

Debevoise In Depth

Annual Filing, Notice and Reporting Requirements for Private Fund Sponsors

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Please see attached a calendar with links to Who/What/When/How sheets on regulatory filings commonly applicable to private fund sponsors, including, among others, Form ADV, Form PF, Exchange Act filings, CPO/CTA exemption filings, and BEA and TIC forms. The Who/What/When/How sheets provide summaries on who is required, links to what forms are required to be filed, information on when the filings are due, and how the filings may be submitted, as well as links to general information, FAQs and other guidance from the applicable governmental entity. While the Who/What/When/How sheets provide summaries on to whom the filings apply, we recommend seeking legal advice concerning the applicability to your firm because there may be complications, including with respect to the consolidation rules.

This Calendar does not cover all possible filing obligations under U.S. or non-U.S. law, including filing obligations relating to tax, ERISA or non-U.S. regulatory regimes. Furthermore, this Calendar focuses on the regulatory obligations applicable to investment advisers to private funds; the filing obligations applicable to other types of investment advisers (particularly investment advisers to separately management accounts or retail investors) may be different.

This Calendar is for informational purposes only and is not intended to be legal advice. Please reach out to us with respect to any questions you may have on the applicability of any of these regulatory filing obligations.

What's New This Year?

The BEA benchmark surveys Form BE-10 ([link](#)) and Form BE-180 ([link](#)) are scheduled to be due this year.

Please do not hesitate to contact us with any questions.

Regulatory Filings Calendar

Assuming Dec. 31, 2019 fiscal year end **Note:** Highlighted items are new

Date	Form	Short Description	Link
1/15/2020	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info
	TIC Form D	4Q 2019 Quarterly Form Deadline	More Info
1/20/2020	TIC B Forms	4Q 2019 Quarterly Form Deadline	More Info
1/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
2/14/2020	Form 13F	4Q 2019 Filing Deadline	More Info
	Form 13H	2019 Annual Filing Deadline	More Info
	Schedule 13G	2019 Annual Filing Deadline for 13d-1(b) & 13d-2(d) Reporters	More Info
	BE-577	4Q 2019 Filing Deadline	More Info
	BE-605	4Q 2019 Filing Deadline	More Info
2/15/2020	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info
2/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
2/29/2020	Form PF	Large Hedge Fund Adviser 4Q 2019 Filing Deadline	More Info
	CPO/CTA Exemption	Annual affirmation of a claim for exemption or exclusion from CPO registration under CFTC Regulation 4.5, 4.13(a)(1), 4.13(a)(2), 4.13(a)(3), 4.13(a)(5) or an exemption from CTA registration under 4.14(a)(8)	More Info
3/6/2020	TIC Form SHCA	Annual Filing Deadline	More Info
3/15/2020	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info

Date	Form	Short Description	Link
3/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
3/30/2020	Form ADV	Annual Amendment	More Info
	Form BE-185	4Q 2019 Filing Deadline	More Info
4/15/2020	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info
	TIC Form D	1Q 2020 Quarterly Form Deadline	More Info
4/20/2020	TIC B Forms	1Q 2020 Quarterly Form Deadline	More Info
4/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
4/29/2020	Form PF	Filing Deadline for Annual Filers	More Info
4/30/2020	BE-577	1Q Filing Deadline	More Info
	BE-605	1Q Filing Deadline	More Info
5/15/2020	Form 13F	1Q 2020 Filing Deadline	More Info
	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info
	Form BE-185	1Q 2020 Filing Deadline	More Info
5/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
5/29/2020	Form BE-10	Benchmark Filing Deadline	More Info
5/30/2020	Form PF	Large Hedge Fund Adviser 1Q 2020 Filing Deadline	More Info
6/15/2020	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info
6/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
6/30/2020 (est.)	BE-15	Annual Filing Deadline	More Info
7/15/2020	TIC B Forms	Monthly Form Deadline	More Info

