



U.S. Securities and Exchange Commission  
**Office of the Investor Advocate**

FISCAL YEAR 2025

# Report on Activities



## ABOUT THIS REPORT AND DISCLAIMER

Section 4(g)(6) of the Securities Exchange Act of 1934 (Exchange Act), 15 U.S.C. § 78d(g)(6), requires the Investor Advocate to file two reports per year with the Committee on Banking, Housing, and Urban Affairs of the Senate and the Committee on Financial Services of the House of Representatives.<sup>1</sup> The two reports are the mid-year Report on Objectives covering the forthcoming Fiscal Year and the end-of-year Report on Activities covering the preceding Fiscal Year.

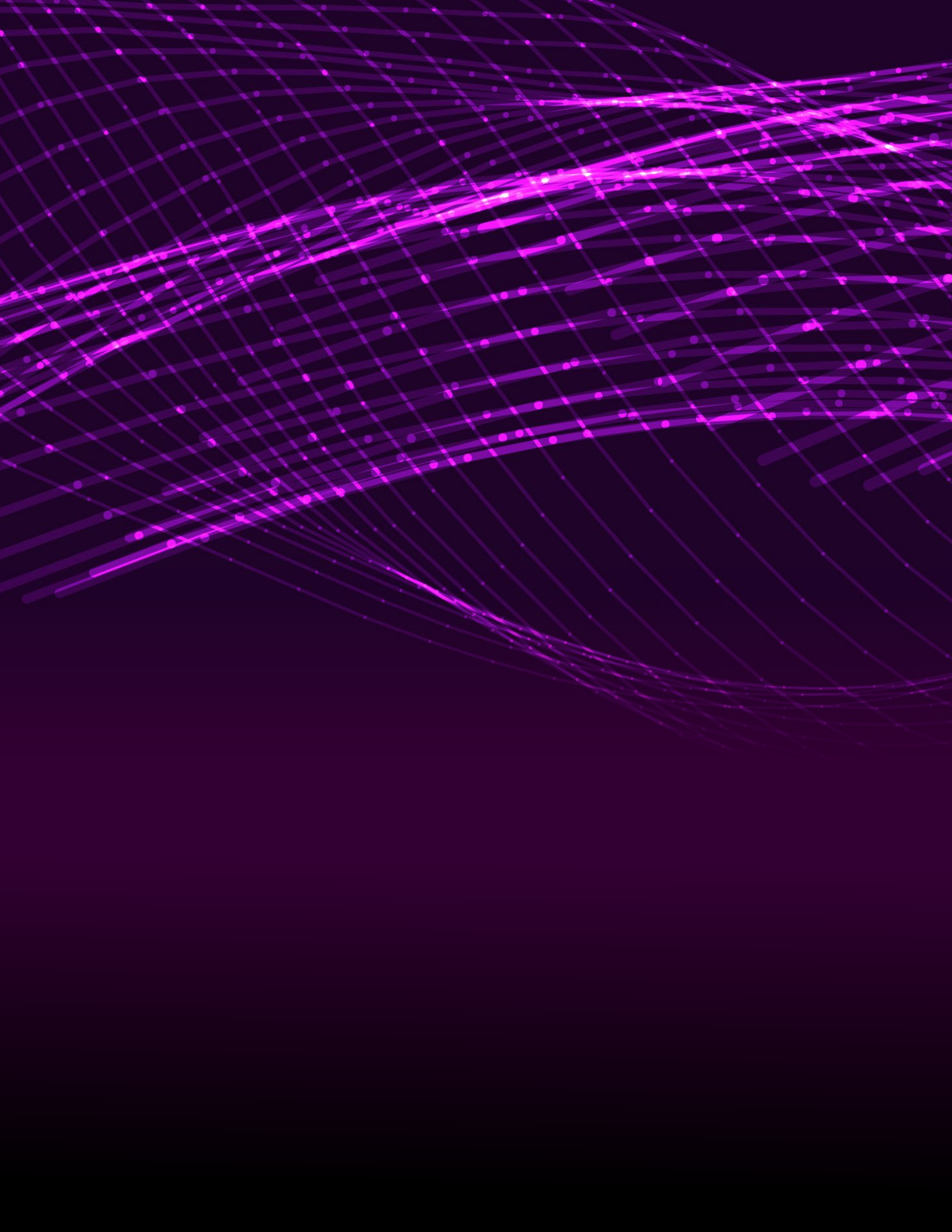
A Report on Objectives is due no later than June 30 of each year, and its purpose is to set forth the objectives of the Investor Advocate for the following Fiscal Year.<sup>2</sup> A Report on Activities is due no later than December 31 of each year.<sup>3</sup> The Report on Activities describes the activities of the Investor Advocate during the immediately preceding Fiscal Year.

Disclaimer: Pursuant to Exchange Act Section 4(g)(6)(B)(iii), 15 U.S.C. § 78d(g)(6)(B)(iii), this Report on Activities is provided directly to Congress without any prior review or comment from the Commission, any Commissioner, any other officer or employee of the Commission outside of the Office of the Investor Advocate or the Office of Management and Budget. This Report on Activities expresses solely the views of the Investor Advocate. It does not necessarily reflect the views of the Commission, the Commissioners, or staff of the Commission, and the Commission disclaims responsibility for this Report on Activities and all analyses, findings, and conclusions contained herein.

# CONTENTS

<b>MESSAGE FROM THE INVESTOR ADVOCATE . . . . .</b>	<b>1</b>
<b>FISCAL YEAR 2025 SUMMARY . . . . .</b>	<b>3</b>
<b>INVESTOR ENGAGEMENT . . . . .</b>	<b>4</b>
Investor Engagement Activities . . . . .	4
SEC And External Collaboration. . . . .	6
FY 2025 by the Numbers. . . . .	6
Interagency Securities Council. . . . .	7
<b>ADVOCACY FOR INVESTORS . . . . .</b>	<b>8</b>
Private Markets. . . . .	8
Improving Disclosures for “Main Street” Investors . . . . .	8
Evaluating The Potential Impact of SRO Rule Proposals . . . . .	9
<b>RESEARCH AND INVESTOR TESTING . . . . .</b>	<b>10</b>
THRIVE . . . . .	11
Accredited Investors. . . . .	11
<b>MESSAGE FROM THE OMBUDS . . . . .</b>	<b>13</b>
<b>ENDNOTES . . . . .</b>	<b>18</b>
<b>ERRATA SHEET . . . . .</b>	<b>20</b>





# MESSAGE FROM THE INVESTOR ADVOCATE

**FOR THE PAST THREE YEARS**, it has been my privilege to serve the public and the Commission as the Investor Advocate. When I accepted this honor back in January 2023, I did so with the intention of serving a limited term. In January 2026, I will leave this role and the SEC in gratitude for the opportunity to promote the aspirations and confront the challenges of investors during a period of time when their choices have rapidly multiplied, as has the complexity of the decisions they make when investing their capital.

During my tenure, I have often reiterated my belief that the expansion of retail investment products and platforms in the past few years is an overall benefit to individual investors, while also stressing the urgent need for better disclosures, especially as the complexity of products on offer grows. Free and fair markets cannot flourish without well-informed investors who can accurately compare risk and opportunity and apply market principles to their choices.

