



# SKRC

## COMPLIANCE WEEKLY

A publication of Seward & Kissel Regulatory Compliance

**December 31, 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
Quarterly Form 13H Amendment due 1/10/2025	<p>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 this initial filing of Form 13H, all large traders must make an amended filing to correct inaccurate information in the form promptly (within 10 days) following the quarter-end in which the information became inaccurate.</p> <p>A large trader is defined as any person that directly or indirectly exercises investment discretion over transactions in listed US equity securities and listed options in an aggregate amount equal to or greater than (A) during a calendar day, either two million shares or shares with a fair market value of \$20 million; or (B) during a calendar month, either twenty million shares or shares with a fair market value of \$200 million.</p> <p>A large trader that is required to submit a quarterly Form 13H amendment for the fourth quarter may instead submit a “Joint Annual and Amended (4th Quarter) 13H Filing.” Doing so will additionally satisfy the requirement to file an annual Form 13H amendment within 45 days of year end.</p>
TIC Form SLT due 1/23/2025	<p>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.</p>



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

**Alexandra Alberstadt**

alberstadt@sewkis.com  
212-574-1217

**Robert M. Kurucza**

kurucza@sewkis.com  
202-661-7195

**Kevin Neubauer**

neubauer@sewkis.com  
212-574-1355

**Jay Baroody**

baroody@sewkis.com  
212-574-1347

**Nicholas R. Miller**

millern@sewkis.com  
212-574-1359

**Patricia A. Poglinco**

poglinco@sewkis.com  
212-574-1247

**Daniel Bresler**

bresler@sewkis.com  
212-574-1203

**Paul M. Miller**

millerp@sewkis.com  
202-661-7155

**Christopher C. Riccardi**

riccardi@sewkis.com  
212-574-1535

**Kevin Cassidy**

cassidy@sewkis.com  
212-574-1542

**Joseph M. Morrissey**

morrissey@sewkis.com  
212-574-1245

**Kris Swiatek**

swiatek@sewkis.com  
212-574-1670

**Debra Franzese**

franzese@sewkis.com  
212-574-1353

**David R. Mulle**

mulle@sewkis.com  
212-574-1452

**Robert B. Van Grover**

vangrover@sewkis.com  
212-574-1205

**Noelle Indelicato**

indelicato@sewkis.com  
212-574-1643

**Steven B. Nadel**

nadel@sewkis.com  
212-574-1231

**Daniel G. Viola**

viola@sewkis.com  
212-574-1457

**Lancelot A. King**

king@sewkis.com  
202-661-7196

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

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