Date	Form	Short Description	Link
	TIC Form S	Monthly Form Deadline	More Info
	TIC Form D	2Q 2020 Quarterly Form Deadline	More Info
7/20/2020	TIC B Forms	2Q 2020 Quarterly Form Deadline	More Info
7/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
7/30/2020	BE-577	2Q Filing Deadline	More Info
	BE-605	2Q Filing Deadline	More Info
8/14/2020	Form 13F	2Q 2020 Filing Deadline	More Info
	Form BE-185	2Q 2020 Filing Deadline	More Info
8/15/2020	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info
8/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
8/29/2020	Form PF	Large Hedge Fund Adviser 2Q 2020 Filing Deadline	More Info
8/31/2020	Form SHLA	Annual Filing Deadline	More Info
9/15/2020	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info
9/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
10/15/2020	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info
	TIC Form D	3Q 2020 Quarterly Form Deadline	More Info
10/20/2020	TIC B Forms	3Q 2020 Quarterly Form Deadline	More Info
10/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
10/30/2020	BE-577	3Q 2020 Filing Deadline	More Info
	BE-605	3Q 2020 Filing Deadline	More Info

Date	Form	Short Description	Link
11/1/2020 (est.)	Form BE-180	Benchmark Survey Deadline	More Info
11/14/2020	Form 13F	3Q 2020 Filing Deadline	More Info
	Form BE-185	3Q 2020 Filing Deadline	More Info
11/15/2020	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info
11/23/2020	TIC Form SLT	Monthly Form Deadline	More Info
11/29/2020	Form PF	Large Hedge Fund Adviser 3Q 2020 Filing Deadline	More Info
12/15/2020	TIC B Forms	Monthly Form Deadline	More Info
	TIC Form S	Monthly Form Deadline	More Info
12/23/2020	TIC Form SLT	Monthly Form Deadline	More Info

Form ADV	
<u>Who</u>	Registered investment advisers and exempt reporting advisers
<u>What</u>	Part 1A (SEC Website) (link) Part 1B (State-registered only, NASAA Website) (link) Part 2 (SEC Website) (link) Execution Pages (SEC Website) (link)
<u>When</u>	Annually within 90 calendar days after the end of the fiscal year
<u>How</u>	IARD (https://crd.finra.org/iad)
<u>Statute & Rules</u>	Advisers Act Rule 204-1 (e-CFR) Advisers Act Rule 204-3 (e-CFR) Advisers Act Rule 204-4 (e-CFR)
<u>FAQs & Guidance</u>	Instructions and Glossary (link) IARD (link) Fees & Accounting (link) Account Set-Up (link) Help & Training (link) Information on Super Account Administrators (link) SEC FAQ on Form ADV and IARD (link) SEC FAQ on Part 2 of Form ADV (link) IARD FAQ (link)

Form PF	
<u>Who</u>	A registered investment adviser who: (i) manages one or more private funds; and (ii) collectively with its related persons had at least \$150 million in private funds assets under management as of the last day of its most recently completed fiscal year
<u>What</u>	Paper Form (link)
<u>When</u>	<i>Quarterly:</i> Large hedge fund advisers (at least \$1.5 billion in hedge funds AUM): 60 calendar days after end of the quarter Large liquidity fund advisers (at least \$1 billion in combined money market and liquidity fund assets under management): 15 calendar days after the end of the quarter <i>Annual:</i> All other advisers: 120 calendar days after the end of the fiscal year
<u>How</u>	IARD (https://crd.finra.org/iad)
<u>Statute & Rules</u>	Advisers Act Rule 204(b)(1) (e-CFR)
<u>FAQs & Guidance</u>	SEC PFRD Home (Information on Electronic Filing, Filing Fees, etc.) (link) SEC Staff Form PF FAQ (link) Form PF: Filing Online Reference Guide (IARD) (link) PFRD System Frequently Asked Questions (IARD) (link)

Form 13F

<u>Who</u>	Institutional investment managers that exercise investment discretion over \$100 million or more in Section 13(f) securities, ¹ which primarily includes U.S. exchange-traded stocks (e.g., NYSE, AMEX, NASDAQ), shares of closed-end investment companies, and shares of exchange-traded funds (ETFs)
<u>What</u>	Paper Form (https://www.sec.gov/pdf/form13f.pdf)
<u>When</u>	Quarterly – 45 days after the last day of each calendar quarter
<u>How</u>	EDGAR (https://www.edgarfiling.sec.gov)
<u>Statute & Rules</u>	Exchange Act Section 13(f) Exchange Act Rule 13f-1 (e-CFR)
<u>FAQs & Guidance</u>	SEC Division of Investment Management: Frequently Asked Questions About Form PF (https://www.sec.gov/divisions/investment/13ffaq.htm)

