



# Private Funds Regulatory Compliance Calendar 2019

This Regulatory Compliance Calendar for 2019 is being furnished on a confidential basis exclusively to certain clients of Paul, Weiss and is not for redistribution or public use. This Calendar covers certain (but not all) regulatory obligations of a typical U.S.-based private fund adviser. This Calendar does not address all potential regulatory reporting and compliance obligations applicable to a private fund adviser, including, but not limited to, those arising under: (i) state reporting regimes; (ii) the Commodities Futures Trading Commission (“CFTC”) or the National Futures Association requirements (other than the annual affirmation requirement applicable to commodity pool operators exempt or excluded from registration under CFTC Rule 4.5, 4.13(a)(1), 4.13(a)(2), 4.13(a)(3), or 4.13(a)(5) or commodity trading advisors exempt from registration under Rule 4.14(a)(8)); (iii) rules or regulations of the Financial Industry Regulatory Authority, Inc. (other than annual “new issues” certifications); (iv) tax; (v) ERISA; and (vi) non-U.S. regulatory regimes.

The information contained herein is provided for informational and discussion purposes only.

**This Calendar is not intended to provide legal advice, and no legal or business decisions should be based on its content. Questions concerning issues addressed in this Calendar should be directed to the Paul, Weiss contacts listed on the last page of this Calendar. Please note that the information contained herein is current as of January 2019 and is subject to change throughout 2019.**

Annual Compliance Obligations Not Tied to a Specific Date		
Activity	Legal Basis for Compliance	Notes
Annual Review of Compliance Policies and Procedures.	<a href="#">Rule 206(4)-7</a> under the Investment Advisers Act of 1940 (the “Advisers Act”) requires a registered investment adviser to review annually the adequacy of its written compliance policies and procedures and the effectiveness of their implementation.	The Advisers Act does not specify a date for the annual review.
Annual Training of Compliance Personnel.	As a matter of best practices under Advisers Act <a href="#">Rule 206(4)-7</a> , an investment adviser’s chief compliance officer should ensure that all relevant personnel receive annual training covering all compliance policies and procedures.	
Annual Bring-Down of “Bad Actor” Representations (only applicable for ongoing offerings relying on <a href="#">Rule 506</a> under the Securities Act of 1933 (the “Securities Act”)).	Securities Act <a href="#">Rule 506(d)</a> / Compliance & Disclosure Interpretations <a href="#">Question 260.14</a> requires an issuer to determine whether bad actor disqualification under Rule 506(d) applies any time an issuer is offering or selling securities in reliance on Rule 506. If an offering is continuous or long-lived (e.g., a typical hedge fund offering), the issuer must update its factual inquiry periodically through bring-down of representations, questionnaires and certifications, negative consent letters, periodic re-checking of public databases, and other steps, depending on the circumstances.	Rule 506 does not require a specific date for the bring-down. Best practices suggest at least on an annual basis.
Annual Holdings Report.	Advisers Act <a href="#">Rule 204A-1</a> requires “access persons” to submit a report of current securities holdings to the investment adviser’s chief compliance officer at least once per 12-month period.	Rule 204A-1 provides for the investment adviser to select a date for the annual holdings reports.
Privacy Policy Notices. Send an annual privacy notice to applicable fund investors.	<a href="#">Regulation S-P</a> under the Gramm-Leach-Bliley Act (the “GLBA”) requires investment advisers to provide annually, during the continuation of the customer relationship, clear and conspicuous notice to “customers” regarding the adviser’s privacy policies and procedures. A 2015 amendment to the GLBA no longer requires financial institutions to provide annual privacy notices if they only share nonpublic personal information with third-parties in a manner that does not trigger an opt-out right and have not changed their policies and practices from those disclosed in the most recent privacy notice provided to the customer.	Regulation S-P does not require a specific date by which the privacy policies must be sent. Privacy policies must be provided at least once during any period of 12 consecutive months (applied to the customer consistently).
Annual New Issues Certification. If a private fund intends to invest in “new issues,” send an annual “new issues” questionnaire and certification to all private fund investors to obtain and/or confirm investors’ “exempted person,” “restricted person,” and “covered person” status.	Financial Industry Regulatory Authority, Inc. (“FINRA”) <a href="#">Rules 5130</a> and <a href="#">5131</a> require FINRA members to obtain representations from private funds of their eligibility to acquire “new issues.”	Annual representations may be obtained through use of negative consent. FINRA rules do not require a specific date by which the certification must be sent, but it must be obtained at least every 12 months.

