



# COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

FEBRUARY 12, 2019

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
Form 13F (due 2/14/2019).	Securities Exchange Act Rule 13f-1 requires every institutional investment adviser that exercises investment discretion over accounts holding “Section 13(f) securities” with an aggregate fair market value on the last trading day of any month of any calendar year of at least \$100 million to file Form 13F within 45 days after the last day of such calendar year and within 45 days after the last day of each of the first three calendar quarters of the subsequent calendar year.
Form 13H (due 2/14/2019).	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 annual filing within 45 days after the end of each full calendar year (unless they are on Inactive Status or have filed a “Joint Annual and Amended (4th Quarter) Filing” for the prior fourth quarter).
Schedule 13G and any amendments (due 2/14/2019)	<p>Securities Exchange Act Rule 13d-2 requires amendments to previously filed Schedule 13Gs within 45 days after calendar year-end if there are changes as of the end of the calendar year in the reported information (other than those caused by a change in an issuer’s securities outstanding).</p> <p>Securities Exchange Act Rule 13d-1(d) requires any person who, as of the end of any calendar year, is or becomes directly or indirectly the beneficial owner of more than 5% of publicly traded equity and who is not otherwise required to file Schedule 13D, to file a Schedule 13G within 45 days after the end of the calendar year (for example, when the relevant shares were acquired prior to registration and certain other considerations are met).</p>
Form CTA-PR (due 2/14/2019).	For 2018. Registered commodity trading advisors (CTAs) must file Form CTA-PR within 45 days of the calendar year end.
TIC Form S (due 2/15/2019).	For January 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 2/25/2019).	For January 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.



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