

October 31, 2022

Via Electronic Mail

**SUBMITTED PURSUANT TO
COMMISSION RULE 140.99**

Amanda L. Olear, Esq.
Director
U.S. Commodity Futures Trading Commission
Market Participants Division
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581
aolear@cftc.gov

**RE: Exemptive Relief Request Concerning Quarterly Account Statements
Required by CFTC Rule 4.7(b)(3)**

Dear Ms. Olear,

We are writing on behalf of Citi Global Alternatives, LLC (NFA ID# 0551098) (“CGA”) and European Investment Management Services, Inc. (NFA ID# 0440498) (“EIMS”) (together, the “Registrants”), each of which is registered with the Commission as a commodity pool operator (“CPO”). The Registrants are not affiliates.

The Registrants serve as co-CPOs of private funds operated pursuant to CFTC Rules 4.7 (each, a “4.7 pool”) and 4.13(a)(3). CGA also serves as sole CPO to various 4.7 pools. Certain of these 4.7 pools operated by the Registrants are “funds of funds”¹ (each, a “4.7 FoF”), and each such 4.7 FoF operated by the Registrants is listed on Appendix A.²

¹ A fund of funds is a commodity pool that invests in one or more other collective investment vehicles that are not operated by the fund of fund’s CPO (“investee funds”). These investments may be in a number of investee funds, such as other commodity pools, securities trading vehicles and/or hedge funds, both domestic and offshore. *See CFTC Proposed Rule: Extension of Time to File Annual Reports for Commodity Pools*, 65 Fed. Reg. 66663 (Nov. 7, 2000).

² The Registrants may operate additional 4.7 FoFs in the future. CGA also serves as sole CPO of certain other 4.7 pools which are not the subject of this request for relief.

Citi Global Alternatives, LLC is located at 388 Greenwich Street, Floor 29, New York, New York 10013 and has been registered with the CFTC as a CPO and a CTA since September 29, 2022.

European Investment Management Services, Inc. is located at 11661 San Vicente Blvd., Suite 220, Los Angeles, California 90049 and has been registered with the CFTC as a CPO since May 31, 2013.

Background

Prior Relief

From September 2013 through March 2021, Citi Private Advisory, LLC (NFA ID# 0423752) (“CPA”) and AMACAR CPO, Inc. (NFA ID# 0307487) (“AMACAR” and together with CPA, the “Initial Registrants”) together served as co-CPOs to several 4.7 FoFs, including certain of the pools listed on Appendix A. The Initial Registrants submitted to the Market Participants Division’s (“MPD”) predecessor, the Division of Swap Dealer and Intermediary Oversight (“DSIO”), a series of requests for exemptive relief from the Rule 4.7(b)(3) requirement to distribute periodic account statements *within 30 days of the end of each quarter* with respect to each such 4.7 FoF, conditioned upon distribution of a Rule 4.7 compliant account statement to each 4.7 FoF investor *within 45 days of the end of each month* (collectively, the “Prior Request Letters”).³ The Staff granted the requested exemptive relief pursuant to letters issued by DSIO to the Initial Registrants (collectively, the “Prior Relief Letters”).

Subsequently, on July 10, 2020, the Initial Registrants submitted a “Letter of Understanding” to DSIO acknowledging the initiative by DSIO to minimize the overall number of regulatory relief letters issued by DSIO.⁴ The Letter of Understanding memorialized our prior discussions with representatives of DSIO that any similarly situated 4.7 FoF operated in the future by the Initial Registrants (or CPA alone) may, subject to the conditions outlined by the Prior Request Letters, be considered within the scope of the Prior Relief Letters, even if the Initial Registrants had not

³ Certain of the Prior Request Letters and Prior Relief Letters referred to herein discussed relief under Rule 4.7(b)(2). Due to amendments to Rule 4.7, as of January 9, 2020 the periodic reporting requirements are contained in CFTC 4.7(b)(3), rather than 4.7(b)(2). *See* Registration and Compliance Requirements for Commodity Pool Operators (CPOs) and Commodity Trading Advisors: Family Offices and Exempt CPOs, 84 Fed. Reg. 67355 at 67368 (December 10, 2019).

