



Services Of

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This brochure provides information about the qualifications and business practices of Thomson Reuters Global Markets, Inc. ("TRGM") and its services, IFR Markets and Municipal Market Data. If you have any questions about the contents of this brochure, please contact us at 617.856.2370 or rachna.patel@thomsonreuters.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. TRGM is registered with the SEC as an investment adviser; however, please note that such registration does not imply a certain level of skill or training.

Additional information about TRGM is available on the SEC's website at www.adviserinfo.sec.gov.

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* A NOTE ABOUT THE FORMAT OF THIS BROCHURE: The SEC requires all investment advisers to organize their disclosure documents according to specific categories, some of which may not pertain to a particular adviser's business. Where a required category is not relevant to our business, we list the category and state that it does not apply.

A. ADVISORY BUSINESS

1. Background

Founded in 1993 as Thomson Technical Data Corporation, TRGM (sometimes referred to as "the Company") is part of the Thomson Reuters global family of companies. Its ultimate indirect owner is Thomson Reuters Corporation, a public company.

2. Services Provided

TRGM publishes a broad range of market data and analysis through two primary divisions. In addition, the Company affords subscribers to many of its publications the opportunity to contact TRGM's analysts by telephone and e-mail to discuss the published information. TRGM does not have discretion over or otherwise manage client accounts. In addition to distributing its services directly, the Company also may from time to time make its written commentary as well as audio and video commentary by its analysts available through third-party distribution channels.

TRGM's products and services include the following:

IFR MARKETS

This division publishes various technical market analyses and information products and services regarding securities, commodities and foreign currencies.

Global Rates – This service monitors the pulse of the major global economies while assessing the sentiment of bond traders, salespeople, and the buy-side community. The product provides technical and fundamental intraday market-flow analysis, real-time trading recommendations and yield curve strategies to global participants in the rates markets. Asset class coverage includes U.S. Treasuries, Agency debt, Swaps, Mortgage-Backed Securities, EGBs, JGBs, Aus/NZ government bonds, and the Canadian marketplace. Also covered are interest rate swaps and funding activities through intraday market commentary and analysis, with news, details of new deals including hedging details, corporate profiles and benchmark swap rates of key currency swaps.

Global Credit – This service delivers real-time coverage of impending and newly launched international debt issues. The product focuses on qualitative deal performance, with insightful reviews and comprehensive transaction details. The real-time commentary and analysis focuses on origination and secondary

trading of investment-grade corporate debt, high-yield bonds, convertibles, Asset-Backed securities, with ancillary coverage of derivatives and emerging markets. Other key areas of coverage include Credit Default Swaps (CDS) as well as exchange traded futures and options. Also included is real-time analysis and commentary on financial, political and social events impacting the emerging markets. Coverage includes rolling headlines, country reports, funding calendars, pipelines, and policy updates, with a focus on Latin America, Asia, and emerging European countries. Asset classes covered run the spectrum for these markets, including asset-backed securities, investment-grade and high-yield debt, convertibles, derivatives, and broader foreign exchange implications.

Foreign Exchange – This product provides 24-hour analysis of political, economic and market-moving events affecting all major spot and cross currency trading. Coverage includes regional coverage of Asia, Europe, North America, and Emerging Markets via rolling news and headlines, trading outlooks, technical strategies, and quantitative/volatility analysis of options.

THOMSON MUNICIPAL MARKET DATA (MMD)

MMD electronically publishes real-time commentary and technical and fundamental analysis of the municipal cash, futures and U.S. Treasury Markets. MMD's analysts report on trading activity, supply and demand pressures and technical conditions, emphasizing significant factors that influence the fixed-income markets. MMD's suite of products and services includes:

Municipal Market Data-Line - Provides proprietary indicative yield curves on a daily basis, as well as daily market commentary, key muni-to-taxables ratios, and technical and historical analysis of the U.S. municipal and U.S. Treasury markets. Also provides key analytical studies on municipal derivative products including Libor/BMA Swaps, MMD Forwards and Tender Option Bond program activity.

