

2020 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	2500	2800
CHICKEN	100	600	840	1440
COCONUT	150	700	770	1470
MANGO	70	8000	7000	15000

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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, 2019 quarter-end)	February 14, 2020
Form 13H (large trader) annual filing for advisers with existing 13H filing obligation	February 14, 2020
Schedule 13G annual amendment	February 14, 2020 ¹
SEC registered advisers 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)	Within 90 days of adviser's fiscal year end (Monday , March 30, 2020 for December 31 fiscal year-end)
Delivery of Part 2A of Form ADV or summary of material changes (Brochure)	April 29, 2020
Form CRS	June 30, 2020
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 hedge fund advisers (for December 31, 2019 quarter-end)	February 29, 2020
Form PF for smaller private fund advisers and large private equity fund advisers (December 31, 2019 fiscal year-end)	April 29, 2020
Delivery of private fund audited financial statements (for December 31, 2019 year-end)	April 29, 2020 (fund of funds by June 28, 2020)
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, 2019 year-end)	February 14, 2020
Affirm CTA exemption (4.14(a)(8))	March 2, 2020
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 2, 2020
Registered Large CPO Form CPO-PQR December 31, 2019 quarter-end report	March 2, 2020
Registered Mid-Size and Small CPO Form CPO-PQR year-end report	March 30, 2020 (90 days after quarter-end for other than year-end filings) ² .

² NFA's electronic filing systems presume that all CPOs qualify as Large CPOs. To obtain the March 30, 2020 filing deadline applicable to Mid-Sized and Small CPOs, qualified CPOs must log on to the NFA systems and affirmatively select the appropriate AUM in the dropdown menu on the Cover Page of Form CPO-PQR. Mid-Sized and Small CPOs that fail to make this selection by March 2, 2020 will incur a \$200/business day fine. Mid-Sized and Small CPOs that file Form CPO-PQR by March 2, 2020 do not need to make this selection. See FAQ “In reviewing my December 31 Form PQR, I noticed it is due within 60 days, I thought that small and mid-sized CPOs have 90 days to complete the filing” <https://www.nfa.futures.org/faqs/members/CPOFormPQR.html>

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 2020) – by February 15, 2020 Quarterly report (March 31, 2020) – by April 20, 2020
TIC Form SLT	Within 23 calendar days of report as-of date ³ . (February 24, 2020 for January 2020 report)
TIC Form SHCA (Report data as of December 31 no later than the first Friday of March)	March 6, 2020
TIC Form SHC (Report data as of December 31 no later than the first Friday of March)	March 6, 2020
FATCA information reports filing for 2019 by participants	March 31, 2020
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)	April 15, 2020
Form BE-13 Surveys (BE-13A, BE-13B, BE-13C, BE-13D and BE-13E) New Foreign Direct Investment Surveys	Annual follow-on filings

³ If 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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