



COMPLIANCE WEEKLY

A Publication of Seward & Kissel Regulatory Compliance

NOVEMBER 12, 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 11/14/2024).	Registered CTAs must file a quarterly Form CTA-PR within 45 days of the quarter end.
Form 13F (due 11/14/2024).	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 .
Schedule 13G and any amendments (due 11/14/2024).	<p>Section 13(d) of the Exchange Act generally requires beneficial owners of more than 5% of publicly traded equity securities to file a Schedule 13D. Exchange Act Rule 13d-1(b) allows beneficial owners who meet certain institutional investor criteria and who do not have the purpose or effect of changing or influencing control of the Issuer, to file Schedule 13G within 45 days after the end of the calendar quarter in lieu of a Schedule 13D. If a beneficial owner's ownership exceeds 10% of publicly traded equity, the initial Schedule 13G must be filed within 5 business days after the last day of the calendar month in which ownership exceeded 10%.</p> <p>Exchange Act Rule 13d-2 requires amendments to previously filed Schedule 13Gs within 45 days after calendar quarter-end if there are material changes as of the end of the calendar quarter in the reported information (other than those caused by a change in an issuer's securities outstanding).</p> <p>Exchange Act Rule 13d-1(d) requires any person who, as of the end of any calendar quarter, is or becomes directly or indirectly the beneficial owner of more than 5% of publicly traded equity and who is not otherwise required to file Schedule 13D to file a Schedule 13G within 45 days after the end of the calendar quarter (for example, when the relevant shares were acquired prior to registration and certain other conditions are met).</p>
TIC Form SLT (due 11/25/2024).	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.



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 | 212-480-8421 (fax) | skdc@sewkis.com

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

© 2024 – present. Seward & Kissel LLP. All rights reserved.



NOVEMBER 12, 2024

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

Jay Baroody
baroody@sewkis.com
212-574-1347

Robert M. Kurucza
kurucza@sewkis.com
202-661-7195

Steven B. Nadel
nadel@sewkis.com
212-574-1231

Alexandra Alberstadt
alberstadt@sewkis.com
212-574-1217

Daniel Bresler
bresler@sewkis.com
212-574-1203

Nicholas R. Miller
millern@sewkis.com
212-574-1359

Kevin Neubauer
neubauer@sewkis.com
212-574-1355

Lancelot A. King
king@sewkis.com
202-661-7196

Kevin Cassidy
cassidy@sewkis.com
212-574-1542

Paul M. Miller
millerp@sewkis.com
202-661-7155

Patricia A. Poglinco
poglinco@sewkis.com
212-574-1247

Kris Swiatek
swiatek@sewkis.com
212-574-1670

Debra Franzese
franzese@sewkis.com
212-574-1353

Joseph M. Morrissey
morrissey@sewkis.com
212-574-1245

Christopher C. Riccardi
riccardi@sewkis.com
212-574-1535

Noelle Indelicato
indelicato@sewkis.com
212-574-1643

David R. Mulle
mulle@sewkis.com
212-574-1452

Robert B. Van Grover
vangrover@sewkis.com
212-574-1205

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 | 212-480-8421 (fax) | skdc@sewkis.com

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

© 2024 – present. Seward & Kissel LLP. All rights reserved.