The impact of retail investors on the markets overall has grown alongside the expansion of their investment opportunities, making the need for effective retail disclosures a subject worthy of every market participant's attention. At the same time, information many institutional investors seek and

receive is also evolving, intensifying the focus on what it means to give and receive disclosures.

Actionable and reliable disclosure is not only critical for informed investment decisions, it is necessary for sound policy development. As an undergraduate, I took a class with Edward Tufte on producing and evaluating data and statistical analyses for policymaking which continues to influence my thinking to this day. Sound policy depends on seeking answers to unbiased questions in the world as it is, not as we wish it to be.

I have endeavored to strengthen the investor research program that my predecessor, Rick Fleming, established when he organized the Office of the Investor Advocate. During my tenure, we have launched the production of quarterly, longitudinal data sets that can provide reliable, consistent, and timely information about retail investor behavior to the Commission and rule-writing teams. We have also maintained the ability to engage more deeply



with investors to conduct qualitative testing and data collection that can inform policy making, and expanded our direct engagement with investors with different viewpoints and experiences.

I am very grateful to Chairman Atkins and Commissioners Peirce, Crenshaw, and Uyeda for their encouragement and on-going support of the work of our office, especially our research. I hope that the data we have produced continues to be of service in evaluating the policy choices the Commission makes. I am also grateful to the Investor Advisory Committee, on which I have served as a statutory member. The volunteer members of the IAC give generously of their time and talent to provide the Commission with valuable insights and thoughtful recommendations.

Finally, I want to acknowledge the SEC staff, especially those in the Office of the Investor Advocate. Their dedication, expertise, and professionalism is a credit to the investors they serve, and is reflected in the legal analysis, engagements, and assistance they offer. In particular, I would like to thank Marc Sharma, Lisa Skrzycki, Alycia Chin, Katie Carman, Adam Anicich, and Andrew Sporkin, who is retiring after nearly four decades of service with the SEC. I have learned from them every day of my tenure, and I am proud to have been their colleague.

I am pleased to submit this Report on Activities for Fiscal Year 2025 on behalf of the Office of the Investor Advocate, and I welcome any questions from Members of Congress.

Respectfully Submitted,

A handwritten signature in black ink, reading "Cristina Begoña Martin Firvida". The signature is written in a cursive, flowing style.

CRISTINA BEGOÑA MARTIN FIRVIDA  
Investor Advocate

# FISCAL YEAR 2025 SUMMARY



**120**  
ENGAGEMENT  
ACTIVITIES

DATA COLLECTION  
ACTIVITIES

involving  
over



**27,000**

INDIVIDUAL INVESTOR  
CONTACTS

**2,496**  
INVESTOR SUBMISSIONS  
to the Ombuds

**14**   
RULEMAKINGS and  
STAFF STATEMENTS  
reviewed



**250+**  
SRO FILINGS  
reviewed

# INVESTOR ENGAGEMENT

The Office of the Investor Advocate (OIAD) is statutorily mandated to assist retail investors, identify problems that investors may have, analyze the potential impacts on investors of rules or regulations, and make proposals to the Commission to promote the interests of investors.<sup>4</sup>

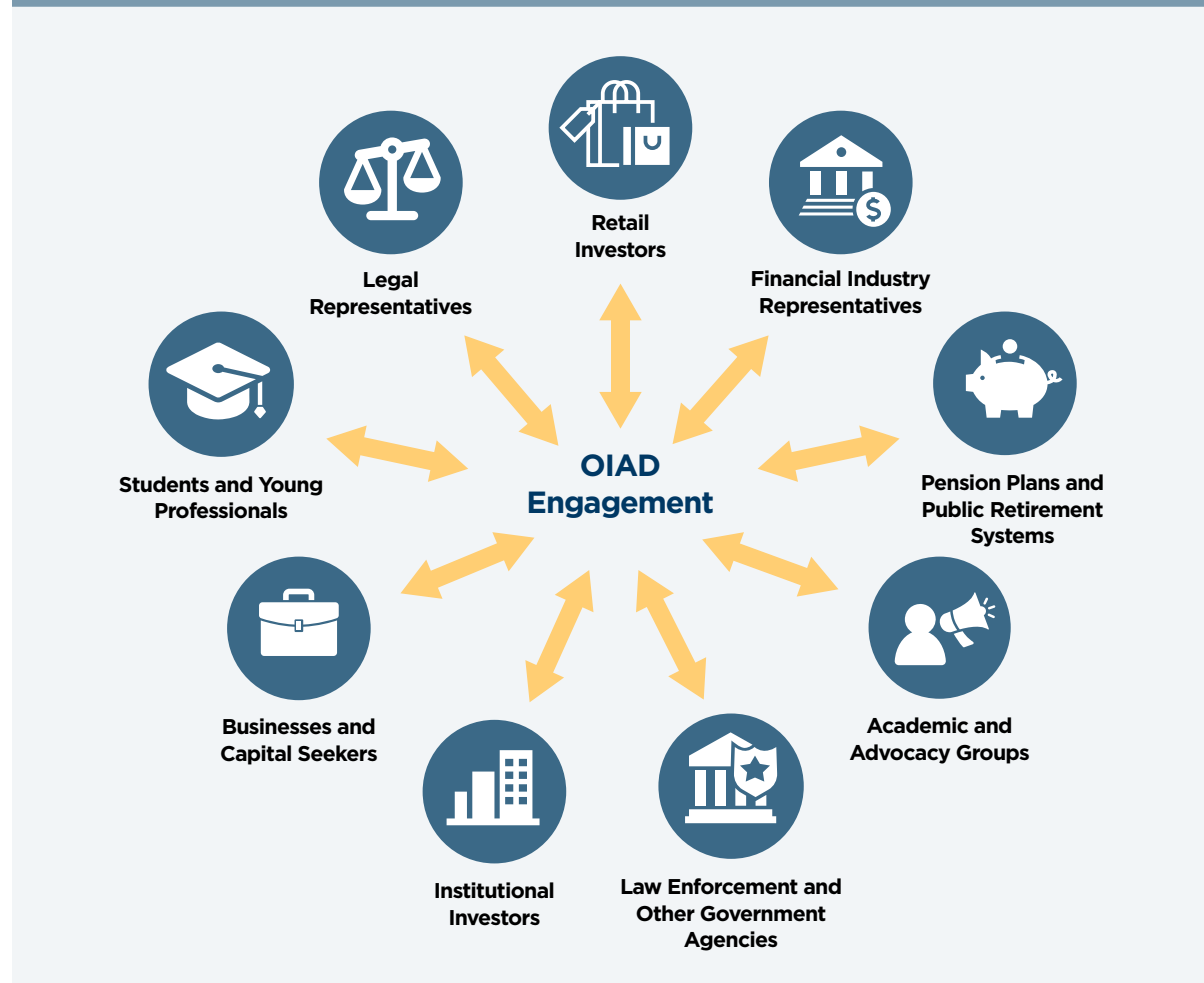
One of the primary ways in which OIAD collects this information and sustains a focus on investors

is through ongoing investor engagement activities,<sup>5</sup> which directly support the statutory mandate and help amplify the voices of investors.

