



2023 Annual Compliance Obligation Reminders

Product	Price	2017	2018	Total
RICE	120	1200	1320	2520
PORK	100	650	750	1400
CORN	85	850	900	1750
PEANUT	150	300	600	900
CHICKEN	100	2000	2500	4500
COCONUT	150	600	700	1300
MANGO	70	700	840	1540

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Investment advisers registered with the U.S. Securities and Exchange Commission (“SEC”) or with a state 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 SEC-registered advisers should be aware. This summary should not be considered an exhaustive list of an SEC-registered adviser’s obligations under the broader federal securities laws, tax laws or applicable state, local or foreign laws. Obligations for state-registered advisers may vary from SEC obligations and clients should feel free to contact us for more information.

List of annual compliance deadlines for SEC-registered advisers

Form 13F (for December 31, 2022 quarter-end)	February 14, 2023, quarterly
Form 13H (large trader) annual filing for advisers with existing 13H filing obligation	February 14, 2023
Schedule 13G annual amendment	February 14, 2023 ¹
SEC registered advisers and Exempt Reporting Advisers pay IARD fee	Before submission of Form ADV
Annual Form ADV update	Within 90 days of adviser’s fiscal year end (March 31, 2023 for most advisers)
Delivery of Part 2A of Form ADV or summary of material changes and offer to provide a copy (Brochure)	Within 120 days of adviser’s fiscal year end (April 30, 2023 for most advisers)
Review of Compliance Policies and Procedures	At least annually

¹ Schedule 13G deadlines depend on the type of adviser and may occur throughout the year as thresholds are met.

Obligations for Private Fund Advisers

Form PF filers pay IARD fee	Before submission of Form PF
Form PF for large liquidity fund advisers (for December 31, 2022 quarter-end)	January 15, 2023, quarterly
Form PF for large hedge fund advisers (for December 31, 2022 quarter-end)	March 1, 2023, quarterly
Form PF for smaller private fund advisers and large private equity fund advisers (December 31 fiscal year-end)	April 30, 2023
Delivery of private fund audited financial statements (for December 31, 2022 year-end)	April 30, 2023 (fund of funds by June 29, 2023)
Form D annual amendments	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, 2022 year-end)	February 14, 2023
Affirm CTA exemption (4.14(a)(8))	March 1, 2023
CTA Annual Registration Update to Forms 7-R and 8-R	Prior to anniversary of registration
Annual Questionnaire, NFA Membership Dues and Self-Examination Questionnaire	Prior to anniversary of registration

Obligations for CPOs

Affirm CPO exemptions (4.5 and 4.13)	March 1, 2023
Form CPO-PQR December 31 quarter-end report	March 1, 2023, quarterly
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
Annual Questionnaire, NFA Membership Dues and Self-Examination Questionnaire	Prior to anniversary of registration
NFA By-law 1101	Recommendation of annual verification

Tax, Treasury and Other Filings

TIC B Forms	Monthly report (January 2023) – by February 15, 2023 Quarterly report (March 31, 2023) – by April 20, 2023
TIC Form SLT	Within 23 calendar days of report as-of date (February 23, 2023 for January 2023 report)
TIC Form SHCA (Report data as of December 31 no later than the first Friday of March)	March 3, 2023
TIC Form SHC (Report data as of December 31 no later than the first Friday of March)	March 3, 2023
FATCA information reports filing for 2022 by participants	March 31, 2023
FinCEN Form 114 (FBAR) (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)	April 15, 2023
Form BE-13 Surveys	Annual follow-on filings

¹If due date of report falls on a weekend or holiday, TIC Form SLT report should be submitted the following business day.

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