

**FORM ADV****Uniform Application for Investment Adviser Registration****Part II – Page 1****OMB APPROVAL**

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Name of Investment Adviser: Auriel Capital Management LLP					
Address: (Number and Street) 22 Cross Keys Close		(City) London	(State) United Kingdom	(Post Code) W1U 2DW	Area Code: Telephone number: + 44 (0)20 7258 8850

This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any governmental authority

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

**1. A. Advisory Services and Fees.** (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

- |                                                                                                                                                                                  |         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| <input type="checkbox"/> (1) Provides investment supervisory services ...                                                                                                        | _____ % |
| <input checked="" type="checkbox"/> (2) Manages investment advisory accounts not involving investment supervisory services ...                                                   | 100 %   |
| <input type="checkbox"/> (3) Furnishes investment advice through consultations not included in either service described above ...                                                | _____ % |
| <input type="checkbox"/> (4) Issues periodicals about securities by subscription ...                                                                                             | _____ % |
| <input type="checkbox"/> (5) Issues special reports about securities not included in any service described above ...                                                             | _____ % |
| <input type="checkbox"/> (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities ... | _____ % |
| <input type="checkbox"/> (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities ...                                               | _____ % |
| <input type="checkbox"/> (8) Provides a timing service ...                                                                                                                       | _____ % |
| <input type="checkbox"/> (9) Furnishes advice about securities in any manner not described above ...                                                                             | _____ % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term?

Yes ☐ No ☒

C. Applicant offers investment advisory services for: (check all that apply)

- |                                                                                 |                                                |
|---------------------------------------------------------------------------------|------------------------------------------------|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges                                     | <input type="checkbox"/> (5) Commissions       |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees)       | <input checked="" type="checkbox"/> (6) Other  |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee;
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable;
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date.

**2. Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- |                                                              |                                                                                                        |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> A. Individuals                      | <input type="checkbox"/> E. Trusts, estates, or charitable organizations                               |
| <input type="checkbox"/> B. Banks or thrift institutions     | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies             | <input checked="" type="checkbox"/> G. Other (describe on Schedule F)                                  |
| <input type="checkbox"/> D. Pension and profit sharing plans |                                                                                                        |

**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |                                                                                                                                                                                                               |                                                                                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> A. Equity securities<br>(1) exchange-listed securities<br><input type="checkbox"/> (2) securities traded over-the-counter<br><input type="checkbox"/> (3) foreign issuers | <input type="checkbox"/> H. United States government securities                                                                                                                                            |
| <input type="checkbox"/> B. Warrants                                                                                                                                                                          | <input type="checkbox"/> I. Options contracts on:<br>(1) securities<br><input type="checkbox"/> (2) commodities                                                                                            |
| <input type="checkbox"/> C. Corporate debt securities (other than commercial paper)                                                                                                                           | <input type="checkbox"/> J. Futures contracts on:<br>(1) tangibles<br><input checked="" type="checkbox"/> (2) intangibles                                                                                  |
| <input type="checkbox"/> D. Commercial paper                                                                                                                                                                  |                                                                                                                                                                                                            |
| <input type="checkbox"/> E. Certificates of deposit                                                                                                                                                           |                                                                                                                                                                                                            |
| <input type="checkbox"/> F. Municipal securities                                                                                                                                                              | <input type="checkbox"/> K. Interests in partnerships investing in:<br>(1) real estate<br><input type="checkbox"/> (2) oil and gas interests<br><input type="checkbox"/> (3) other (explain on Schedule F) |
| <input type="checkbox"/> G. Investment company securities<br>(1) variable life insurance<br><input type="checkbox"/> (2) variable annuities<br><input type="checkbox"/> (3) mutual fund shares                | <input type="checkbox"/> L. Other (explain on Schedule F)                                                                                                                                                  |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

