



Reminder: Upcoming Filing Deadlines for Fund Managers

With the new year comes a number of annual compliance obligations for evaluation by investment fund managers. In addition to the obligation for registered investment advisers to conduct an annual review of their compliance programs, certain filings may be required over the course of the next few months. The chart below is not comprehensive and certain fund managers may have additional filing requirements. For example, commodity pool operators and commodity trading advisors registered with the National Futures Association may have additional filing requirements, and managers with ongoing fund offerings need to amend Form D annually, based on the date of the initial filing. Further, as noted below certain annual filings are based on fiscal year end rather than calendar year end. For further guidance on whether a filing may be required, please contact a member of the Polsinelli Investment Funds team below or your Polsinelli attorney.

Authors

Daniel L. McAvoy
Shareholder
212.413.2844
dmcavoy@polsinelli.com

Daniel A. Peterson
Shareholder
314.622.6130
dpeterson@polsinelli.com

Brian A. Bullard
Office Managing Partner |
Practice Co-Chair
214.661.5531
bbullard@polsinelli.com

Deadline	Filing or Rule	Who Must File or Comply
February 14, 2021	Schedule 13G	Beneficial owners of 5% or more of a stock registered under Section 12(b) or 12(g) of the Securities Exchange Act that were not previously required to file Schedule 13D or 13G.
February 14, 2021	Schedule 13D/A and Schedule 13G/A	Any Schedule 13D or Schedule 13G filer if anything in the filing has changed other than percent ownership due to changes in the number of outstanding shares.
February 14, 2021	Form 5	Section 16 filers if there was any transaction in the subject security during 2020 that was not required to be reported on Form 4, and any other delinquent Section 16 filing, if the issuer has a December 31 FYE.

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Deadline	Filing or Rule	Who Must File or Comply
February 14, 2021	Form 13F	Institutional investment managers that exercised investment discretion over \$100 million or more in Section 13(f) securities on the last trading day of any month during 2020.
February 14, 2021	Form 13H	Any “large trader” of “NMS securities” during 2020, whether or not any changes need to be reported.
March 1, 2021	Affirmations of exemptions from registration under commodity pool operator (CPO) or commodity trading adviser (CTA) rules	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).
March 1, 2021	Form PF	Large hedge fund advisers (as defined in Form PF)
March 31, 2021	Form ADV Part 1 and state notice filings	All federal and state registered investment advisers and exempt reporting advisers with December 31 FYE
March 31, 2021	Form ADV Part 2 brochure ¹	All federal and state registered investment advisers with December 31 FYE
April 30, 2021	Form PF	Registered investment advisers with at least \$150 million of AUM attributable to private funds (other than large hedge fund advisers and large liquidity fund advisers)



¹ Form ADV Part 3, also known as the Form CRS relationship summary may, but is not strictly required to, be amended along with the rest of Form ADV in their annual updating amendments.