



# COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

OCTOBER 26, 2021

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 10/30/2021).	Advisers Act Rule 204A-1 requires “access persons” of a registered adviser 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 10/30/2021).	CPOs are required to distribute a periodic report of their account statements within 30 calendar days of each month end. Note, however, that CPOs relying on an exemption under CFTC Rule 4.7 or Rule 4.12(b) are only required to distribute a periodic report of their account statements 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.

<b>Debra Franzese</b> 212-574-1353 franzese@sewkis.com	<b>Paul M. Miller</b> 202-737-8833 millerp@sewkis.com	<b>Joseph M. Morrissey</b> 212-574-1245 morrissey@sewkis.com	<b>David R. Mulle</b> 212-574-1452 mulle@sewkis.com	<b>Steven B. Nadel</b> 212-574-1231 nadel@sewkis.com
<b>Kevin Neubauer</b> 212-574-1355 neubauer@sewkis.com	<b>Patricia A. Poglinco</b> 212-574-1247 poglinco@sewkis.com	<b>Christopher C. Riccardi</b> 212-574-1535 riccardi@sewkis.com	<b>Robert Van Grover</b> 212-574-1205 vangrover@sewkis.com	<b>Daniel Bresler</b> 212-574-1203 bresler@sewkis.com
<b>Robert L. Chender</b> 212-574-1415 chender@sewkis.com	<b>David Tang</b> 212-574-1260 tang@sewkis.com	<b>Valentino Vasi</b> 212-574-1281 vasi@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 Portal](#).

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.