Form 13H

<u>Who</u>	Persons, directly or indirectly, who exercise investment discretion and effect transactions in “NMS securities” in an aggregate amount equal to or greater than (i) during a calendar day, either two million shares or shares with a fair market value of \$20 million; or (ii) during a calendar month, either twenty million shares or shares with a fair market value of \$200 million. “NMS securities” generally refers to exchange-listed equity securities and standardized options but does not include exchange-listed debt securities, securities futures, or open-end mutual funds
<u>What</u>	Paper Form (https://www.sec.gov/files/form13h.pdf)
<u>When</u>	Annually – 45 days after the end of each calendar year
<u>How</u>	EDGAR (https://www.edgarfiling.sec.gov)
<u>Statute & Rules</u>	Exchange Act Rule 13h-1 (e-CFR) Regulation NMS, Rule 600(b)(46) (e-CFR)
<u>FAQs & Guidance</u>	SEC Division of Trading and Markets, Responses to Frequently Asked Questions Concerning Large Trader Reporting (https://www.sec.gov/divisions/marketreg/large-trader-faqs.htm)

¹ See <http://www.sec.gov/divisions/investment/13flists.htm> for the full list.

Schedule 13D & 13G

<u>Who</u>	<p>Schedule 13D: A person or group of persons acquires beneficial ownership of more than 5% of a voting class of a company's equity securities registered under Section 12 of the Securities Exchange Act of 1934</p> <p>Schedule 13G: The following persons may file a Schedule 13G in lieu of a Schedule 13D:</p> <p>Rule 13d-1(b) Reporter: Certain listed institutional investors² who acquired in the ordinary course of business and not with the purpose nor with the effect of changing or influencing the control of the issuer;</p> <p>Rule 13d-1(c) Reporter: A person who holds less than 20% of the class and who has not acquired the securities with the purpose, or with the effect, of changing or influencing the control of the issuer (excluding 13d-1(b) Reporters);</p> <p>Rule 13d-1(d) Reporter: A person who acquires the security in a transaction that satisfies one of the exceptions in 13(d)(6)³ or who acquired prior to Dec. 22, 1970</p>
<u>What</u>	<p>Paper Form</p> <p>Schedule 13D (e-CFR)</p> <p>Schedule 13G (e-CFR)</p>
<u>When</u>	<p>Schedule 13D: Within 10 days after the acquisition</p> <p>Schedule 13G:</p> <p>Rule 13d-1(b) Reporter: Within 45 days after the end of the calendar year and within 10 days after the end of the first month in which the person's beneficial ownership exceeds 10% of the class of equity securities, computed as of the last day of the month</p> <p>Rule 13d-1(c) Reporter: Within 10 days after acquiring beneficial ownership</p> <p>Rule 13d-1(d) Reporter: Within 45 days after the end of the calendar year</p>
<u>How</u>	<p>EDGAR (https://www.edgarfiling.sec.gov)</p>

² The enumerated persons are: (i) registered broker-dealers, (ii) banks, (iii) insurance companies, (iv) registered investment companies, (v) SEC- or state-registered investment advisers, (vi) certain employee benefit plans, (vii) holding companies or control persons where less than 1% of securities of the subject class are derived from direct holdings and subsidiaries or affiliates not specified in (i) through (vi), (viii) saving associations, (ix) certain church plans, (x) a non-U.S. institution that is functionally equivalent to (i) through (ix), and (xi) a group of persons, each of which is listed in (i) through (x).

³ The exceptions are: (A) any acquisition or offer to acquire securities made or proposed to be made by means of a registration statement under the Securities Act of 1933; and (B) any acquisition of the beneficial ownership of a security which, together with all other acquisitions by the same person of securities of the same class during the preceding twelve months, does not exceed 2% of that class.

<p><u>Statute & Rules</u></p>	<p>Exchange Act Section 13(d) & 13(g) Regulation 13D-G: Rule 13d-1 (e-CFR), 13d-2 (e-CFR), 13d-3 (e-CFR), 13d-4 (e-CFR), 13d-5 (e-CFR), 13d-6 (e-CFR), 13d-7 (e-CFR), 13d-101 (e-CFR), 13d-102 (e-CFR)</p>
<p><u>FAQs & Guidance</u></p>	<p>SEC Division of Corporate Finance, Exchange Act Sections 13(d) and 13(g) and Regulation 13D-G Beneficial Ownership Reporting https://www.sec.gov/divisions/corpfin/guidance/reg13d-interp.htm</p>

