



# COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

JUNE 4, 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 6/24/2024).	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.
Distribute audited financial statements to investors in "funds-of-funds" (due 6/28/2024).	With respect to a "fund-of-funds", the Custody Rule provides an exception from certain requirements of the Custody Rule with respect to the account of a limited partnership, limited liability company or another type of pooled investment vehicle (e.g., hedge funds and other private funds) that is subject to audit by an independent public accountant at least annually and distributes its audited financial statements prepared in accordance with U.S. generally accepted accounting principles to all investors within 180 days after the fund's fiscal year-end. Notwithstanding the timing of this requirement, registered CPOs are required to file and distribute audited financials within 90 days of the pool's fiscal year-end, unless an extension has been granted.



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 | 212-480-8421 (fax) | [skdc@sewkis.com](mailto:skdc@sewkis.com)

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

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

**Daniel G. Viola**, Head of SKRC  
[viola@sewkis.com](mailto:viola@sewkis.com)  
212-574-1457

**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

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

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

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

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

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

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

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

**Paul M. Miller**  
[millerp@sewkis.com](mailto:millerp@sewkis.com)  
202-661-7155

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

**Kris Swiatek**  
[swiatek@sewkis.com](mailto:swiatek@sewkis.com)  
212-574-1670

**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

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

**Noelle Indelicato**  
[indelicato@sewkis.com](mailto:indelicato@sewkis.com)  
212-574-1643

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

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

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212-574-1200 | 212-480-8421 (fax) | [sknyc@sewkis.com](mailto:sknyc@sewkis.com)

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