



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

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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
TIC Form SLT (5/23/2018).	For April 2018. 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 update to Form PF due for all "large hedge fund advisers" (due 5/30/2018).	For first quarter 2018. Form PF requires a "large hedge fund adviser" to file a quarterly update within 60 calendar days after the end of its first, second and third fiscal quarters that updates the answers to items in Form PF relating to the "hedge funds" that it advises.
Form PQR for all CPOs (due 5/30/2018).	For first quarter 2018 for all commodity pool operators (CPOs).
Periodic Report for CPOs (due 5/30/2018).	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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