Form D	
<u>Who</u>	Each issuer of securities that sells its securities in reliance on an exemption provided in Regulation D or Section 4(a)(5) of the Securities Act of 1933
<u>What</u>	Paper Form (link)
<u>When</u>	New notice for each new offering of securities no later than 15 calendar days after the “date of first sale” Annual amendment on or before the first anniversary of the most recent notice if the offering is continuing at that time
<u>How</u>	EDGAR (https://www.edgarfiling.sec.gov)
<u>Statutes & Rules</u>	Section 4(a)(5) of the Securities Act of 1933 Regulation D Rule 503 (e-CFR)
<u>FAQs & Guidance</u>	Small Business Compliance Guide: Form D (link) Guidance on Form D Filing Process (link) Guide to Definition of Terms Used in Form D (link) FAQs (Section 130) (link)

CPO/CTA Exemption Filing	
<u>Who</u>	Any person claiming an exemption or exclusion from CPO registration under CFTC Regulation 4.5, 4.13(a)(1), 4.13(a)(2), 4.13(a)(3), 4.13(a)(5) or an exemption from CTA registration under 4.14(a)(8)
<u>What</u>	No standard form; information and representation required in statement are specified in applicable rules
<u>When</u>	Within 60 days of the calendar year end
<u>How</u>	NFA (https://www.nfa.futures.org/electronic-filing-systems/exemptions.html)
<u>Statutes & Rules</u>	CFTC Regulation 4.5 (e-CFR), 4.13 (e-CFR), 4.14 (e-CFR)
<u>FAQs & Guidance</u>	General Information (CFTC) (link) CFTC Part 4 Easy Reference Guide (NFA Website) (link) Exemption System Easy Reference Guide (NFA Website) (link)

BEA Forms	
Foreign Direct Investment in United States https://www.bea.gov/surveys/fdiusurv	
BE-13	Transactional
BE-605	Quarterly
BE-15	Annual
BE-12	Benchmark (2018)
U.S. Direct Investment Abroad https://www.bea.gov/surveys/diasurv	
BE-577	Quarterly
BE-11	Annual
BE-10	Benchmark (2020)
U.S. International Services Transactions https://apps.bea.gov/ssb/be180/	
Form BE-185	Quarterly
Form BE-180	Benchmark (2020)

Form BE-13	
<u>Who</u>	<p>Required for each U.S. business enterprise when a foreign entity:</p> <p>(i) acquires, directly or indirectly, ownership or control 10% or more of the voting securities of an incorporated U.S. business enterprise, or an equivalent interest of an unincorporated U.S. business enterprise, including a branch; or</p> <p>(ii) establishes a new U.S. legal entity, expands its U.S. operations or acquires a U.S. business enterprise</p> <p><u>General exemption:</u></p> <p>The total cost of the acquisition, establishment or expansion is \$3 million or less</p> <p><u>Private fund exemption:</u></p> <p>(i) The U.S. business enterprise is a private fund;</p> <p>(ii) the private fund does not own, directly or indirectly through another business enterprise, an operating company (a business enterprise that is not a private fund or a holding company) in which the foreign parent owns at least 10% of the voting interest (directly, or indirectly through another U.S. business enterprise); and</p> <p>(iii) if the foreign parent owns the private fund indirectly (through one or more other U.S. business enterprises), there are no U.S. operating companies between the foreign parent and the indirectly owned U.S. private fund</p>
<u>What</u>	<p>BE-13A (link) BE-13B (link) BE-13D (link) BE-13E – 2019 (link) BE-13 Claim for Exemption (link)</p>
<u>When</u>	<p>45 days after the acquisition is completed, the new legal entity is established or the expansion is begun</p>
<u>How</u>	<p>BEA eFile (www.bea.gov/efile)</p>
<u>FAQs & Guidance</u>	<p>General Information (link) Decision Tree for Which Form to File (link) International Surveys: Foreign Direct Investment in the United States (link) Guide to BEA’s Direct Investment Surveys (link) FAQs (link) Video Tutorial (link)</p>

