

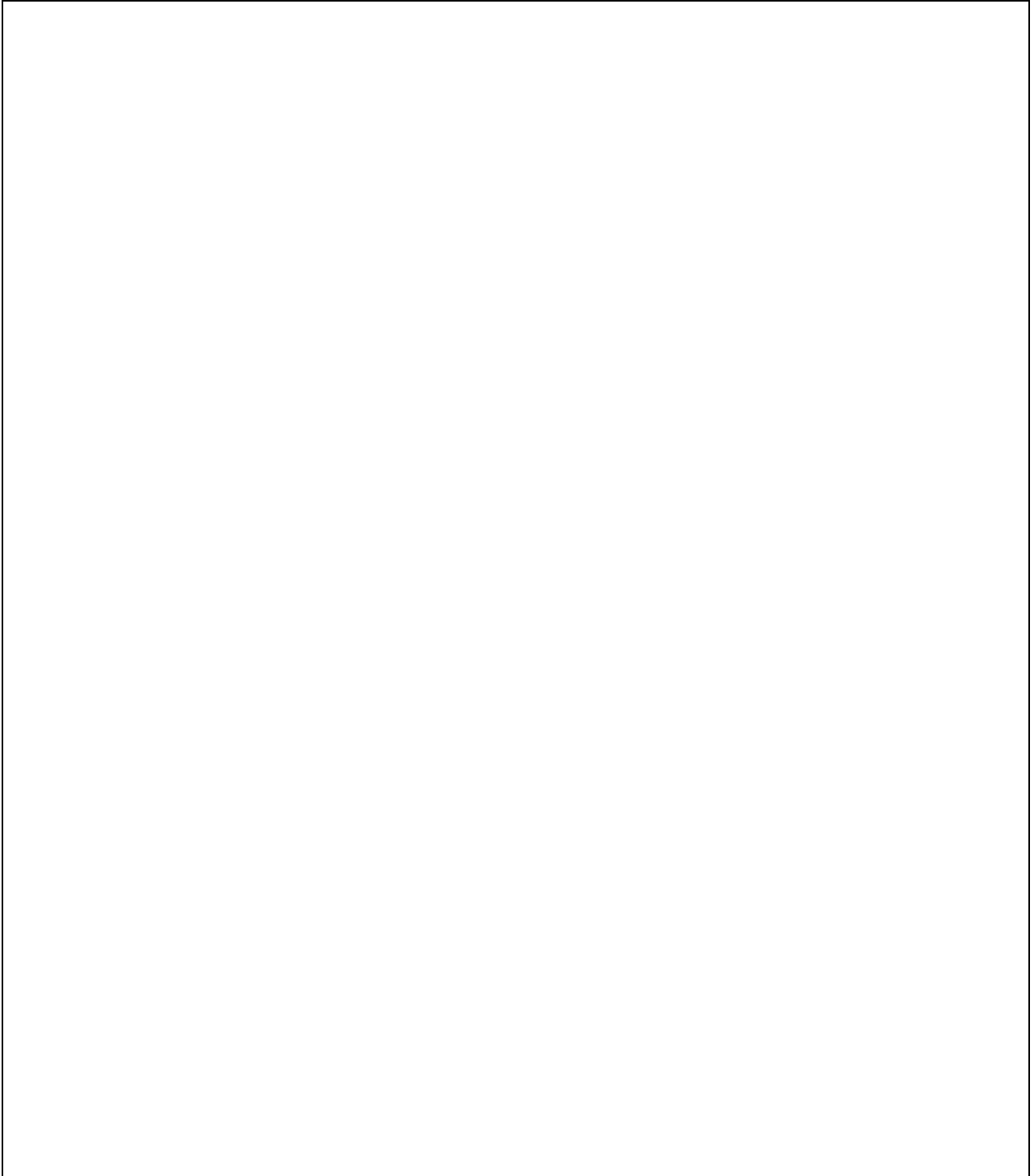
Part 2A of Form ADV: Firm *Brochure*