A. Applicant's security analysis methods include: (check those that apply)

- |                                                     |                                                            |
|-----------------------------------------------------|------------------------------------------------------------|
| (1) <input type="checkbox"/> Charting               | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical   |                                                            |

B. The main sources of information applicant uses include: (check those that apply)

- |                                                                    |                                                                                                                |
|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| (1) <input type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services                                                                   |
| (2) <input type="checkbox"/> Inspections of corporate activities   | (6) <input type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input type="checkbox"/> Research materials prepared by others | (7) <input type="checkbox"/> Company press releases                                                            |
| (4) <input type="checkbox"/> Corporate rating services             | (8) <input checked="" type="checkbox"/> Other (explain on Schedule F)                                          |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |                                                                                                 |                                                                                                                      |
|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| (1) <input type="checkbox"/> Long term purchases<br>(securities held at least a year)           | (5) <input checked="" type="checkbox"/> Margin transactions                                                          |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options,<br>uncovered options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days)                | (7) <input type="checkbox"/> Other (explain on Schedule F)                                                           |
| (4) <input checked="" type="checkbox"/> Short sales                                             |                                                                                                                      |

**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ...

Yes ☒ No ☐

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

**7. Other Business Activities.** (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

- |                                                                                                                |                                                                                    |
|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| <input type="checkbox"/> (1) broker-dealer                                                                     | <input type="checkbox"/> (7) accounting firm                                       |
| <input type="checkbox"/> (2) investment company                                                                | <input type="checkbox"/> (8) law firm                                              |
| <input type="checkbox"/> (3) other investment adviser                                                          | <input type="checkbox"/> (9) insurance company or agency                           |
| <input type="checkbox"/> (4) financial planning firm                                                           | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution                                                     | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? . . . Yes ☒ No ☐  
(If yes, describe on Schedule F the partnerships and what they invest in.)

**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☐ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

**10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes ☒ No ☐

(If yes, describe on Schedule F)

**11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

See Schedule F

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

See Schedule F

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |                                                          |                                         |                             |
|----------------------------------------------------------|-----------------------------------------|-----------------------------|
| (1) securities to be bought or sold? .....               | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? ..... | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) broker or dealer to be used? .....                   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (4) commission rates paid? .....                         | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? ... Yes ☒ No ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- |                                                                                                                                                                                      |                                         |                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|----------------------------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients?..... | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? .....                                                                                                         | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            |

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- ☐ has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
- ☐ requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet? ... Yes ☐ No ☒

**Schedule F of  
Form ADV  
Continuation Sheet Form ADV**

Applicant:  
Auriel Capital Management LLP

SEC File Number:  
801-65136

Date:  
31 January 2006

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:  
Auriel Capital Management LLP

IRS Empl. Ident. No.:  
UK Reg No OC307203

Item of Form (identify)	Answer
1D	<p>The Applicant manages client assets on a fully discretionary basis.</p> <p>The Applicant produces a monthly newsletter and the management of the Applicant are available to clients by e-mail and telephone.</p> <p>The Applicant will manage accounts set up by clients at brokers and a Cayman Fund. Remuneration is in the form of a management fee and an incentive fee. Fees are usually 2% and 20%. Management fees are paid monthly in arrears. Clients can generally redeem their investment at the end of each month subject to one months notice. Managed account investors can redeem at shorter notice. The incentive fee is negotiable subject to certain circumstances for example that the size and nature of the investment is sufficient to merit large scale or long term advantages.</p>
2	<p>The Applicant provides advisory services to two Cayman 'private funds' and one Irish Fund. The Applicant has its principal office and place of business outside the U.S and is therefore not required to 'look through' the funds but may treat them each as a single client. The managed accounts are managed for non-U.S. residents.</p>
4B	<p>The applicant primarily uses historic price data and economic statistics as input to its models. The data is purchased from data vendors.</p>
5	<p>The applicant is authorised and regulated by the UK Financial Services Authority. In accordance with the rules of the FSA members of the applicants staff must meet the training and competence standards laid down by the FSA. Typically staff members managing investments must have passed an approved (by the UK Financial Skills Council) examination and an experience requirement. In exceptional circumstances persons who have been managing investments since prior to 1 December 2001 may be exempt from the exam requirement.</p>
6	<p><u>LARRY ABELE</u> Date of Birth; 03/24/67</p> <p>Business Background; 01/2000 – 04/2004; Global Head of Quantitative Strategies – Deutsche Asset Management London 04/2004 – Present; Partner of applicant</p> <p>Formal education after high school; Bachelor of Arts; Economics, minor in Mathematics– Florida State University Master of Arts; Financial Economics – Cambridge University Chartered Financial Analyst</p> <p><u>ANOOSH LACHIN</u> Date of Birth; 07/05/72</p> <p>Business Background; 02/1999 – 04/2004; Director – Responsible for Investment Management / Quantative Analysis Deutsche Asst Management London 04/2004 – Present; Partner of applicant</p> <p>Formal education after high school;</p>

