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As a reminder critical SEC and NFA deadlines are quickly approaching, including significant audited financial statement distribution requirements at the end of March and April.

For a robust list of filings for the First Quarter of 2019, please click this link.

REGULATORY NOTICE 19-04

REMINDER OF SIGNIFICANT DEADLINES QUICKLY APPROACHING

Investment Advisers, Alternative Investment Funds, Alternative Investment Fund Managers

❖ **March 15, 2019**

- Blue Sky Filings
- **Appoint Partnership Representative (New IRS Rule)**

❖ **March 29, 2019¹**

- Form ADV Annual Amendment (Fiscal Year Ending 12/31)
- Form MA
- FATCA Reports

❖ **April 30, 2019**

- Distribute Audited Financial Statements to Fund investors (Fiscal Year Ending 12/31)

Commodity Pool Operators and Commodity Trading Advisers

❖ **March 15, 2019**

- **Appoint Partnership Representative (New IRS Rule)**

❖ **March 29, 2019²**

- February Monthly Account Statements (CPO with NAV over \$500,000) – delivered to pool participants
- PQR (CPOs AUM < \$1.5 Billion)

❖ **April 1, 2019**

- Distribute Audited Financial Statements to Pool Participants (Fiscal Year Ending 12/31)

TAKE ACTION!

Clients Should:

- Appoint Partnership Representative.
- Fund IARD account for annual ADV amendment and Form PF (if applicable).
- Determine whether RAUM triggers Form PF filing requirement (\$150 million and up).

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¹ For deadlines that fall on a weekend or holiday, Constellation recommends submitting the filings early even though it may be permissible to submit the filings or comply with the regulatory requirement on the next business day.

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