

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

OMB Number: 3235-0049
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Name of Investment Adviser: White Oak Global Advisors, LLC						
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code:	Telephone Number:
	88 Kearny Street, 4th Floor	San Francisco	CA	94108	(415)	644-4100

**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 government authority.**

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(Schedule 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.

Applicant: White Oak Global Advisors, LLC

SEC File Number:

801- 70433

Date:

12/31/2009

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.)

Applicant:

- | | | | | |
|-------------------------------------|-----|--|-----|---|
| <input checked="" type="checkbox"/> | (1) | Provides investment supervisory services | 100 | % |
| <input type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services..... | | % |
| <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
<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)

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

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

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 checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical | |

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

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | Securities and Exchange Commission |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (7) <input checked="" type="checkbox"/> Company press releases |
| | (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 checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days) | (7) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (4) <input checked="" type="checkbox"/> Short sales | |

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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, please 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 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 checked="" type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input checked="" 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.)

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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 sell for itself securities it also recommended 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 advisory 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 condition 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 account, 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.

The investment strategies and portfolio decisions are ratified by the Investment Committee with the support of the investment team members. The Investment Committee is comprised of the four Managing Members of the firm. The Investment Committee and investment team members meet weekly, or more often if needed, to discuss investment strategies and the merits of individual investment opportunities.

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

White Oak Global Advisors, LLC, through its independent fund administrator, provides clients with regular monthly portfolio statements which report gains and losses at the end of each monthly period.

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12. Investment or Brokerage Discretion.

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

- | | | |
|--|-------------------------------------|--------------------------|
| | Yes | No |
| (1) securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? | <input checked="" type="checkbox"/> | <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 | No |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes | No |
| | <input checked="" type="checkbox"/> | <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 for Form ADV Part II**

Applicant:
White Oak Global Advisors, LLC

SEC File Number:
801- 70433

Date:
12/31/2009

(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: White Oak Global Advisors, LLC		IRS Empl. Ident. No.: 26-0340395
Item of Form (identify)	Answer	
1.D.	<p>White Oak Global Advisors, LLC ("Applicant") provides investment advice and management to privately placed investment funds that are organized as limited partnerships ("Funds"), as well as separately managed accounts (the "Separate Account"). White Oak Partners, LLC, a related party of the Applicant, serves as General Partner of the Funds. Applicant may, in the future, provide similar services to additional pooled investment vehicles or separate account clients (together, such potential investment vehicles or separately managed accounts, are from time to time referred to herein as "Other Clients"). Applicant currently offers four types of portfolios for the Funds.</p> <p><u>White Oak Strategic Fund</u></p> <p>The White Oak Strategic Fund invests and trades securities primarily which are senior-secured, direct asset-based loans.</p> <p><u>White Oak Strategic Fund II</u></p> <p>The White Oak Strategic Fund II invests and trades securities primarily which are senior-secured, direct asset-based loans. The primary difference between this fund and the White Oak Strategic Fund is the lock-up provision.</p> <p><u>White Oak Opportunity Fund</u></p> <p>The White Oak Opportunity Fund invests and trades securities primarily which are direct loans, but which do not conform to the specific mandate of the White Oak Strategic Fund and white Oak Strategic Fund II.</p> <p><u>White Oak Patriot Fund</u></p> <p>The White Oak Patriot Fund is a stand-alone, U.S.-only fund that acts primarily as a loan origination fund.</p> <p><u>General Fee Structure</u></p> <p>Management fee - 2% payable in advance on a quarterly basis</p> <p>Performance fee - 20% payable in arrears on an annual basis</p>	

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
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Applicant:
White Oak Global Advisors, LLC

SEC File Number:
801- 70433

Date:
12/31/2009

(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:

White Oak Global Advisors, LLC

IRS Empl. Ident. No.:

26-0340395

Item of Form (identify)	Answer
2.	In addition to the types of clients checked in Item 2, above, White Oak Global Advisors, LLC's advisory clients include university endowments.
4.A.(5)	In addition to the analysis methods noted in Item 4.A above, White Oak Global Advisors, LLC performs credit related underwriting procedures to assess the likelihood of repayment of direct loans that it originates with corporate borrowers. The primary procedures performed include gaining an understanding of the business and the need for capital, assessing the company's and management's ability to perform under the terms of the loan, and obtaining an understanding of the valuation of the underlying collateral.
4.B.(8)	White Oak Global Advisors, LLC obtains information from each prospective borrower in order to evaluate whether or not to provide a loan. This information may include audited and unaudited financial information, independent appraisals of the underlying collateral, and independent loan valuation reports on a quarterly basis.
4.C.(7)	Currently, White Oak Global Advisors, LLC primarily originates direct asset-based loans to corporate borrowers for the benefit of the Funds which it advises. The firm may also choose to hedge individual positions with the portfolio, or the entire portfolio itself, using various derivative instruments.
5.	For its principal executive officers and senior investment staff, White Oak Global Advisors, LLC requires a college degree and a minimum of 2 years of business experience in an investment related business.