Red: SEC Regulatory Obligations    Black: TIC and BEA Filing Obligations    Green: Miscellaneous Filing Obligations

Annual Compliance Obligations Not Tied to a Specific Date		
Activity	Legal Basis for Compliance	Notes
<p>Conduct general review of Treasury International Capital Forms (“TIC Forms”) applicable for the calendar year:</p> <p><b>Monthly and Quarterly Reports:</b></p> <p>TIC <a href="#">Form BC, BL-1, BL-2</a> – For preceding month. (Due on the 15th day following each month-end.)</p> <p>TIC <a href="#">Form BQ-1, BQ-2, BQ-3</a> – For preceding quarter. (Due on the 20th day following each quarter-end.)</p> <p>TIC <a href="#">Form S</a> – For preceding month. (Due on the 15th day following the last business day of each month.)</p> <p>TIC <a href="#">Form SLT</a> – For preceding month. (Due on the 23rd day following the last business day of each month.)</p> <p><b>Annual and Benchmark Reports:</b></p> <p>TIC <a href="#">Form SHC Schedules</a> – Quinquennial report; no current form available. Next filing as of December 31, 2021. (Expected to be due first Friday of March 2022.)</p> <p>TIC <a href="#">Form SHCA</a> – For preceding year. (Due March 1, 2019.)</p> <p>TIC <a href="#">Form SHL</a> – Quinquennial report; no current form available. Next filing as of last business day of June 2019. 2018 Form not yet available. (Expected to be due last business day of August 2019.)</p> <p>TIC <a href="#">Form SHLA Schedules</a> – No form due in 2019 (SHL year) (Next form expected to be due last business day of August 2020.)</p> <p>TIC <a href="#">Form D</a> – For preceding quarter. (Due on the 50th day following each quarter-end.)</p>	<p>TIC Forms and Instructions:<sup>1,2</sup></p> <p>TIC <a href="#">B Forms Instructions</a> – Monthly or quarterly reporting of liabilities to, and claims against, foreign residents, required of all U.S.-resident financial institutions (including private funds). Exemption levels apply form-by-form (and within parts on certain forms) and range from \$25 million to \$4 billion (note that private funds advisers complete the forms as the financial institution and report for the private funds they manage as customers). An entity that is not of the type subject to TIC Form B reporting may instead be subject to TIC Form C reporting.</p> <p>TIC <a href="#">Form S Instructions</a> – Monthly transaction-based reporting of purchases and sales of long-term securities between U.S. and foreign entities required of U.S.-resident entities that, during the month, had \$350 million or more in reportable purchases or reportable sales (note that private fund advisers must aggregate reportable securities across private funds managed).</p> <p>TIC <a href="#">Form SLT Instructions</a> – Monthly reporting of ownership of long-term foreign securities by U.S. persons and ownership of long-term U.S. securities by foreign persons. \$1 billion reporting threshold (note that private fund advisers must aggregate reportable securities across U.S. private funds managed).</p> <p>TIC <a href="#">Form SHC Instructions</a> – Quinquennial reporting (next filing as of December 31, 2021) of U.S. ownership of foreign securities.</p> <p>TIC <a href="#">Form SHCA Instructions</a> – Annual report (other than SHC years) of U.S. ownership of foreign securities as of December 31; <i>only required for entities contacted by the Federal Reserve.</i></p> <p>TIC <a href="#">Form SHL Instructions</a> – Quinquennial reporting of foreign residents’ holdings of U.S. securities as of the last business day of June.</p> <p>TIC <a href="#">Form SHLA Instructions</a> – Annual report (other than SHL years) of foreign residents’ holdings of U.S. securities as of the last business day of June; <i>only required for entities contacted by the Federal Reserve.</i></p> <p>TIC <a href="#">Form D Instructions</a> – Quarterly reporting of holdings and transactions in derivatives contracts required of U.S. residents worldwide derivatives holdings with a total notional value exceeding \$400 billion or “Grand Total Net Settlements” exceeding \$400 million.</p>	

