



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

OCTOBER 30, 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
Quarterly Transaction Reports (due 10/30/2018).	For third quarter 2018. Investment Advisers Act Rule 204A-1 requires "access persons" of a registered adviser to submit a transaction report to the chief compliance officer covering all transactions during the previous quarter no later than 30 days after the end of each calendar quarter.
Periodic Report for CPOs (due 10/30/2018).	Commodity pool operators (CPOs) are required to distribute a periodic report of their account statements within 30 calendar days of each month end. CPOs relying on an exemption under CFTC Rule 4.7 or Rule 4.12(b) are required to distribute a periodic report within 30 days of each quarter end.
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.



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