



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

OCTOBER 12, 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
Quarterly Form 13H Amendment (due 10/12/2021).	Exchange Act Rule 13h-1 requires a "large trader" to identify itself to the SEC and promptly make certain disclosures to the SEC on Form 13H. Following an initial filing of Form 13H, all large traders must make an amended filing to correct inaccurate information promptly (within 10 days) following the quarter-end in which the information became inaccurate.
TIC Form S (due 10/15/2021).	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.
TIC Form SLT (due 10/25/2021).	Must be filed by "US residents" on a monthly basis to report "long term cross border ownership" of securities in excess of \$1 billion. TIC Form SLT must be submitted to the Federal Reserve Bank no later than 23 calendar days following the last business day of the month. If the due date of the report falls on a weekend or holiday, TIC Form SLT should be submitted the following business day.

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

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