<sup>1</sup> TIC Forms expire and/or are updated on a rolling basis and the instructions accordingly change from time to time. Before filing, please confirm that the form you are completing is still current.

<sup>2</sup> If a TIC report is due on a non-business day, the due date is the next business day.

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Annual Compliance Obligations Not Tied to a Specific Date		
Activity	Legal Basis for Compliance	Notes
<p>Conduct general review of Bureau of Economic Analysis (“BEA”), Agency of U.S. Department of Commerce reporting forms (“BEA Forms”) applicable for the calendar year:</p> <p><a href="#">BE-13</a> – Due on the 45th day after the transaction is completed.</p> <p><a href="#">BE-577</a> – For the preceding quarter. (Due on the 30th day following quarter-end, except due on the 45th day following end of the final quarter.)</p> <p><a href="#">BE-605</a> – For the preceding quarter. (Due on the 30th day following quarter-end, except due on the 45th day following end of the final quarter.)</p> <p><a href="#">BE-185</a> – For the preceding quarter. (Due on the 45th day following quarter-end, except due on the 90th day following end of the final quarter.)</p> <p><a href="#">BE-11</a> – For the preceding year. 2018 form not yet available. (Expected to be due May 31, 2019.)</p> <p><a href="#">BE-15</a> – Form retired, no longer required.</p>	<p>BEA Forms and Instructions:<sup>3,4</sup></p> <p><a href="#">BE-13 Instructions</a> – Transaction-based reporting of new foreign direct investments in the U.S. required for transactions in which a foreign person acquires a 10% or more voting interest in a U.S. person or expands U.S. operations. Exemption available if total acquisition cost is not more than \$3 million. <i>Report required regardless of whether the reporter was contacted by the BEA.</i></p> <p><a href="#">BE-577 Instructions</a> – Quarterly reporting of U.S. direct investment abroad required from U.S. persons (“U.S. reporters”) who have had direct transactions or positions with a foreign business enterprise in which it held, indirectly or directly, an ownership interest of at least 10% of voting securities at any time during the reporting period. Exemption available for any foreign affiliate that had total assets, annual sales or gross operating revenues, <u>and</u> annual net income of not more than \$60 million and had directly held intercompany debt balances with the U.S. reporter of not more than \$1 million. <i>Only entities contacted by the BEA must report.</i></p> <p><a href="#">BE-605 Instructions</a> – Quarterly reporting of foreign direct investment in the U.S. required from U.S. reporters that were established, acquired, liquidated or sold or that became inactive during the reporting period and in which foreign persons owned, directly or indirectly, a 10% or more voting interest at any time during the reporting period. Exemption available for any U.S. affiliate that had total assets, annual sales or gross operating revenues <u>and</u> annual net income of no more than \$50 million and no intercompany debt with its foreign affiliates. <i>Only entities contacted by the BEA must report.</i></p> <p><a href="#">BE-185 Instructions</a> – Quarterly reporting required from U.S. financial services providers (including private funds and their advisers) of financial services purchased from or sold to foreign persons. Exemption available if sales to foreign persons did not exceed \$20 million, or purchases from foreign persons did not exceed \$15 million, during the prior fiscal year and are not expected to exceed those amounts during the current fiscal year. <i>Only entities contacted by the BEA must report.</i></p> <p><a href="#">BE-11 Instructions</a> – Annual reporting (other than BE-10 years) of U.S. direct investment abroad required from U.S. reporters for each foreign business enterprise in which it held, directly or indirectly, an ownership interest of at least 10% of voting interests. Based on 2017 form, exemption available for any foreign affiliate that had total assets, annual sales or gross operating revenues, <u>and</u> annual net income of not more than \$25 million. (Annual filing related to quarterly Form BE-577.) <i>Only entities contacted by the BEA must report.</i></p> <p><a href="#">BE-15 Instructions</a> – Form retired after 2016. No longer required.</p>	

