

FORM ADV**UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT
BY EXEMPT REPORTING ADVISERS****Primary Business Name: ADVANCED INVESTMENT PARTNERS, LLC****CRD Number: 149670****Other-Than-Annual Amendment - All Sections****Rev. 10/2012**

WARNING: Frp schwh#k l#irup #uxwk ixø l#Idoxh#vdwhp hqw#ru#rp lvlrqv#p d | #uhvxow#lq#gqldg#r i#| rxu#
dssdfdwlrq/#uhyrfdwlrq#r i#| rxu#uhj lwudwlrq/#ru#fulp lqdd#survhfxwlrq l#| rx#p xvwnhhs#k l#irup #
xsgdwhg#e | #ldqj #shulrglf#dp hggp hqw1#Vhh#lrup #DGY#J hqhudg#Lqvwxfwlrq#7 l#

Item 1 Identifying Information

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ADVANCED INVESTMENT PARTNERS, LLC

E1 Qdp h#xqghu#z klfk#| rx#sulp dul#| #frggxfw#| rxu#dgylvru#| #exvlqhv/#l#g liuhq#w#lurp #lwhp #1 D1=

ADVANCED INVESTMENT PARTNERS, LLC

List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.

F1 Li#k l#l#ldqj #lv#h#srw#lqj #d#fkdqjh#lq#| rxu#hjd#qdp h#lwhp #1 D1,#ru#sulp du#| #exvlqhv/#lqg#p h#lwhp #
41E1,#hqw#h#k h#qhz #qdp h#lqg#vshfli#| #z khwku#k h#qdp h#fkdqjh#lv#r i

☐ | rxu#hjd#qdp h ru# ☐ | rxu#sulp du#| #exvlqhv/#lqg#p h=

G1 +4,#l#l#| rx#duh#uhj lwuhung#z l#k #k h#VHF #dv#dq#lqyhvp hqw#dgylvhu/#| rxu#VHF #l#h#qxp ehu#**801-70008**

+5,#l#l#| rx#h#srw#r #k h#VHF #dv#dq#exempt reporting adviser/#| rxu#VHF #l#h#qxp ehu#

H1 Li#| rx#kdyh#l#qxp ehu#%CRD Qxp ehu#,#dvvlj qhg#e | #k h#FINRA's CRD v| vwhp #ru#e | #k h#DUG #v| vwhp /#
| rxu#CRD qxp ehu#**149670**

If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.

I1 Principal Office and Place of Business

+4, Dgguhvv#gr#qrw#kvh#d#SIR l#Er{,=

Qxp ehu#lqg#Vwhhw#4=

Qxp ehu#lqg#Vwhhw#5=

433#P DIQ #VWUHHW/#z 634

F lw|=

Vwdwh=

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] IS. 72Srvdd#Frgh=

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679<8

Li#k l#l#lqguhvv#lv#d#sulydwh#uhvlgqhfh/#k hfn#k l#er{= ☐

List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest five offices in terms

of numbers of employees.

+5, Gd|v#ri#z hhn#kdw#|rx#qrup d#|frqgxfw#exvlghvv#dw#|rxu#principal office and place of business:

☒ P r q g d | # 0 I u l g d | ☐ R w k h u = #

Q r u p d # e x v l g h v v # k r x u v # d w # k l v # r f d w l r q =

;=33DP 08=33SP

+6, W h d s k r q h # q x p e h u # d w # k l v # r f d w l r q =

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J1 P d l q j # d g g u h v v / # l i g l i i h u h q w # i r p # | r x u # principal office and place of business d g g u h v v = #

Q x p e h u # d q g # V w h h w # 4 =

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F l w | =

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K1 L i # | r x # d u h # d # r d h # s u r s u l h w r u / # v d w h # | r x u # x c # u h v l g h q f h # d g g u h v v / # l i g l i i h u h q w # i r p # | r x u # principal office and place of business d g g u h v v # l q # l w h p # 4 I I 1 = #

Q x p e h u # d q g # V w h h w # 4 =

Q x p e h u # d q g # V w h h w # 5 =

F l w | =

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F r x q w | =

] I S . 7 2 S r v w d q # F r g h =

Yes No

L1 G r # | r x # k d y h # r q h # r u p # r u h # z h e v l w h v B #

☒ ☐

If "yes," list all website addresses on Section 1.1. of Schedule D. If a website address serves as a portal through which to access other information you have published on the web, you may list the portal without listing addresses for all of the other information. Some advisers may need to list more than one portal address. Do not provide individual electronic mail (e-mail) addresses in response to this Item.

M1 S u r y l g h # k k h # q d p h # d q g # f r q w d f w # l q i r u p d w l r q # r i # | r x u # F k l h i # F r p s d d q f h # R i i l f h u = # L i # | r x # d u h # d q # exempt reporting adviser / # | r x # p x v w # s u r y l g h # k k h # f r q w d f w # l q i r u p d w l r q # i r u # | r x u # F k l h i # F r p s d d q f h # R i i l f h u / # l i # | r x # k d y h # r q h # l i # q r w # | r x # p x v w # f r p s d w h # l w h p # 4 I N 1 # e h o r z 1 #

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H d f w u r q l f # p d l # h o p d l # d g g u h v v / # l i # F k l h i # F r p s d d q f h # R i i l f h u # k d v # r q h =

P D W I H C D I S O O F 1 F R P

N1 D g g l w r q d d # U h j x d w r u | # F r q w d f w # S h u v r q = # L i # d s h u v r q # r w k h u # k d q # k k h # F k l h i # F r p s d d q f h # R i i l f h u # l v # d x w k r u l # h g # r # u h f h l y h # l q i r u p d w l r q # d q g # u h v s r q g # r # t x h v l r q v # d e r x w # k l v # l r u p # D G Y / # | r x # p d | # s u r y l g h # w k d w # l q i r u p d w l r q # k h u h 1 #

Q d p h =

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M R Q # T X L J O H \

F I R

Whdskrqh#qxp eh=#

Idfvlp lh#qxp eh=#

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Qxp eh#dgg#Vwhhw#1=

Qxp eh#dgg#Vwhhw#5=

433#P DIQ #VWUHHW/#6 634

F lw|=

Vwdwh=

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VDIHW\#KDUERU

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XQ IWHG #VWDWHV

679<8

Hdhwurqlf#p dl#h0p dl#dgguhvv/#li#frqwdfw#shuvrq#kdv#rgh=

MRQC DISOOF1FRP

Yes No

- 01 Gr#| rx#p dlqwdlq#vrp h#ru#d#ri#kch#errnv#dgg#uhfrugv#| rx#duh#htxling#r#nhhs#xqghu#
Vhfwrq#537#ri#kch#Dgylvhu#Dfw#ru#vlp ldu#vwdh#dz /#vrp hz khuh#rwhu#kdkq#| rxu#*principal
office and place of business*B

☒☐*If "yes," complete Section 1.L. of Schedule D.*

Yes No

- P 1 Duh#| rx#uhj lvwhung#z lk#d#*foreign financial regulatory authority*B#

☐☒

Answer "no" if you are not registered with a foreign financial regulatory authority, even if you have an affiliate that is registered with a foreign financial regulatory authority. If "yes," complete Section 1.M. of Schedule D.

Yes No

- Q 1 Duh#| rx#d#sxedf#uhsruwqj#frrp sdq| #xqghu#Vhfwrqv#15#ru#18+g, #ri#kch#Vhfxuwlhv#I{fkdkqjh#
Dfw#ri#1<67B#
Li#| hv/#surylgh#| rxu#FIN#qxp eh#Fhqwdq#Lggh{#Nh| #qxp eh#kdw#kch#VHF#dvvlj qv#r#ndfk#sxedf#
uhsruwqj#frrp sdq| ,=

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Yes No

- R 1 Glg#| rx#kdyh# 4#e ldrq#rup ruh#lg#dvvhw#r#kch#dvvhgd| #ri#| rxu#p rvw#uhfhqw#ilvfd#| hduB#

☐☒

- S1 Surylgh#| rxu#*Legal Entity Identifier* li#| rx#kdyh#rgh=#

D#*legal entity identifier* lv#d#xqltxh#qxp eh#kdw#frrp sdqlv#xvh#r#lgghqwi| #ndfk#rwhu#lg#kch#ilqdkfld#
p dunhwsdfh1#lg#kch#ilvw#kdd#ri#5344/#kch#*legal entity identifier* vwdggdug#z dv#vldq#ghyha#sp hqwi#rx#
p d| #qrw#kdyh#d#*legal entity identifier*#

SECTION 1.B. Other Business Names

Qr#Lqirup dwrq#I lhg

SECTION 1.F. Other Offices

Qr#Lqirup dwrq#I lhg

SECTION 1.I. Website Addresses

Olw#|rxu#z hevln#dgguhvv1#rx#p xvw#frp sdwh#d#hsdudwh#Vfkhgxd#G #Vhfwlrq#4 1L1#iru#ndfk#z hevln#
dgguhvv1#

Z hevln#Dgguhvv=# Z Z Z IDISOOF1FRP

SECTION 1.L. Location of Books and Records

Frp sdwh#kch#iror#z lqj#lqirup dwrq#iru#ndfk#rfdwlrq#dw#z klfk#|rx#nhhs#|rxu#errnv#dgg#uhfrugv#rwhu#
wkdg#|rxu#*principal office and place of business*1#rx#p xvw#frp sdwh#d#hsdudwh#Vfkhgxd#G #Vhfwlrq#4 101#
iru#ndfk#rfdwlrq1#

Qdp h#ri#hgw| #z khuh#errnv#dgg#uhfrugv#duh#nhsw=
Z IQWUXVW#Z HDOWK #P DQDJHP HQW

Qxp ehudgg#Vwuhw#4=#

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F lw|=#

Vwdwh=#

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93939

Li#k l#dgguhvv#lv#d#sulydwh#uhvlgqhfh/#khhfn#k l#er{=# ☐

Whdskrqh#Qxp ehudgg#

Idfvlp l#h#Qxp ehudgg#

645076404:33

645076403:37

Wk l#lv#fkhhfn#rqh,=#

☒ rqh#r i#|rxu#eudqfk#r iilfhv#ru#diiddwhv1#

☐ d#k l#g0sduw| #xqdiiddwhg#uhfrugnhhshul#

☐ rwhul#

Eulhiq #ghvfuleh#kch#errnv#dgg#uhfrugv#nhsw#dw#k l#rfdwlrq=#

SD\UROO/#KXP DQ #UHVRXUFHV/#P XWXDO#IXQG #DGYLVRU\#UHFRUGV

Qdp h#ri#hgw| #z khuh#errnv#dgg#uhfrugv#duh#nhsw=
VHL#JORED0#VHUYLFHV#QF

Qxp ehudgg#Vwuhw#4=#

Qxp ehudgg#Vwuhw#5=#

RQH#IUHHGRP #YDOOH\#GULYH

F lw|=#

Vwdwh=#

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]LS. 72Srvdd#Frgh=#

RDNV

Shqqv|yqdql

XQ LWHG #VWDWHV

4<78905443

Li#k l#dgguhvv#lv#d#sulydwh#uhvlgqhfh/#khhfn#k l#er{=# ☐

Whdskrqh#Qxp ehudgg#

Idfvlp l#h#Qxp ehudgg#

94309:904333

Wklv#lv#fkhfn#rgh,=#

- ☐ rgh#r i#|rxu#eudqfk#r iilfhv#ru#diildwhv1#
- ☒ d#wk lvg0sduw| #xqdiildwhg#uhfrugnhhshu1#
- ☐ rwhu1#

Eulhiq #ghvfuleh#wkh#errnv#dgg#uhfrugv#nhsw#dw#wk lv#rfdwlrq=#

Z UDS#DFFRXQW#FOHQW#LQ IR UP DWIR Q

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

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Item 2 SEC Registration/Reporting

Uhvsrqvhw#r#k#l#h#p#k#s#v#d#q#|rx,#ghw#p#l#h#z#k#h#k#u#|rx#d#h#h#d#j#l#e#h#r#h#j#l#w#h#z#l#k#k#h#V#H#F#l#
Frp schw#k#l#h#p#5#D#l#r#q#|d#|rx#d#h#d#s#s#q#l#j#h#r#u#V#H#F#h#j#l#w#d#w#l#r#q#h#r#u#v#x#p#l#w#l#j#j#d#q#*annual updating
amendment* wr#|rx#u#V#H#F#h#j#l#w#d#w#l#r#q#l#

