



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

MARCH 29, 2022

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
Periodic Report for CPOs (for March 2022) (due 3/30/2022).	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.
Form ADV annual updating amendment due. (due 3/31/2022).	Advisers Act Rule 204-1(a)(1) requires a registered investment adviser to file an annual updating amendment to its Form ADV within 90 days after its fiscal year-end. The adviser's IARD account must be funded with the required filing fees in advance of the annual ADV filing.
BE-185 (due 3/31/2022).	Report on "international financial service payments" that must be filed within 90 days of closing the final quarter of the filer's fiscal year by entities that are contacted by the Bureau of Economic Analysis.
Annual Report for pools with a calendar-year fiscal year (due 3/31/2022).	Registered CPOs must distribute an Annual Report (audited financial statements of a pool), certified by an independent public accountant, to pool participants within 90 days of the pool's fiscal year-end. CPOs are also required to file this report with the NFA within 90 days of the pool's fiscal year-end. CPOs can submit a request for extension (e.g., for a fund-of-funds) to the NFA.



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