<sup>3</sup> BEA Forms expire and/or are updated on a rolling basis and instructions accordingly change from time to time. Before filing, please confirm that the form you are completing is still current.  
<sup>4</sup> Although not set out in written guidance, BEA staff have indicated that, in practice, if a form is due on a non-business day, a form submitted on the next business day will be considered timely.

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<p>BE-10 – Quinquennial report, no current form available. Next filing for 2019 fiscal year. (Expected to be due on the last business day of May or June 2020, depending on the reporter.)</p> <p><a href="#">BE-12</a> – Quinquennial report. Next filing for 2022 fiscal year. (Expected to be due on the last business day of May or June 2023, depending on the reporter.)</p> <p><a href="#">BE-180</a> – Quinquennial report. Next filing for 2019 fiscal year. (Expected to be due October 1, 2020.)</p>	<p>BE-10 Instructions – Quinquennial benchmark reporting of U.S. direct investment abroad in lieu of annual BE-11. (Next due for 2019 fiscal year.) <i>Report required regardless of whether the reporter was contacted by the BEA.</i></p> <p><a href="#">BE-12 Instructions</a> – Quinquennial benchmark reporting of foreign direct investment in the U.S. (Next due for 2022 fiscal year.) <i>Report required regardless of whether the reporter was contacted by the BEA.</i></p> <p><a href="#">BE-180 Instructions</a> – Quinquennial benchmark reporting of financial services transactions between U.S. financial services providers and foreign persons. (Next due for 2019 fiscal year.) <i>Report required regardless of whether the reporter was contacted by the BEA.</i></p>	

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January			
January 15, 2019	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	
January 22, 2019**	TIC <a href="#">Form BQ-1</a> , <a href="#">BQ-2</a> and <a href="#">BQ-3</a> due (for fourth quarter 2018).	See Annual Compliance Obligations.	
January 23, 2019	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
January 30, 2019	Quarterly Transaction Reports due (for fourth quarter 2018).	Advisers Act <a href="#">Rule 204A-1</a> requires “access persons” to submit a transaction report to the chief compliance officer covering all transactions during the previous quarter no later than 30 days after the end of each calendar quarter.	
February			
February 14, 2019	<a href="#">Form 13F</a> due.	<a href="#">Rule 13f-1</a> under the Securities Exchange Act of 1934 (the “Exchange Act”) 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.	
February 14, 2019	<a href="#">Form 13H</a> due.	Exchange Act <a href="#">Rule 13h-1</a> requires a “large trader” to identify itself to the SEC and promptly make certain disclosures to the SEC on Form 13H. All large traders must make an annual filing within 45 days after the end of each full calendar year (unless they are on Inactive Status).	
February 14, 2019	<a href="#">Schedule 13G</a> and any amendments due.	Exchange Act <a href="#">Rule 13d-1</a> requires beneficial owners of more than 5% of publicly traded equity, who do not have the purpose or effect of changing or influencing control, to file Schedule 13G within 45 days after the end of the calendar year. If a beneficial owner’s ownership exceeds 10% of publicly traded equity, the initial Schedule 13G must be filed within 10 days after the last day of the calendar month in which the ownership exceeded 10%.  Exchange Act <a href="#">Rule 13d-2</a> requires amendments to previously filed 13Gs within 45 days after calendar year-end if there are changes as of the end of the calendar year in the reported information (other than those caused by a change in an issuer’s securities outstanding).	