## INVESTOR ENGAGEMENT ACTIVITIES

The Office actively seeks input from a broad range and variety of investors—including individual retail investors, smaller and regional investor groups, non-profits and consumer groups, academics and

FIGURE 1. Investor Groups Consulted





researchers, public and private pension funds, and other small and large money managers—as well as regulatory and law enforcement counterparts.<sup>6</sup>

Retail investors, and their unique perspectives, are particularly important to OIAD. We place special emphasis on individuals and groups whose views and needs may be less frequently heard, including those who do not routinely travel to Washington, DC, to lobby government leaders, or who do not regularly submit comment letters to the Commission. Among those whom OIAD especially seeks to hear from are older investors, new investors, veterans, military, and military spouses, affinity-connected investors, investors from rural and non-metro areas, historically underserved and/or Native American communities, crypto and non-traditional finance investors, investors with disabilities, investors with innovative approaches to investing, and investors with varying levels of exposure to capital markets. The Office also solicits and encourages input from stakeholders with a range of epistemological perspectives and values.

The goals for investor engagement are twofold:

- Understand investor experiences and perspectives regarding products, practices, regulations, rulemakings, and the markets, and communicate them in a decision-useful context for Commission leaders and staff; and

- Advocate for investors’ interests in the regulatory and rulemaking environments in a manner consistent with the Office’s statutory mission.

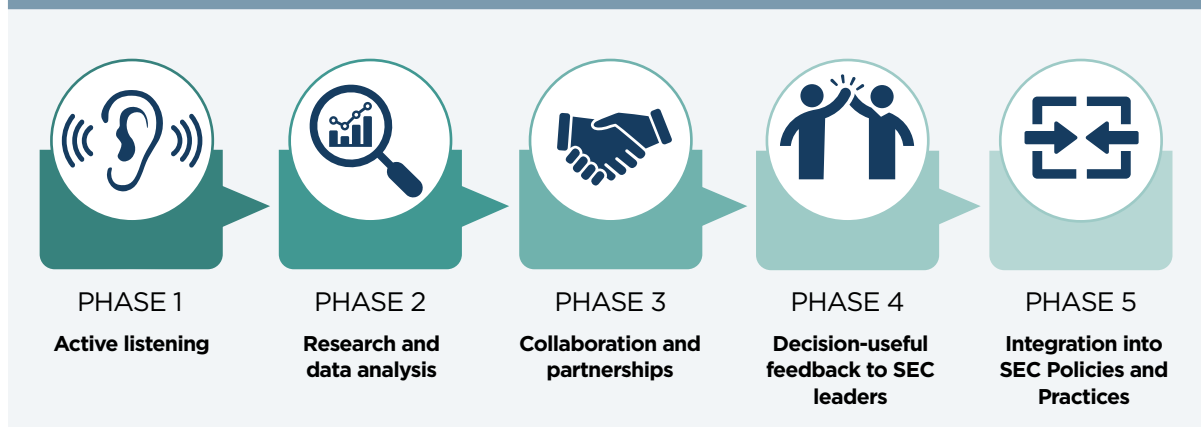
This year, the Office continued to meet with a broad array of investors and investor representatives to gain from their perspectives and identify trends, issues, and policies that investors consider to be important. By leveraging virtual conferencing, in addition to the numerous in-person activities traditionally performed, OIAD welcomed a number of new investors and related groups to share their experiences with the Investor Advocate.<sup>7</sup>

One area in which OIAD further matured this year was to increase engagement with State and Local government agencies, as well as expand data-driven decision-support across the portfolio, which provided decision makers with useful and evidence-based investor preferences, trends, and capabilities. OIAD has the unique ability to identify, answer, evaluate, and operationalize the questions of:

- What do we learn from investors?
- What do we do with that information?

OIAD does this, in part, by partnering with other Divisions and Offices to hear directly from investors regarding the impact that potential rules

FIGURE 2. Types of Investor Engagement



and regulations have on investors and identify problems that investors may have with products or services. The goal is to further institutionalize stakeholder (i.e., investor) input into all stages of the Commission's operations.

## SEC AND EXTERNAL COLLABORATION

OIAD further enhanced available engagement opportunities with other SEC Divisions and Offices, federal departments, state agencies, and law enforcement partners—so that they could hear directly from investors how the Commission, and the government, can best serve them. This included:

### SEC Divisions and Offices

The Office expanded opportunities for investors to communicate their perspectives directly with the Divisions. For example, during FY 2025, OIAD organized numerous investor engagement activities with Division and Office Directors and Commissioners, so they could hear investor commentary first-hand—including hosting an event titled Demystifying Capital Markets and the SEC's Investor Advocacy Law School Clinic Summit.

### Federal Departments and Agencies

In addition to the SEC, other federal departments and agencies are constantly working to protect the financial markets, products, and the American people. As part of the Office's regular course of business, we often communicate and partner with federal agencies to support the larger investor advocacy mission, or to obtain broad investor and stakeholder feedback consistent with our statutory mission.

### State Agencies

State Securities Regulators play a critical part in the regulatory and investor protection mosaic, and the Office continued to foster the already strong connections with the North American Securities Administrators Association (NASAA) and individual state regulators.

## Law Enforcement Partners

As part of OIAD's commitment to investors, understanding the evolution in investment frauds is of paramount concern. To enhance the Office's ability to mitigate problems and promote the interests of investors, the Division of Enforcement in 2024 launched the Interagency Securities Council<sup>8</sup> (ISC), with OIAD's conceptualization and support. The ISC convenes recurring meetings between law enforcement and regulators at the federal, state, and local levels. Additional details are described in the *Interagency Securities Council* section below.

OIAD also engaged with various local, state, and federal law enforcement and government regulatory agencies throughout the year to better understand the threats facing retail investors, and the related feedback from investors that other agencies are receiving.

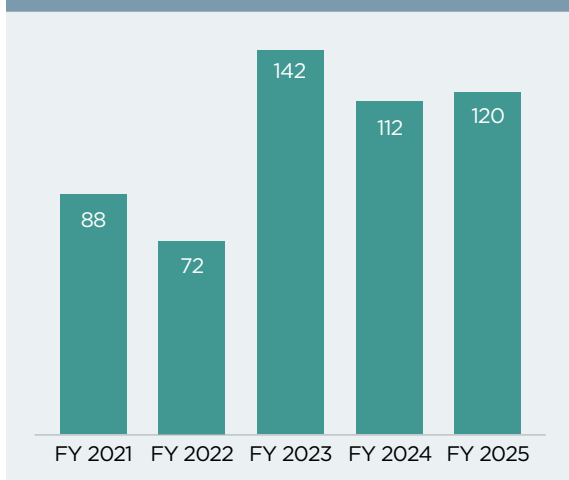
## FY 2025 BY THE NUMBERS

OIAD hosted or substantially contributed to approximately 120 engagements in FY 2025, with one-third of those being individuals or organizations that had not previously met with the Office.<sup>9</sup> Through these engagements, investors, firms, advocates, investigators, and regulators shared their experiences with investment products and providers, policy, rules, and regulation, the SEC and SROs, and securities fraud.