MMD Fundamental - Provides comprehensive intra-day commentary and analysis on municipal and Treasury markets. The "Squawk Box" feature of this product provides rolling commentary and analysis on municipal cash, derivatives and taxable fixed-income markets. Strategy comments such as

weekly and long-term outlook and MMD Relative Value provide critical views on market trends. State reviews focus on the market activity and opportunities within California, New York, Florida, and Texas. Also provides key analytical studies on municipal derivative products including Libor/BMA Swaps, MMD Forwards and Tender Option Bond program activity.

MMD Short-Term - Offers comprehensive commentary and analysis on short-term, tax-exempt markets with a focus on variable rate demand securities, municipal notes and other money-market-eligible instruments. This product includes VRDN benchmark averages, MMD MIG-1 yield curves, market surveys and short-term supply/demand indicators, as well as coverage of municipal cash trading through 5-year maturity.

State & Sector - Offers more than 250 yield curves, including state general obligation and generic insured curves for all 50 states, Washington, D.C., Puerto Rico, New York City and Texas PSF insured. Provides sector curves for all investment-grade ratings with sector coverage for general obligation, revenue, pre-refunded, housing, healthcare, COP, non-callable and zero coupon debt. Also provides state level tax-guide data and taxable equivalent yield data.

B. FEES AND COMPENSATION

IFR Markets provides its services to clients on a subscription basis, for either rolling 90-day terms or a fixed term of one year. Subscription rates vary, depending upon the nature and quantity of the services provided. For IFR Markets, the list price is \$365 per month/per user for 1 product and \$600 per month/per user for all 3 products. Fees are charged in advance, on a monthly or quarterly basis; other arrangements may be made at a client's request.

A client may terminate its subscription upon 90 days' advance written notice. Upon termination of a subscription agreement, the Company will refund the pro-rata portion of any advance payment based on the number of days remaining in the billing period after the effective date of termination of the contract.

MMD's services are also furnished to clients on a subscription basis for a fixed term of one year. Subscription rates vary, depending on the nature and quantity of the services provided. Rates can range from \$600 - \$1300 per month/per user. Fees generally are charged monthly or quarterly; other arrangements may be made at a

client's request. Historical data is provided for fixed fees which depend on the amount of data supplied.

Note that TRGM's fees do not include the cost of managing assets, the cost maintaining custody of assets or brokerage or other transaction costs.

C. *PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT*

This item does not apply to our business.

D. *TYPES OF CLIENTS*

Although TRGM has some individual clients, the vast majority of its subscribers are large institutions such as banks or thrift institutions, pension and profit sharing plans, hedge funds, trusts, and state or municipal government entities. All told, TRGM's clients are responsible for managing hundreds of billions of dollars of investments.

E *METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS*

Among the analytical methods TRGM uses in formulating investment advice are charting, technical, fundamental and cyclical analyses. The Company also performs mathematical computations of arbitrage possibilities between the cash and financial futures markets.

Clients wishing to implement the advice they receive from TRGM would employ one or more of the following investment strategies: long-term purchases, short-term purchases, short-term (*i.e.* within 30 days) trading, short sales, margin transactions and option writing.

Please be aware that investing in securities involves a risk of loss that you should be prepared to bear. The value of an account may decline, among other reasons, because of a general weakness in the stock market or because of factors that affect particular companies or industries. Fixed-income investments entail "interest rate risk," which is the risk that the price of a bond will fall as interest rates rise. These investments also entail "credit risk," which is the risk that the issuer of a debt security will fail to make scheduled principal or interest payments. Where foreign securities are acquired, client accounts may be adversely affected by global political and economic conditions, reduced liquidity or decreases in foreign currency values relative to the U.S. dollar. Depending on the nature of the account, other risks may also apply. TGM does not guarantee that the advice it provides will lead to any particular return in or performance of a client's account.

F. DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

G. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

TRGM is part of the Thomson Reuters family of companies, which includes Tradeweb LLC, a registered broker-dealer and alternative trading system ("ATS"). Tradeweb distributes TRGM's products over its electronic trading communication facility. Tradeweb also provides TRGM with aggregated, non-attributed market information relating to securities traded over the ATS.

Furthermore, in order to draw fully upon the expertise and talent of Thomson Reuters' global work force -- which consists of more than 40,000 people in more than 45 locations worldwide -- the Company has entered into arrangements with certain of its foreign affiliates whereby it distributes its affiliates' published investment advice to TRGM's clients. The Company's analysts will be available to consult with any U.S. clients who wish to obtain further information about such published advice. TRGM does not believe these arrangements present material conflicts between its interests and those of its clients.

H. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

In accordance with SEC Rule 204A-1, TRGM has adopted a Code of Ethics that describes certain standards of conduct that the Company's employees must follow, and that addresses personal trading by employees and their related accounts. With regard to the standards of conduct, the Code of Ethics, among other things, emphasizes that TRGM is obligated to carry out its duties solely in the best interests of clients and free from all compromising influences and loyalties. The Code also imposes limits on gifts, business entertainment and political contributions, and emphasizes the importance of maintaining the confidentiality of sensitive information learned about clients. TRGM will provide a copy of its Code of Ethics to clients and prospective clients upon request.

TRGM's employees (or employees of its affiliates) may, from time to time, maintain personal securities accounts with registered broker-dealers who subscribe to the Company's services. In the ordinary course of trading in such accounts, such employees may buy securities from or sell securities to such broker-dealers on a principal basis. All such purchases or sales will be completely independent of any investment advice rendered to such clients.

Furthermore, from time to time, the Company's officers, directors and employees (or the officers, directors and employees of its affiliates) may invest in the same or related securities that the Company recommends to clients, and may do so at or around the same time that such recommendations are made. Where TRGM's affiliates are concerned, such personal trading does not appear to present a conflict of interest, because TRGM generally will be unaware if an affiliate or its associated persons have a financial interest in a security, and affiliates generally do not have pre-publication access to TRGM's advice. (While as noted in Section G above, certain foreign affiliates contribute content for distribution to TRGM's clients, the production of such content is governed by the foreign affiliates' respective editorial guidelines that are designed to protect the integrity of all published advice.)

However, where TRGM's officers, directors and employees are concerned, personal investing may present a potential conflict of interest. In order to ensure that the personal trading activities of these related persons is independent of any investment advice rendered to clients, TRGM's Code of Ethics contains a number of specific provisions. These include provisions designed to prevent TRGM's employees from improperly trading on inside information, and those that obligate employees to report their trading activity to the Company's chief compliance officer on a periodic basis. Employees also must preclear any purchases or sales of fixed-income securities for their own accounts, in order to prevent such personal trades from interfering with the objectivity and independence of the advice the Company renders to clients. Additional restrictions are placed on personal trading in any derivative security with an MMD scale as the underlying instrument; municipal bond futures; short-term trading in municipal bonds; and aggregate holdings of any one municipal issue.

I. BROKERAGE PRACTICES

This item does not apply to our business.

J. REVIEW OF ACCOUNTS

This item does not apply to our business.

K. CLIENT REFERRALS AND OTHER COMPENSATION

At a client's election, TRGM may receive cash payments from one or more broker-dealers in consideration for providing services to that client. In such a situation, TRGM acts as a third-party research provider in the client's soft-dollar arrangement with the client's broker-dealer. We do not believe such situations involve any conflicts between our interests and those of our clients who choose to pay in this fashion.

L. CUSTODY

This item does not apply to our business.

M. INVESTMENT DISCRETION

This item does not apply to our business.

N. VOTING CLIENT SECURITIES

This item does not apply to our business.

O. FINANCIAL INFORMATION

This item does not apply to our business.