Form BE-605	
<u>Who</u>	<p>Required for:</p> <p>(i) directly owned U.S. affiliate for which total assets; annual sales or gross operating revenues, excluding sales taxes; or annual net income after provision for U.S. income taxes was greater than \$60 million (positive or negative) at any time during the affiliate’s fiscal reporting year; or</p> <p>(ii) indirectly owned U.S. affiliate that met the \$60 million threshold and had an intercompany debt balance with the affiliated foreign group</p> <p><u>Private fund exemption:</u></p> <p>(i) The U.S. business enterprise is a private fund,</p> <p>(ii) the private fund does not own, directly or indirectly through another business enterprise, an “operating company”—i.e., a business enterprise that is not a private fund or a holding company—in which the foreign parent owns at least 10% of the voting interest, and</p> <p>(iii) if the foreign parent owns the private fund indirectly (through one or more other U.S. business enterprises), there are no U.S. “operating companies” between the foreign parent and the indirectly owned U.S. private fund</p>
<u>What</u>	Paper form (link)
<u>When</u>	Quarterly – 30 days after the end of the calendar or fiscal quarter or 45 days after final quarter
<u>How</u>	BEA eFile (www.bea.gov/efile)
<u>FAQs & Guidance</u>	<p>International Surveys: Foreign Direct Investment in the United States (link)</p> <p>Guide to BEA’s Direct Investment Surveys (link)</p> <p>FAQs (link)</p>

Form BE-15

<u>Who</u>	<p>Each U.S. business enterprise in which a foreign person or entity owned or controlled, directly or indirectly, 10% or more of the voting securities if an incorporated U.S. business enterprise, or an equivalent interest if an unincorporated U.S. business enterprise, at the end of the business enterprise's fiscal year that ended in calendar year 2019</p> <p>Entities not contacted by BEA have no reporting responsibilities for the BE-15</p> <p><u>General exemption:</u></p> <p>Total assets, Sales or gross operating revenues, or Net income (loss)—for the U.S. affiliate (not just the foreign parent's share) exceed \$40 million at the end of, or for, its fiscal year that ended in calendar year 2019</p> <p><u>Private fund exemption:</u></p> <p>(i) The U.S. business enterprise is a private fund,</p> <p>(ii) the private fund does not own, directly or indirectly through another business enterprise, an “operating company”—i.e., a business enterprise that is not a private fund or a holding company—in which the foreign parent owns at least 10% of the voting interest, and</p> <p>(iii) if the foreign parent owns the private fund indirectly (through one or more other U.S. business enterprises), there are no U.S. “operating companies” between the foreign parent and the indirectly owned private fund</p>
<u>What</u>	BE-15A (link) BE-15B (link) BE-15C (link) BE-15 Claim for Exemption (link)
<u>When</u>	Annual – May 31, 2020 (est.) (or June 30, 2020 (est.) for reports submitted via eFile)
<u>How</u>	BEA eFile (www.bea.gov/efile)
<u>FAQs & Guidance</u>	International Surveys: Foreign Direct Investment in the United States (link) Guide to BEA's Direct Investment Surveys (link) Decision Tree for Which Form to File (link) FAQs (link)

Form BE-12	
<u>Who</u>	<p>Required for each U.S. business enterprise (including real estate held for non-personal use) in which a foreign person or entity owned or controlled, directly or indirectly, 10% of more of the voting securities if an incorporated U.S. business enterprise, or an equivalent interest if an unincorporated U.S. business enterprise</p> <p><u>Private fund exemption:</u></p> <p>(i) The U.S. business enterprise is a private fund;</p> <p>(ii) the private fund does not own, directly or indirectly through another business enterprise, an “operating company”—i.e., a business enterprise that is not a private fund or a holding company—in which the foreign parent owns at least 10% of the voting interest; and</p> <p>(iii) if the foreign parent owns the private fund indirectly (through one or more other U.S. business enterprises), there are no U.S. “operating companies” between the foreign parent and the indirectly owned private fund</p>
<u>What</u>	<p>BE-12A (link) BE-12B (link) BE-12C (link) BE-12 Claim for Not Filing (link)</p>
<u>When</u>	Benchmark – Every 5 years (last 2018)
<u>How</u>	BEA eFile (www.bea.gov/efile)
<u>FAQs & Guidance</u>	<p>General Information (link) International Surveys: Foreign Direct Investment in the United States (link) Guide to BEA’s Direct Investment Surveys (link) FAQs (link)</p>

