



18-03428-T



August 1, 2018

RESEARCH SUBJECT: Portland Hill Asset Management Ltd.  
CIK # 0001703658  
London, UK

Dear Sir or Madam:

In accordance with the Freedom of Information Act (FOIA), by this correspondence I request notice of any non-public correspondence for consumer complaints, investigations and/or disciplinary actions that may be on file for **all available dates (to the present)** for the subject listed above.

I understand that my firm is responsible for the costs associated with processing this request and ask that you contact me in advance if the estimated costs will exceed \$100.

My regards.

Sally Marcus  
Sr. Risk Administrator



BNY MELLON



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
STATION PLACE  
100 F STREET, NE  
WASHINGTON, DC 20549-2465

Office of FOIA Services

August 14, 2018

Ms. Sally Marcus  
EACM Advisors, LLC  
200 Connecticut Ave., 6th Floor  
Norwalk, CT 06854

Re: Freedom of Information Act (FOIA), 5 U.S.C. § 552  
Request No. **18-03428-T**

Dear Ms. Marcus:

This letter is in response to your request, dated and received in this office on August 1, 2018, for any non-public correspondence for consumer complaints, investigations and/or disciplinary actions concerning Portland Hill Asset Management Ltd.

Based on the information you provided in your letter, we conducted a thorough search of the SEC's various systems of records, but did not locate or identify any information responsive to your request.

If you still have reason to believe that the SEC maintains the type of information you seek, please provide us with additional information, which could prompt another search. Otherwise, we conclude that no responsive information exists and we consider this request to be closed.

You have the right to appeal the adequacy of our search or finding of no responsive information to the SEC's General Counsel under 5 U.S.C. § 552(a)(6), 17 CFR § 200.80(f)(1). The appeal must be received within ninety (90) calendar days of the date of this adverse decision. Your appeal must be in writing, clearly marked "Freedom of Information Act Appeal," and should identify the requested records. The appeal may include facts and authorities you consider appropriate.

You may file your appeal by completing the online Appeal form located at [https://www.sec.gov/forms/request\\_appeal](https://www.sec.gov/forms/request_appeal), or mail your appeal to the Office of FOIA Services of the Securities and Exchange Commission located at Station Place, 100 F Street NE, Mail Stop 2465, Washington, D.C. 20549, or deliver it to Room 1120 at that address.

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If you have any questions, please contact me at [mandicf@sec.gov](mailto:mandicf@sec.gov). You may also contact me at [foiapa@sec.gov](mailto:foiapa@sec.gov) or (202) 551-7900.

You also have the right to seek assistance from Dave Henshall at (202) 551-7900 as a FOIA Public Liaison for this office, or contact the Office of Government Information Services (OGIS) for dispute resolution services. OGIS can be reached at 1-877-684-6448 or [Archives.gov](http://Archives.gov) or via e-mail at [ogis@nara.gov](mailto:ogis@nara.gov). Note that contacting the FOIA Public Liaison or OGIS does not stop the 90-day appeal clock and is not a substitute for filing an administrative appeal.

Sincerely,

A handwritten signature in black ink that reads "Frank Mandic". The signature is written in a cursive style with a large, stylized "F" and "M".

Frank Mandic  
FOIA Research Specialist