D#l###W#r#h#j#l#w#h#r#u#h#p#d#l#h#j#l#w#h#g#z#l#k#k#h#V#H#F#/#|rx#p#x#v#f#k#h#f#n#**at least one** r#i#k#h#h#p#v#5#D#l#4#,#
w#k#u#r#x#j#k#5#D#l#4#5#/#h#o#r#z#l#h#i#|rx#d#h#v#x#p#l#w#l#j#j#d#q#*annual updating amendment* wr#|rx#u#V#H#F#
h#j#l#w#d#w#l#r#q#d#q#|rx#d#h#q#r#r#q#j#h#h#d#j#l#e#h#r#h#j#l#w#h#z#l#k#k#h#V#H#F#/#f#k#h#f#n#h#p#5#D#l#4#6#l#S#d#u#l#D#
l#q#v#w#x#f#w#l#r#q#5#s#u#r#y#l#h#v#l#q#i#r#u#p#d#w#l#r#q#h#r#u#v#x#p#|rx#ghw#p#l#h#z#k#h#k#u#|rx#p#d#l#i#l#p#d#w#l#h#d#h#v#s#r#q#h#r#
h#d#f#k#h#r#i#k#h#h#p#v#l#
\rx#w#k#h#d#g#y#l#h#u#=#

☒ +4, duh#d#**large advisory firm** wkdw#h#l#k#h#u#=#

+d, kdv#h#j#x#d#w#r#|d#v#h#w#x#q#g#h#p#d#q#d#j#h#p#h#q#w#r#i#433#p#l#o#r#q#h#l#q#X#IV#l#g#r#o#l#u#v#h#r#u#p#r#u#h#r#u#
+e, kdv#h#j#x#d#w#r#|d#v#h#w#x#q#g#h#p#d#q#d#j#h#p#h#q#w#r#i#<3#p#l#o#r#q#h#l#q#X#IV#l#g#r#o#l#u#v#h#r#u#p#r#u#h#d#w#k#h#
w#l#p#h#r#i#l#d#j#j#l#w#p#r#v#w#h#f#h#q#w#*annual updating amendment* d#q#h#l#h#j#l#w#h#g#z#l#k#k#h#
V#H#F#>#

☐ +5, duh#d#**mid-sized advisory firm** wkdw#kdv#h#j#x#d#w#r#|d#v#h#w#x#q#g#h#p#d#q#d#j#h#p#h#q#w#r#i#58#
p#l#o#r#q#h#l#q#X#IV#l#g#r#o#l#u#v#h#r#u#p#r#u#h#e#x#w#h#v#h#w#k#d#q#433#p#l#o#r#q#h#l#q#X#IV#l#g#r#o#l#u#v#h#r#u#p#r#u#h#
h#l#k#h#u#=#

+d, qrw#h#t#x#l#h#g#h#r#h#h#j#l#w#h#g#d#v#d#g#d#g#y#l#h#u#z#l#k#k#h#*state securities authority* r#i#k#h#
v#w#d#w#h#z#k#h#h#|rx#p#d#l#q#w#d#l#q#|rx#u#*principal office and place of business*/h#r#u#

+e, qrw#x#e#h#f#w#h#r#h#h#{d#p#l#q#w#l#r#q#e#|k#h#*state securities authority* r#i#k#h#v#w#d#w#h#z#k#h#h#|rx#p#
p#d#l#q#w#d#l#q#|rx#u#*principal office and place of business*>#

Click [HERE](#) for a list of states in which an investment adviser, if registered, would not be subject to examination by the state securities authority.

☐ +6, kdyh#|rx#u#*principal office and place of business***in Wyoming** +z#k#l#f#k#g#r#h#v#q#r#w#h#j#x#d#w#h#
d#g#y#l#h#u#>#

☐ +7, kdyh#|rx#u#*principal office and place of business***outside the United States**>#

☒ +8, duh#**an investment adviser (or sub-adviser) to an investment company** h#j#l#w#h#g#
x#q#g#h#h#k#h#l#q#y#h#v#p#h#q#w#F#r#p#s#d#q#|D#f#w#r#i#l#<73>#

☐ +9, duh#**an investment adviser to a company which has elected to be a business
development company** s#x#u#v#d#q#w#h#r#h#f#w#l#r#q#8#7#r#i#k#h#l#q#y#h#v#p#h#q#w#F#r#p#s#d#q#|D#f#w#r#i#l#<73#
d#q#g#k#d#v#q#r#w#z#l#k#g#u#d#z#q#h#k#h#h#d#f#w#l#r#q#/#d#q#g#|rx#k#d#y#h#d#w#h#d#v#w#58#p#l#o#r#q#h#l#q#X#IV#l#g#r#o#l#u#v#h#r#u#p#r#u#h#
x#q#g#h#p#d#q#d#j#h#p#h#q#w#>#

☐ +:, duh#d#**pension consultant** z#l#k#h#h#v#h#f#w#h#r#d#v#h#w#h#r#i#s#o#l#q#v#k#d#y#l#j#d#q#d#j#j#h#j#d#w#h#y#d#o#x#h#r#i#d#w#
h#d#v#w#533/333/333#k#d#w#x#d#d#l#h#v#h#r#u#h#k#h#h#{h#p#s#w#l#r#q#h#l#q#X#d#h#536D05+d#>#

☐ +;, duh#d#**related adviser** x#q#g#h#h#u#h#536D05+e#h#k#d#w#*controls*/h#v#h#*controlled*e#|/h#r#u#h#v#x#q#g#h#
f#r#p#p#r#q#*control*z#l#k#/#d#q#h#q#y#h#v#p#h#q#w#d#g#y#l#h#u#h#k#d#w#h#h#j#l#w#h#g#z#l#k#k#h#V#H#F#/#d#q#g#|rx#u#
principal office and place of business l#k#h#h#v#p#h#d#v#h#h#h#j#l#w#h#g#d#g#y#l#h#u#>#

If you check this box, complete Section 2.A.(8) of Schedule D.

☐ +<, duh#d#**newly formed adviser** u#h#q#l#j#h#r#q#h#u#h#536D05+f#h#h#f#d#x#v#h#|rx#h#{s#h#f#w#h#r#h#h#d#j#l#e#h#
h#r#u#V#H#F#h#j#l#w#d#w#l#r#q#z#l#k#l#q#l#53#g#d#|v#>#

If you check this box, complete Section 2.A.(9) of Schedule D.

☐ +43,

duh#d#**multi-state adviser** wkdw#lv#hntx#lhg#wr#uhj lvhu#lq#48#ru#p ruh#vwdwh#dgg#lv#uhq#lqj#
rq#uxdn#536D05+g,>#

If you check this box, complete Section 2.A.(10) of Schedule D.

- ☐ +44, duh#dgg#**Internet adviser** uhq#lqj#rq#uxdn#536D05+h,>#
- ☐ +45, kdyh#**received an SEC order** h{hp swlqj#|rx#hup #kxh#surkle#lwrq#djd#lqv#uhj lvwdwlrq#z lk#
wkh#VHF>#

If you check this box, complete Section 2.A.(12) of Schedule D.

- ☐ +46, duh#**no longer eligible** wr#hup dlq#uhj lvwhung#z lk#kxh#VHF1#

State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers

F1###Xqghu#vwdwh#dz v/#VHF0uhj lvwhung#dgy lvhu#p d| #eh#hntx#lhg#wr#surygh#wr#state securities authorities d#
frs| #ri#kxh#rup #DGY#dgg#d| #dp hggp hqw#wkh| #lch#z lk#kxh#VHF1#kxhv#duh#fdoqg#notice filings#lq#
dgg#lwrq/#exempt reporting advisers p d| #eh#hntx#lhg#wr#surygh#state securities authorities z lk#d#
frs| #ri#hswruw#dgg#d| #dp hggp hqw#wkh| #lch#z lk#kxh#VHF1#l#lk lv#lv#d|q#lwd#dssdfdwlrq#ru#hswruw/#
fkhn#kxh#er{+hv,#qh{w#wr#kxh#vwdwh+v,#kdw#| rx#z rxqg#dnh#wr#uhfhyh#qrwfh#ri#k lv#dgg#d#xevhtxhqw#
ldqjv#ru#hswruw#| rx#xep lw#wr#kxh#VHF1#l#lk lv#lv#d|q#dp hggp hqw#wr#gj lhf#| rxu#notice filings ru#
hswruw#wr#dgg#lwrq#d#vwdwh+v,#fkhn#kxh#er{+hv,#qh{w#wr#kxh#vwdwh+v,#kdw#| rx#z rxqg#dnh#wr#uhfhyh#
qrwfh#ri#k lv#dgg#d#xevhtxhqw#ldqjv#ru#hswruw#| rx#xep lw#wr#kxh#VHF1#l#lk lv#lv#d|q#dp hggp hqw#wr#
|rxu#uhj lvwdwlrq#wr#vws#| rxu#notice filings ru#hswruw#hup #jrlqj#wr#vwdwh+v,#kdw#Exuhqwo#uhfhyh#
wkh#p /#xqfkhn#kxh#er{+hv,#qh{w#wr#kxh#vwdwh+v,1#

Mxulvg lwlrqv

<input checked="" type="checkbox"/> DO	<input checked="" type="checkbox"/> IG	<input checked="" type="checkbox"/> PR	<input checked="" type="checkbox"/> SD
<input type="checkbox"/> DN	<input checked="" type="checkbox"/> IO	<input checked="" type="checkbox"/> PW	<input type="checkbox"/> SU
<input checked="" type="checkbox"/> DJ	<input checked="" type="checkbox"/> IQ	<input checked="" type="checkbox"/> QH	<input checked="" type="checkbox"/> UL
<input checked="" type="checkbox"/> DU	<input checked="" type="checkbox"/> ID	<input checked="" type="checkbox"/> QY	<input checked="" type="checkbox"/> VF
<input checked="" type="checkbox"/> FD	<input checked="" type="checkbox"/> NV	<input checked="" type="checkbox"/> QK	<input type="checkbox"/> VG
<input checked="" type="checkbox"/> FR	<input checked="" type="checkbox"/> N\	<input checked="" type="checkbox"/> QM	<input checked="" type="checkbox"/> WQ
<input checked="" type="checkbox"/> FW	<input checked="" type="checkbox"/> OD	<input checked="" type="checkbox"/> QP	<input checked="" type="checkbox"/> W[
<input checked="" type="checkbox"/> GH	<input checked="" type="checkbox"/> PH	<input checked="" type="checkbox"/> Q\	<input checked="" type="checkbox"/> XW
<input checked="" type="checkbox"/> GF	<input checked="" type="checkbox"/> PG	<input checked="" type="checkbox"/> QF	<input checked="" type="checkbox"/> YW
<input checked="" type="checkbox"/> IO	<input checked="" type="checkbox"/> PD	<input checked="" type="checkbox"/> QG	<input type="checkbox"/> YL
<input checked="" type="checkbox"/> JD	<input checked="" type="checkbox"/> PL	<input checked="" type="checkbox"/> RK	<input checked="" type="checkbox"/> YD
<input type="checkbox"/> JX	<input checked="" type="checkbox"/> PQ	<input checked="" type="checkbox"/> RN	<input checked="" type="checkbox"/> Z D
<input checked="" type="checkbox"/> KL	<input checked="" type="checkbox"/> PV	<input checked="" type="checkbox"/> RU	<input checked="" type="checkbox"/> Z Y
			<input checked="" type="checkbox"/> Z L

If you are amending your registration to stop your notice filings or reports from going to a state that currently receives them and you do not want to pay that state's notice filing or report filing fee for the coming year, your amendment must be filed before the end of the year (December 31).