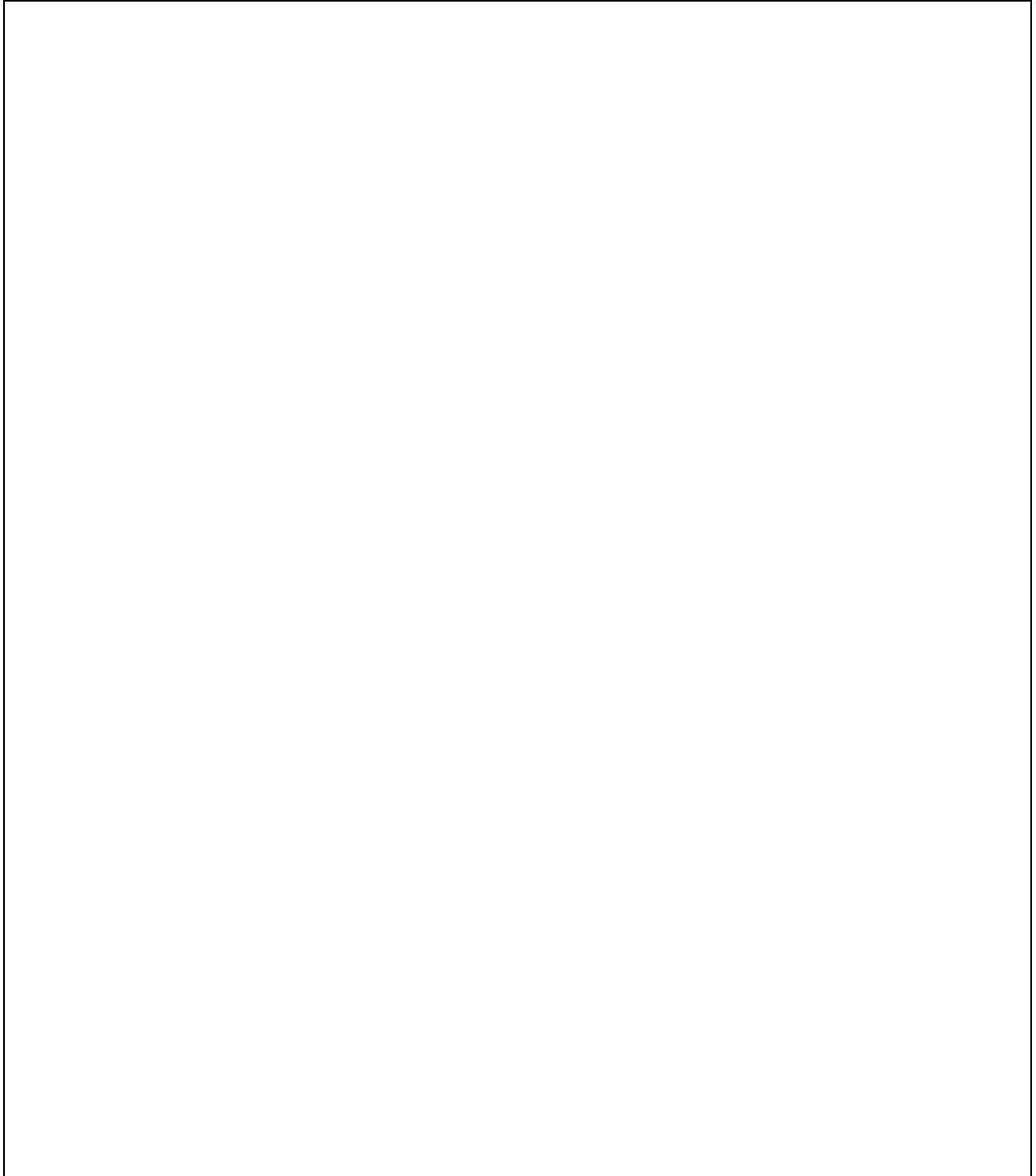
Item 1 Cover Page

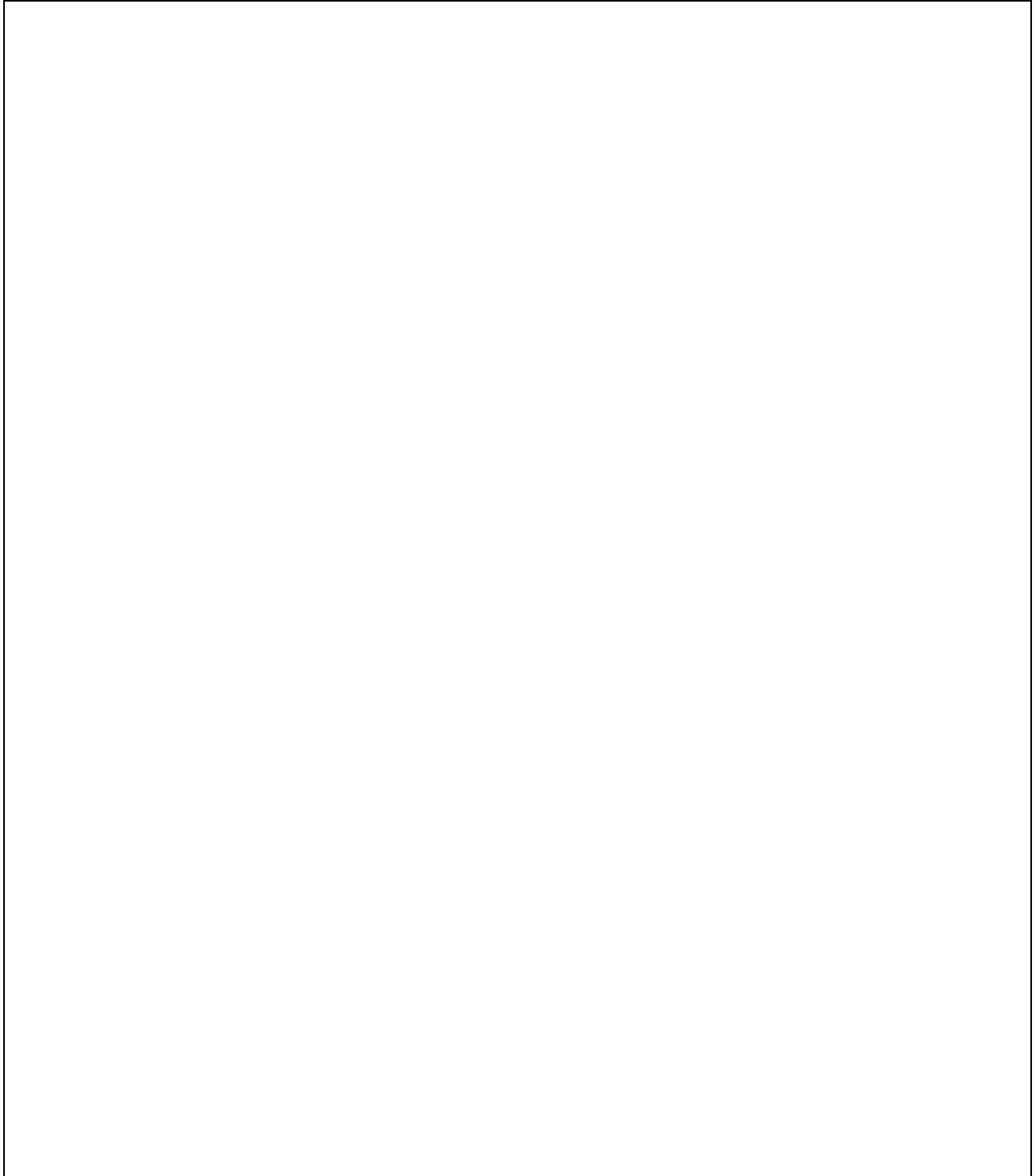