(Complete amended pages in full, circle amended items and file with execution page (page 1)).

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Applicant:
White Oak Global Advisors, LLC

SEC File Number:
801- 70433

Date:
12/31/2009

(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:

White Oak Global Advisors, LLC

IRS Empl. Ident. No.:

26-0340395

Item of Form (identify)	Answer
6.	<p>Kenneth Masters - Managing Member and Portfolio Manager Born - 1967 B.S. - Cornell University M.B.A. - Harvard University White Oak Global Advisors, LLC - July 2007 to present KKR Financial Holdings, LLC. - November 2004 to July 2006 Franklin Resources, Inc. - August 2000 to October 2004</p> <p>Barbara McKee - Managing Member and Portfolio Manager Born - 1961 B.A. - Yale University J.D. - University of Chicago M.A. - University of California at Berkeley White Oak Global Advisors, LLC - July 2007 to present</p> <p>Andre Hakkak - Managing Member and Portfolio Manager Born - 1973 B.S. in Finance - University of California at Berkeley White Oak Global Advisors, LLC - July 2007 to present Alpine Global, Inc. - January 2000 to March 2007</p> <p>Philip Duff - Managing Member and Portfolio Manager Born - 1957 B.S. in Mathematics - Harvard College M.B.A. - Massachusetts Institute of Technology White Oak Global Advisors, LLC - October 2009 to present Duff Capital Advisors - January 2007 to September 2009 FrontPoint Partners - June 2000 to December 2006</p> <p>Jack Thrift - Managing Director of Operations and Compliance Born - 1966 B.S. in Accountancy - University of Southern California White Oak Global Advisors, LLC - July 2008 to present Pacific Growth Holdings, LLC - January 2004 to June 2008</p> <p>Nick Pasco - Managing Director of Finance Born - 1971 B.S.C. in Accounting - San Beda College White Oak Global Advisors, LLC - July 2007 to present Peninsula Capital Management, Inc. - April 2006 to June 2007 Ernst & Young, LLP - January 1998 to March 2006</p>

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**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
White Oak Global Advisors, LLC

SEC File Number:
801- 70433

Date:
12/31/2009

(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: White Oak Global Advisors, LLC		IRS Empl. Ident. No.: 26-0340395
Item of Form (identify)	Answer	
8.C.(1)	White Oak Global Advisors, LLC entered into arrangements with Weston Capital Management, LLC and Weston Capital Partners Master Fund II, Ltd. (collectively "Weston") whereby Weston agreed to provide initial investment capital and other services, in exchange for a percentage of the revenues of White Oak Global Advisors, LLC. Additionally, Andre Hakkak, managing member of White Oak Global Advisors, LLC is a registered representative of Weston Capital Management, Inc.	
8.D.	White Oak Global Advisor, LLC is the investment advisor to the Funds. White Oak Partners, LP, is the general partner to the White Oak Strategic Fund, LP, White Oak Strategic Fund II, LP, White Oak Opportunity Fund, LP and White Oak Patriot Fund, LP. The managing members of White Oak Global Advisors, LLC are also partners of White Oak Partners, LP.	
9.	<p>White Oak Global Advisors, LLC will provide a copy of its Code of Ethics to clients upon request. The code states:</p> <p>Principles</p> <p>At White Oak, we are dedicated to fully complying with our Business Principles and spirit of the laws, rules and ethical principles that govern us. Our continued success depends upon unswerving adherence to this standard:</p> <p>Our clients' (which include our investors, partners, advisors and service providers), interests always come first. Our experience shows that if we serve our clients well, our own success will follow.</p> <p>We take great pride in the professional quality of our work. We have an uncompromising determination to achieve excellence in everything we undertake.</p> <p>We stress creativity and imagination in everything we do. We constantly strive to find a better solution to realize value and solve problems.</p> <p>We offer our people the opportunity to move ahead more rapidly than is possible at most other places. For us to be successful, our women and men must reflect the diversity of the communities and cultures in which we operate. That means we must attract, retain and motivate people from diverse backgrounds and perspectives.</p> <p>We constantly strive to anticipate the rapidly changing needs of our partners and clients. We know that the work of alternative investment management will not stand still and that complacency can lead to extinction.</p> <p>Our business is highly competitive, and we aggressively seek to expand our professional relationships. However, we must always be fair competitors and must never denigrate other firms.</p>	

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

White Oak Global Advisors, LLC

IRS Empl. Ident. No.:

26-0340395

Item of Form (identify)	Answer
9. (continued)	<p>Code of Ethics. "Integrity and honesty are at the heart of our business. We expect our people to maintain high ethical standards in everything they do, both in their work for the firm and in their personal lives." This Code of Ethics (the "Code") embodies the commitment of White Oak and its subsidiaries to conduct our business in accordance with all applicable laws, rules and regulations and the highest ethical standards. All employees and members of our investment committee and advisors are expected to adhere to those principles and procedures set forth in this Code that are applicable to them.</p> <p>Compliance and Reporting. Principals, advisors, employees, and directors (collectively called "Partners") will strive to identify and raise potential issues before they lead to problems, and should ask about the application of this Code whenever in doubt. The firm will take such disciplinary or preventive action as it deems appropriate to address any existing or potential violation of this Code brought to its attention.</p> <p>Disclosure. It is the firm's policy that the information in its public communications, including NASD, SEC filings, be full, fair, accurate, timely and understandable. All Partners who are involved in the company's disclosure process are responsible for acting in furtherance of this policy. In particular, these individuals are required to maintain familiarity with the disclosure requirements applicable to the firm and are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material facts about the firm to others, whether within or outside the firm, including the firm's independent auditors. In addition, any Partners who have a supervisory role in the firm's disclosure process have an obligation to discharge his or her responsibilities diligently.</p> <p>Compliance with Laws, Rules and Regulations. It is the firm's policy to comply with all applicable laws, rules and regulations. It is the personal responsibility of each Partner to adhere to the standards and restrictions imposed by those laws, rules and regulations.</p> <p>Corporate Opportunities. Partners owe a duty to the firm to advance the firm's legitimate business interests when the opportunity to do so arises. Partners are prohibited from taking for themselves (or directing to a third party) a business opportunity that is discovered through the use of corporate property, information or position, unless the firm has already been offered the opportunity and turned it down. Sometimes the line between personal and firm benefits is difficult to draw, and sometimes both personal and firm benefits may be derived from certain activities. The only prudent course of conduct for our Partners is to make sure that any use of firm property or services that is not solely for the benefit of the firm is approved beforehand.</p> <p>Confidentiality. In carrying out the firm's business, employees, affiliates, investment committee members and directors often learn confidential or proprietary information about the firm, its clients/customers, prospective clients/customers or other third parties. Such parties must maintain the</p>

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White Oak Global Advisors, LLC

IRS Empl. Ident. No.:

26-0340395

Item of Form (identify)	Answer
9. (continued)	<p>confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated. Confidential or proprietary information includes, among other things, any non-public information concerning the firm, including its businesses, financial performance, results or prospects, the existing and prospective clients, service providers and any non-public information provided by a third party with the expectation that the information will be kept confidential and used solely for the business purpose for which it was conveyed.</p> <p>Fair Dealing. We have a history of succeeding through honest business competition. We do not seek competitive advantages through illegal or unethical business practices. Each Partner should endeavor to deal fairly with the firm's clients, service providers, suppliers, competitors and peers. No Partner should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.</p> <p>Equal Employment Opportunity and Harassment. Our focus in personnel decisions is on merit and contribution to the firm's success. Concern for the personal dignity and individual worth of every person is an indispensable element in the standard of conduct that we have set for ourselves. The firm affords equal employment opportunity to all qualified persons without regard to any impermissible criterion or circumstance. This means equal opportunity in regard to each individual's terms and conditions of employment and in regard to any other matter that affects in any way the working environment of the employee. We do not tolerate or condone any type of discrimination prohibited by law, including harassment. The Code highlighted above may change from time-to-time as appropriate with prior approval from the Partners.</p>

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Item of Form (identify)	Answer	
10.	Generally, the Funds that White Oak Global Advisors, LLC manages require a minimum investment of \$3,000,000.00. However, the White Oak Patriot Fund requires a minimum investment of \$1,000,000.00.	
12.A.	White Oak Global Advisors, LLC shall invest and reinvest the assets of the Funds which it manages as it deems in a manner consistent with the investment objectives outlined in the respective offering materials and which is in the best interest of its clients. White Oak Global Advisors, LLC has the authority to determine without consultation with its clients on a transaction-by-transaction basis, the securities to be bought or sold, and the amount of securities to be bought or sold. White Oak Global Advisors, LLC has the authority to chose broker-dealers with whom to transact business on behalf of its clients. White Oak Global Advisors, LLC seeks to transact business primarily with those firms which offer to buy and sell securities which reflect the best possible pricing on behalf of White Oak Global Advisors, LLC's clients.	
13.B.	White Oak Global Advisors, LLC has entered into contractual arrangements with firms which may solicit clients for the Funds. The arrangements are made in writing pursuant to Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended. Rule 206(4)-3 requires, among other things, that solicitors comply with requirements of the Rule and other applicable law, as well as their contract with White Oak Global Advisors, LLC. The solicitor must, at the time of his/her solicitation, provide the client with a copy of Part II of White Oak Global Advisors, LLC's Form ADV. He/She must also provide the client with a separate document describing the solicitation arrangement, disclosing any affiliation between White Oak Global Advisors, LLC and the solicitor, his/her compensation for solicitation, and whether fees for solicited clients are higher than those for other clients due to compensation paid to the solicitor.	

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Continuation Sheet for Form ADV Part II**

Applicant:
White Oak Global Advisors, LLC

SEC File Number:
801- 70433

Date:
12/31/2009

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White Oak Global Advisors, LLC

IRS Empl. Ident. No.:
26-0340395

Item of Form (identify)	Answer

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