

February 13, 2019

Reminder: Annual Compliance Filing and Reporting Deadlines

Compliance Calendars and Checklists

The IM Practice Group highly recommends that each investment adviser and fund manager prepare a compliance calendar and checklist with the appropriate reporting and filing deadlines and compliance obligations applicable to their operations, investment strategy and securities offerings. The table below is provided for your convenience as an example of a typical compliance calendar / checklist for an investment manager or fund manager with a fiscal year-end of December 31.

| <i>Due Date</i> | <i>Requirement</i> | <i>Complete</i> |
|---|---|-----------------|
| January 10, 2019 (within 10 days of fourth calendar quarter-end if any information has become stale) | File Form 13H (Large Trader) amendment promptly with SEC if any information from previous filing has become stale during the quarter ending December 31, 2018. An "annual filing" may be submitted and also designated as an "amended filing" to satisfy both the fourth quarter amendment filing requirement (if applicable) and the mandatory annual update filing requirement, as long as the submission is made by the due date for the fourth amendment (i.e., 10 days after the fourth quarter-end). | |
| January 15, 2019 (within 15 days of fourth fiscal quarter-end for <i>Large Liquidity Fund Advisers</i>) | File Form PF quarterly update with SEC (for quarter ending December 31, 2018). | |
| January 21, 2019 | Final Statement payment due date for any unpaid balance of IARD Final Statement for Registration Renewal with IARD in preparation for investment adviser/exempt reporting adviser registration renewal. | |
| January 31, 2019 | Recommended due date for collection of annual "access person" personal holdings reports. | |
| February 14, 2019 (within 45 days of the calendar year-end and quarterly thereafter) | File Form 13F (Institutional Investment Manager Holdings Report) amendment with SEC (for institutional investment managers that exercise investment discretion over \$100 million or more in Section 13(f) securities). | |
| February 14, 2019 (within 45 days of the calendar year-end and quarterly thereafter if any information has changed) | File Form 13H (Large Trader) mandatory annual amendment with SEC (for "large traders" whose activity exceeds certain thresholds). | |
| February 14, 2019 | File Schedule 13G mandatory annual amendment to update beneficial ownership of more than 5% of a class of equity | |

| Due Date | Requirement | Complete |
|---|--|-----------------|
| (within 45 days of the calendar year-end) | securities registered under Section 12 of the Securities Exchange Act of 1934, as amended, with SEC. | |
| March 1, 2019 (within 60 days of the calendar year-end) | Affirm CFTC exemption(s) for Commodity Pool Operators and/or Commodity Trading Advisers with the NFA (annually). | |
| March 1, 2019 (within 60 days of the fourth fiscal quarter-end for <i>Large Hedge Fund Advisers</i>) | File Form PF quarterly update with SEC (for quarter ending December 31, 2018). | |
| March 31, 2019 (within 90 days of the fiscal year-end for <i>Registered Investment Advisers</i> and <i>Exempt Reporting Advisers</i>) | File Form ADV annual update (and state notice filings, if required by any states) with SEC through IARD system for investment advisers and exempt reporting advisers. | |
| April 10, 2019 (within 10 days of first calendar quarter-end if any information has become stale) | File Form 13H (Large Trader) amendment promptly with SEC if any information from previous filing has become stale during quarter ending March 31. | |
| April 15, 2019 (within 15 days of first fiscal quarter-end for <i>Large Liquidity Fund Advisers</i>) | File Form PF quarterly update with SEC (for quarter ending March 31). | |
| April 30, 2019 (within 120 days of the fiscal year-end) | Deliver updated Form ADV Part 2A (<i>firm brochure</i>), Appendix 1 (<i>wrap fee brochure supplement</i>), and Part 2B (<i>supervised persons brochure supplement</i>) and a summary of material changes to the brochure and supplements to applicable clients and fund investors. | |
| April 30, 2019 (within 120 days of the fiscal year-end for <i>Large Private Equity Fund Advisers</i> and <i>Smaller Private Fund Advisers / Registered Investment Advisers</i> that are <u>not</u> <i>Large Hedge Fund Advisers</i> or <i>Large Liquidity Fund Advisers</i>) | File annual Form PF with SEC. | |
| April 30, 2019 (within 120 days of the fiscal year-end for <i>Private Fund Advisers</i> <u>other than</u> <i>Funds of Funds</i>) | Deliver audited financial statements to fund investors (if relying on the “audit exception” to requirements under Rule 206(4)-2 relating to reporting and surprise custody examinations). | |
| May 15, 2019 (within 45 days of first calendar quarter-end) | File Form 13F (Institutional Investment Manager Holdings Report) quarterly update with SEC (for quarter ending March 31). | |

| Due Date | Requirement | Complete |
|---|---|-----------------|
| May 30, 2019 (within 60 days of first fiscal quarter-end for <i>Large Hedge Fund Advisers</i>) | File Form PF quarterly update with SEC (for quarter ending March 31). | |
| June 29, 2019 (within 180 days of the fiscal year-end for <i>Funds of Funds</i>) | Deliver audited financial statements to fund investors (if relying on the “audit exception” to requirements under Rule 206(4)-2 relating to reporting and surprise custody examinations). | |
| July 10, 2019 (within 10 days of second calendar quarter-end if any information has become stale) | File Form 13H (Large Trader) amendment promptly with SEC if any information from previous filing has become stale during quarter ending June 30. | |
| July 15, 2019 (within 15 days of second fiscal quarter-end for <i>Large Liquidity Fund Advisers</i>) | File Form PF quarterly update with SEC (for quarter ending June 30). | |
| August 14, 2019 (within 45 days of second calendar quarter-end) | File Form 13F (Institutional Investment Manager Holdings Report) quarterly update with SEC (for quarter ending June 30). | |
| August 29, 2019 (within 60 days of the second fiscal quarter-end for <i>Large Hedge Fund Advisers</i>) | File Form PF quarterly update with SEC (for quarter ending June 30). | |
| October 10, 2019 (within 10 days of third calendar quarter-end if any information has become stale) | File Form 13H (Large Trader) amendment promptly with SEC if any information from previous filing has become stale during quarter ending September 30. | |
| October 15, 2019 (within 15 days of third fiscal quarter-end for <i>Large Liquidity Fund Advisers</i>) | File Form PF quarterly update with SEC (for quarter ending September 30). | |
| November 14, 2019 (within 45 days of third calendar quarter-end) | File Form 13F (Institutional Investment Manager Holdings Report) quarterly update with SEC (for quarter ending September 30). | |
| November 29, 2019 (within 60 days of third fiscal quarter-end for <i>Large Hedge Fund Advisers</i>) | File Form PF quarterly update with SEC (for quarter ending September 30). | |
| December 16, 2019 | Payment due for IARD Preliminary Statement for Registration Renewal with IARD in preparation for investment adviser/exempt reporting adviser registration renewal for the next year. | |

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