



A publication of Seward & Kissel Regulatory Compliance

## **October 28, 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
Quarterly Transaction Reports due 10/30/2025	Advisers Act Rule 204A-1 requires "access persons" of a registered adviser to submit a transaction report to the chief compliance officer covering all transactions during the previous quarter no later than 30 days after the end of each calendar quarter.
Periodic Report for CPOs due 10/30/2025	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.





A publication of Seward & Kissel Regulatory Compliance

If you have any questions regarding the matters covered herein, please contact your primary Seward & Kissel partner or a member of <u>Investment Management Group</u>.

Seward & Kissel Regulatory Compliance (SKRC) is a service provided by Seward & Kissel LLP. SKRC offers Compliance Services as well as an Online Compliance Portal.

## SEWARD & KISSEL LLP

One Battery Park Plaza New York, NY 10004 212-574-1200 | 212-480-8421 (fax) sknyc@sewkis.com

901 K Street, NW Washington, DC 20001 202-737-8833 | 212-480-8421 (fax) skdc@sewkis.com

The information contained herein is for informational purposes only and is not intended and should not be considered to be legal advice on any subject matter. As such, recipients of this information, whether clients or otherwise, should not act or refrain from acting on the basis of any information included in this report without seeking appropriate legal or other professional advice. This information is presented without any warranty or representation as to its accuracy or completeness, or whether it reflects the most current legal developments. This information may be considered attorney advertising. Prior results do not guarantee a similar outcome.