



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

MARCH 19, 2024

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 3/25/2024).	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 TIC Form SLT must be reported as of the last business day of the immediately preceding 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 2024) (due 3/30/2024).	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 3/30/2024).	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. ¹ The adviser’s IARD account must be funded with the required filing fees in advance of the annual ADV filing. ¹ Please note that this date is a Saturday. IARD accepts filings on weekends, however, we recommend filing by the preceding business day (March 29, 2024) to avoid a late filing in the event of website maintenance or system errors.
Annual Report for pools with a calendar-year fiscal year (due 3/30/2024).	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. ² CPOs can submit a request for extension (e.g., for a fund-of-funds) to the NFA. ² When the due date falls on a weekend or holiday, the NFA will accept filings on the next business day.



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