



SKRC

COMPLIANCE WEEKLY

A publication of Seward & Kissel Regulatory Compliance

September 30, 2025

SKRC Compliance Weekly is a weekly reminder of certain regulatory obligations that may apply to an SEC-registered investment adviser and CFTC-registered commodity pool operator and commodity trading advisor with a December 31 fiscal year-end that advises one or more private funds.

Obligation	Comment
Periodic Report for CPOs due 9/30/2025	CPOs are required to distribute a periodic report of their account statements within 30 calendar days of each month end. Note, however, that CPOs relying on an exemption under CFTC Rule 4.7 or Rule 4.12(b) are only required to distribute a periodic report of their account statements within 30 days of each quarter end.
Quarterly Form 13H Amendment due 10/10/2025	Exchange Act Rule 13h-1 requires a “large trader” to identify itself to the SEC and promptly make certain disclosures to the SEC on Form 13H. Following an initial filing of Form 13H all large traders must make an amended filing to correct inaccurate information promptly (within 10 days) following the quarter-end in which the information became inaccurate.



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If you have any questions regarding the matters covered herein, please contact your primary Seward & Kissel partner or a member of [Investment Management Group](#).

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