SECTION 2.A.(8) Related Adviser

Li#|rx#duh#uhq#lqj#rq#kxh#h{hp swlqj#lq#uxdn#536D05+e,#hup #kxh#surkle#lwrq#rq#uhj lvwdwlrq#ehfdxvh#|rx#
control/#duh#controlled e|/#ru#duh#xqghu#erp p rq#control z lk#d|q#lqyhvp hqw#dgy lvhu#wkdw#lv#uhj lvwhung#z lk#
wkh#VHF#dgg#|rxu#principal office and place of business lv#kxh#vdp h#dv#wkdw#ri#kxh#uhj lvwhung#dgy lvhu#
surygh#kxh#ir#z lqj#lqirup dwlrq=#

Qdp h#r i#Uhj lwhuhg#Lqyhvp hqw#Dgylvhu#

CRD Qxp ehur i#Uhj lwhuhg#Lqyhvp hqw#Dgylvhu#

VHF #Qxp ehur i#Uhj lwhuhg#Lqyhvp hqw#Dgylvhu#
; 34 0

SECTION 2.A.(9) Newly Formed Adviser

Li#| rx#duh#uhq| lqj #rq#uxd#536D05+f,/ #k#h#qhz d| #irup hg#dgylvhu#n{ hp swlrq#iurp #k#h#surkle lwrq#rq#
uhj lwudwlrq/#| rx#duh#uhtx lnhg#r#p dnh#fhuwdlq#uhsuhvqhgdwlrqv#derxw#| rxu#ndj le lwl| #iru#VHF #uhj lwudwlrq1#
E| #k#hfnlqj #k#h#dssursuldwh#er{ hv/#| rx#z k#eh#gghp hg#r#k#dyh#p dgh#k#h#uhtx lnhg#uhsuhvqhgdwlrqv1# rx#
p xvwp# dnh#erwk#r i#k#hvh#uhsuhvqhgdwlrqv=#
☐ I#dp #qrw#uhj lwhuhg#ru#uhtx lnhg#r#eh#uhj lwhuhg#z l#k#k#h#VHF #ru#d#state securities authority dgg#l#k#dyh#
d#uhdvrqdedh# { shfwdwlrq#k#dw#l#z k#eh#ndj ledh#r#uhj lvhu#z l#k#k#h#VHF #z l#k#lq#453#g#d| v#d#lvhu#k#h#g#dwh#
p | #uhj lwudwlrq#z l#k#k#h#VHF #ehfrp hv#h#i#hfwlyh1#
☐ I#k#gghuwnh#r#z l#gudz #iurp #VHF #uhj lwudwlrq#di/#rq#k#h#453wk#g#d| #d#lvhu#p | #uhj lwudwlrq#z l#k#k#h#VHF #
ehfrp hv#h#i#hfwlyh/#z rx#g#eh#surkle lnhg#e | #hfwlrq#536D+d, #r i#k#h#Dgylvhu#Dfw#iurp #uhj lvhu#lqj #z l#k#
k#h#VHF1#

SECTION 2.A.(10) Multi-State Adviser

Li#| rx#duh#uhq| lqj #rq#uxd#536D05+g,/ #k#h#p xowlvwdwh#dgylvhu#n{ hp swlrq#iurp #k#h#surkle lwrq#rq#
uhj lwudwlrq/#| rx#duh#uhtx lnhg#r#p dnh#fhuwdlq#uhsuhvqhgdwlrqv#derxw#| rxu#ndj le lwl| #iru#VHF #uhj lwudwlrq1#
E| #k#hfnlqj #k#h#dssursuldwh#er{ hv/#| rx#z k#eh#gghp hg#r#k#dyh#p dgh#k#h#uhtx lnhg#uhsuhvqhgdwlrqv1#

Li#| rx#duh#dssq| lqj #iru#uhj lwudwlrq#dv#dq#dgyhvp hqw#dgylvhu#z l#k#k#h#VHF/#| rx#p xvwp# dnh#erwk#r i#k#hvh#
uhsuhvqhgdwlrqv=#
☐ I#k#dyh#uhylnz hg#k#h#dssdfdedh#vwdh#dqg#hghudk#dz v#dqg#k#dyh#frqfoxghg#k#dw#l#dp #uhtx lnhg#e | #k#h#
dz v#r i#48#ru#p ruh#vwdwhv#r#uhj lvhu#dv#dq#dgyhvp hqw#dgylvhu#z l#k#k#h#state securities authorities lq#
wkrvh#vwdwhv1#
☐ I#k#gghuwnh#r#z l#gudz #iurp #VHF #uhj lwudwlrq#di#l#l#h#dq#dp hqgp hqw#r#k#l#uhj lwudwlrq#dqg#ldwqj #k#dw#
I#z rx#g#eh#uhtx lnhg#e | #k#h#dz v#r i#h#z hu#k#dq#48#vwdwhv#r#uhj lvhu#dv#dq#dgyhvp hqw#dgylvhu#z l#k#k#h#
state securities authorities r i#k#rvh#vwdwhv1#

Li#| rx#duh#xep lwqj#| rxu#annual updating amendment/#| rx#p xvwp# dnh#k#l#uhsuhvqhgdwlrq=#
☐ Z l#k#lq#3#g#d| v#sulru#r#k#h#g#dwh#r i#l#dqj #k#l#dp hqgp hqw#l#k#dyh#uhylnz hg#k#h#dssdfdedh#vwdh#dqg#
hghudk#dz v#dqg#k#dyh#frqfoxghg#k#dw#l#dp #uhtx lnhg#e | #k#h#dz v#r i#d#h#dv#48#vwdwhv#r#uhj lvhu#dv#dq#
dgyhvp hqw#dgylvhu#z l#k#k#h#state securities authorities lq#k#rvh#vwdwhv1#

SECTION 2.A.(12) SEC Exemptive Order

Li#| rx#duh#uhq| lqj #ksrq#dq#VHF #order h{ hp swlqj#| rx#iurp #k#h#surkle lwrq#rq#uhj lwudwlrq/#surygh#k#h#
iræz lqj #qirup dwlrq=#

Dssdfdwlrq#Qxp ehur=
; 360

Gdwh#r i#order=#

Item 3 Form of Organization

D1## Krz #duh#| rx#rujdql}hgB#

- ☐ Frusrudwlrq#
- ☐ Vrch#Sursulhwruvks#
- ☐ Olp lhg#Oldeblw| #Sduwghuvks#OOS,#
- ☐ Sduwghuvks#
- ☒ Olp lhg#Oldeblw| #Frp sdq| #OOF,#
- ☐ Olp lhg#Sduwghuvks#OS,#
- ☐ Rwkhu#vshfli| ,=#

If you are changing your response to this Item, see Part 1A Instruction 4.

E1# Lq#z kdw#p rqw#grhv#| rxu#lvfd#| hdu#hgg#ndfk#| hduB#
GHFHP EHU

F1# Xqghu#kh#dz v#ri#z kdw#vwdh#ru#frxqwu| #duh#| rx#rujdql}hgB#
Vwdh# Frxqwu| #
Gh#dz duh XQ LWHG #VWDWHV

If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.

If you are changing your response to this Item, see Part 1A Instruction 4.

Item 4 Successions**Yes No**

D1## Duh#| rx/#dw#kh#wp h#ri#k l#lqj /#vxfhbg lqj #r#k h#exvlqhv#ci d#hj lwhung#qyhw# hqw#
dgy lhuB#



If "yes", complete Item 4.B. and Section 4 of Schedule D.

E1# G dwh#ri#Vxfhvvlrq=#P P 2GG2\\ \ \ ,#

If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.

SECTION 4 Successions

Qr#Lqirup dwlrq#l lhg

3 (#

G1# For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships. The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, check "None" in response to Item 5.D.(1)(d) and do not check any of the boxes in response to Item 5.D.(2)(d).

+4, Z kdw#|shv#i#clients gr#|rx#kdyhB#lqglfdw#kch#dssur { p dwh#shufhgw#djh#kdw#ndfk#w|sh#i#client frp subhv#i#|rxu#rwdq#xp eh#i#clients1#i#i#client ilw#qwr#p ruh#kdw#qch#fdwhjru|/#fkhfn#d#kdw#dssd|1#

		Xs#w#	440	590	840	:90
	Org#	43 (#	58 (#	83 (#	:8 (#	<< (# 433 (#
+d, # lqglylxdo#rwhu#kdw#high net worth individuals, #	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+e, High net worth individuals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
+f, Edqnlgj#ru#kuliw#lqvwlwlrqv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+g, lqyhvp hqw#frp sdqlhv#	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+h, Exvlghvv#ghyh#sp hqw#frp sdqlhv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+i, Srrdng#lqyhvp hqw#yhlfdhv#rwhu#kdw#lqyhvp hqw#frp sdqlhv, #	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+j, Shqvlrq#dgg#surilw#kduqj#sdlqv#exw#qrw#kch#sdlq#sduwflsdgw, #	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+k, Fkduwdeh#rujdql#dwlrqv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+l, Frusrudwlrqv#ru#rwhu#exvlghvvhv#qrw#dwhg#cleryh#	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+m, Vwdwh#ru#p xqlf#sdq#government entities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+n, Rwhu#lqyhvp hqw#lgylvhu#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+q, lqvxdqfh#frp sdqlhv	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+p, Rwhu=====	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

+5, lqglfdw#kch#dssur { p dwh#p rxqwr#i#|rxu#hjcawru| #dvvhw#kqghu#p dgdjhp hqw#uhsrwng#lq#lwhp #811#eharz, #dwulexwdeh#r#ndfk#r#i#kch#r#arz lqj#w|sh#i#client1#i#i#client ilw#qwr#p ruh#kdw#qch#fdwhjru|/#fkhfn#d#kdw#dssd|1#

		Xs#w#	Xs#w#	Xs#w#
	Org#	58 (#	83 (#	:8 (# A:8 (
+d, # lqglylxdo#rwhu#kdw#high net worth individuals, #	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+e, High net worth individuals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
+f, Edqnlgj#ru#kuliw#lqvwlwlrqv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+g, lqyhvp hqw#frp sdqlhv#	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
+h, Exvlghvv#ghyh#sp hqw#frp sdqlhv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+i, Srrdng#lqyhvp hqw#yhlfdhv#rwhu#kdw#lqyhvp hqw#frp sdqlhv, #	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

+j, Shqvlrq#dgg#suril#wkdulqj#sodqv#exw#grw#kh# sodq#sduwflsdqgw,#	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+k, Fkduwdeh#rujdql}dwlrqv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+l, Frusrudwlrqv#ru#rwhu#exvlqhvvhv#grw#dwhg# deryh#	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+m, Vwdw#ru#p xqlfisdq# <i>government entities</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+n, Rwhu#qyhvp hqw#dgylvhu#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+o, Iqvxdqfh#frp sdqlhv	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+p, Rwhu####	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Compensation Arrangements

H1# \rx#duh#frp shqvdwhg#iru#| rxu#qyhvp hqw#dgylvru| #vhuylfhv#e| #fkhfn#dow#kdw#dssq,=#

- ☒ +4, ### Dshufhqwjh#i#dvvhw#xqghu#| rxu#p dgdjhp hqw
- ☐ +5, Krxu# #fkdujhv
- ☐ +6, Vxevfulswlrq#ihhv#iru#d#ghz vdwwhu#ru#shulrglfdq
- ☐ +7, Il[hg#ihhv#rwhu#kdq#xevfulswlrq#ihhv,
- ☐ +8, Frp p lvlrqv
- ☒ +9, *Performance-based fees*
- ☐ +:, Rwhu#vshfli|,=#

Item 5 Information About Your Advisory Business - Regulatory Assets Under Management

Regulatory Assets Under Management

	Yes	No
I1## +4, Gr# rx#surylgh#frqwlqrrxv#dgg#uhjxdu#vshuylru #ru#p dgdjhp hqw#vhuylfhv#r# vhfxulwlv#sruwrdrvB#	<input checked="" type="radio"/>	<input type="radio"/>
+5, Li# hv#z kdw#lv#kch#dp rxqw#r i# rxu#uhjxduwru #dvvhw#xqghu#p dgdjhp hqw#dgg#rwdqxp ehur i# dffrxqwB		
	XIV1#Grdu#Dp rxqw#	WrwddQxp ehur i#Dffrxqw#
G lvfuwlrqdu =#	+d, #' #7 ; 4 / 8 < 8 / 97	+g, #: 58
Q r q 0 G lvfuwlrqdu =#	+e, #' #4 ; 5 / 56 ; / : < 3	+h, #4 / 3 : :
Wrwde#	+f, #' #96 / ; 67 / 687	+i, # 4 / ; 35

Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item.

