



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

MAY 1, 2018

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 5/15/2018).	For first quarter 2018. 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.
BE-185 (due 5/15/2018).	For first quarter 2018. Report on "international financial service payments" that must be filed on a quarterly basis by entities that are contacted by the Bureau of Economic Analysis.
TIC Form S (due 5/15/2018).	For April 2018. 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.
Form CTA-PR (due 5/15/2018).	For first quarter 2018. Registered commodity trading advisors (CTAs) must file Form CTA-PR.

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

Debra Franzese 212-574-1353 franzese@sewkis.com	Maureen R. Hurley 212-574-1384 hurley@sewkis.com	Paul M. Miller 202-737-8833 millerp@sewkis.com	Joseph M. Morrissey 212-574-1245 morrissey@sewkis.com	David R. Mulle 212-574-1452 mulle@sewkis.com
Steven B. Nadel 212-574-1231 nadel@sewkis.com	Marlon Q. Paz 202-661-7178 paz@sewkis.com	Patricia A. Poglinco 212-574-1247 poglinco@sewkis.com	Christopher C. Riccardi 212-574-1535 riccardi@sewkis.com	Robert Van Grover 212-574-1205 vangrover@sewkis.com
Robert L. Chender 212-574-1415 chender@sewkis.com	Keri E. Riemer 212-574-1598 riemer@sewkis.com	David Tang 212-574-1260 tang@sewkis.com		

Seward & Kissel Regulatory Compliance (SKRC) is a service provided by Seward & Kissel LLP.

SKRC offers [Compliance Services](#) as well as an [Online Compliance Subscription Service](#).

The information contained herein is for informational purposes only and is not intended and should not be considered to be legal advice on any subject matter. As such, recipients of this information, whether clients or otherwise, should not act or refrain from acting on the basis of any information included in this report without seeking appropriate legal or other professional advice. This information is presented without any warranty or representation as to its accuracy or completeness, or whether it reflects the most current legal developments. This information may be considered attorney advertising. Prior results do not guarantee a similar outcome.

