



SKRC

COMPLIANCE WEEKLY

A publication of Seward & Kissel Regulatory Compliance

January 27, 2026

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 1/30/2026	Advisers Act Rule 204A-1(b)(2) requires “access persons” of a registered investment 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 1/30/2026	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.
NFA Bylaw 1101 Confirmation (for CPOs and CTAs) due 2/2/2026	A CPO of a pool with investors that are either (a) pools that are exempt under CFTC Rule 4.5 or Rule 4.13 or (b) CTAs that are exempt under CFTC Rule 4.14(a)(8) should confirm promptly after the beginning of each calendar year that each such exempt investor has affirmed its exemption, claimed another exemption, or properly registered with the CFTC and become a NFA member. Same requirement for CTAs.



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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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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

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