Item 5 Information About Your Advisory Business - Advisory Activities

Advisory Activities

J 1## Z kdw#w| sh+v, #r i#dgylvru| #vhuylfhv#gr#| rx#surylghB#fkhfn#dow#kdw#dssq l#

- ☐ +4, ### Ildqfldd#sodqlqj #vhuylfhv
- ☒ +5, Sruwrdr#p dgdjhp hqw#iru#dgglylxdo#dgg2ru#p d#exvlqhvvhv
- ☒ +6, Sruwrdr#p dgdjhp hqw#iru#qyhvp hqw#frp sdqlhv#dv#z h#dv#exvlqhvvhv#ghyha#sp hqw#
frp sdqlhv#kdw#kdyh#p dgh#dq#hdfwlrq#suvxdqgw#r#hfwlrq#87#r i#kch#qyhvp hqw#
Frp sdq| #Dfw#r i#4 < 73, #
- ☐ +7, Sruwrdr#p dgdjhp hqw#iru#srrdg#qyhvp hqw#yhk lfdv#rwhu#kdq#qyhvp hqw#frp sdqlhv,
- ☒ +8, Sruwrdr#p dgdjhp hqw#iru#exvlqhvvhv#rwhu#kdq#p d#exvlqhvvhv, #ru#qvwlvwlrqdc#clients
+rwhu#kdq#uhj lvhuhg#qyhvp hqw#frp sdqlhv#dgg#rwhu#srrdg#qyhvp hqw#yhk lfdv, #
- ☐ +9, Shqvlrq#frqvxdqj #vhuylfhv

- ☐ +: , Vhdfwlrq#r i#rkhu#dgy lvhu#lqfoxglqj#private fund p dgdjhuv,#
- ☐ +; , Sxedfdwlrq#r i#shuerg lfdv#ru#qhz vdwvhu
- ☐ +< , Vhfxulw| #udwlgjv#ru#sulfqj#vhuylfhv
- ☐ +43 , P dunhw#wp lqj#vhuylfhv
- ☐ +44 , Hgxfdwlrqdd#vhp lqduv2z runvkrsv
- ☐ +45 , R wkuh+vshfli| ,=#

Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 814 number of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Schedule D.

- K1 Li#|rx#surylgh#lqdgldq#s oqqlqj#vhuylfhv/#krz #p dq|#clients glg#|rx#surylgh#khvh#vhuylfhv#gxulqj#
|rxu#dvw#lvdq#|hduB#
- ☐ 3
- ☐ 4#0 43
- ☐ 44#0 58
- ☐ 59#0 83
- ☐ 84#0 433
- ☐ 434#0 583
- ☐ 584#0 833
- ☐ P ruh#wkdq#833
- Li#p ruh#wkdq#833/#krz #p dq|B
- +urxqg#r#kh#qhdvhw#833,#

In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

- L1 Li#|rx#sdwiflsdwh#lq#d#wrap fee program/#gr#|rx#fkhfn#d#kdw#lssq| ,=#
- ☐ +4 ,## sponsor wk#wrap fee programB#
- ☒ +5 , dfw#dv#d#ruwrdr#p dgdjhuv#ru#wk#wrap fee programB#

If you are a portfolio manager for a wrap fee program, list the names of the programs and their sponsors in Section 5.I.(2) of Schedule D.

If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check either Item 5.I.(1) or 5.I.(2).

Yes No

- M1 Lq#uhvsrqvh#r#Lwhp #7 1E1#r i#Sduw#5D#r i#Irup #DGY/#gr#|rx#lqglfdwh#wkdw#|rx#surylgh#
lqyhwv hq#w#dgylfh#rcqj #z lk#uhvshfw#r#dp lwhg#w|shv#r i#lqyhwv hqwB#

☒ ☐

SECTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies

Li#|rx#fkhfn#Lwhp #8 1J 1+6 ,/#z kdw#lv#wkh#VHF #lkh#qxp ehu#; 44#ru#; 47#qxp ehu,#r i#hdfk#r i#wkh#uhj lvwhug#
lqyhwv hq#w#frp sdq lnv#lqg#exvlghvv#ghyharsp hq#w#frp sdq lnv#wr#z klfk#|rx#dfw#dv#lq#dgy lvhu#suvxdq#wr#
dq#dgy lvru|#frqwdfwB#|rx#p xv#w#frp sdwh#d#hsdudwh#V fkhgxd#G #V hfwlrq#8 1J 1+6 ,#ru#hdfk#uhj lvwhug#

kyhvw hqwf#rp sdq | #dgg#exvlghvv#ghyhαsp hqwf#rp sdq | #r#z klfk# | rx#dfw#dv#dq#dgylvhu1

VHF #Lh#Qxp eh#; 44055858

SECTION 5.1.(2) *Wrap Fee Programs*

L1# | rx#duh#d#srwirdr#p dgdjhu#iru#rqn#ru#p ruh#*wrap fee programs*/#dv#kxh#qdp h#r i#hdfk#surjudp #dgg#lw#
*sponsor*1\ rx#p xvw#Erp sdwh#d#vhsdudwh#V fkhgxdh#G #vhfwlrq#8 11+5 ,#iru#hdfk#*wrap fee program* iru#z klfk#
 | rx#duh#d#srwirdr#p dgdjhu1#

Qdp h#r i#*Wrap Fee Program*

DGYLVRU#SURJUDP

Qdp h#r i#*Sponsor*

ORFNZ RRG #DGYLVRUV /#QF1

Qdp h#r i#*Wrap Fee Program*

DGYLVRU#SURJUDP

Qdp h#r i#*Sponsor*

Z HOOV #IDUJR

Qdp h#r i#*Wrap Fee Program*

DGYLVRU#SURJUDP

Qdp h#r i#*Sponsor*

SUXGHQWIDO#0UEF

Qdp h#r i#*Wrap Fee Program*

DGYLVRU#SURJUDP #0IV /#DFFHVV

Qdp h#r i#*Sponsor*

PRUJDQ #/WDQOH\ #VP LWK #EDUQH\

Qdp h#r i#*Wrap Fee Program*

DGYLVRU#SURJUDP #0PDS

Qdp h#r i#*Sponsor*

VHL#QYHVWP HQWV#P DQDJHP HQW#FRUS

Item 6 Other Business Activities

Iq#k#lv#Lwhp /#z h#htxhv#qirup dwlrq#derxw#| rxu#ilup *#rwkhu#exvlqhv#dfwylwhv1#

D1## \rx#duh#dfwylh#qjdjhg#q#exvlqhv#dv#d#fkhfn#d#kdw#dssq,=#

- ☐ +4,### eurnhu0ghdchu#uhj lvwhug#ru#xquhj lvwhug,
- ☐ +5, uhj lvwhug#hshuhqwdwylh#r i#d#eurnhu0ghdchu
- ☐ +6, frp p rgw|#errd#shudwru#ru#frp p rgw|#udgqj#dgylvru#z khwku#uhj lvwhug#ru#{hp sw#
iurp #uhj lvwdwlrq,
- ☐ +7, ixwuhv#frp p lvlrq#p hufkdqw
- ☐ +8, uhddhvwdh#eurnhu#ghdchu#ru#djhgq
- ☐ +9, lqvudqfh#eurnhu#ru#djhgq
- ☐ +:, edqn#lqf#xqj#d#vhsdudwh#d#ghqwilded#ghsdwp hqw#ru#gylvlrq#r i#d#edqn,
- ☐ +;, wxvw#frp sdq|
- ☐ +<, uhj lvwhug#p xqlf#sd#dgylvru
- ☐ +43, uhj lvwhug#vhfxulw| 0edvhg#vz ds#ghdchu
- ☐ +44, p dmru#vhfxulw| 0edvhg#vz ds#sdwlf#sdqw
- ☐ +45, dffrxqwdq#ru#dffrxqwdqj#ilup
- ☐ +46, dz |hu#ru#dz #ilup
- ☐ +47, rwkhu#ilqdqf#d#surgxfw#vdhvshvvrq#vshfli|,=#

If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B, complete Section 6.A. of Schedule D.

Yes No

E1 +4,### Duh#| rx#dfwylh#qjdjhg#q#d#q| #rwkhu#exvlqhv#grw#dvwhg#q#Lwhp #D ID1#rwkhu#kdw#
jlylqj#qyhwq hqw#dgylfh,B#

☐ ☒

+5, Li#| hv#lv#k#lv#rwkhu#exvlqhv#| rxu#sup du| #exvlqhvB#

☐ ☐

If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.

Yes No

+6, Gr#| rx#h#surgxfw#ru#surygh#vhuylfhv#rwkhu#kdw#qyhwq hqw#dgylfh#r#| rxu#dgylvru| #
clientsB#

☐ ☒

If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.

SECTION 6.A. Names of Your Other Businesses

Qr#qirup dwlrq#l#hg

SECTION 6.B.(2) Description of Primary Business

Ghvfulh#| rxu#sup du| #exvlqhv#grw#| rxu#qyhwq hqw#dgylvru| #exvlqhv,=

Li#| rx#qjdjhg#q#kdw#exvlqhv#xqghu#d#g lliuhgq#qdp h/#surygh#kdw#qdp h=#

SECTION 6.B.(3) Description of Other Products and Services

Ghvfulh#rwkhu#surgxfw#ru#vhuylfhv#| rx#h#r#| rxu#client/#| rx#p d| #rp lv#surgxfw#dgg#vhuylfhv#kdw#| rx#
dvwhg#q#vhfwlrq#9 IE1+5, #deryh1#

Li#|rx#hqqdjhh#q#kdw#exvlqhv#xqghu#b#g lihuqh#qdp h/#surylg#kdw#qdp h1#

Item 7 Financial Industry Affiliations and *Private Fund* Reporting

Iq#kLv#Lwhp /#z h#htxlv#lqirup d#lrg#derxw#| rxu#lqdgfldo#lqgxvw#| #lilddwlrqv#dgg#dfwlylvhv1#WkLv#
lqirup d#lrg#lghqwlilhv#duhdv#lq#z klfk#lrgqldfw#r i#lqwhuhv#p d| #rffxu#ehwz hhq#| rx#lqg#| rxu#clients1#

D1## WkLv#sdw#r i#Lwhp #: #htxlv#lqirup d#lrg#derxw#| rx#lqg#| rxu#related persons/#lqfoxglj#
iruhljq#lilddwlv1#| rxu#related persons duh#lq#r i#| rxu#advisory affiliates dgg#lq| #person wkdw#lv#kqghu#
frp p r#g#control z l#k#| rx1#

\rx#kdyh#l#related person wkdw#lv#l#fkhn#lq#kdw#lssq,=#

- ☒ +4,### eurnhu0ghddu/#p xqlf#lscd#vhfxulwlv#ghddu/#ru#jryhuqp hqw#vhfxulwlv#eurnhu#ru#ghddu#
+uhjlvwhug#ru#kquhjlvwhug,
☒ +5,# rwxhu#lgyhvp hqw#lgylvhu#lqfoxglj#lqdgfldo#lqghw,
☐ +6,# uhjlvwhug#p xqlf#lscd#lgylvru
☐ +7,# uhjlvwhug#vhfxulw| 0edvhg#vz ds#ghddu
☐ +8,# p dmr#vhfxulw| 0edvhg#vz ds#sdwflsdgw
☐ +9,# frp p rglw| #rrd#shudwru#ru#frp p rglw| #udglj#lgylvru#z khwku#uhjlvwhug#ru#h{hp sw#
iurp #uhjlvwdwlrq,
☐ +:,# ixwuhv#frp p lvlrq#p hufkdq
☒ +;,# edqnlgj#ru#kulw#lqvwlvwlrq
☒ +<,# wwxv#frp sdq|#
☐ +43,# dffrxqwdw#ru#dffrxqwlj#lilp
☐ +44,# l#z |hu#ru#l#z #ilp
☒ +45,# lqvudqfh#frp sdq|#ru#ljhqf|
☐ +46,# shqvlrg#lrgvxdq
☐ +47,# uhd#lvwdw#eurnhu#ru#ghddu
☐ +48,# vsrqvr#ru#| qglfdw#r i#p lwhg#sdwghuvk#lv#ru#htxlyddqg/#h{foxglj#lrrdg#lgyhvp hqw#
yhklfdv
☐ +49,# vsrqvr/#jhqhud#sdwghu/#p dgdjlgj#p hp eh#ru#htxlyddqg,#r i#lrrdg#lgyhvp hqw#yhklfdv

For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete *Section 7.A. of Schedule D*.

You do not need to complete *Section 7.A. of Schedule D* for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.

You must complete *Section 7.A. of Schedule D* for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

Yes No

E1 Duh#| rx#lq#lgylvhu#r #lq| #private fundB#



If "yes," then for each private fund that you advise, you must complete a *Section 7.B. (1) of Schedule D*, except in certain circumstances described in the next sentence and in *Instruction 6 of the Instructions to Part 1A*. If another adviser reports this information with respect to any such private fund in *Section 7.B. (1) of Schedule D* of its Form ADV (e.g., if you are a subadviser), do not complete *Section 7.B. (1) of Schedule D* with respect to that private fund. You must, instead, complete *Section 7.B. (2) of Schedule D*.

In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designation in place of the fund's name.

