



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
NFA Bylaw 1101 Confirmation (for CPOs and CTAs) (due 2/1/2022).	A CPO of a pool with investors that are either (a) pools that are exempt under CFTC Rule 4.5 or Rule 4.13 or (b) CTAs that are exempt under CFTC Rule 4.14(a)(8) should confirm promptly after the beginning of each calendar year that each such exempt investor has affirmed its exemption, claimed another exemption, or properly registered with the CFTC and become a NFA member. Same requirement for CTAs.

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

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