

COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

JULY 24, 2018

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 7/30/2018).	For second quarter 2018. 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 7/30/2018).	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.

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

Debra Franzese	Maureen R. Hurley	Paul M. Miller	Joseph M. Morrissey	David R. Mulle
212-574-1353	212-574-1384	202-737-8833	212-574-1245	212-574-1452
franzese@sewkis.com	hurley@sewkis.com	millerp@sewkis.com	morrissey@sewkis.com	mulle@sewkis.com
Steven B. Nadel	Marlon Q. Paz	Patricia A. Poglinco	Christopher C. Riccardi	Robert Van Grover
212-574-1231	202-661-7178	212-574-1247	212-574-1535	212-574-1205
nadel@sewkis.com	paz@sewkis.com	poglinco@sewkis.com	riccardi@sewkis.com	vangrover@sewkis.com
Robert L. Chender 212-574-1415 chender@sewkis.com	Keri E. Riemer 212-574-1598 riemer@sewkis.com	David Tang 212-574-1260 tang@sewkis.com		

Seward & Kissel Regulatory Compliance (SKRC) is a service provided by Seward & Kissel LLP. SKRC offers <u>Compliance Services</u> as well as an <u>Online Compliance Subscription Service</u>.

The information contained herein is for informational purposes only and is not intended and should not be considered to be legal advice on any subject matter. As such, recipients of this information, whether clients or otherwise, should not act or refrain from acting on the basis of any information included in this report without seeking appropriate legal or other professional advice. This information is presented without any warranty or representation as to its accuracy or completeness, or whether it reflects the most current legal developments. This information may be considered attorney advertising. Prior results do not guarantee a similar outcome.

One Battery Park Plaza | New York, NY 10004 212-574-1200 | 212-480-8421 (fax) | <u>sknyc@sewkis.com</u>



901 K Street, NW | Washington, DC 20001 202-737-8833 | 202-737-5184 (fax) | <u>skdc@sewkis.com</u>