These engagements directly informed the Investor Advocate's consultations with the Chairman and Commissioners, Division and Office directors, and senior staff related to the experiences of everyday American investors, as well as the two annual reports the Office develops and submits to Congress, pursuant to statute.<sup>10</sup>

The Office also presented at multiple large conferences, including *SEC Speaks*,<sup>11</sup> the ICGN 30th Anniversary Conference in the Americas, the

FIGURE 3. Number of Engagements



2025 CIPHER Conference, and the PwC Fraud Executive Roundtable.

### INTERAGENCY SECURITIES COUNCIL

The Interagency Securities Council (ISC)<sup>12</sup> is a joint task force that invites federal, state, and local regulatory and law enforcement professionals to meet quarterly to discuss the latest in scams, trends, frauds, and mitigation strategies, and provides briefings on emerging and complex topics.

The ISC's objective is to strengthen the cohesion between federal, state, and local agencies, enhance opportunities to collaborate on cases to protect investors, provide insight and guidance across the ecosystem for investigators who may not frequently operate in the securities space, and creates a forum for unified efforts in combating financial fraud. Chaired by the Director of the Division

of Enforcement, OIAD's Investor Engagement Manager envisioned, developed, and leads the SEC's efforts on the Council.

This unique Council is limited to law enforcement and government regulatory agencies, and now includes over 2,500 representatives from more than 250 departments and agencies,<sup>13</sup> including federal financial and law enforcement agencies, state offices of attorneys general and state police, state securities regulators, and local police departments and sheriff's offices. Members participate in discussions with experts on emerging threats, hear from investigators conducting and supervising investigations, and explore case study examples of agencies employing innovative approaches to combat financial fraud. The ISC also serves as an opportunity to connect and share information with the larger law enforcement community that less frequently deals with securities law violations, such as police/sheriff departments and tribal- and military-community law enforcement.

In FY 2025, the ISC conducted large meetings<sup>14</sup> and hosted specialized briefings with experts, such as a briefing on Digital Evidence Collection, Extraction, and Preservation with the SEC's Office of Inspector General.

The ISC was also invited by SEC's Investor Advisory Committee to present on threats facing retail investors at the public meeting<sup>15</sup> in March 2025; with the presentation later being cited<sup>16</sup> in others' congressional testimony, and the Congressional Record.

# ADVOCACY FOR INVESTORS

**T**his section of our annual Report on Activities describes a selection of our policy activities on behalf of investors for the period from October 1, 2024 through September 30, 2025 (the Reporting Period).

## PRIVATE MARKETS

During Fiscal Year 2025, the Office of the Investor Advocate continued to pay close attention to the issues surrounding the considerable growth of the private markets in the United States over the past two decades. In our prior Reports, we have acknowledged that the private markets have become an increasingly important avenue both for companies seeking to raise capital and for investors seeking investment opportunities and portfolio diversification. We also recognize the risks inherent in investing in the private markets, including reduced, incomplete or unreliable disclosure; limited liquidity; and greater risk of fraud and/or investment loss.

A key element of this effort has been our ongoing outreach to institutional and retail investors and other stakeholders to acquire a deeper understanding of the issues and different perspectives surrounding the private markets. Through this outreach, we have gained further insight into, and developed a greater appreciation of, the range of views held by investors and other stakeholders on topics such as expanded retail investor participation in the private markets, the inclusion of private market investments in retirement savings plans, the degree of transparency in the private markets, accredited investor status, and the interplay between the private and public markets.<sup>17</sup>

The Office has also continued to monitor pending legislative proposals in Congress that addressed various aspects of the private markets and evaluated the impact that these bills would have on investors. In addition, our Office of Investor Research (OIR) has engaged in ongoing research on topics relating to the private markets, which included the issuance of a working paper on accredited investors and private market securities ownership in June 2025.<sup>18</sup>

Chairman Paul Atkins has indicated that democratizing access to alternative assets and facilitating the ability of retail investors to participate in the private markets, consistent with President Trump's Executive Order,<sup>19</sup> is a priority for the Commission. Going forward, we will continue to focus on the issues surrounding the private markets and will endeavor to help ensure that investors' interests remain at the forefront of the discussion as the Commission considers potential initiatives in this area.

## IMPROVING DISCLOSURES FOR "MAIN STREET" INVESTORS

Another longstanding area of focus in the Office of the Investor Advocate has been the quality and effectiveness of disclosures provided to investors, particularly retail investors. Over the years, the Office has been supportive of the Commission's efforts to assess and improve the efficacy of disclosures by public companies, investment companies, and other regulated entities. Among other things, we have encouraged investor testing as a means of improving the accessibility of disclosures to retail investors, as our Office of Investor Research has moved forward with its

innovative research efforts on investor behavior and decision making.

Many commentators have noted the increasing length and complexity of the disclosures being provided under the Commission's rules and have raised concerns as to whether material information is communicated to investors under these rules in a more effective manner. During the Reporting Period, the Office sought to develop a more thorough understanding of how investors use these disclosures and to solicit a range of views on how to improve the effectiveness of the current disclosure system. Through ongoing engagements with retail investors and other relevant parties as well as our own analysis, the Office gained additional insight on different approaches to making required disclosures more user-friendly and comprehensible to investors, particularly retail investors, while also taking into account the extent to which this may add to the costs and burdens on issuers and other providers of disclosure.

According to the Commission's most recent Regulatory Flexibility Act Agenda, Commission staff is considering rule amendments to "rationalize disclosure practices to facilitate material disclosure by companies and shareholders' access to that information." We welcome staff recommendations that would make disclosures more accessible to retail investors in a cost-effective manner, and we will continue to monitor developments in this area,

including the increasing use of artificial intelligence in both preparing and analyzing disclosures, as we advocate for the disclosure needs of investors.

## **EVALUATING THE POTENTIAL IMPACT OF SRO RULE PROPOSALS**

Pursuant to our statutory mandate, during Fiscal Year 2025, the Office of the Investor Advocate continued to analyze the potential impact on investors of proposed rules of SROs. Self-regulation of market intermediaries is a core element of the securities law framework concerning national exchanges, broker-dealers, and clearing agencies. These SROs are primarily responsible for establishing the standards under which their members conduct business and for monitoring that conduct; and can do so in ways that are innovative and fast moving. Due to potential conflicts of interest in their business models, however, SEC oversight of the SROs is an important component—both to instill public confidence in the securities industry and to ultimately protect investors. During Fiscal Year 2025, our resources allowed our Office to analyze over 250 of the proposed rules of SROs. In Fiscal Year 2026, the Investor Advocate will continue to communicate with investors and their representatives to determine the potential impact of proposed rules of SROs on investors and consider areas in which investors could benefit from changes in the proposals.



# RESEARCH AND INVESTOR TESTING

**T**he Exchange Act directs the Investor Advocate to identify problems with financial service providers and investment products and analyze the potential impact on investors of proposed regulations of the Commission and proposed rules of self-regulatory organizations. Pursuant to Section 4(g)(3) of the Exchange Act, the Investor Advocate created OIAD's Office of Investor Research (OIR) to accomplish these goals. Pursuant to Section 4(g)(6) of the Exchange Act, OIAD summarizes OIR's activities annually in its Report on Activities for Fiscal Year.

