



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

AUGUST 10, 2021

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
BE-185 (due 8/15/2021).	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 13F (due 8/16/2021).	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. The list of Section 13(f) securities is available at sec.gov .
Form CTA-PR (due 8/16/2021).	Registered CTAs must file a quarterly Form CTA-PR within 45 days of the quarter end.
TIC Form S (due 8/16/2021).	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 S is due no later than 15 calendar days following the last business day of the month. If the due date of the report falls on a weekend or holiday, Form S is due the following business day.

Please note that certain regulatory obligations may be subject to regulatory relief or extension due to circumstances related to COVID-19. Please visit [Seward & Kissel's COVID-19 Resource Center](#) for more information.



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

<https://compliance.sewkis.com/>

© 2021 – present. Seward & Kissel LLP. All rights reserved.



AUGUST 10, 2021

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

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

Kevin Neubauer

212-574-1355
neubauer@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

Daniel Bresler

212-574-1203
bresler@sewkis.com

Robert L. Chender

212-574-1415
chender@sewkis.com

David Tang

212-574-1260
tang@sewkis.com

Valentino Vasi

212-574-1281
vasi@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 Portal](#).

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.



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

<https://compliance.sewkis.com/>

© 2021 – present. Seward & Kissel LLP. All rights reserved.