



# COMPLIANCE WEEKLY

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SKRC Compliance Weekly is a weekly reminder of certain regulatory obligations that may apply to an SEC-registered investment adviser and CFTC-registered commodity pool operator and commodity trading advisor with a December 31 fiscal year-end that advises one or more private funds.

Obligation	Comment
Quarterly Form 13H Amendment (due 4/10/2019).	For first quarter 2019. Securities Exchange Act Rule 13h-1 requires a “large trader” to identify itself to the SEC and promptly make certain disclosures to the SEC on Form 13H. Following an initial filing of Form 13H, all large traders must make an amended filing to correct inaccurate information in the form promptly (within 10 days) following the quarter-end in which the information became inaccurate.
TIC Form S (due 4/15/2019).	For March 2019. Must be filed by “US resident entities” that, during a reporting month, transacted (i.e., purchases or sales) with foreign persons in “long term securities” in excess of \$350 million.
TIC Form SLT (due 4/22/2019).	For March 2019. Must be filed by “US residents” on a monthly basis to report “long term cross border ownership” of securities in excess of \$1 billion.

If you have any questions regarding the matters covered herein, please contact any of the attorneys listed below.

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