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February			
February 14, 2019*	<a href="#">Form 5</a> due.	Exchange Act <a href="#">Rule 16a-3</a> requires persons subject to Section 16 to disclose transactions that should have been reported previously on any Form 3 or 4, as well as exempt transactions and certain small acquisitions, within 45 days after the fiscal year-end.	
February 14, 2019*	<a href="#">BE-577</a> and <a href="#">BE-605</a> due (for fourth quarter 2018).	See Annual Compliance Obligations.	Deadline for other three quarters is within 30 days after the quarter-end.
February 15, 2019	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	
February 19, 2019	TIC <a href="#">Form D</a> due.	See Annual Compliance Obligations.	
February 25, 2019**	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
March			
March 1, 2019*	Quarterly update to <a href="#">Form PF</a> due for all “large hedge fund advisers” (for fourth quarter 2018).	<a href="#">Form PF</a> requires a “large hedge fund adviser” to file a quarterly update within 60 calendar days after the end of its fourth fiscal quarter that updates the answers to all items in Form PF (not just relating to the “hedge funds” it advises).	Instead, for the fourth quarter, an investment adviser may submit an initial filing that updates information relating only to its “hedge funds” and then amend Form PF within 120 calendar days after the end of the fourth quarter to update information relating to any other of its private funds. When an investment adviser files such an amendment, it is not required to update information previously filed for such quarter.

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March			
March 1, 2019	Annual Exemption Affirmation due for “commodity pool operators” and “commodity trading advisors” relying upon Commodities Futures Trading Commission <a href="#">Rules 4.5, 4.13(a)(1), 4.13(a)(2), 4.13(a)(3), 4.13(a)(5) and 4.14(a)(8)</a> . (Must be filed through the National Futures Association’s electronic filing system.)	Commodities Futures Trading Commission <a href="#">Rules 4.5, 4.13(a)(1), 4.13(a)(2), 4.13(a)(3), 4.13(a)(5) and 4.14(a)(8)</a> require relying “commodity pool operators” and “commodity trading advisors” to affirm their qualification for the applicable exemption with the National Futures Association annually within 60 days after calendar year-end.	
March 1, 2019	TIC <a href="#">Form SHCA</a> due.	See Annual Compliance Obligations.	
March 15, 2019	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	
March 25, 2019**	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
March 31, 2019	<a href="#">Form ADV</a> annual updating amendment due. State notice filings (if any required by states) and related fees due.	Advisers Act <a href="#">Rule 204-1(a)(1)</a> requires a registered investment adviser to file an amendment to its <a href="#">Form ADV</a> within 90 days after its fiscal year-end.	Filing fees payable. Note that the Investment Adviser Registration Depository (IARD) will be open on Sunday, March 31, 2019.
March 31, 2019	Amended <a href="#">Form 13H</a> filing due promptly after this date.	Exchange Act <a href="#">Rule 13h-1</a> requires a “large trader” to identify itself to the SEC and promptly make certain disclosures to the SEC on Form 13H. Following an initial filing of Form 13H, all large traders must make an amended filing to correct inaccurate information promptly (within 10 days) following the quarter-end in which the information became stale.	
April			
April 1, 2019*.,***	<a href="#">BE-185</a> due (for fourth quarter 2018).	See Annual Compliance Obligations.	
April 15, 2019	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	
April 22, 2019**	TIC <a href="#">Form BQ-1</a> , <a href="#">BQ-2</a> and <a href="#">BQ-3</a> due (for first quarter 2019).	See Annual Compliance Obligations.	