SECTION 7.A. Financial Industry Affiliations

Frp sdwh#d#vhsdudwh#V fkhgxdh#G #Vhfwrq#; 1D 1#ru#ndfk#related person dwhg#q#lwhp #: 1D 1#

4 1###Ohjdd#Q dp h#r i#Related Person=#

FKLFDJR #WUXVW#FRP SDQ \

5 1# Sup du|Bxvlg hvv#Q dp h#r i#Related Person=#

FKLFDJR #WUXVW#FRP SDQ \

6 1# Related Person's VHF #Lh#Q xp eh#Lh#q | ,#h1j 1/#; 340/#; 0/#; 990/#; 350,#

0

ru#

Rwkh#

7 1# Related Person's CRD Q xp eh#Lh#q | ,=

8 1# Related Person lv=#fkhfn#dwhkdw#lssq | ,#

+d,###☐ ###eurnhu0ghdnu#p xqlfisdq#vhfxulw#ghdnu#ru#jryhuq hqw#vhfxulw#eurnhu#ru#ghdnu#

+e,# ☐ ###rwkh#qyhwq hqw#dgylvhu#lqfoxglj#lqdgfld#sdqghu,#

+f,# ☐ uhjlvhuq#p xqlfisdq#dgylvru#

+g,# ☐ uhjlvhuq#vhfxulw|0edvhg#vz ds#ghdnu#

+h,# ☐ ###p dmru#vhfxulw|0edvhg#vz ds#sdwiflsdqw#

+i,# ☐ ###frp p rgw|#srrd#rshudru#ru#frp p rgw|#wudglj#dgylvru#z khwkhuhjlvhuq#ru#{hp sw#iurp #uhjlvudwlrq,#

+j,# ☐ ixwuhv#frp p lvlrq#p hufkdqw#

+k,# ☐ edqnlqj#ru#wkuliw#lqvwxwlrq#

+l,# ☒ wuxvw#frp sdq | #

+m,# ☐ dffrxqwdqw#ru#dffrxqwdqj#ilp #

+n,# ☐ dz |hu#ru#dz #ilp #

+o,# ☐ lqvxdqfh#frp sdq | #ru#djhqf | #

+p ,# ☐ shqvlrq#frqvxdq#w

+q,# ☐ ###undchvwdh#eurnhu#ru#ghdnu#

+r,# ☐ vsrqvru#ru#v|qglfdwru#i#dp lwhg#sdwghuvklsv#ru#ntxlyddqw,#n{foxglj#srrdg#qyhwq hqw#yhklfdv#

+s,# ☐ ###vsrqvru#jhghud#sdwghu#p dqdj lqj #p hp eh#ru#ntxlyddqw,#i#srrdg#qyhwq hqw#yhklfdv#

Yes No

9 1# Gr#|rx#control ru#duh#|rx#controlled e | #kh#related person#

☐ ☒

: 1# Duh#|rx#dgg#kh#related person xqghu#frp p rq#control#

☒ ☐

; 1# +d,#

☐ ☒

Grhv#kxh#related person dfw#lv#d#t#xdddilhg#fxvwrqldq#iru# rxu#clients lq#frqghfwlrq#z lk# dgylvru #vhuylfhv# rx#surylgh#wr#clientsB		
+e,#	Li# rx#duh#uhj lvwhuqj #ru#uhj lvwhung#z lk#kxh#VHF #dgg# rx#kdyh#dqvz huhg# hv/#w# txhvwlrq#; +d,#deryh/#kdyh# rx#ryhufrp h#kxh#suhvxp swlrq#kdw# rx#duh#grw# rshudwlrqd# #lqghshqghq#w#sxuvxdq#w#r#lx#d#539+7,0+5,+g,+8,,#urp #kxh#related person dgg#kxv#duh#grw#uh#tx#lhq#w#r#ewdlq#d#xusulv#h#h{dp lqdwlrq#iru# rxu#clients' ixqgv#ru# vxfxulv#wkdw#duh#p dlqdlqhg#d#wkxh#related personB#	<input type="radio"/> <input type="radio"/>
+f,#	Li# rx#kdyh#dqvz huhg# hv#w#r#t#xhvwlrq#; 1+d,#deryh/#surylgh#wkxh#rfdwlrq#r#i#kxh#related person's riilfh#uhvsrqvled#iru#custody ri# rxu#clients' dvvhw=# Qxp eh#dgg#Vwuhhw#1= Qxp eh#dgg#Vwuhhw#5= Fw#l#=# Vwdwh=# Frxqwl#=#] LS. 72Srvdd#Frg#= Li#k lv#dgguhvv#lv#d#sulydwh#uhvlgqfh/#fkhn#k#lv#er{=#	
		Yes No
<1#	+d,# Li#wkxh#related person lv#d#lq#qyhw#p hq#w#dgylvhu#lv#lv#h{hp sw#urp #uhj lvwudwlrqB#	<input type="radio"/> <input type="radio"/>
+e,#	Li#wkxh#dqvz hu#lv# hv/#kqghu#z kdw#h{hp swlrqB	
431#	+d,# Lv#wkxh#related person uhj lvwhung#z lk#d#foreign financial regulatory authority B#	<input type="radio"/> <input checked="" type="radio"/>
+e,#	Li#wkxh#dqvz hu#lv# hv/#lv#wkxh#qdp h#dgg#frxqwl#/#lq#lqj#dk/#r#i#hdfk#foreign financial regulatory authority z lk#z klfk#wkxh#related person lv#uhj lvwhung1 Qr#lqirup dwlrq#l#hg	
441#	Gr# rx#dgg#wkxh#related person vkduh#d#q #supervised personsB#	<input type="radio"/> <input checked="" type="radio"/>
451#	Gr# rx#dgg#wkxh#related person vkduh#wkxh#vdp h#sk vlfdd#rfdwlrqB#	<input type="radio"/> <input checked="" type="radio"/>

41###Ohjd#Qdp h#r#i#Related Person=#
J UHWD#ODNHV#DGYLVR UV /#OOF

51# Sup du| #xvlg hv#Qdp h#r#i#Related Person=#
J UHWD#ODNHV#DGYLVR UV /#OOF

61# Related Person's VHF #l#h#Qxp eh#l#d#q| ,#h1j1/#; 340/#; 0/#; 990/#; 350,#
; 34 049<6:
ru#
Rwku#

71# Related Person's CRD Qxp eh#l#d#q| ,=
443:8:

81# Related Person lv#r#fkhn#d#kdw#lssq| ,#
+d,###☐ ###eurnhu0ghddu/#p xqlfssd#vxfxulv#ghddu/#ru#j ryhuq# hq#w#vxfxulv#eurnhu#ru#ghddu#
+e,# ☒ ###rkwu#lqyhw#p hq#w#dgylvhu#lqfoxglj#lqddqfld#s#lqghuv,#
+f,# ☐ uhj lvwhung#p xqlfssd#dgylvru#
+g,# ☐ uhj lvwhung#vxfxulv#lqddqfld#s#lqghuv#
+h,# ☐ ###p dmru#vxfxulv#lqddqfld#s#lqghuv#
+i,# ☐ ###frp p rglw| #srrd#rshudwlrq#ru#frp p rglw| #udglqj#dgylvru#z khwku#uhj lvwhung#ru#h{hp sw#urp #
uhj lvwudwlrq#
+j,# ☐ ixwuhv#frp p lvlrq#p hufkdq#

+k,# ☐ edqnlqj#ru#kuliw#lqvwlxwlrq#
 +l,# ☐ wuxvw#frp sdq|#
 +m,# ☐ dffrxqwdqg#ru#dffrxqwlqj#ilp#
 +n,# ☐ alz|h#ru#alz#ilp#
 +o,# ☐ lqvxdqfh#frp sdq|#ru#djhgqf|#
 +p,# ☐ shqvlrq#frqvxdqg#
 +q,# ☐ ###uhdghvwdwh#urnhu#ru#gddhu#
 +r,# ☐ vsrqvru#ru#v|qgldwru#i#dp lhg#sduqhuvklsv#ru#htxlyddqg,#h{foxglqj#srrdng#lqyhvwp hqw#
 yhkldhv#
 +s,# ☐ ###vsrqvru/#jhqhuda#sduqhu/#p dgdj lqj#p hp eh#ru#htxlyddqg,#r#srrdng#lqyhvwp hqw#yhlfdhv#

Yes No

91# Gr#|rx#control ru#duh#|rx#controlled e|#kh#related personB#

☐ ☐

:1# Duh#|rx#dgg#kh#related person xqghu#frp p rq#controlB#

☐ ☒;1# +d,# Grhv#kh#related person dfw#dv#d#t xddilhg#fxvrgldq#iru#|rxu#clients lq#frqghfwlrq#z lk#
dgylvru|#huylfhv#|rx#surylgh#wr#clientsB☐ ☒

+e,# Li#|rx#duh#uhj lwhulqj#ru#uhj lwhuhg#z lk#kh#VHF#dgg#|rx#kdyh#dqvz huhg#hv/#wr#
 txhvwlrq#;+d,#deryh/#kdyh#|rx#ryhufrp h#kh#suhvxp swlrq#kdw#|rx#duh#grw#
 rshudwlrqd#|lqghshqghqg#suxvxdqg#wr#uxd#539+7,0+5,+g,+8,,#urp #kh#related person
 dgg#kxv#duh#grw#htx lhg#wr#rewdlq#d#xusulv#h#dp lqdwlrq#iru#|rxu#clients' ixqgv#ru#
 vhfuxulhv#kdw#duh#p dlqdlqhg#d#kh#related personB#

☐ ☐

+f,# Li#|rx#kdyh#dqvz huhg#hv#wr#txhvwlrq#;1+d,#deryh/#surylgh#kh#rfdwlrq#r#i#kh#related person's
 riilfh#uhvsrqvled#iru#custody ri#|rxu#clients' dvvhw=#

Qxp eh#dgg#Vwhhw#1=

Qxp eh#dgg#Vwhhw#5=

Fw|=

Vwdh=

Frqxw|=

]LS.72Srvdd#Frgh=

Li#k l#dgguhvv#dv#d#sulydwh#uhvlghqfh/#fkhn#k l#er {=}

Yes No

<1# +d,# Li#kh#related person lv#dq#lqyhvwp hqw#dgylvhu#dv#lwh#hp sw#urp #uhj lwdwlrqB#

☐ ☒

+e,# Li#kh#dqvz hu#dv#hv/#kqghu#z kdw#h#hp swlrqB

431# +d,# Lv#kh#related person uhj lwhuhg#z lk#d#foreign financial regulatory authority B#

☐ ☒

+e,# Li#kh#dqvz hu#dv#hv/#dv#kh#qdp h#dgg#frxgw|#dq#lqj dvk/#r#hdfk#foreign financial regulatory
 authority z lk#z klfk#kh#related person lv#uhj lwhuhg1

Qr#lqirup dwlrq#l lhg

441#Gr#|rx#dgg#kh#related person vkduh#dq|#supervised personsB#

☒ ☐

451#Gr#|rx#dgg#kh#related person vkduh#kh#vdp h#sk|vld#rfdwlrqB#

☐ ☒

41###Ohjd#Q dp h#i#Related Person=#

Z D\QH#KXP P HU#Q YHVWP HQ WV#DIO1F1

51# Sup du|#xvlg hvv#Q dp h#i#Related Person=#

Z D\QH#KXP P HU#Q YHVWP HQ WV#DIO1F1

61#

Related Person's VHF #Lh#Qxp ehulh#dq|, #h1j1/#; 340/#; 0/#; 990/#; 350, #
; 34 0 97566
ru#
Rwkh#

71# Related Person's CRD Qxp ehulh#dq|, =
; : 8

81# Related Person lv=#fkhfn#d#kdw#dssq|, #
+d, ### ☒ #eurnhu0ghdnu/#p xqlfisdqvhfxulwlv#ghdnu/#ru#jryhuqp hqw#vhfxulwlv#eurnhu#ru#ghdnu#
+e, # ☒ #rkh#qyhwv hqw#dgylvhu#lqfoxglj#lqdgfld#sdlqghu, #
+f, # ☐ uhjlvhuhg#p xqlfisdq#dgylvru#
+g, # ☐ uhjlvhuhg#vhfxulw|0edvhg#vz ds#ghdnu#
+h, # ☐ #p dmru#vhfxulw|0edvhg#vz ds#sduwlfisdq#
+i, # ☐ #frp p rglw|#srrc#rshudwru#ru#frp p rglw|#udglj#dgylvru#z khwkhuhjlvhuhg#ru#h{hp sw#urp #
uhjlvudwlrq, #
+j, # ☐ ixwuhv#frp p lvlrq#p hufkdq#
+k, # ☐ edqnlqj#ru#kuliw#lqvwlxwlrq#
+l, # ☐ wxv#frp sdq| #
+m, # ☐ dffrxqwdq#ru#dffrxqwlqj#lup #
+n, # ☐ dz|h#ru#dz#lup #
+o, # ☒ lqvudqfh#frp sdq|#ru#djhqf|#
+p, # ☐ shqvlrq#frqvxdq#
+q, # ☐ #hndq#vwdw#eurnhu#ru#ghdnu#
+r, # ☐ vsrqvru#ru#|qglfdruc#i#dp lhg#sdughuvklsv#ru#htxlyddq#, #h{foxglj#srrdg#qyhwv hqw#
yhklfchv#
+s, # ☐ #vsrqvru/#jhghud#sdughu/#p dqdjlgj#p hp ehulh#ru#htxlyddq#, #i#srrdg#qyhwv hqw#yhklfchv#