⁴ *See* Joshua B. Sterling, Esq., Director of the Division of Swap Dealer and Intermediary Oversight, Commodity Futures Trading Comm’n, New Day Rising: Focusing the Division of Swap Dealer and Intermediary Oversight to Embrace Today’s Challenges and Tomorrow’s Opportunities (Sept. 25, 2019) (transcript available at <https://www.cftc.gov/PressRoom/SpeechesTestimony/opasterling1>) (noting that DSIO expects to “reduce [DSIO’s] use of letter relief for specific parties”); *See also* Joshua B. Sterling, Esq., Director of the Division of Swap Dealer and Intermediary Oversight, Commodity Futures Trading Comm’n, What’s Going On: Our Division’s Measured Approach to Key Derivatives Market Issues for Bank-Affiliated CFTC Registrants (Sept. 26, 2019) (transcript available at <https://www.cftc.gov/PressRoom/SpeechesTestimony/opasterling2>) (noting “an expected reduction in [DSIO’s] issuance of one-off letter relief, as a matter of good government and regulatory economy”).

sought additional exemptive relief with respect to such future pools. Thus, the Initial Registrants understood that they generally were no longer expected or required to seek additional exemptive relief in order to rely on the Prior Relief Letters.

CPO Changes

Effective March 31, 2021, AMACAR withdrew as managing member and resigned as co-CPO of the 4.7 FoFs operated by the Initial Registrants pursuant to the Prior Relief Letters. Following such resignation, CPA entered into a co-CPO agreement with EIMS (together with the resignation of AMACAR, the “Initial CPO Change”), the terms of which were substantially the same as those of the terminated co-CPO agreement that had been in place between CPA and AMACAR (the “Co-CPO Terms”). Pursuant to its co-CPO agreement with EIMS, CPA continued to fulfill its role as the CPO responsible, with respect to the 4.7 FoFs, for ensuring compliance by the co-CPOs with all disclosure, reporting and recordkeeping obligations, as well as any other duties required of a CPO under the Commodity Exchange Act (the “CEA”) and CFTC regulations (the “CPO Duties”).

Subsequently, effective September 30, 2022, CGA replaced CPA as investment manager and CPO or co-CPO (as applicable) of the 4.7 FoFs listed on Appendix A.⁵ In connection therewith, CGA assumed the CPO Duties with respect to the 4.7 FoFs and entered into a co-CPO agreement with EIMS (the “Second CPO Change” and together with the Initial CPO Change, the “CPO Changes”) on terms substantially similar to the Co-CPO Terms included in the terminated co-CPO agreement that had been in place between CPA and EIMS. Thus, aside from (x) CGA replacing CPA as CPO or co-CPO (as applicable) and (y) EIMS replacing AMACAR as a co-CPO (with respect to certain of the 4.7 FoFs listed on Appendix A), the CPO and co-CPO arrangements have remained unchanged since the Prior Relief Letters.

We understand from our correspondence with MPD staff that, as a result of the CPO Changes, the Registrants should file a new request for relief. The relief sought by the Registrants herein largely mirrors that of the Prior Request Letters, and pertains to the updated list of 4.7 FoFs listed on Appendix A (as well as future similarly situated 4.7 FoFs co-operated by the Registrants or operated by CGA alone (“Future 4.7 FoFs”)).

Requested Relief

In light of the above, on behalf of CGA and EIMS (where applicable), we are requesting relief which parallels that granted to the Initial Registrants pursuant to the Prior Relief Letters. Assuming the Registrants (or CGA alone, as applicable) continue to serve as the registered CPOs of the 4.7 FoFs listed on Appendix A, we request that the Staff provide to the Registrants exemptive relief from the requirement in Rule 4.7(b)(3) that quarterly account statements be distributed to pool participants within 30 days of each quarter end, provided that the Registrants:

⁵ CPA and CGA are under common control.

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- a. distribute to investors within 45 calendar days after the end of each month an account statement that includes all of the information required to be included in a Rule 4.7(b)(3) quarterly account statement and that is signed and affirmed in accordance with CFTC Rule 4.22(h);
- b. inform current and prospective investors in their 4.7 FoFs that account statements will be distributed within 45 calendar days after the end of the period to which they relate; and
- c. comply with all other applicable reporting requirements.

