

COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

AUGUST 13, 2024

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 CTA-PR (due 8/14/2024). | Registered CTAs must file a quarterly Form CTA-PR within 45 days of the quarter end. |
| Form 13F (due 8/14/2024). | 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 . |
| TIC Form SLT (due 8/23/2024). | 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 immediately preceding 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. |
| Form N-PX (for the period 7/1/2023 to 6/30/2024) due 8/31/2024. | "Institutional investment managers", subject to the reporting requirements of Section 13(f) of the Exchange Act, must annually report on Form N-PX how they voted proxies relating to executive compensation (or "say-on-pay") matters no later than August 31 of each year. |



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