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April			
April 23, 2019	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
April 30, 2019	Quarterly Transaction Reports due (for first quarter 2019).	Advisers Act <a href="#">Rule 204A-1</a> requires “access persons” to submit a transaction report to the chief compliance officer covering all transactions during the previous quarter no later than 30 days after the end of each calendar quarter.	
April 30, 2019*	Distribute audited financial statements to investors.	Advisers Act <a href="#">Rule 206(4)-2</a> (the “Custody Rule”) requires an investment adviser to distribute audited financial statements prepared in accordance with U.S. generally accepted accounting principles (“GAAP”) to all investors within 120 days after its fiscal year-end.	Note that a 180-day time limit applies to “funds-of-funds.” See July 1 description of Advisers Act <a href="#">Rule 206(4)-2</a> .
April 30, 2019*	Distribute updated <a href="#">Form ADV Part 2A</a> (or summary of material changes) to investors.	Advisers Act <a href="#">Rule 204-3(b)</a> requires an investment adviser to distribute to each “client” an updated Part 2A or a summary of material changes with an offer and information on how to obtain the updated Part 2A within 120 days after its fiscal year-end.	
April 30, 2019*	Annual update to <a href="#">Form PF</a> due for all private fund advisers other than “large hedge fund advisers” and “large liquidity fund advisers.”  Quarterly update to <a href="#">Form PF</a> due (for fourth quarter 2018) for “large hedge fund advisers” and “large liquidity fund advisers” who did not submit information relating to their other private funds with their fourth-quarter filing.	<a href="#">Form PF</a> requires all private fund advisers other than “large hedge fund advisers” and “large liquidity fund advisers” to file an annual update to all items in <a href="#">Form PF</a> within 120 days after the fiscal year-end.	See March 1 description of <a href="#">Form PF</a> .
April 30, 2019*	<a href="#">BE-577</a> and <a href="#">BE-605</a> due (for first quarter 2019).	See Annual Compliance Obligations.	
May			
May 15, 2019	<a href="#">Form 13F</a> (and any related Confidential Treatment Request) due (for first quarter 2019).	Exchange Act <a href="#">Rule 13f-1</a> 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 <a href="#">Form 13F</a> 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.	
May 15, 2019*	<a href="#">BE-185</a> due (for first quarter 2019).	See Annual Compliance Obligations.	

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May			
May 15, 2019	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	
May 20, 2019	TIC <a href="#">Form D</a> due.	See Annual Compliance Obligations.	
May 23, 2019	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
May 30, 2019*	Quarterly update to <a href="#">Form PF</a> due for all “large hedge fund advisers” (for first quarter 2019).	<a href="#">Form PF</a> 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 <a href="#">Form PF</a> relating to the “hedge funds” that it advises.	
May 31, 2019	<a href="#">BE-11</a> expected to be due (no current forms available).	See Annual Compliance Obligations.	
June			
June 17, 2019**	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	
June 24, 2019**	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
June 30, 2019	Amended <a href="#">Form 13H</a> filing due promptly after this date.	Exchange Act <a href="#">Rule 13h-1</a> requires a “large trader” to identify itself to the SEC and promptly make certain disclosures to the SEC on <a href="#">Form 13H</a> . Following an initial filing of <a href="#">Form 13H</a> , all large traders must make an amended filing to correct inaccurate information promptly (within 10 days) following the quarter-end in which the information became stale.	
July			
July 1, 2019*	Distribute audited financial statements to investors in “funds-of-funds.”	Pursuant to an SEC <a href="#">No-Action Letter</a> , an investment adviser to any “funds-of-funds” is required to distribute audited financial statements prepared in accordance with GAAP to all investors within 180 days after its fiscal year-end.	See April 30 description of Advisers Act <a href="#">Rule 206(4)-2</a> .
July 15, 2019	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	
July 22, 2019**	TIC <a href="#">Form BQ-1</a> , <a href="#">BQ-2</a> and <a href="#">BQ-3</a> due (for second quarter 2019).	See Annual Compliance Obligations.	

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July			
July 23, 2019	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
July 30, 2019	Quarterly Transaction Reports due (for second quarter 2019).	Advisers Act <a href="#">Rule 204A-1</a> requires “access persons” to submit a transaction report to the chief compliance officer covering all transactions during the previous quarter no later than 30 days after the end of each calendar quarter.	
July 30, 2019*	<a href="#">BE-577</a> and <a href="#">BE-605</a> due (for second quarter 2019).	See Annual Compliance Obligations.	
August			
August 14, 2019	<a href="#">Form 13F</a> (and any related Confidential Treatment Request) due (for second quarter 2019).	Exchange Act <a href="#">Rule 13f-1</a> 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.	
August 14, 2019*	<a href="#">BE-185</a> due (for second quarter 2019).	See Annual Compliance Obligations.	
August 15, 2019	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	
August 19, 2019	TIC <a href="#">Form D</a> due.	See Annual Compliance Obligations.	
August 23, 2019	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
August 29, 2019*	Quarterly update to <a href="#">Form PF</a> due for all “large hedge fund advisers” (for second quarter 2019).	<a href="#">Form PF</a> 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.	
August 30, 2019	TIC <a href="#">Form SHL</a> due.	See Annual Compliance Obligations.	
September			
September 16, 2019**	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	