OIR is a multidisciplinary group that uses investor testing, surveys, qualitative interviews, and statistical modeling to study investment behavior and provide the Commission and the public with insight into how investors and other stakeholders interact with the investment marketplace. OIR provides research support to Commission offices and divisions seeking objective information about investors and responds to Congressional mandates for investor testing.<sup>20</sup> Section 19(e) of the Securities Act, in addition to other statutes, authorizes OIR to conduct investor testing.



OIR conducts long-term research to understand fundamental aspects of investor behavior and works with policymakers to provide an evidence base for policymaking. Since June 2017, OIR has conducted 79 survey and experimental projects, 19 qualitative data collection projects, and several analyses of market data, including 8 surveys and 1 qualitative data collection project in this fiscal year. OIR's research has been published in peer-reviewed journals including the *Journal of Economic Behavior & Organization* and *Financial Services Review*, and cited in multiple SEC rulemakings.<sup>21</sup> In Fiscal Year 2025, OIR also presented research at the Current Innovations in Probability-Based Household Internet Panel Research (CIPHER) conference in an effort to promote investor-related research within the broader scientific community.



Looking forward, OIR will continue to support OIAD's statutory directive through high-quality research. We intend to examine investors' decisions and behavior, their decision context, household factors, and macroeconomic trends. The rest of this year's report presents a subset of results from OIR's public research.

## THRIVE

OIR directs and maintains a nationally representative survey panel of U.S. retail investors referred to as the Thoughtful Households Relating InVesting Experiences (THRIVE) Panel. THRIVE consists of quarterly longitudinal surveys (that is, surveys that invite the same people over time) and custom testing projects that are the Commission's primary research tool for understanding retail investors. As part of THRIVE quarterly surveys, 7,500 people are invited to answer recurring questions on investment decisions and household events, as well as novel questions examining contemporaneous areas of interest.

THRIVE benefits the Commission and OIAD in multiple ways. Longitudinal surveys are a cost-effective and efficient method for evaluating key investor developments and identifying emerging investor issues, information that is critical to understanding investor activity, and promoting policy efficacy. Each quarter, OIR produces *Perspectives on Investing in the U.S.: Insights from THRIVE*, which contains 9 key measurements from each quarterly survey.

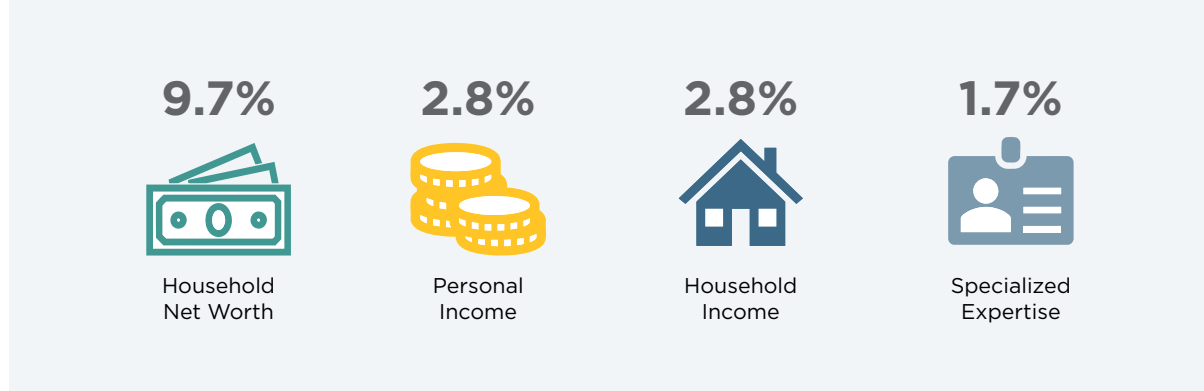
THRIVE also provides infrastructure that allows OIAD to quickly respond to policymakers' needs by reducing the cost and time required to collect data. We discussed additional benefits of THRIVE in our 2024 Report on Activities.<sup>22</sup>

## ACCREDITED INVESTORS

Accredited investors include individuals and entities that meet certain criteria thought to be indicative of financial sophistication or the ability to bear financial risk, such as meeting a net worth or income threshold or holding certain professional certifications or designations. Individuals and entities that qualify as accredited investors may participate in investment opportunities such as private offerings conducted by issuers relying on Rule 506 of Regulation D.

Four ways for individuals to qualify as an accredited investor include (1) having a net worth or joint net worth with a spouse of over \$1 million, excluding their primary residence; (2) having individual income that exceeds \$200,000 in each of the prior two years and a reasonable expectation of that income level in the current year;

FIGURE 4. The percentage of the U.S. population that qualifies as accredited investors by criteria



(3) having joint income (with a spouse or spousal equivalent) that exceeds \$300,000 in each of the prior two years and a reasonable expectation of that income level in the current year; or (4) holding certain professional certifications or other credentials (e.g., the Series 65 investment adviser representative license).<sup>23</sup>

This year, OIAD was interested in better understanding the characteristics and capabilities of accredited investors. OIR conducted research in furtherance of this goal by analyzing nationally representative survey data from THRIVE to document the characteristics of accredited investors and non-accredited investors.<sup>24</sup>

Based on our research, we find that 12.6% of individuals in the U.S. population qualify as accredited investors. Individuals primarily qualify based on their reported net worth (capturing 9.7% of the population), followed by personal income (capturing 2.8% of the population) and household income (capturing 2.8% of the population). Least common is qualifying based on specialized expertise (capturing 1.7% of the population). The majority of accredited investors (75%) satisfy only a single criterion, while the remaining 25% satisfy two or more. 4.3% of those who qualify report owning private market securities described in the question as “private funds or offerings” and further specifying that these types of assets typically require investors to meet certain criteria.

# MESSAGE FROM THE OMBUDS

*There are some frauds so well conducted, that it would be stupidity not to be deceived by them.*<sup>25</sup>

**THE OMBUDS OFFICE** data reported below indicates that, statistically, every single day, an Ombuds staff member responds to an investor defrauded in an investment scheme. Nearly all of the fraud complaints reported to the Ombuds Office during the Reporting Period were made possible by digital payment services or cryptocurrency platforms, encrypted messaging systems, and the investor's lack of information and experience with legitimate cryptocurrency investments. In this void of information, scammers exploit ignorance, oftentimes funneling Americans' hard-earned savings out of the country and into the coffers of organized crime.

Too many investors do not know legitimate financial professionals do not communicate via Instagram or WhatsApp. Investors may not understand why they should not fund an investment account by digital payments to a third party. Investors too often believe that an application available for download through their smartphone's official system means it has been approved by the distributor and is safe. When sophisticated scammers impersonate legitimate firms, financial professionals, and government employees, how are Main Street investors expected to know the difference?

When the staff of the Ombuds Office responds to defrauded investors, we have no trouble finding publications from the SEC and other agencies providing education about investing and warning against fraud tactics. Unfortunately, these resources are often identified all too late.