	<p>Bachelor of Science (Hons) Physics, 1 class and PHD Space Physics – Imperial College of Science, Technology &amp; Medicine, London</p> <p>Investment Management Certificate</p> <p><u>ASIF NOOR</u></p> <p>Date of Birth; 07/24/1977</p> <p>Business Background;</p> <p>08/2000 – 04/2004; Deutsche Asset Management – Final Job Title: Assistant Vice President Quantitative Research &amp; Portfolio Engineering</p> <p>04/2004 – Present; Partner of the Applicant</p> <p>Formal education after high school;</p> <p>Bachelor of Arts; Economics – Bard College New York</p> <p>Chartered Financial Analyst</p>
8	The Applicant has a related party who is the General Partner of Auriel Global Macro Fund LP a Delaware based partnership.
10	<p>The applicant manages accounts directly for investors and via pooled investment vehicles.</p> <p>Minimum investment in Pooled Vehicles is \$100,000. Minimum investment for Managed Account is \$10 million, but exceptions can be made if future large investment is expected.</p>
11	<p>The fund targets a constant expected ex-ante volatility of 15% measured using Auriel’s proprietary risk models. The three main risk factors and how Auriel analyse them are:</p> <p>Concentration risk: We monitor the risk of individual positions and constrain them to 12% to control for concentration risk. Risk clusters are another way in which we search for concentration risk. Here the covariance matrix of asset returns is used to group the portfolio into self-funded clusters of assets where the clusters are kept uncorrelated and as much risk as possible is grouped within each cluster. Generally our portfolio is grouped into thirteen risk clusters.</p> <p>Correlation risk: Correlation/covariance matrix of asset returns is continually reviewed/revised and benchmarked using 3rd party systems. Additionally most correlation risk comes from correlations going to one. Our strategy is fully hedged when correlations go to one as in major ‘event’ risk situations.</p> <p>Liquidity risk: Our strategy trades the most liquid financial future in the market. We monitor open interest and volumes and aim to keep under 10% of open interest and 25% of daily volume in any single asset.</p> <p>All accounts trade the same strategy and are reviewed in aggregate as described below.</p> <p>Larry Abele, Asif Noor and Anoosh Lachin have total discretion over the investments in the fund but must follow the objectives, instructions and restrictions of the prospectus and the Directors of the fund. The three managers delegate some day to day authority to other team members but always under their supervision.</p>
11B	<p>The firm sends a monthly newsletter to all investors in the fund. The firm makes its partners available to clients to discuss the fund.</p> <p>The Administrator of the fund sends on behalf of the Applicant to the investors of the fund; Annual financial statements made up to 31 December in each year as soon as practicable. Half-yearly unaudited interim reports within four months of the end of the period to which they relate.</p>
12	Risk and performance are monitored on a daily basis and the partners have weekly risk meetings. We use standard deviation/volatility as a measure of risk and utilize a bespoke risk model, developed internally and review/assess its performance using off the shelf risk products