Yes No

91# Gr#|rx#control ru#duh#|rx#controlled e|#kh#related personB#

☐ ☒

: 1# Duh#|rx#dqg#kh#related person xqghu#frp p rq#controlB#

☒ ☐

; 1# +d, # Grhv#kh#related person dfw#dv#d#xaddihg#fxvrgldq#iru#|rxu#clients lq#frqghfwlrq#z lk#
dgylvru| #huylfhv#|rx#surylg#h#clientsB

☐ ☒

+e, # Li#|rx#duh#uhjlvhuqj#ru#uhjlvhuhg#z lk#kh#VHF#dqg#|rx#kdyh#dqvz hulg#E|hv/#r#
txhvwlrq#; +d, #deryh/#kdyh#|rx#ryhufp h#kh#suhvxp swlrq#kdw#|rx#duh#qrw#
rshudwlrqd#lqghshqghq#suxvxdq#r#lxch#539+7, 0+5, +g, +8, , #urp #kh#related person
dqg#kxv#duh#qrw#htxlg#r#redlq#d#xusulh#h{dp lqdwlrq#iru#|rxu#clients' ixqgv#ru#
vhfxulwlv#kdw#duh#p dlqwdlg#d#kh#related personB#

☐ ☐

+f, # Li#|rx#kdyh#dqvz hulg#|hv#r#txhvwlrq#; 1+d, #deryh/#surylg#kh#rfdwlrq#i#kh#related person's
riilfh#uhvsrqvled#iru#custody ri#|rxu#clients' dvvhw=#

Qxp ehulh#dqg#Vwuhw#1=

Qxp ehulh#dqg#Vwuhw#5=

Fw#

Vwdw#

Frqgw#

] LS. 72Srvdd#Frgh=

Li#kh#lqgguhvv#v#d#sulydw#uhvlgqhfh/#fkhfn#kh#l#er{= ☐

Yes No

< 1# +d, # Li#kh#related person lv#dq#qyhwv hqw#dgylvhu/#lv#h{hp sw#urp #uhjlvudwlrqB#



☐ ☒



+e, # Li#kh#dqvz hu#lv#|hv/#xqghu#z kdw#h{hp swlrqB

431# +d, # Lv#kh#related person uhjlvhuhg#z lk#d#foreign financial regulatory authority B#

☐ ☒

+e, # Li#kh#dqvz hu#lv#| hv/#lv#kh#qdp h#dqg#frxqwu| /#q#Iqj dvk/#r i#hdfk#foreign financial regulatory
 authority z wk#z klfk#kh#related person lv#hj lv#hug1
 Q r#Lqirup dwlrq#I lhg

441#Gr#| rx#dqg#kh#related person vkduh#dq| #supervised personsB#  

451#Gr#| rx#dqg#kh#related person vkduh#kh#vdp h#sk| vlfdd#rfdwlrqB#  

SECTION 7.B.(1) *Private Fund Reporting*

Q r#Lqirup dwlrq#I lhg

SECTION 7.B.(2) *Private Fund Reporting*

Q r#Lqirup dwlrq#I lhg

Item 8 Participation or Interest in *Client* Transactions

Iq#k#lv#lwhp /#z h#htxhvw#lqirup d#lwrq#derxw#| rxu#s#dwlf#s#dwlrq#dgg#lqwhuhvw#lq#| rxu#*clients*#w#udqvd#fwrqv#l#
Wk#lv#lqirup d#lwrq#lghqwl#lv#lqgg#lwrqdd#ludhv#lq#z k#lfk#frq#idfwr#r#lqwhuhvw#p d| #rffxu#ehwz h#h#q#| rx#dgg#| rxu#
*clients*l#

Olh#lwhp #: /#lwhp #: #htx#lvh#| rx#w#surylgh#lqirup d#lwrq#derxw#| rx#dgg#| rxu#*related persons*/#lqf#x#g#lqj#
iruh#lq#d#i#l#ddwhv#l#

Proprietary Interest in *Client* Transactions

D1## Gr# rx#ru#lq # <i>related person</i> =	Yes	No
+4, # ex #vhfxulwlv#ru# rxuvhd#lurp #dgy#lvru # <i>clients</i> /#ru#h#h#vhfxulwlv# rx#z q#w#dgy#lvru # <i>clients</i> +sulq#f#s#d#w#udqvd#fwrqv,B	<input type="radio"/>	<input checked="" type="radio"/>
+5, ex #ru#h#h#ru# rxuvhd#vhfxulwlv#r#khu#k#dq#k#duhv#r#i#p xwdd#xqgv,#k#dw# rx#d#or# uhfrp p hgg#w#dgy#lvru # <i>clients</i> B	<input checked="" type="radio"/>	<input type="radio"/>
+6, uhfrp p hgg#vhfxulwlv#ru#r#khu#lqy#hvw# hq#w#surg#x#fw,#w#dgy#lvru # <i>clients</i> lq#z k#lfk# rx#ru# dq # <i>related person</i> kdv#r#p h#r#khu#s#ursulhwdu #r#z q#h#v#k#l#s,#lqwhuhvw#r#khu#k#dq#k#rvh# p hq#w#r#q#h#g#lq#lwhp v#; D1+4,#ru#5,,B	<input type="radio"/>	<input checked="" type="radio"/>

Sales Interest in *Client* Transactions

E1 Gr# rx#ru#lq # <i>related person</i> =	Yes	No
+4, dv#d#eurnhu0ghdhu#ru#h#j lvwhung#h#suhvhq#w#l#y#h#r#i#d#eurnhu0ghdhu/#h{hfxw#h#vhfxulwlv# wdghv#ru#eurnhudjh#fxvwrp huv#lq#z k#lfk#dgy#lvru # <i>client</i> vhfxulwlv#duh#v#r#g#w#ru#e#rxjkw# iurp #k#h#eurnhudjh#fxvwrp hu#d#j#h#q#f #furvv#w#udqvd#fwrqv,B	<input type="radio"/>	<input checked="" type="radio"/>
+5, uhfrp p hgg#s#xufkdv#h#r#vhfxulwlv#w#dgy#lvru # <i>clients</i> iru#z k#lfk# rx#ru#lq # <i>related</i> <i>person</i> v#huyh#dv#k#qghuz ulhu/#j h#qhud#ru#p d#q#j lqj#s#dwqhu/#ru#s#xufkdvhu# uhsuhvhq#w#l#y#h#B	<input type="radio"/>	<input checked="" type="radio"/>
+6, uhfrp p hgg#s#xufkdv#ru#v#d#h#r#i#vhfxulwlv#w#dgy#lvru # <i>clients</i> iru#z k#lfk# rx#ru#lq # <i>related person</i> kdv#lq #r#khu#v#d#h#lqwhuhvw#r#khu#k#dq#k#h#h#f#h#s#w#r#i#v#d#h#r#p l#v#l#qv# dv#d#eurnhu#ru#h#j lvwhung#h#suhvhq#w#l#y#h#r#i#d#eurnhu0ghdhu,B	<input type="radio"/>	<input checked="" type="radio"/>

Investment or Brokerage Discretion

F1 Gr# rx#ru#lq # <i>related person</i> kdyh# <i>discretionary authority</i> w#r#g#h#h#p lq#h#k#h#	Yes	No
+4, vhfxulwlv#w#r#h#e#r#xjkw#ru#v#r#g#ru#d# <i>client's</i> d#f#r#x#q#B	<input checked="" type="radio"/>	<input type="radio"/>
+5, dp rxq#w#r#i#vhfxulwlv#w#r#h#e#r#xjkw#ru#v#r#g#ru#d# <i>client's</i> d#f#r#x#q#B	<input checked="" type="radio"/>	<input type="radio"/>
+6, eurnhu#ru#ghdhu#w#r#h#e#r#v#g#ru#d#s#xufkdv#ru#v#d#h#r#i#vhfxulwlv#ru#d# <i>client's</i> d#f#r#x#q#B	<input checked="" type="radio"/>	<input type="radio"/>
+7, frp p l#v#l#q#u#d#h#v#w#r#h#e#s#d#g#w#r#d#eurnhu#ru#ghdhu#ru#d# <i>client's</i> vhfxulwlv#w#udqvd#fwrqvB	<input checked="" type="radio"/>	<input type="radio"/>

G1 Li#| rx#dqvz hu#%| hv#%w#r#F1+6,#deryh/#duh#d#q | #r#i#k#h#eurnhu#ru#ghdhu#*related persons*B
 ☐ | ☒ |

H1 Gr#| rx#ru#lq | #*related person* uhfrp p hgg#eurnhu#ru#ghdhu#w#r#*clients*B#
 ☒ | ☐ |

I1 Li#| rx#dqvz hu#%| hv#%w#r#I#deryh/#duh#d#q | #r#i#k#h#eurnhu#ru#ghdhu#*related persons*B
 ☐ | ☒ |

J1 +4, Gr#| rx#ru#lq | #*related person* uhfhlyh#uhv#duf#k#ru#r#khu#s#urg#x#fw#ru#v#huy#lfhv#r#khu#k#dq#
h{hfxw#l#r#q#iurp #d#eurnhu0ghdhu#ru#d#k#l#g#s#duw | #%v#r#i#v#g#r#o#u#e#h#q#h#l#w#%#lq#f#r#q#h#f#w#l#r#q#z l#k#
client vhfxulwlv#w#udqvd#fwrqvB
 ☐ | ☒ |

+5, Li#%| hv#%w#r#J1+4,#deryh/#duh#d#q#w#k#h#%v#r#i#v#g#r#o#u#e#h#q#h#l#w#%| rx#ru#lq | #*related persons*
uhfhlyh#h#d#j l#e#h#uhv#duf#k#ru#eurnhudjh#v#huy#lfhv#%q#ghu#v#h#f#w#l#r#q#5 ; +h,#r#i#k#h#v#h#f#w#l#r#v#
H{fkdqj#h#d#f#w#r#i#1<67B
 ☐ | ☐ |

K1 Gr#| rx#ru#lq | #*related person*/#g#l#h#f#w#l#ru#lq#g#l#h#f#w#l#/#r#p s#h#q#v#d#w#l#q | #*person* iru#*client*
uh#h#u#d#o#B
 ☐ | ☒ |

L1 Gr#|rx#ru#dq|#related person/#g|uhfw| #ru#qg|uhfw|/uhfhlyh#frp shqvdwlrq#urp #dq|#person
iru#client uhihudoB

In responding to Items 8.H and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H) or received from (in answering Item 8.I) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.

Dq#independent public accountant suhsduhv#dq#qwhugdc#frqwrduhsruw#z wk#uhvshfw#r#
 fxvwrqld#vhuylfhv#z khq#|rx#ru#|rxu#related persons duh#t xddilhg#fxvwrqldqv#iru#client
 ixqgv#dqg#vhfxuwlhv#

If you checked Item 9.C.(2), C.(3) or C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the private funds you advise in Section 7.B.(1) of Schedule D).

G1	Gr# rx#ru# rxu#related person(s) dfw#dv#t xddilhg#fxvwrqldqv#iru# rxu#clients lq#frqghfwlrq#	Yes No
	z wk#dgylvru #vhuylfhv# rx#surygh#r#clientsB#	
	+4, rx#dfw#dv#t xddilhg#fxvwrqldq	<input type="radio"/> <input checked="" type="radio"/>
	+5, rxu#related person(s) dfw#dv#t xddilhg#fxvwrqldq+v,#	<input type="radio"/> <input checked="" type="radio"/>

If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

H1 Li#|rx#duh#ldqj#|rxu#annual updating amendment dqg#|rx#z huh#vxemfw#r#ld#vxusulvh#h{dp lqdwlrq#e|#
 dq#independent public accountant gxulqj#|rxu#dv#lvfdd#|hdu#surygh#kh#gdw#P P 2\\|\\, #kh#
 h{dp lqdwlrq#frp p hqfhg=#

I1 Li#|rx#ru#|rxu#related persons kdyh#custody ri#client ixqgv#ru#vhfxuwlhv/#krz #p dq|#shwvrqv/#
 lqfoxglqj/#exw#qrw#p lhg#r/#|rx#dqg#|rxu#related persons, dfw#dv#t xddilhg#fxvwrqldqv#iru#|rxu#clients
 lq#frqghfwlrq#z wk#dgylvru| #vhuylfhv#|rx#surygh#r#clients?