During my time at the SEC providing direct investor assistance, I've observed my colleagues at the SEC and other agencies use every tool at their disposal to address investment fraud. Often jurisdictional and resource roadblocks hamper efforts to hold wrongdoers accountable or return lost funds; however, I am heartened by the successes of recent agency and interagency actions targeting the organizations allegedly responsible for much of the fraud reported to our office. As our previous Ombuds warned in last year's Report on Activities, without necessary funding for law enforcement and regulatory agencies, we may fail to quell this rising tide of fraud.<sup>26</sup>

I reiterate the prior Ombuds' plea to Congress to provide the SEC, other financial regulators, and



law enforcement agencies the necessary funds to address this fraudulent activity.<sup>27</sup> Otherwise, agencies like the SEC are forced to divert resources away from our other investor protection efforts or risk failing to respond at all. In my observation, more often than not, it is the SEC frontline staff that shoulders this burden, drawing upon a selfless devotion to the agency's mission to bridge the gap between what we have to work with and what must be done.

Our nation cannot afford to watch the savings and investment accounts of Americans continue to be raided by foreign bad actors.

\*\*\*

It has been one of the highest honors of my career to head the Ombuds Office during this period of transition and to be able to escalate the concerns

of retail investors to the Commission's senior leadership. I am humbled by the trust placed in me by the Investor Advocate and the Ombuds Office staff.

As the term of my temporary appointment to Acting Ombuds comes to an end in January 2026, I look forward to rejoining my colleagues as a staff attorney and supporting the goals of the next Investor Advocate and their appointed Ombuds.

Finally, I extend my gratitude to the staff of the Ombuds Office for their steadfast commitment and enthusiasm in serving retail investors, and my colleagues in the Office of the Investor Advocate and across the SEC for their support of our work. Above all, I thank the Investor Advocate, Cristina Martin Firvida, for her leadership, support, and unwavering dedication to retail investors for the last three years.

Respectfully Submitted,



LISA A. SKRZYCKI

Acting Ombuds



## WHO WE ARE

The Securities Exchange Act requires the Investor Advocate to appoint an Ombudsman (Ombuds) to act as a liaison for retail investors to relay their concerns and questions about the Commission and the self-regulatory organizations (SROs) the Commission oversees.<sup>28</sup> The Ombuds staff consists of an experienced team of lawyers, law clerks, and paralegals, each with differing subject matter expertise, all dedicated to providing personalized, tailored assistance to the retail investors that contact the Ombuds Office for help. Through direct engagement with investors, relevant parties within the Commission, and external stakeholders committed to investor protection issues, the Ombuds Office fulfills its statutory duty to help retail investors resolve issues relating to the Commission and SROs.

Among other statutory duties, the Ombuds must submit biannual reports to Congress describing the work of the office and its effectiveness in assisting retail investors.<sup>29</sup> This Ombuds' Report provides a look back on the Ombuds' activities for the six-month period of October 1, 2024, through March 31, 2025 (Reporting Period), and discusses the Ombuds' objectives and outlook for Fiscal Year 2026.

## WHAT WE DO

As noted above, the Ombuds is required by statute to:

- help retail investors resolve questions and complaints they may have with the Commission or with SROs the Commission oversees;
- review and make recommendations regarding policies and procedures that encourage investors

to present questions to the Investor Advocate regarding compliance with the securities laws;

- take steps to ensure the confidentiality of investor communications with our Office; and
- submit biannual reports to the Investor Advocate that describe the activities and evaluate the effectiveness of the Office.<sup>30</sup>

## HOW WE HELP

Our primary responsibility is to assist retail investors by resolving concerns, questions, and complaints about the SEC and the SROs subject to SEC oversight. We accomplish this in several ways—most commonly by conducting research, providing information, making referrals, conducting research, and collaborating with other divisions, offices, and SROs about complaints that impact investor interests.

Many submitters who contact our Office are not complaining about the SEC and SROs, but rather seek assistance and information regarding fraud. When we receive credible allegations of securities violations, we refer this information to the Divisions of Examinations and Enforcement for potential examination, investigation, or action. When we receive reports of fraudsters impersonating the SEC or misappropriating the SEC's seal, we notify staff in the Office of the General Counsel and Office of Inspector General. If an investor seeks assistance with their personal investments or an investment account, we refer the investor to the Office of Investor Education and Advocacy. In all cases, we endeavor to make sure the investor receives a clear response from the SEC regarding their concerns and that such concerns are elevated to the attention of the Investor Advocate and other interested parties within the Commission.

FIGURE 5. The Process by Which We Receive and Assist Investors with Their Requests



## HOW TO CONTACT US

Our primary means of communication with the public is through the Ombudsman Matter Management System (OMMS), an online portal for receiving, responding to, and managing data submitted to our Office. The public can also contact us by email, telephone, and regular mail.

## INVESTOR VOICES, BY THE NUMBERS



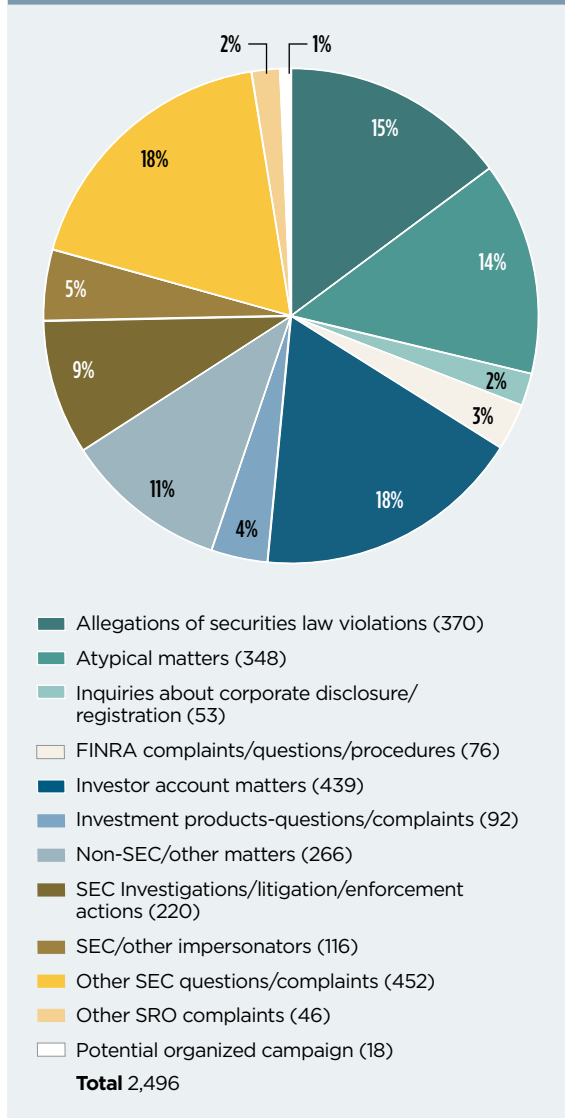
The Ombuds team maintains records in OMMS of all submissions and responses handled by our Office. Matters are assigned a label or “Primary Issue Category,” reflecting the nature of the issues raised in the submission.<sup>31</sup>

In tracking investor submissions by volume and by Primary Issue Category, OMMS may serve as an early warning system, flagging existing or potential risks for retail investors.

