

Investment Services Bulletin

February 2016

Annual Compliance Obligation Reminders

Investment advisers registered with the U.S. Securities and Exchange Commission (“SEC”) or with a state (“Advisers”), as well as commodity pool operators (“CPOs”) and commodity trading advisors (“CTAs”) registered with the U.S. Commodity Futures Trading Commission (“CFTC”), are subject to important annual compliance obligations. This summary sets forth the primary obligations of which your firm should be aware. This summary should not be considered an exhaustive list of your firm’s obligations under the broader federal securities laws, tax laws or applicable state, local or foreign laws. State-registered Advisers may vary from SEC obligations and clients should feel free to contact us for more information.

Annual Compliance Deadlines for Advisers

Pay IARD fee for registration of advisory reps with states	December 2015
Form 13F (for December 31, 2015 quarter-end)	February 16, 2016
Form 13H annual filing	February 16, 2016
Schedule 13G annual amendment	February 16, 2016
SEC-registered and Exempt Reporting Advisers pay IARD fee	Before submission of Form ADV
Annual Form ADV update (don't forget to get "bad boy" certifications from employees prior to filing) (December 31, 2015 fiscal year-end)	March 30, 2016
Delivery of Part 2A of Form ADV (Brochure) (December 31, 2015 fiscal year-end)	April 29, 2016
Delivery of Privacy Policy	At least once per year
Review of Compliance Policies and Procedures	At least annually

Obligations for Private Fund Advisers

Form PF filers pay IARD fee	Before submission of Form PF
Form PF for large hedge fund advisers (for December 31, 2015 quarter-end)	February 29, 2016
Form PF for large liquidity fund advisers (for December 31, 2015 quarter end)	April 15, 2016
Form PF for smaller private fund advisers and large private equity fund advisers (December 31, 2015 fiscal year-end)	April 29, 2016
Delivery of private fund audited financial statements (for December 31, 2015 year-end)	April 29, 2016
Form D annual amendment	One-year anniversary from last amendment filing
Disqualifying Events under Rule 506(d) (from certain covered persons)	At least once per year
"New Issues" Questionnaire	At least once per year

Obligations for CTAs

Registered CTA Form PR (for December 31, 2015 year-end)	February 17, 2016
Affirm CTA exemptions (4.14(a)(8))	February 29, 2016
CTA Annual Registration Update to Forms 7-R and 8-R	Prior to anniversary of registration
Self-Examination Checklist	Prior to anniversary of registration

Obligations for CPOs

Affirm CPO exemptions (4.5 and 4.13)	February 29, 2016
Registered Large CPO Form CPO-PQR December 31 quarter-end report	February 29, 2016 (60 days after quarter-end)
Registered CPOs filing Form PF in lieu of Form CPO-PQR December 31 quarter-end report	March 30, 2016 (within 60 or 90 days, depending on the size of the CPO)
Registered Mid-Size and Small CPO Form CPO-PQR year-end report	March 30, 2016 (60 days after quarter-end for other than year-end filing)
Annual Report (financial statements for registered or 4.7 pools)	Within 90 days of the pool's fiscal year-end
CPO Annual Registration Update to Forms 7-R and 8-R	Prior to anniversary of registration
Self-Examination Checklist	Prior to anniversary of registration
NFA By-law 1101	Recommendation of annual verification

Tax and Treasury Filings

TIC B Forms	Monthly report (December 2015) – by January 15, 2016; Quarterly report (December 31, 2015) – by January 20, 2016
TIC Form SLT	January 23, 2016 (for December 2015)
TIC Form SHCA	March 4, 2016
FBAR Form FinCEN Report 114 (for persons having a financial interest in or signature authority over a foreign financial account exceeding certain thresholds, unless otherwise deferred pursuant to FinCEN Notices 2015-1, 2014-1, 2013-1, 2012-2, 2012-1, 2011-2 and 2011-1)	June 30, 2016

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