SECTION 9.C. Independent Public Accountant

Qr#Lqirup dwlrq#l lhg

Item 10 Control Persons

Iq#kLv#Lwhp /#z h#dvn#| rx#r#ghqwi| #hyhu| #person wkdw#g luhfw| #ru#ggluhfw| /#controls |rx1#

Li#| rx#duh#xep lwqj #dq#q lwdq dssdfdwlrq#ru#hsrw/#| rx#p xvw#frp schwh#V fkhgxdh#D #dgg#V fkhgxdh#E 1#
V fkhgxdh#D #dvnv#iru#qirup dwlrq#derxw#| rxu#g luhfw#z qhuv#dgg#h { hfxwlyh#r ilfhuw1#V fkhgxdh#E #dvnv#iru#
qirup dwlrq#derxw#| rxu#ggluhfw#z qhuv1#Li#kLv#lv#dq#dp hggp hqw#dgg#| rx#duh#xsgdwqj #qirup dwlrq#| rx#
uhsrwg#q#h lwhu#V fkhgxdh#D #ru#V fkhgxdh#E #ru#erwk, #kdw#| rx#lbg#z lk#| rxu#q lwdq dssdfdwlrq#ru#hsrw/#
| rx#p xvw#frp schwh#V fkhgxdh#E 1#

Yes No

D1## Grhv#dq | #person qrw#qdp hg#q#Lwhp #4 1D1#ru#V fkhgxdh#D /#E /#ru#F /#g luhfw| #ru#ggluhfw| /#
control | rxu#p dqdjhp hqw#ru#srdflvB

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If yes, complete Section 10.A. of Schedule D.

E1 Li#dq | #person qdp hg#q#V fkhgxdh#D /#E /#ru#F /#ru#g#Vhfwrq#4 3 1D1#ri#V fkhgxdh#G #lv#d#sxedf#uhsrwqj#
frp sdq | #xgghu#Vhfwrqv#4 5#ru#4 8+g, #r i#kh#Vhfuxlwhv#H { fkdqjh#D fw#r i#4 < 67 /#s chdv#frp schwh#Vhfwrq#
4 3 1E 1#r i#V fkhgxdh#G 1#

SECTION 10.A. Control Persons

Qr#qirup dwlrq#lbg

SECTION 10.B. Control Person Public Reporting Companies

E1## Li#dq | #huvrq#qdp hg#q#V fkhgxdh#D /#E /#ru#F /#ru#g#Vhfwrq#4 3 #D1#ri#V fkhgxdh#G #lv#d#sxedf#uhsrwqj#
frp sdq | #xgghu#Vhfwrqv#4 5#ru#4 8+g, #r i#kh#Vhfuxlwhv#H { fkdqjh#D fw#r i#4 < 67 /#s chdv#surylg#kh#
iræz lqj #qirup dwlrq#| rx#p xvw#frp schwh#d#vhsdudwh#V fkhgxdh#G #Vhfwrq#4 3 1E 1#ru#hdfk#sxedf#
uhsrwqj#frp sdq |,=#

+4, Ixæhjdq#qdp h#r i#kh#sxedf#uhsrwqj#frp sdq |,=# Z IQWUXVW#IIQDQFIDO#
FRUSRUDWIRQ

+5, Wkh#sxedf#uhsrwqj#frp sdq | *#FIN#qxp ehu#Fhqwudq#Lgh { #Nh | # 434865;
qxp ehu#kdw#kh#VHF #dvljqv#wr#hdfk#uhsrwqj#frp sdq |,=#

Item 11 Disclosure Information

Iq#kLv#Lwhp /#z h#dvn#iru#qirup d#w#q#d#erxw#| rxu#g#l#f#s#d#q#du| #k#lwru| #d#q#g#k#h#g#l#f#s#d#q#du| #k#lwru| #r#i#d#o#| rxu#
*advisory affiliates*1#z h#k#v#h#k#l#v#qirup d#w#q#r#g#h#h#p l#h#z k#h#k#h#u#r#j#u#d#q#w#| rxu#d#s#d#f#d#w#r#q#i#r#u#h#j l#w#d#w#r#q#/
 w#r#g#h#f#l#g#z k#h#k#h#u#r#h#y#r#n#h#| rxu#h#j l#w#d#w#r#q#r#u#r#s#o#f#h#d#p l#w#d#w#r#q#v#r#q#| rxu#d#f#w#y l#w#h#v#d#v#d#q#d#q#y#h#v#p h#q#w#
 d#g#y#l#h#u#d#q#g#r#g#h#g#w#l#| #s#r#w#q#w#d#s#u#r#e#d#p #d#u#d#v#r#h#f#x#v#r#q#g#x#u#l#j# #r#x#u#r#q#o#v#h#h#{d#p l#q#d#w#r#q#v#l#R q#h#h#y#h#g#w#
 p#d#| #h#v#x#o#d#q#%| h#v#%d#q#v#z h#u#r#r#p r#u#h#k#d#q#r#q#h#r#i#k#h#t#x#h#v#w#r#q#v#e#h#o#z 1#

\rxu#*advisory affiliates* duh=#4 ,#d#o#r#i#| rxu#f#x#u#h#g#w#*employees* +r#w#k#h#u#r#k#d#q#*employees* shu#r#u#p l#j#r#q#d#
 f#d#u#f#d#q#d#g#p l#q#l#w#d#w#y#h/#x#s#s#r#w#r#u#v#p l#d#u#i#x#q#f#w#r#q#v#>#5 ,#d#o#r#i#| rxu#r#i#l#f#h#u#/#s#d#w#q#h#u#/#r#u#g#l#h#f#w#r#u#r#u#d#q#| #
person shu#r#u#p l#j#v#p l#d#u#i#x#q#f#w#r#q#v#>#d#q#g#6 ,#d#o#r#i#| *persons* g#l#h#f#w#d# #r#u#l#g#g#l#h#f#w#d# #*controlling* | r#x#r#u#*controlled*
 e#| #| r#x#l#i#| r#x#d#u#h#d#%v#h#s#d#u#d#w#d# #l#g#h#g#w#l#d#e#d#h#g#h#s#d#u#p h#q#w#r#u#g#l#y#l#r#q#%#VIG ,#r#i#d#e#d#q#n/#v#h#h#k#h#t#r#v#v#d#u#| #r#i#
 Whup v#r#r#g#h#h#p l#h#z k#r#| rxu#*advisory affiliates* duh#

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.

\rx#p xv#w#f#r#p s#d#w#h#k#h#d#s#s#u#r#s#u#d#w#h#G l#f#o#r#v#x#u#h#U#h#s#r#w#l#j# #S#d#j#h#%G US% ,#r#u#%| h#v#%d#q#v#z h#u#r#r#p r#u#h#k#h#t#x#h#v#w#r#q#v#
 l#q#k#l#v#Lwhp #4 1#

Gr#d#q | #r#i#k#h#h#y#h#g#w#e#h#o#z #l#q#y#r#q#h#| rx#r#u#d#q | #r#i#| rxu#*supervised persons*B# Yes No

Iru#%| h#v#%d#q#v#z h#u#r#r#p r#u#h#k#h#t#x#h#v#w#r#q#v#/#f#r#p s#d#w#h#d#f#u#p l#q#d#d#f#w#r#q#G US=

D1## Iq#k#h#s#d#v#w#h#g#| h#d#u#/#k#d#y#h#| rx#r#u#d#q | #*advisory affiliate*= Yes No

+4 , eh#q#f#r#q#y l#f#w#h#r#i#r#u#s#d#g#j#x#l#w#| #r#u#g#r#o#f#r#q#w#h#g#h#u#h#%q#r#f#r#q#w#h#w#% ,#l#q#d#l#g#r#p h#w#l#f/#r#u#h#l#j#q/# Yes No

r#u#p l#w#d#u#| #f#r#x#u#w#r#d#q | #*felony*B

+5 , eh#q#*charged* z l#w#k#d#q | #*felony*B# Yes No

If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are currently pending.

E1 Iq#k#h#s#d#v#w#h#g#| h#d#u#/#k#d#y#h#| rx#r#u#d#q | #*advisory affiliate*= Yes No

+4 , eh#q#f#r#q#y l#f#w#h#r#i#r#u#s#d#g#j#x#l#w#| #r#u#g#r#o#f#r#q#w#h#g#h#u#h#%q#r#f#r#q#w#h#w#% ,#l#q#d#l#g#r#p h#w#l#f/#r#u#h#l#j#q/# Yes No

r#u#p l#w#d#u#| #f#r#x#u#w#r#d#q | #*misdemeanor* l#q#y#r#q#l#j#=#l#q#y#h#v#p h#q#w#r#u#d#q#*investment-related*

ex#v#l#h#v#/#r#u#d#q | #i#d#x#g/#i#d#o#h#v#w#d#w#p h#q#w#/#r#u#r#p l#v#l#r#q#v#/#z u#r#q#j#i#x#d#w#d#n#l#j# #r#i#s#u#r#h#w#|/#

e#u#l#h#u#|/#s#h#u#k#u#|/#i#r#u#j#h#u#|/#f#r#x#q#w#h#u#h#l#w#l#j#/#h#{w#r#w#r#q#/#r#u#d#l#f#r#q#v#s#l#d#f#| #r#r#f#r#p l#w#d#q | #r#i#

w#k#h#v#h#r#i#h#q#v#h#v#B

+5 , eh#q#*charged* z l#w#k#d#l#*misdemeanor* d#w#h#g#l#q#Lwhp #4 1E1+4 ,B# Yes No

If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are currently pending.

Iru#%| h#v#%d#q#v#z h#u#r#r#p r#u#h#k#h#t#x#h#v#w#r#q#v#/#f#r#p s#d#w#h#d#U#h#j#x#o#w#r#u#| #d#f#w#r#q#G US=

F1## K#d#v#k#h#V#H#f#r#u#k#h#f#r#p p r#g#l#w#| #I#x#w#u#h#v#w#u#d#g#l#j# #f#r#p p l#v#l#r#q#v#F IWF ,#h#y#h# Yes No

+4 , *found* | rx#r#u#d#q | #*advisory affiliate* w#r#k#d#y#h#p d#g#h#d#i#d#o#h#v#w#d#w#p h#q#w#r#u#r#p l#v#l#r#q#v#B# Yes No



