



# COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

AUGUST 20, 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
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.
Quarterly update to Form PF for all “large hedge fund advisers” (due 8/29/2024).	Form PF requires a “large hedge fund adviser” to file a quarterly update within 60 calendar days after the end of its first, second and third fiscal quarters that updates the answers to items in Form PF relating to the “hedge funds” that it advises.
Form PQR (due 8/29/2024).	Registered CPOs that operate pools for which they have reporting obligations under Part 4 of the CFTC’s regulations must file pool quarterly reports (Form PQR) within 60 days following each quarter.
Periodic Report for CPOs (due 8/30/2024).	CPOs are required to distribute a periodic report of their account statements within 30 calendar days of each month end. Note, however, that CPOs relying on an exemption under CFTC Rule 4.7 or Rule 4.12(b) are only required to distribute a periodic report of their account statements within 30 days of each quarter end.
TIC Form SHL (due 8/30/2024).	TIC Form SHL requires reporting of foreign residents’ holdings of U.S. securities by: (i) U.S.-resident issuers and U.S.-resident custodians that meet the reporting threshold for TIC Form SHL as of the last business day of June; and (ii) U.S. entities that have been contacted by the Federal Reserve Bank of New York to file on TIC Form SHL, regardless of whether such U.S. entities meet the reporting threshold for TIC Form SHL as of the last business day of June.
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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