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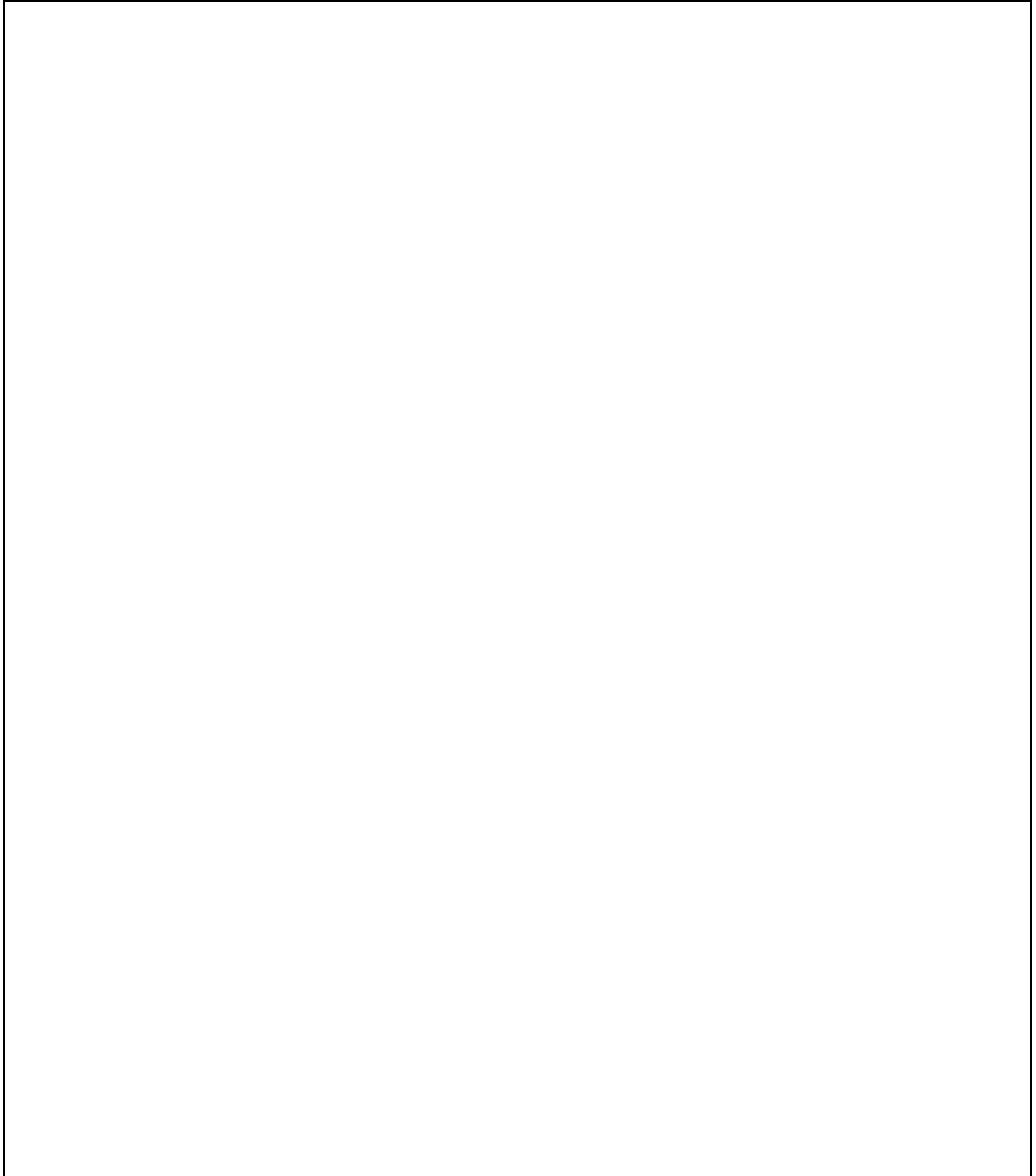
