



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

NOVEMBER 13, 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 11/14/2018).	For third 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 11/14/2018).	For third 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.
Form CTA-PR (due 11/14/2018).	For third quarter 2018. Registered commodity trading advisors (CTAs) must file Form CTA-PR.
TIC Form S (due 11/15/2018).	For October 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.
TIC Form SLT (due 11/23/2018).	For October 2018. Must be filed by "US residents" on a monthly basis to report "long term cross border ownership" of securities in excess of \$1 billion.



One Battery Park Plaza | New York, NY 10004
212-574-1200 | 212-480-8421 (fax) | sknyc@sewkis.com

901 K Street, NW | Washington, DC 20001
202-737-8833 | 202-737-5184 (fax) | skdc@sewkis.com

www.compliance.sewkis.com

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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

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