Form BE-577

<p><u>Who</u></p>	<p>Required for:</p> <p>(i) each directly owned foreign affiliate for which total assets; annual sales or gross operating revenues, excluding sales taxes; or annual net income after provision for foreign income taxes was greater than \$60 million (positive or negative) at any time during the affiliate’s fiscal reporting year; and</p> <p>(ii) each indirectly owned foreign affiliate that met the \$60 million threshold and had an intercompany receivable or payable balance with the U.S. Reporter that exceeded \$1 million</p> <p><u>Private fund exemption:</u></p> <p>(i) The affiliate is a private fund</p> <p>(ii) The private fund affiliate does not own, directly or indirectly through another business enterprise, an “operating company”—i.e., a business enterprise that is not a private fund or a holding company—in which the consolidated U.S. Reporter owns at least 10% of the voting interest</p> <p>(iii) If the U.S. Reporter owns the private fund indirectly (through one or more other business enterprises), there are no “operating companies” between the consolidated U.S. Reporter and the indirectly owned private fund foreign affiliate</p>
<p><u>What</u></p>	<p>Paper Form (link)</p>
<p><u>When</u></p>	<p>Quarterly – 30 days after the end of the calendar or fiscal quarter or 45 days for final quarter</p>
<p><u>How</u></p>	<p>BEA eFile (www.bea.gov/efile)</p>
<p><u>FAQs & Guidance</u></p>	<p>International Surveys: U.S. Direct Investment Abroad (link) Guide to BEA’s Direct Investment Surveys (link) General FAQs (link)</p>

Form BE-11	
<u>Who</u>	Currently not applicable. File Form BE-10 instead
<u>What</u>	BE-11A (link) BE-11B (link) BE-11C (link) BE-11D (link) BE-11 Claim for Not Filing (link)
<u>When</u>	Annual, but currently not applicable
<u>How</u>	BEA eFile (www.bea.gov/efile)
<u>FAQs & Guidance</u>	International Surveys: U.S. Direct Investment Abroad (link) Guide to BEA's Direct Investment Surveys (link) General FAQs (link) BE-11 Instruction Booklet (link)

Form BE-10

<u>Who</u>	Required for a fully consolidated U.S. domestic business that has one or more foreign affiliates and for the foreign affiliates of the U.S. business <u>Private fund exemption:</u> (i) The affiliate is a private fund; (ii) The private fund affiliate does not own, directly or indirectly through another business enterprise, an “operating company”—i.e., a business enterprise that is not a private fund or a holding company—in which the consolidated U.S. Reporter owns at least 10% of the voting interest; (iii) If the U.S. Reporter owns the private fund indirectly (through one or more other business enterprises), there are no “operating companies” between the consolidated U.S. Reporter and the indirectly owned private fund foreign affiliate
<u>What</u>	BE-10A (link unavailable) BE-10B (link unavailable) BE-10C (link unavailable) BE-10D (link unavailable) BE-10 Claim for Not Filing (link unavailable)
<u>When</u>	Benchmark – May 29, 2020 (or June 30, 2020 if required to file 50 or more Forms)
<u>How</u>	BEA eFile (www.bea.gov/efile)
<u>FAQs & Guidance</u>	International Surveys: U.S. Direct Investment Abroad (link) General Information (link) Guide to BEA’s Direct Investment Surveys (link) General FAQs (link) Form BE-10 FAQs (link)

Form BE-185

<u>Who</u>	Each U.S. person who had sales of covered financial services to foreign persons that exceeded \$20 million during the previous fiscal year or are expected to exceed that amount during the current fiscal year; or had purchases of covered financial services from foreign persons that exceeded \$15 million during the previous fiscal year or are expected to exceed that amount during the current fiscal year
<u>What</u>	Paper Form (link)
<u>When</u>	Quarterly – Within 45 days of the close of each fiscal quarter (or within 90 days of closing the final quarter of your fiscal year)
<u>How</u>	BEA eFile (www.bea.gov/efile)
<u>FAQs & Guidance</u>	General Information (link) FAQs (link)

Form BE-180

<u>Who</u>	Each U.S. person that is a financial services provider or intermediary, or whose consolidated U.S. enterprise includes a separately organized subsidiary, or part, that is a financial services provider or intermediary, and that had transactions (either sales or purchases) directly with foreign persons in financial services
<u>What</u>	Paper Form (link unavailable)
<u>When</u>	Benchmark – November 1, 2020 (estimated)
<u>How</u>	BEA eFile (www.bea.gov/efile)
<u>FAQs & Guidance</u>	General Information (link) FAQs (link)