During the Reporting Period (October 1, 2024–September 30, 2025), the Ombuds Office received and processed 1,256 new matters submitted by U.S. and foreign investors, market participants, and other interested members of the public. (Matters counted in prior reports and reopened during the Reporting Period are not reflected in this figure.) The chart below (Figure 6) illustrates the number of matters divided into 12 Primary Issue Categories, which are used to classify the nature of the submission.

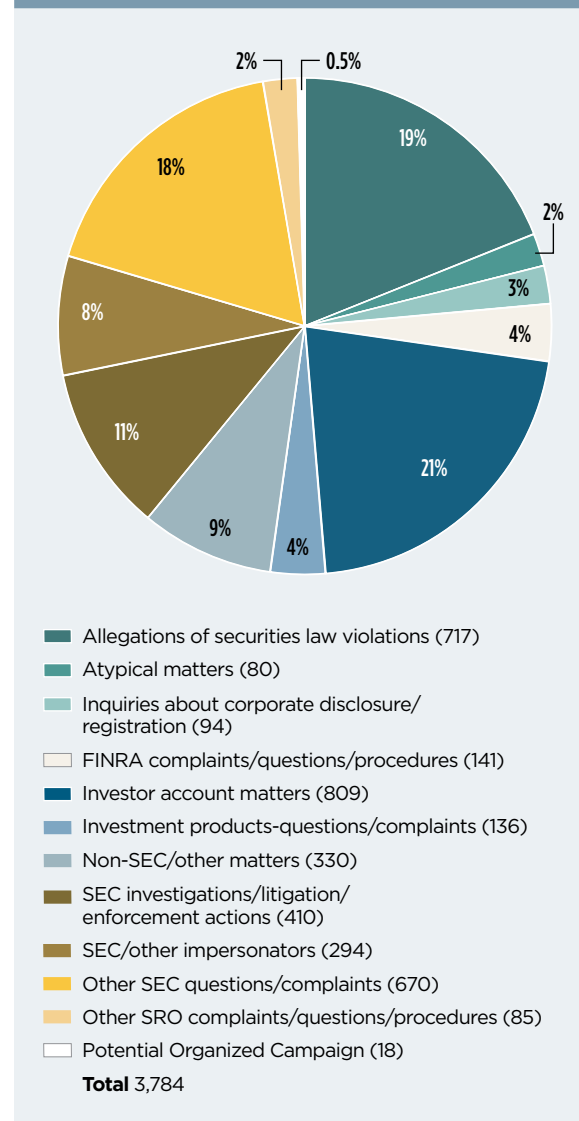
In addition, the Ombuds team made approximately 1,864 follow-up emails, phone calls, and other forms of correspondence to resolve the 1,256 matters received and reopened matters identified in prior reports. This accounts for a combined total of 3,120 contacts with or on behalf of submitters from October 1, 2023, to March 31, 2024. Figure 7 details the number of follow-up contacts with the public, separated by Primary Issue Category.

FIGURE 6. Matters by Primary Issue Category, October 1, 2024–September 30, 2025



In comparison to the figures reported in FY 2024, the Ombuds Office has noted a slight decrease in the volume of new matters submitted to the Ombuds Office, along with a slight increase in the team's efforts to resolve these matters. The total

FIGURE 7. Contacts by Primary Issue Category, October 1, 2024–September 30, 2025



number of matters received in FY 2025 (2,496) decreased by 11 percent from FY 2024 (2,772). The total number of contacts in FY 2025 (3,784) marked a 10 percent increase from the number of contacts in FY 2024 (3,390).

# ENDNOTES

- 1 Exchange Act § 4(g)(6), 15 U.S.C. § 78d(g)(6).
- 2 Exchange Act § 4(g)(6)(A)(i), 15 U.S.C. § 78d(g)(6)(A)(i).
- 3 Exchange Act § 4(g)(6)(B)(i), 15 U.S.C. § 78d(g)(6)(B)(i).
- 4 See Exchange Act § 4(g)(4), 15 U.S.C. § 78d(g)(4). Full text is available at <https://www.govinfo.gov/content/pkg/COMPS-1885/pdf/COMPS-1885.pdf#page=57>.
- 5 See SEC's Performance Goal #6: Investor Engagement Activities, SEC, *Fiscal Year 2026 Congressional Budget Justification Annual Performance Plan Fiscal Year 2024 Annual Performance Report* (May 30, 2025), <https://www.sec.gov/files/fy-2026-congressional-budget-justification.pdf#page=55>.
- 6 Investor Engagement Activities are defined in the SEC's performance goals as organizing: "investor-focused meetings, events, and activities that are designed primarily to engage directly with investors and receive feedback about policy questions, investing challenges, regulatory policy and rulemaking, investment products and services, investor issues, and/or potential misconduct. Investor Engagement Activities, defined above, include consultations with individual investors; small business investors; institutional investors; representatives from organizations that are comprised of, and/or represent the interests of, investors; other market participants and industry experts, and law enforcement and regulatory entities. This also includes a number of public events such as investor roundtables, public meetings, and academic engagement."
- 7 OIAD conducted investor engagement activities with approximately forty new entities/organizations in fiscal year 2025.
- 8 See Press Release, SEC, SEC Launches Interagency Securities Council to Coordinate Enforcement Efforts Across Federal, State, and Local Agencies (July 19, 2024), <https://www.sec.gov/newsroom/press-releases/2024-86>.
- 9 Approximately 40 Investor Engagement Activities in FY 2025 were classified as "new engagements"—those that included individuals or organizations that had not previously consulted or engaged with the Office of the Investor Advocate.
- 10 Pursuant to 4(g)(6)(A)(i) and (B)(i) of the Exchange Act, the Investor Advocate is required to submit to the Committee on Banking, Housing, and Urban Affairs of the Senate and the Committee on Financial Services of the House of Representatives the following two reports each year: (1) a report on the objectives of the Investor Advocate for the following fiscal year, not later than June 30 each year; and (2) a report on the activities of the Investor Advocate during the immediately preceding fiscal year, not later than December 31 each year.
- 11 Additional details and the full agenda for Practising Law Institute's *SEC Speaks* event can be found online at <https://www.pli.edu/programs/the-sec-speaks/413804>.
- 12 See Press Release, SEC, SEC Launches Interagency Securities Council to Coordinate Enforcement Efforts Across Federal, State, and Local Agencies (July 19, 2024), <https://www.sec.gov/newsroom/press-releases/2024-86>.
- 13 As of September 30, 2025.
- 14 The term "large meetings" generally indicates multiple hundreds of law enforcement and government regulators from one-to-two hundred departments and agencies all over the country.
- 15 Details and the full agenda can be found at <https://www.sec.gov/about/advisory-committees/investor-advisory-committee/iac030625-agenda>.
- 16 See *Financial Aggression: How The Chinese Communist Party Exploits American Retirees and Undermines National Security*, U.S. Senate Special Committee and the U.S. House Select Committee on the Chinese Communist Party, 119th Cong. (2025) (statement of Christopher Iacovella, President and CEO, American Securities Association), <https://www.congress.gov/event/119th-congress/senate-event/LC74495/text>.
- 17 This range of views is reflected in a wide array of recent policy recommendations from various parties on improving private market regulation, including a recommendation issued by the Investor Advisory Committee at its September 2025 meeting on retail investor access to private market assets.
- 18 See Katherine Carman et al., *Exploring Accredited Investors and Private Market Securities Ownership* (SEC, OIAD Working Paper No. 1, 2025), <https://www.sec.gov/files/exploring-accredited-investors-june-2025.pdf>.

