliance Officer, American Capital Partners, LLC**
- **Joshua Hergan, 2nd Vice President and Chief Compliance Officer, Park Avenue Securities**