



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

SEPTEMBER 17, 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 9/23/2024).	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 (due 9/30/2024).	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.

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 | 212-574-1457

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

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

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

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

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

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

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

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

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

Paul M. Miller
millerp@sewkis.com
202-661-7155

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

Kris Swiatek
swiatek@sewkis.com
212-574-1670

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

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

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

Noelle Indelicato
indelicato@sewkis.com
212-574-1643

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

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

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

901 K Street, NW | Washington, DC 20001
202-737-8833 | 212-480-8421 (fax) | skdc@sewkis.com

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

© 2024 – present. Seward & Kissel LLP. All rights reserved.