



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

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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
Form 13F (due 5/15/2019).	For first quarter 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.
BE-185 (due 5/15/2019).	For first quarter 2019. 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 5/15/2019).	For April 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.
Form CTA-PR (due 5/15/2019)	For first quarter 2019. Registered CTAs must file a quarterly Form CTA-PR within 45 days of the quarter end.

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

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