

MEMO# 32406

April 23, 2020

SEC Extends EDGAR Filing Window on April 29

[32406]

April 23, 2020 TO: ICI Members SUBJECTS: Compliance

Disclosure

Operations

Variable Insurance Products RE: SEC Extends EDGAR Filing Window on April 29

The Division of Investment Management recently announced that it will extend the EDGAR filing window on April 29, 2020, from 5:30 p.m. to 10:00 p.m. Eastern Daylight Time for registered investment company and business development company filings to mitigate potential filing delays associated with COVID-19.^[1] Filings submitted after 5:30 pm would normally be considered filed on the next business day. Filings submitted after 5:30 pm on April 29 will automatically have the filing date adjusted to April 29. The SEC will make the filing date adjustment on April 30 or as soon as practicable thereafter.

The extension of the filing window should accommodate December 31 fiscal year end funds filing their annual registration statement update.^[2] The announcement notes the extension is for one day only and advises any fund or business development company requiring a subsequent filing window extension to submit a request to IMEmergency@sec.gov.

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endnotes

^[1] See EDGAR Filing Window Extension for Registered Investment Companies and Business Development Companies on April 29, 2020 (April 22, 2020) *available at* <https://www.sec.gov/oit/announcement/edgar-filing-window-extension>.

^[2] Investment Company Act rule 8b-16 requires investment companies to update their registration statement not more than 120 days after the fiscal year end.

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