2025 Regulatory Update for Investment Managers and Private Funds

By Evan Hall, Jacqueline Jensen, Georgia Neal | January 14, 2025

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The purpose of this update is to remind investment advisers, investment managers, private funds, commodity pool operators, commodity trading advisors and commodity pools about various annual and periodic regulatory, legal, reporting, compliance and other obligations, considerations and requirements, including required filings and reports with due dates in 2025. This update does not purport to be a comprehensive or exhaustive overview of all applicable compliance, reporting, regulatory, legal or other obligations that are or may be applicable to investment advisers, investment managers, private funds, commodity pool operators, commodity trading advisors and/or commodity pools.

FORM ADV ANNUAL UPDATING AMENDMENT FOR RIAs; ANNUAL DELIVERY OF PART 2A TO CLIENTS

Annual Updating Amendment

Each registered investment adviser ("RIA") must file an annual updating amendment to its Form ADV (including Part 1A and Part 2A) to update its responses to all items and questions within 90 days of the end of each fiscal year. Accordingly, an RIA with a December 31 fiscal year end will be required to file an annual updating amendment to its Form ADV by **March 31, 2025**. The Form ADV annual updating amendment is filed electronically with the Securities and Exchange Commission ("SEC") (or applicable state regulatory authorities) via the Investment Adviser Registration Depository ("IARD"). An RIA must include the summary of material changes required by Item 2 of Part 2A either in the brochure (cover page or the page immediately thereafter) or as an exhibit to the brochure. Amendments to Part 2B of Form ADV generally are not required to be filed with the SEC (unless requested) or made publicly available on the IAPD website, but investment advisers registered with the state of Texas or other state regulatory authorities may be required to file amendments to Part 2B of Form ADV with such authorities (including as part of the annual updating amendment).

Read the full article here.

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