TIC B Monthly Forms

<u>Who</u>	Financial institutions if \$50 million or more across all geographic areas or \$25 million or more in an individual country: Form BC: Reporter's own dollar claims on foreign residents; Form BL-1: Reporter's own dollar liabilities to foreign residents; and Form BL-2: Reporter's U.S. customers' dollar liabilities to foreign residents
<u>What</u>	Form BC: Report on U.S. Dollar Claims of Financial Institutions on Foreign Residents (link) Form BL-1: Report on U.S. Dollar Liabilities of Financial Institutions to Foreign-Residents (link) Form BL-2: Report of Customers' U.S. Dollar Liabilities to Foreign Residents (link)
<u>When</u>	Monthly – 15 calendar days following the last day of the month
<u>How</u>	Federal Reserve System's Reporting Central (link)
<u>FAQs & Guidance</u>	TIC Forms & Instructions (link) B Forms Resource Center (link) B Forms Instructions (link) TIC Glossary (link) Reporting Central Resource Center (link) Reporting Central External User Guide (link) Reporting Central FAQ (link)

TIC B Quarterly Forms	
<u>Who</u>	<p>Financial institutions if \$50 million or more across all geographic areas or \$25 million or more in an individual country:</p> <p>Form BQ-1: Reporter’s U.S. customers’ dollar claims on foreign residents;</p> <p>Form BQ-2 (Part 1): Reporter’s foreign currency liabilities and claims and its domestic customers’ foreign currency claims with foreign residents;</p> <p>Form BQ-2 (Part 2): Total reporter’s domestic customers’ foreign currency liabilities to foreign residents; and</p> <p>Form BQ-3: Financial institutions if \$4 billion or more across all geographic areas of total U.S. dollar & foreign currency-denominated liabilities to foreign residents</p>
<u>What</u>	<p>Form BQ-1: Report on Customers’ U.S. Dollar Claims on Foreign Residents (link)</p> <p>Form BQ-2: Report on Foreign Currency Liabilities and Claims of Financial Institutions and of their Domestic Customers’ Foreign Currency Claims with Foreign Residents and Report on Customers’ Foreign Currency Liabilities to Foreign Residents (May 2020 or earlier: link; Post-May 2020: link)</p> <p>Form BQ-3: Report on Maturities of Selected Liabilities and Claims of Financial Institutions with Foreign Residents (link)</p>
<u>When</u>	<p>Quarterly – 20 calendar days following the last day of March, June, September and December</p>
<u>How</u>	<p>Federal Reserve System’s Reporting Central (link)</p>
<u>FAQs & Guidance</u>	<p>TIC Forms & Instructions (link)</p> <p>B Forms Resource Center (link)</p> <p>B Forms Instructions (link)</p> <p>TIC Glossary (link)</p> <p>Reporting Central Resource Center (link)</p> <p>Reporting Central External User Guide (link)</p> <p>Reporting Central FAQ (link)</p>

TIC Form D	
<u>Who</u>	All entities resident in the United States that have derivatives contracts if: (i) the total notional value of worldwide holdings of derivatives (including contracts with U.S. and foreign residents, measured on a consolidated-worldwide accounting basis) for the reporter’s own account and the accounts of the reporter’s customers exceeds \$400 billion, or (ii) the amount reported by the reporter for Grand Total Net Settlements (Part 1, Column 3, Row 7) exceeds \$400 million (either a positive or negative value)
<u>What</u>	Report of Holdings of, and Transactions in, Financial Derivatives Contracts with Foreign Residents (link)
<u>When</u>	Quarterly – 15th calendar day following the last day of March, June, September and December
<u>How</u>	Federal Reserve System’s Reporting Central (link)
<u>FAQs & Guidance</u>	<p>TIC Forms & Instructions (link)</p> <p>Form D Resource Center (link)</p> <p>Form D Instructions (link)</p> <p>TIC Glossary (link)</p> <p>Reporting Central Resource Center (link)</p> <p>Reporting Central External User Guide (link)</p> <p>Reporting Central FAQ (link)</p>

TIC Form S	
<u>Who</u>	United States resident entities who, during the reporting month, conduct transactions (e.g., purchases, sales, redemptions and new issues) in U.S. long-term securities directly from or to foreign residents, and/or conduct transactions in foreign long-term securities directly from or to foreign residents, or have foreign-resident agents conduct transactions in these securities on their own behalf, or on behalf of customers if the total reportable transactions in purchases or sales of long-term securities amount to \$350 million or more during the reporting month ⁴
<u>What</u>	Purchases and Sales of Long-Term Securities by Foreign Residents (link)
<u>When</u>	Monthly - 15th calendar day following the last day of the month
<u>How</u>	Federal Reserve System's Reporting Central (link)
<u>FAQs & Guidance</u>	TIC Forms & Instructions (link) S-Form Instructions (link) TIC Glossary (link) Reporting Central Resource Center (link) Reporting Central External User Guide (link) Reporting Central FAQ (link)

⁴ Note: If the level of transactions meet or exceed the exemption level in any month, reporting is required for the remainder of the calendar year regardless of the level of transactions in subsequent months; and for both purchases and sales even if only one meets or exceeds the exemption level.

