SKRC

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 (due 11/23/2018).	For October 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 11/29/2018).	For third quarter 2018.
Form CPO-PQR for all CPOs (due 11/29/2018).	For third quarter 2018 for all commodity pool operators (CPOs).
Periodic Report for CPOs (due 11/30/2018).	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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