



# COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

MARCH 21, 2023

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.
Form ADV annual updating amendment (due 3/31/2023).	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.
Annual Report for pools with a calendar-year fiscal year (due 3/31/2023).	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.



One Battery Park Plaza | New York, NY 10004  
212-574-1200 | 212-480-8421 (fax) | [sknyc@sewkis.com](mailto:sknyc@sewkis.com)

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

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

© 2023 – present. Seward & Kissel LLP. All rights reserved.



MARCH 21, 2023

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

**Daniel Bresler**  
[bresler@sewkis.com](mailto:bresler@sewkis.com)  
212-574-1203

**Paul M. Miller**  
[millerp@sewkis.com](mailto:millerp@sewkis.com)  
202-737-8833

**Kevin Neubauer**  
[neubauer@sewkis.com](mailto:neubauer@sewkis.com)  
212-574-1355

**Alexandra Albersadt**  
[albersadt@sewkis.com](mailto:albersadt@sewkis.com)  
212-574-1217

**Debra Franzese**  
[franzese@sewkis.com](mailto:franzese@sewkis.com)  
212-574-1353

**Joseph M. Morrissey**  
[morrissey@sewkis.com](mailto:morrissey@sewkis.com)  
212-574-1245

**Patricia A. Pogliinco**  
[pogliinco@sewkis.com](mailto:pogliinco@sewkis.com)  
212-574-1247

**Jay Baroody**  
[baroody@sewkis.com](mailto:baroody@sewkis.com)  
212-574-1347

**Robert M. Kurucza**  
[kurucza@sewkis.com](mailto:kurucza@sewkis.com)  
(202) 661-7195

**David R. Mulle**  
[mulle@sewkis.com](mailto:mulle@sewkis.com)  
212-574-1452

**Christopher C. Riccardi**  
[riccardi@sewkis.com](mailto:riccardi@sewkis.com)  
212-574-1535

**Kevin Cassidy**  
[cassidy@sewkis.com](mailto:cassidy@sewkis.com)  
(212) 574-1542

**Nicholas R. Miller**  
[millern@sewkis.com](mailto:millern@sewkis.com)  
212-574-1359

**Steven B. Nadel**  
[nadel@sewkis.com](mailto:nadel@sewkis.com)  
212-574-1231

**Robert Van Grover**  
[vangrover@sewkis.com](mailto:vangrover@sewkis.com)  
212-574-1205

**Lancelot A. King**  
[king@sewkis.com](mailto:king@sewkis.com)  
(202) 661-7196

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.



One Battery Park Plaza | New York, NY 10004  
212-574-1200 | 212-480-8421 (fax) | [sknyc@sewkis.com](mailto:sknyc@sewkis.com)

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

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

© 2023 – present. Seward & Kissel LLP. All rights reserved.