TIC Form SLT	
<u>Who</u>	All U.S. persons who are U.S.-resident custodians, U.S.-resident issuers and U.S.-resident end-investors (including private fund managers) who have a consolidated total of all reportable long-term U.S. and foreign securities of a total fair value equal to or more than \$1 billion on the last business day of the reporting month ⁵
<u>What</u>	Aggregate Holdings of Long-Term Securities by U.S. and Foreign Residents (link)
<u>When</u>	Monthly – 23rd calendar day of the month following the report as-of date
<u>How</u>	Federal Reserve System’s Reporting Central (link)
<u>FAQs & Guidance</u>	TIC Forms & Instructions (link) Form SLT Resource Center (link) Form SLT Instructions (link) TIC Glossary (link) Reporting Central Resource Center (link) Reporting Central External User Guide (link) Reporting Central FAQ (link)

⁵ Note: The reporting entity also must submit a report for each remaining month in that calendar year, regardless of the consolidated total of reportable securities held in any subsequent month.

TIC Form SHC & SHCA	
<u>Who</u>	<p>Form SHC: All U.S. resident custodians and end-investors if either:</p> <p>(i) the total fair value of foreign securities whose safekeeping they manage for themselves and for other U.S. residents or whose safekeeping the reporter has entrusted directly to foreign-resident custodians or U.S. or foreign resident central securities depositories is US\$ 200 million or more; or</p> <p>(ii) if the total fair value of the foreign securities entrusted to that U.S.-resident custodian by the U.S. parts of the reporter's organization and its U.S.-resident clients whom the reporter represents as end-investor—aggregated over all accounts—is US\$ 200 million or more as of December 31st</p> <p>Form SHCA: Only required to file if contacted by the Federal Reserve Bank of New York</p>
<u>What</u>	<p>Form SHCA: Report of U.S. Ownership of Foreign Securities (Annual) (Form and Instructions link)</p> <p>Form SHC: Report of U.S. Ownership of Foreign Securities (5-year Benchmark) (Expired Form link)</p>
<u>When</u>	<p>Form SHC: 5-year Benchmark (Last in 2017, next in 2022)</p> <p>Form SHCA: Annual – First Friday of March</p>
<u>How</u>	<p>Federal Reserve System's Reporting Central (link)</p>
<u>FAQs & Guidance</u>	<p>TIC Forms & Instructions (link)</p> <p>Forms SHL/SHLA & SHC/SHCA Resource Center (link)</p> <p>TIC Glossary (link)</p> <p>Reporting Central Resource Center (link)</p> <p>Reporting Central External User Guide (link)</p> <p>Reporting Central FAQ (link)</p>

TIC Form SHL & SHLA

<u>Who</u>	Form SHL: All U.S.-resident entities unless the total fair (market) value of the reportable U.S. securities owned by foreign residents is less than \$100 million as of the close of business on June 30, 2019 Form SHLA: Only required to file if contacted by the Federal Reserve Bank of New York
<u>What</u>	Form SHL: Foreign-Residents' Holdings of U.S. Securities (5-Year Benchmark) (Form and Instructions link) Form SHLA: Foreign-Residents' Holdings of U.S. Securities (Annual) (Expired Form link)
<u>When</u>	Form SHL: 5-Year Benchmark – Last 2019, next 2024 Form SHLA: Annual – Last business day of August
<u>How</u>	Federal Reserve System's Reporting Central (link)
<u>FAQs & Guidance</u>	TIC Forms & Instructions (link) Forms SHL/SHLA & SHC/SHCA Resource Center (link) TIC Glossary (link) Reporting Central Resource Center (link) Reporting Central External User Guide (link) Reporting Central FAQ (link)

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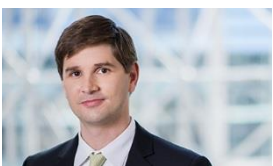
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