

◆ **Table of Annual Compliance Deadlines:**

FILING or Compliance Task	DEADLINE
New	
California Consumer Privacy Act (CCPA) - California privacy laws	Effective January 1, 2020
Amendments to FINRA Rules 5130 and 5131 (New Issues)	Effective January 1, 2020
CFTC amendment rules affecting exemptions for CPOs and CTAs with respect to family offices and non-US persons.	Effective January 9, 2020
NFA member “swap firms” – swaps proficiency requirements for Swap APs of NFA member CPOs and CTAs (among others)	January 31, 2020 (exam available) To be satisfied no later than January 31, 2021
Form CRS (Part 3 of Form ADV) to be delivered to “retail investors”	Between may 1 and June 30
Code of Ethics	
Rule 204A-1 quarterly transaction reports by access persons	January 31
Rule 204A-1 annual holdings reports by access persons	February 14
Form ADV	
State registered advisers and ERAs pay IARD fee	November-December (of every year)
SEC registered advisers and ERAs pay IARD fee	Before submission of Form ADV annual amendment
Annual ADV updating amendment	March 30, 2020
Delivery of Brochure (within 120 days from fiscal year end)	April 29, 2020
Delivery of audited financial statements (for December 31, 2019 year-end)	April 29, 2020
Form PF	
Form PF filers pay IARD fee (\$150)	Before submission of Form PF

Form PF for large liquidity fund advisers – within 15 calendar days after the end of first, second and third fiscal quarters.	For December 31, 2019 quarter end - January 15, 2020
Form PF for large hedge fund advisers – within 60 calendar days after the end of first, second and third fiscal quarters.	For December 31, 2019 quarter end - March 2, 2020*
Form PF for smaller private fund advisers and large private equity fund advisers – within 120 calendar days after the end of the fiscal year.	For December 31, 2019 fiscal year-end - April 29, 2020
Annual Securities Filings	
Form 13F (for December 31, 2019 quarter-end)	February 14, 2020
Form 13H annual filing	February 14, 2020
Schedule 13G annual amendment	February 14, 2020
Form D annual amendment	One year anniversary from last amendment filing.
CPO and CTA	
Affirm CPO exemption	February 29, 2020 (NOTE that if the exemption is not affirmed on or before February 29, 2020, the exemption will be withdrawn on March 1, 2020.)
Legal Entity Identifier (LEI) Renewal	One year anniversary from last renewal.
CPO Annual Reports - each CPO member must distribute an Annual Report (annual pool financial statements), certified by an independent public accountant, to pool participants within 90 days of the pool's fiscal year end and file the report using the NFA's EasyFile system.	March 30, 2020
Registered Large CPO Form CPO-PQR December 31 quarter end report (within 60 days of the quarters ending March 31, June 30, September 30 and December 31)	March 2, 2020*
Registered CPOs filing Form PF in lieu of Form CPO-PQR December 31 year end report	March 30, 2020
Registered Mid-Size and Small CPO Form CPO-PQR year end report (within 90 days of the calendar year end)	March 30, 2020

Registered CTA Form PR (for December 31, 2019 year end)	February 14, 2020 (and within 45 days after the quarters ended March, June and September)
Bureau of Economic Analysis Filings	
Form BE-13 Surveys (BE-13A, BE-13B, BE-13C, BE-13D and BE-13E) New Foreign Direct Investment Surveys	Due not later than 45 days after a triggering acquisition; quarterly and annual follow-on filing.
U.S. Treasury Filings	
TIC Form S	Monthly (if triggered)
TIC Form SLT	January 23, 2020 (for December 2019)
TIC Form SHCA (Report data as of December 31 no later than the first Friday of March)	March 6, 2020
TIC B Forms: Monthly – no later than the 15 th calendar day following the last day of the month. Quarterly – no later than the 20 th calendar day following the last day of March, June, September and December.	Monthly report (December 31, 2019) – by January 15, 2020 Quarterly report (December 31, 2019) – by January 20, 2020
TIC Form D: No later than the 50 th calendar day following the last day of March, June, September and December.	Quarterly report (December 31, 2019) – by February 19, 2020
FATCA Report Form 8966 (for financial institutions)	March 31, 2020 (automatic 90-day extension may be requested.)
FBAR Form FinCEN Report 114 (6-month automatic extension permitted)	April 15, 2020 (October 15 - with auto extension)
Other Filings	
California LLC-12 Statement of Information for LLCs organized or registered (qualified) to do business in CA	Initial - within 90 days of registration filing with the CA Secretary of State. Every 2 years – within 6 months prior to the LLC's

	biennial registration anniversary.
California FTB 3522 – LLC Annual Tax Voucher and \$800 Tax Fee.	Initial – by the 15 th day of the 4 th month after the LLC’s California registration. Annual – by April 15th
California Finance Lender License annual report (for December 31, 2019 year-end)	March 15, 2020

*Reflects an extended due date under Exchange Act Rule 0-3. If the due date of filing falls on a Saturday, Sunday or holiday, a report is considered timely filed if it is filed on the first business day following the due date.