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COMPLIANCE WEEKLY A Publication of Seward & Kissel Regulatory Compliance

JULY 16, 2019

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
TIC Form SLT (due 7/22/2019).	For June 2019. Must be filed by "US residents" on a monthly basis to report "long term cross border ownership" of securities in excess of \$1 billion.
Quarterly Transaction Reports (due 7/30/2019).	For second quarter 2019. Investment Advisers Act Rule 204A-1 requires "access persons" 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 7/30/2019).	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.

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

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