



COMPLIANCE WEEKLY

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SKRC Compliance Weekly is a weekly reminder of certain regulatory obligations that may apply to an SEC-registered investment adviser and CFTC-registered commodity pool operator and commodity trading advisor with a December 31 fiscal year-end that advises one or more private funds.

Obligation	Comment
Quarterly Transaction Reports (due 1/30/2019).	For fourth quarter 2018. Investment Advisers Act Rule 204A-1(b)(2) requires “access persons” of a registered adviser to submit a transaction report to the chief compliance officer covering all transactions during the previous quarter no later than 30 days after the end of each calendar quarter.
Periodic Report for CPOs (due 1/30/2019).	Commodity pool operators (CPOs) are required to distribute a periodic report of their account statements within 30 calendar days of each month end. CPOs relying on an exemption under CFTC Rule 4.7 or Rule 4.12(b) are required to distribute a periodic report within 30 days of each quarter end.
Bylaw 1101 (for CPOs and CTAs) (due 2/1/2019).	A CPO of a pool with investors that are either (a) pools that are exempt under CFTC Rule 4.5 or Rule 4.13 or (b) commodity trading advisors (CTAs) that are exempt under CFTC Rule 4.14(a)(8), should confirm promptly after the beginning of each calendar year that each such investor has affirmed its exemption, claimed another exemption, or properly registered with the CFTC and become a NFA member. Same requirement for CTAs.

If you have any questions regarding the matters covered herein, please contact any of the attorneys listed below.

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