



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 3/23/2023).	Must be filed by "US residents" on a monthly basis to report "long term cross border ownership" of securities in excess of \$1 billion. Data on the Form TIC SLT must be reported as of the last business day of the month (as-of date). The TIC Form SLT must be submitted to the Federal Reserve Bank no later than the 23rd calendar day of the month following the report as-of date. If the due date of the report falls on a weekend or holiday, TIC Form SLT should be submitted the following business day.
Periodic Report for CPOs (for February 2023) (due 3/30/2023).	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.

Daniel Bresler
bresler@sewkis.com
212-574-1203

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

Kevin Neubauer
neubauer@sewkis.com
212-574-1355

Alexandra Alberstadt
alberstadt@sewkis.com
212-574-1217

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

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

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

Jay Baroody
baroody@sewkis.com
212-574-1347

Robert M. Kurucza
kurucza@sewkis.com
(202) 661-7195

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

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

Kevin Cassidy
cassidy@sewkis.com
(212) 574-1542

Nicholas R. Miller
millern@sewkis.com
212-574-1359

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

Robert Van Grover
vangrover@sewkis.com
212-574-1205

Lancelot A. King
king@sewkis.com
(202) 661-7196

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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

<https://compliance.sewkis.com/>

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