Assuming such conditions are satisfied, the Registrants request that: (x) such relief be granted with respect to each 4.7 FoF listed on Appendix A and (y) with respect to any Future 4.7 FoF, such relief be granted so long as the Registrants (or CGA alone, as applicable) timely file a Rule 4.7 exemption on NFA's BASIC System and promptly inform the Director of MPD of the name and NFA ID number of such Future 4.7 FoF requiring relief, via submission to mpdnoaction@cftc.gov. A notice claiming the Rule 4.22(f)(2) 90-day extension for filing and distributing a FoF annual report will also be filed for each such 4.7 FoF.

If you need any additional information regarding this letter, or if we may otherwise be of assistance in this matter, please do not hesitate to call me at (212) 728-8727 or Steven C. Matos of my office at (212) 728-8757.

Very truly yours,



Rita M. Molesworth

cc: Michael D. Stein, *Citi Global Alternatives, LLC*
Trudi Gilligan, Esq., *Citi Global Alternatives, LLC*
Samuel Cahn, Esq., *Citi Global Alternatives, LLC*
Julie A. Gilbert, Esq., *European Investment Management Services, Inc.*
Steven C. Matos, Esq., *Willkie Farr & Gallagher LLP*

CERTIFICATION AND UNDERTAKING
OF
CITI GLOBAL ALTERNATIVES, LLC

I hereby certify that the material facts regarding Citi Global Alternatives, LLC set forth in the foregoing letter dated October 31, 2022, are true and complete to the best of my knowledge. Further, I undertake that if at any time prior to issuance of a letter by the Commodity Futures Trading Commission (“Commission”), any material representation of Citi Global Alternatives, LLC made in the request ceases to be true and complete, I will ensure that the Commission staff is informed promptly in writing of all materially changed facts and circumstances. If a material change in facts or circumstances regarding Citi Global Alternatives, LLC occurs subsequent to issuance of a letter by the Commission, I will promptly so inform the Commission staff.



Signature

Director

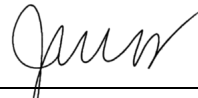
Title

Michael D. Stein

Print Name

CERTIFICATION AND UNDERTAKING
OF
EUROPEAN INVESTMENT MANAGEMENT SERVICES, INC.

I hereby certify that the material facts regarding European Investment Management Services, Inc. set forth in the foregoing letter dated October 31, 2022, are true and complete to the best of my knowledge. Further, I undertake that if at any time prior to issuance of a letter by the Commodity Futures Trading Commission (“Commission”), any material representation of European Investment Management Services, Inc., made in the request ceases to be true and complete, I will ensure that the Commission staff is informed promptly in writing of all materially changed facts and circumstances. If a material change in facts or circumstances regarding European Investment Management Services, Inc. occurs subsequent to issuance of a letter by the Commission, I will promptly so inform the Commission staff.



Signature

President

Title

Julie A. Gilbert

Print Name

Appendix A

POOLS OPERATED BY CGA AND EIMS AS CO-CPOs

4.7 FoF Name	NFA ID	Exemption
HedgeForum Portfolios LLC – HF Activist Series	P112611	4.7
HedgeForum Portfolios LLC – HF Core Series	P061687	4.7
HedgeForum Portfolios LLC – HF Diversifiers Series	P114958	4.7
HedgeForum Renaissance Equities, LLC	P077513	4.7

POOLS OPERATED SOLELY BY CGA

4.7 FoF Name	NFA ID	Exemption
HedgeForum Portfolios S.A. – HF Activist	P112610	4.7
HedgeForum Portfolios S.A. – HF Core	P057940	4.7
HedgeForum Portfolios S.A. – HF Diversifiers	P115248	4.7
HedgeForum Portfolios S.A. – HF Dedicated 4	P171491	4.7
HedgeForum Portfolios S.A. – HF Fundamental Trading	P127364	4.7
HedgeForum Renaissance Equities, Ltd.	P078974	4.7
HedgeForum Millennium, Ltd.	P148332	4.7
HedgeForum Caxton, Ltd.	P051691	4.7