- 19 Exec. Order No. 14330, 90 FR 38921 (Aug. 12, 2025), <https://www.whitehouse.gov/presidential-actions/2025/08/democratizing-access-to-alternative-assets-for-401k-investors>.
- 20 See, e.g., U.S. House of Representatives, Consolidated Appropriations Act, H.R. 2617, Pub. L. No. 117-328, 136 Stat. 5529 (2022), <https://www.congress.gov/bill/117th-congress/house-bill/2617> (Sec. 101(b)(2)(B) directing the Commission to conduct investor testing on registered index-linked annuities).
- 21 See Alycia Chin et al., *How Should I Know? Lack of Confidence Biases Stock Market Expectations Toward Zero*, 229 Journal of Economic Behavior & Organization (2025); see also Brian Scholl et al., *Mutual Fund Knowledge Assessment for Policy and Decision Problems*, Financial Services Review (2022); see also SEC, *Registration for Index-Linked Annuities and Registered Market Value Adjustment Annuities; Amendments to Form N-4 for Index-Linked Annuities, Registered Market Value Adjustment Annuities, and Variable Annuities; Other Technical Amendments*, 89 Fed. Reg. 59978 (Jul. 24, 2024); see also SEC, *Tailored Shareholder Reports for Mutual Funds and Exchange-Traded Funds; Fee Information in Investment Company Advertisements*, 87 Fed. Reg. 72758 (Nov. 25, 2022); see also SEC, *Regulation Best Interest: The Broker Dealer Standard of Conduct*, 84 Fed. Reg. 33318, at 33415-33417 (Jul. 12, 2019); see also SEC, *Form CRS Relationship Summary; Amendments to Form ADV*, 84 Fed. Reg. 33492 (Jul. 12, 2019).
- 22 SEC, Office of the Investor Advocate, *Report on Activities for Fiscal Year 2024* (Dec. 12, 2024), <https://www.sec.gov/files/fy24-oiad-sar-activities-report.pdf>.
- 23 See Rule 501(a) of Regulation D [17 CFR § 230.501(a)], or <https://www.sec.gov/education/capitalraising/building-blocks/accredited-investor>. Individuals may also qualify under Rule 501(a)(4), which includes any director, executive officer, or general partner of the issuer, or Rule 501(a)(11), which covers knowledgeable employees of private funds investing in these funds, but these additional categories of accredited investors were not covered in this research.
- 24 See Katherine Carman et al., *Exploring Accredited Investors and Private Market Securities Ownership* (SEC, OIAD Working Paper No. 1, 2025), <https://www.sec.gov/files/exploring-accredited-investors-june-2025.pdf>.
- 25 Charles Caleb Colton, *LACON: OR MANY THINGS IN FEW WORDS; ADDRESSED TO THOSE WHO THINK 70*, (1837).
- 26 See SEC, Office of the Investor Advocate, *Report on Activities for Fiscal Year 2024* (Dec. 12, 2024), <https://www.sec.gov/files/fy24-oiad-sar-activities-report.pdf>.
- 27 See *id.*
- 28 Exchange Act Section 4(g)(8)(B)(i), 15 U.S.C. § 78d(g)(8)(B)(i).
- 29 Exchange Act Section 4(g)(8)(D), 15 U.S.C. § 78d(g)(8)(D).
- 30 Exchange Act Section 4(g)(8)(D), 15 U.S.C. § 78d(g)(8)(B), (D).
- 31 The 12 Primary Issue Categories can be defined as follows:
  1. *Allegations of Securities Law Violations*: Investor alleges that an individual, firm, or entity has violated or is violating the U.S. securities laws. Where the investor makes a specific, credible allegation of fraud, these matters are referred to the Divisions of Enforcement or Examinations.
  2. *Atypical matters*: Matters of undetermined or harassing nature.
  3. *FINRA Complaints/Questions/Procedures*: Questions or complaints relating to a FINRA investigation or arbitration, a FINRA employee, or about FINRA rules, policies, or procedures.
  4. *Inquiries about Corporate Disclosure/Registration*: Questions about SEC filings and other matters relating to corporate disclosure.
  5. *Investment Products–Questions/Complaints*: Questions or complaints about a specific type of investment product.
  6. *Investor Account Matters*: Questions or complaints relating to a retail investor’s personal investments or finances.
  7. *Non-SEC/Other Matters*: Questions or complaints about issues that do not fall within the SEC’s jurisdiction.
  8. *Other SEC Questions/Complaints*: Questions or complaints about the SEC, including its policies, procedures, rules, and employees.
  9. *Other SRO Complaints/Questions/Procedures*: Questions or complaints relating to the policies, procedures, or rules of an SRO other than FINRA.
  10. *Potential Organized Campaign*: Submission appears to be part of a coordinated effort by multiple individuals to contact the Ombuds’ Office about the same issue.
  11. *SEC Investigations/Litigation/Enforcement Actions*: Questions or complaints about SEC investigations, litigation, or other related issues, such as distributions.
  12. *SEC/Other Impersonators*: Complaints about SEC or SRO impersonators, and complaints involving fraudulent use of the SEC or SRO seal.



# ERRATA SHEET

The following corrections and clarifications apply to typographical errors in certain of the Office of the Investor Advocate's prior reports to Congress, as identified below.

1. The following correction applies to the Fiscal Year 2026 Report on Objectives (June 2025) regarding a typographical error in the date range reported in the Figure 4 label on page 16, which reads "October 1, 2024–March 31, 2024." The correct date range is "October 1, 2024–March 31, 2025."
2. The following correction applies to the Fiscal Year 2023 Report on Activities (December 2023) regarding the transposition of accurately reported data under two different labels in Figures 15 and 16 on page 35. Figure 15 relates to the number of "Matters" received, while Figure 16 relates to the number of "Contacts." The accurate data underlying both of those categories is transposed, with the number of matters received and corresponding chart misplaced under Contacts, and the number of contacts and corresponding chart misplaced under Matters. The data and corresponding chart relating to the number of matters received should be reported under "Matters," while the data and corresponding chart relating to the number of contacts should be reported under "Contacts."
3. The following correction applies to the Fiscal Year 2022 Report on Activities (December 2022) regarding the chart and key in Figure 13 on page 49. While the total number of matters discussed in the text on page 49 is accurate—2,780 matters—that total did not carry through to the accompanying chart and key. Instead, the chart and key were not updated and instead are reproduced from the Fiscal Year 2023 Report on Objectives (June 2022). The correction would update the chart and key in the Fiscal Year 2022 Report on Activities (December 2022) to match the 2,780 total number of matters reported in the text.



