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PREPARING TO BE A COMMODITY POOL OPERATOR: NFA COMPLIANCE OBLIGATIONS

The CFTC has adopted sweeping regulatory changes that will compel more operators of private and registered funds to register as commodity pool operators and become members of the National Futures Association. As members, CPOs must make sure that their investors and counterparties in commodity interest transactions are appropriately registered or exempt. There are also advertising rules, ethics training requirements, supervisory procedures, and annual and quarterly reporting obligations.

By Cary J. Meer and Kathy K. Ingber *

Last year, the Commodity Futures Trading Commission adopted sweeping changes to its regulations exempting and excluding operators of private and registered funds from regulation as commodity pool operators ("CPOs"). The CFTC rescinded the exemption from CPO registration under Regulation 4.13(a)(4) for operators of private funds that limit investors to highly sophisticated investors.¹ The CFTC also amended Regulation 4.5 to significantly narrow the exclusion for operators of registered funds.² As a result, fund operators have had to consider whether they must register as CPOs or if they

can rely on the exemption in Regulation 4.13(a)(3) for private funds or the amended exclusion in Regulation 4.5 for registered funds. In light of these regulatory changes, operators of private and registered funds that are no longer exempt or excluded from regulation as CPOs must have registered with the CFTC and become members of the National Futures Association ("NFA") by January 1, 2013.³

¹ *Commodity Pool Operators and Commodity Trading Advisors, Compliance Obligations*, 77 Fed. Reg. 11252 (February 24, 2012); correction notice published at 77 Fed. Reg. 17328 (March 26, 2012) ("Amendment Release").

² *Id.*

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³ In CFTC Letter No. 12-68 (December 21, 2012), the CFTC's Division of Swap Dealer and Intermediary Oversight stated that it would not recommend enforcement action against CPOs, commodity trading advisors ("CTAs"), and the principals and associated persons ("APs") of CPOs and CTAs who are required to register as a result of the amendment to Regulation 4.5 or the rescission of Regulation 4.13(a)(4), for engaging in activities as

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Guide To Becoming A Commodity Pool Operator

Shasha Hu



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