

## **DECEMBER 12, 2023**

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
TIC Form SLT (due 12/26/2023).	Must be filed by "US residents" on a monthly basis to report "long term cross border ownership" of securities in excess of \$1 billion. Data on the TIC Form SLT must be reported as of the last business day of the month (as-of date). The TIC Form SLT must be submitted to the Federal Reserve Bank no later than the 23rd calendar day of the month following the report as-of date. 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.

Daniel G. Viola, Head of SKRC viola@sewkis.com (212) 574-1457

Daniel Bresler bresler@sewkis.com	Debra Franzese franzese@sewkis.com	Robert M. Kurucza kurucza@sewkis.com	Nicholas R. Miller millern@sewkis.com
212-574-1203	212-574-1353	(202) 661-7195	212-574-1359
Paul M. Miller	Joseph M. Morrissey	David R. Mulle	Steven B. Nadel
millerp@sewkis.com	morrissey@sewkis.com	mulle@sewkis.com	nadel@sewkis.com
202-737-8833	212-574-1245	212-574-1452	212-574-1231
Kevin Neubauer	Patricia A. Poglinco	Christopher C. Riccardi	Robert Van Grover
neubauer@sewkis.com	poglinco@sewkis.com	riccardi@sewkis.com	vangrover@sewkis.com
212-574-1355	212-574-1247	212-574-1535	212-574-1205
Alexandra Alberstadt	Jay Baroody	Kevin Cassidy	Lancelot A. King
alberstadt@sewkis.com	baroody@sewkis.com	cassidy@sewkis.com	king@sewkis.com
212-574-1217	212-574-1347	(212) 574-1542	(202) 661-7196

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) | <u>skdc@sewkis.com</u>