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Item 4 Advisory Business



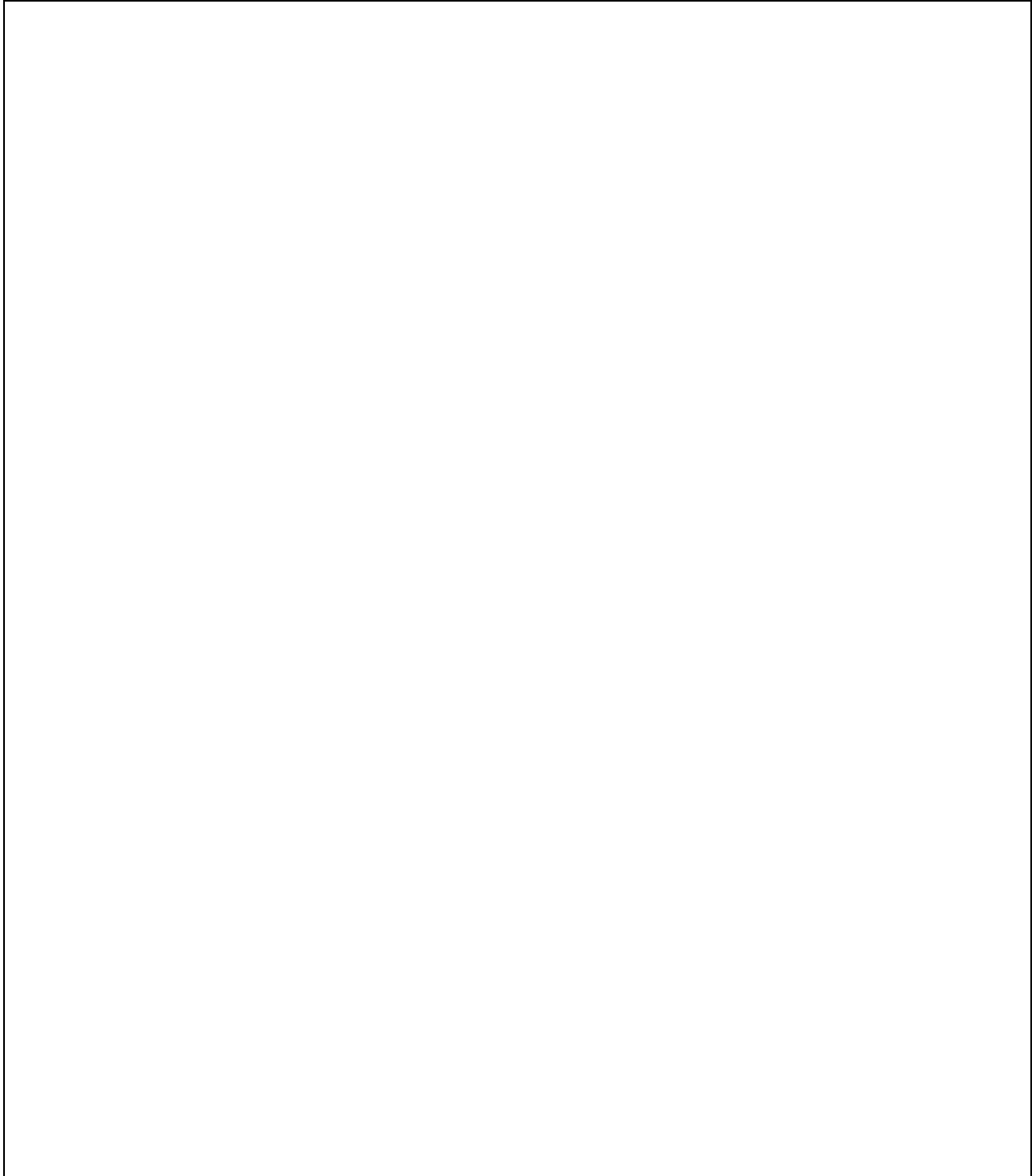


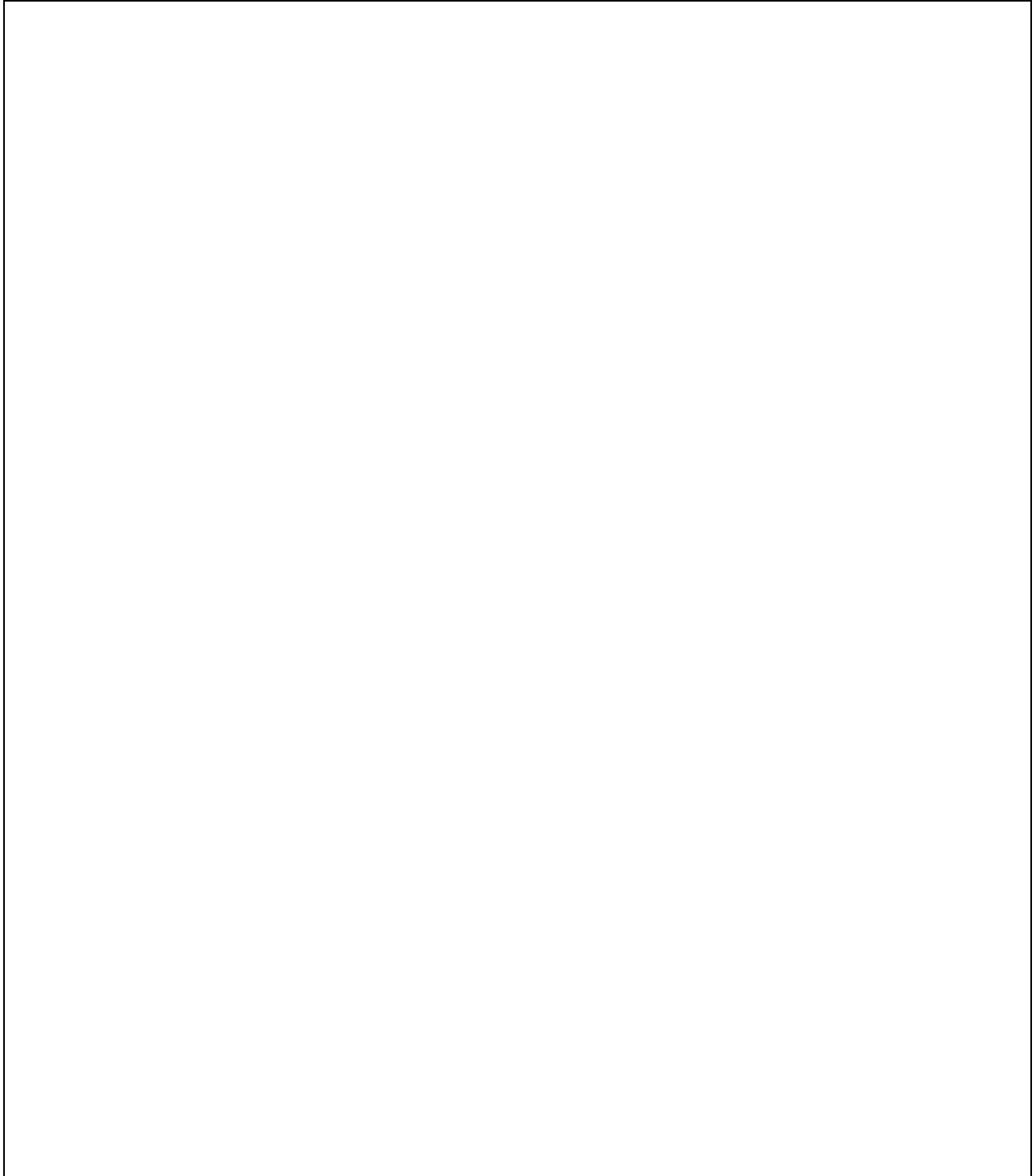


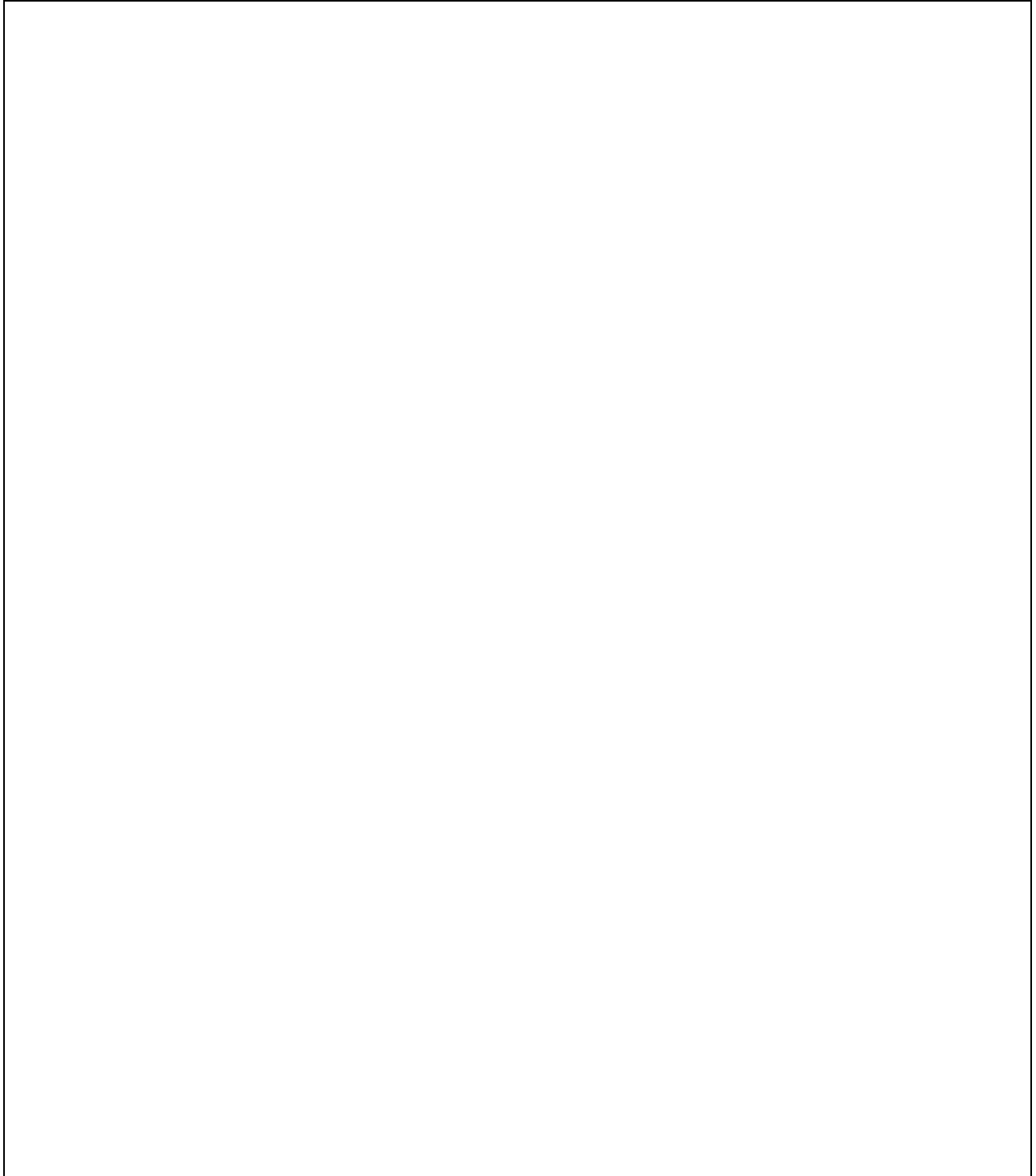