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September			
September 23, 2019	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
September 30, 2019	Amended <a href="#">Form 13H</a> filing due promptly after this date.	Exchange Act <a href="#">Rule 13h-1</a> requires a “large trader” to identify itself to the SEC and promptly make certain disclosures to the SEC on Form 13H. Following an initial filing of Form 13H, all large traders must make an amended filing to correct inaccurate information promptly (within 10 days) following the quarter-end in which the information became stale.	
October			
October 15, 2019	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	
October 21, 2019**	TIC <a href="#">Form BQ-1</a> , <a href="#">BQ-2</a> and <a href="#">BQ-3</a> due (for third quarter 2019).	See Annual Compliance Obligations.	
October 23, 2019	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
October 30, 2019	Quarterly Transaction Reports due (for third quarter 2019).	Advisers Act <a href="#">Rule 204A-1</a> requires “access persons” to submit a transaction report to the chief compliance officer covering all transactions during the previous quarter no later than 30 days after the end of each calendar quarter.	
October 30, 2019*	<a href="#">BE-577</a> and <a href="#">BE-605</a> due (for third quarter 2019).	See Annual Compliance Obligations.	
November			
November 14, 2019	<a href="#">Form 13F</a> (and any related Confidential Treatment Request) due (for third quarter 2019).	Exchange Act <a href="#">Rule 13f-1</a> 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.	
November 14, 2019*	<a href="#">BE-185</a> due (for third quarter 2019).	See Annual Compliance Obligations.	
November 15, 2019	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	

Red: SEC Regulatory Obligations    Black: TIC and BEA Filing Obligations    Green: Miscellaneous Filing Obligations

Date	Activity	Legal Basis for Compliance	Notes
November			
November 19, 2019	TIC <a href="#">Form D</a> due.	See Annual Compliance Obligations.	
November 25, 2019**	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
November 29, 2019*	Quarterly update to <a href="#">Form PF</a> due for all “large hedge fund advisers” (for third quarter 2019).	<a href="#">Form PF</a> 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 <a href="#">Form PF</a> relating to the “hedge funds” that it advises.	
December			
December 16, 2019**	TIC <a href="#">Form S</a> , <a href="#">Form BC</a> , <a href="#">BL-1</a> and <a href="#">BL-2</a> due.	See Annual Compliance Obligations.	
December 23, 2019	TIC <a href="#">Form SLT</a> due.	See Annual Compliance Obligations.	
December 31, 2019	Amended <a href="#">Form 13H</a> filing due promptly after this date.	Exchange Act <a href="#">Rule 13h-1</a> requires a “large trader” to identify itself to the SEC and promptly make certain disclosures to the SEC on <a href="#">Form 13H</a> . Following an initial filing of <a href="#">Form 13H</a> , all large traders must make an amended filing to correct inaccurate information promptly (within 10 days) following the quarter-end in which the information became stale.	

**Notes**

- \* Assumes a fiscal year ending December 31.
- \*\* If a TIC report is due on a non-business day, the due date is the next business day.
- \*\*\* Although not set out in written guidance, BEA staff have indicated that, in practice, if a form is due on a non-business day, a form submitted on the next business day will be considered timely.

Red: SEC Regulatory Obligations    Black: TIC and BEA Filing Obligations    Green: Miscellaneous Filing Obligations

This Calendar is not intended to provide legal advice, and no legal or business decision should be based on its content. Questions concerning issues addressed in this Calendar should be directed to:

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**Private Funds Practice**

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