



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

NOVEMBER 27, 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 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.

Debra Franzese
212-574-1353
franzese@sewkis.com

Maureen R. Hurley
212-574-1384
hurley@sewkis.com

Paul M. Miller
202-737-8833
millerp@sewkis.com

Joseph M. Morrissey
212-574-1245
morrissey@sewkis.com

David R. Mulle
212-574-1452
mulle@sewkis.com

Steven B. Nadel
212-574-1231
nadel@sewkis.com

Marlon Q. Paz
202-661-7178
paz@sewkis.com

Patricia A. Poglinco
212-574-1247
poglinco@sewkis.com

Christopher C. Riccardi
212-574-1535
riccardi@sewkis.com

Robert Van Grover
212-574-1205
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 [Compliance Services](#) as well as an [Online Compliance Subscription Service](#).

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) | sknyc@sewkis.com



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

www.compliance.sewkis.com

© 2018 – present. Seward & Kissel LLP. All rights reserved.