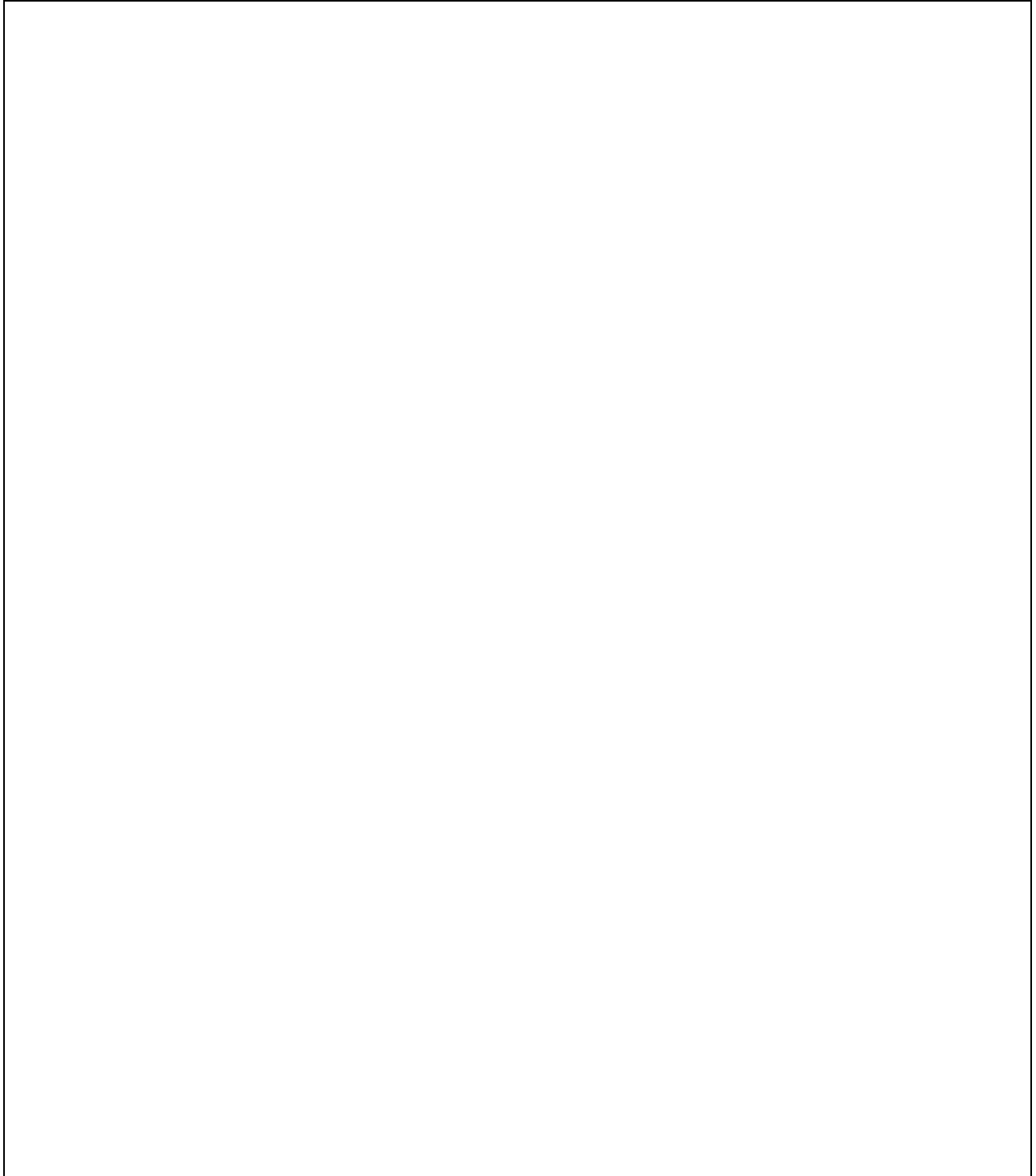
Item 10 Other Financial Industry Activities and Affiliations

Item 11 Code of Ethics, Participation or Interest in *Client* Transactions and Personal Trading









Item 19 Requirements for State-Registered Advisers