+5 , *found* | rx#r#u#d#q | #*advisory affiliate* w#r#k#d#y#h#eh#h#q#*involved* l#q#d#h#y#l#r#o#w#r#q#r#i#V#H#f#r#u#F IWF# Yes No

u#h#j#x#o#w#r#q#v#r#u#h#w#d#w#h#v#B

+6 ,

	found rx#ru#dq #advisory affiliate wr#kdyh#ehhg#d#dxvh#r i#dq#investment-related exvqhvv#kdy#j #lw#dxwkrul}dwlrq#r#gr#exvqhvv#ghq#hg/#xvshqghg/#hynrhg/#ru#uhvwulfwhgB#	<input type="radio"/>	<input type="radio"/>
+7,	hqwhhg#dq#order djdlqv# rx#ru#dq #advisory affiliate lq#frqghfwlrq#z lk#investment-related dfwlyw B	<input type="radio"/>	<input type="radio"/>
+8,	lp srvhg#d#lyl#p rgh #shqdow #cq# rx#ru#dq #advisory affiliate/#ru#ordered rx#ru#dq #advisory affiliate wr#fhdvh#dqg#ghv#w#urp #dq #dfwlyw B	<input type="radio"/>	<input type="radio"/>
G1	Kdv#dq #rwhu#hghud#h#jxowru #dj hqf /#dq #wdwh#h#jxowru #dj hqf /#ru#dq #foreign financial regulatory authority=		
+4,	hyhu#found rx#ru#dq #advisory affiliate wr#kdyh#p dgh#d#idov#vwdwhp hqw#ru#p lvlrq/#ru#ehhg#lkrqhv#xqidl#ru#xghwklfdB	<input type="radio"/>	<input type="radio"/>
+5,	hyhu#found rx#ru#dq #advisory affiliate wr#kdyh#ehhg#involved lq#d#y#r#wlrq#r i#investment-related uhjxowlrqv#ru#vwdwvhwB	<input type="radio"/>	<input type="radio"/>
+6,	hyhu#found rx#ru#dq #advisory affiliate wr#kdyh#ehhg#d#dxvh#r i#dq#investment-related exvqhvv#kdy#j #lw#dxwkrul}dwlrq#r#gr#exvqhvv#ghq#hg/#xvshqghg/#hynrhg/#ru#uhvwulfwhgB	<input type="radio"/>	<input type="radio"/>
+7,	lq#kch#sdv#w#h#h# hduw/#hqwuhg#dq#order djdlqv# rx#ru#dq #advisory affiliate lq#frqghfwlrq#z lk#dq#investment-related dfwlyw B	<input type="radio"/>	<input type="radio"/>
+8,	hyhu#ghq#hg/#xvshqghg/#ru#hynrhg# rxu#ru#dq #advisory affiliate's uhj lvudwlrq#ru#dfhgvh/#ru#rwhuz lv#shyhgwhg# rx#ru#dq #advisory affiliate/#e #order/#urp #dvrfldwqj#z lk#dq#investment-related exvqhvv#ru#uhvwulfwhg# rxu#ru#dq #advisory affiliate's dfwlyw B	<input type="radio"/>	<input type="radio"/>
H1	Kdv#dq #self-regulatory organization ru#frp p rgwlvh#h{fkdqjh#hyhu=		
+4,	found rx#ru#dq #advisory affiliate wr#kdyh#p dgh#d#idov#vwdwhp hqw#ru#p lvlrqB	<input type="radio"/>	<input type="radio"/>
+5,	found rx#ru#dq #advisory affiliate wr#kdyh#ehhg#involved lq#d#y#r#wlrq#r i#lw#xchv#rwhu#wkdq#d#y#r#wlrq#ghvlj qdwhg#dv#d#minor rule violation#xqghu#d#dq#assuryhg#e #kch#VHF,B	<input type="radio"/>	<input type="radio"/>
+6,	found rx#ru#dq #advisory affiliate wr#kdyh#ehhg#kch#dxvh#r i#dq#investment-related exvqhvv#kdy#j #lw#dxwkrul}dwlrq#r#gr#exvqhvv#ghq#hg/#xvshqghg/#hynrhg/#ru#uhvwulfwhgB	<input type="radio"/>	<input type="radio"/>
+7,	glvlsdqhg# rx#ru#dq #advisory affiliate e #h{shdqj#ru#xvshqglj# rx#ru#kch#advisory affiliate urp #p hp ehvkl#/#edwqj#ru#xvshqglj# rx#ru#kch#advisory affiliate urp #dvrfldwlrq#z lk#rwhu#p hp ehv/#ru#rwhuz lv#uhvwulfwqj# rxu#ru#kch#advisory affiliate's dfwlywlvhwB	<input type="radio"/>	<input type="radio"/>
I1	Kdv#dq#dxwkrul}dwlrq#r#dfw#dv#dq#dwzugh /#dfrxqwdqw#ru#hghud#frqwdfwru#j udqwhg#r# rx#ru#dq #advisory affiliate hyhu#ehhg#hynrhg#ru#xvshqghgB	<input type="radio"/>	<input type="radio"/>
J1	Duh# rx#ru#dq #advisory affiliate qrz #kch#xerhfwr i#dq #h#jxowru #surfhgqj #kdw#frxog#uhvxow#dq#d# hv#dqqv hu#r#dq #dwr#r i#whp #4 1F 1/#4 1G 1/#ru#4 1H 1B	<input type="radio"/>	<input type="radio"/>
<u>Iru# hv#dqvz hu#r#kch#r#r#z lqj#xhvwlrqv/#frp sdwh#d#F ly#h#xq#l#d#fwlrq#GUS=</u>			
K1##	+4, Kdv#dq #grp hvwlf#ru#huhljq#frxu=	Yes	No
	+d, lq#kch#sdv#w#h#h# hduw/#hqr#lqhg# rx#ru#dq #advisory affiliate lq#frqghfwlrq#z lk#dq #investment-related dfwlyw B	<input type="radio"/>	<input type="radio"/>
	+e, hyhu#found wkdw# rx#ru#dq #advisory affiliate z huh#involved lq#d#y#r#wlrq#r i#investment-related vdwvhwv#ru#uhjxowlrqvB	<input type="radio"/>	<input type="radio"/>
	+f,	<input type="radio"/>	<input type="radio"/>

hyhu#glp lvhg/#xuvxdqw#r#d#vhwdhp hqw#djuhph hqw#dq#*investment-related* flyl#
 dfwlrq#eurxjkw#djdqvw#|rx#ru#dq|#*advisory affiliate* e|#d#vwdh#ru#*foreign financial*
*regulatory authority*B

+5, Duh#|rx#ru#dq|#*advisory affiliate* qrz #kh#xentfw#r#dq|#flyl#surfhhgqj#kdw#rxqg#hvxow# 
 lq#d#%|hv%dqvz hu#r#dq|#sdw#r#lwhp #141K1+4,B

Item 12 Small Businesses

Wkh#VHF#lv#hntx#lhg#e | #k#h#U#j#x#wru | #i# { 1e 1b | #D#f#w#r#f#r#q#v#l#ghu#k#h#i#h#f#w#r#i#l#w#h#j#x#w#r#q#v#r#q#p#d#
h#q#w#l#h#v#l#q#r#u#h#u#r#r#k#l#/#z#h#q#h#h#g#r#g#h#h#p#l#q#h#z#k#h#k#h#u# | r#x#p#h#h#w#k#h#g#h#i#q#l#w#r#q#r#i#p#v#p#d#e#x#v#l#h#v#%#r#u#
%v#p#d#e#r#u#j#d#q#l#d#w#r#q#%#x#q#g#h#u#x#d#h#3#0#1#

D#q#v#z#h#u#k#l#v#l#h#p# #4#5#r#q#q# | #i# | r#x#d#h#h#j#l#w#h#h#g#r#u#h#j#l#w#h#u#q#j#z#l#k#k#h#VHF#and | r#x#l#g#g#l#f#d#w#h#g#l#g#h#v#s#r#q#v#h#
w#r#l#h#p# #8#1#1#5# +f# #k#d#w# | r#x#k#d#y#h#h#j#x#w#r#u# | #d#v#h#w#x#q#g#h#u#p#d#q#d#j#h#p#h#q#w#r#i#h#v#v#k#d#q# #5#8#p#l#o#r#q#l# | r#x#d#h#
q#r#w#h#t#x#l#h#g#r#d#q#v#z#h#u#k#l#v#l#h#p# #4#5# | #i# | r#x#d#h#h#j#l#w#h#h#g#r#u#h#j#l#w#d#w#r#q#d#v#d#v#d#w#h#d#g#y#l#h#u#/#d#p#h#q#g#l#g#j#d#
f#x#u#h#q#w#v#d#w#h#h#j#l#w#d#w#r#q#/#r#u#v#z#l#w#f#k#l#g#j#h#u#p# #VHF#w#r#v#d#w#h#h#j#l#w#d#w#r#q#l#

I#r#u#s#x#u#s#r#v#h#r#i#k#l#v#l#h#p# #4#5#r#q#q# | =#

- ~ W#r#w#d#d#v#h#w#h#i#h#u#v#w#r#k#h#w#r#w#d#d#v#h#w#r#i#d#i#l#p#/#h#d#w#k#h#u#k#d#q#k#h#d#v#h#w#p#d#q#d#j#h#g#r#q#e#h#k#d#d#r#i#clients#1#
l#g#h#g#h#u#p#l#g#l#g#j# | r#x#u#r#u#d#q#r#w#k#h#u#p#person's#w#r#w#d#d#v#h#w#/# | r#x#p#d# | #k#v#h#k#h#w#r#w#d#d#v#h#w#v#k#r#z#q#r#q#d#
f#x#u#h#q#w#e#d#o#q#f#h#k#h#h#w#e#x#w#k#v#h#w#r#w#d#d#v#h#w#h#u#s#r#w#h#g#r#q#d# | #f#r#q#v#r#d#g#d#w#h#g#e#d#o#q#f#h#k#h#h#w#z#l#k#
v#x#e#v#l#g#l#u#l#h#v#l#g#f#o#g#h#g/#h#i#k#d#w#d#p#r#x#q#w#l#v#d#u#j#h#u#1#
- ~ Control#p#h#d#q#v#w#k#h#s#r#z#h#u#w#r#g#l#h#f#w#r#u#f#d#x#v#h#w#k#h#g#l#h#f#w#r#q#r#i#w#k#h#p#d#q#d#j#h#p#h#q#w#r#u#s#r#d#f#l#v#r#i#d#person#/#
z#k#h#k#h#u#w#k#u#r#x#j#k#r#z#q#h#u#v#k#l#s#r#i#h#v#f#x#u#l#h#v#/#e# | #f#r#q#w#d#f#w#/#r#u#r#w#k#h#u#z#l#h#1#D#q# | #person#w#k#d#w#g#l#h#f#w#j#r#u#
l#g#g#l#h#f#w#j#k#d#v#w#k#h#u#l#j#k#w#r#y#r#w#h#5#8#s#h#u#f#h#q#w#r#u#p#r#u#h#r#i#w#k#h#y#r#w#l#g#j#v#h#f#x#u#l#h#v#/#r#u#l#v#h#q#w#l#w#h#g#r#h#5#8#
s#h#u#f#h#q#w#r#u#p#r#u#h#r#i#w#k#h#s#u#r#i#w#/#r#i#d#q#r#w#k#h#u#p#person#l#s#u#h#v#p#h#g#r#w#r#control#w#k#h#r#w#k#h#u#p#person#1#

Yes No

D#1#G#l#g# | r#x#k#d#y#h#w#r#w#d#d#v#h#w#r#i# #8#p#l#o#r#q#r#u#p#r#u#h#r#q#w#k#h#d#v#w#g#d# | #r#i# | r#x#u#p#r#v#w#h#f#h#q#w#l#v#f#d#
| h#d#B

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If "yes," you do not need to answer Items 12.B. and 12.C.

E#1#G#r# | r#x#=#

- +4, control#d#q#r#w#k#h#u#l#g#y#h#v#p#h#q#w#d#g#y#l#h#u#w#k#d#w#k#d#g#h#j#x#w#r#u# | #d#v#h#w#x#q#g#h#u#p#d#q#d#j#h#p#h#q#w#
+f#d#f#x#o#l#w#h#g#l#g#h#v#s#r#q#v#h#w#r#l#h#p# #8#1#1#5# +f# #r#i#I#r#u#p#D#G#Y# #r#i# #5#8#p#l#o#r#q#r#u#p#r#u#h#r#q#w#k#h#
o#l#w#g#d# | #r#i#l#w#p#r#v#w#h#f#h#q#w#l#v#f#d# | h#d#B#
- +5, control#d#q#r#w#k#h#u#p#person#+r#w#k#h#u#w#k#d#q#d#h#g#d#w#x#u#d#s#h#u#v#r#g# #k#d#w#k#d#g#w#r#w#d#d#v#h#w#r#i# #8#p#l#o#r#q#
r#u#p#r#u#h#r#q#w#k#h#d#v#w#g#d# | #r#i#l#w#p#r#v#w#h#f#h#q#w#l#v#f#d# | h#d#B#

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F#1#D#h# | r#x#=#

- +4, controlled#e# | #r#u#x#q#g#h#u#f#r#p#r#q#control#z#l#k#d#q#r#w#k#h#u#l#g#y#h#v#p#h#q#w#d#g#y#l#h#u#w#k#d#w#k#d#g#
u#h#j#x#w#r#u# | #d#v#h#w#x#q#g#h#u#p#d#q#d#j#h#p#h#q#w#f#d#f#x#o#l#w#h#g#l#g#h#v#s#r#q#v#h#w#r#l#h#p# #8#1#1#5# +f# #r#i#I#r#u#p#
D#G#Y# #r#i# #5#8#p#l#o#r#q#r#u#p#r#u#h#r#q#w#k#h#d#v#w#g#d# | #r#i#l#w#p#r#v#w#h#f#h#q#w#l#v#f#d# | h#d#B#
- +5, controlled#e# | #r#u#x#q#g#h#u#f#r#p#r#q#control#z#l#k#d#q#r#w#k#h#u#p#person#+r#w#k#h#u#w#k#d#q#d#h#g#d#w#x#u#d#
s#h#u#v#r#g# #k#d#w#k#d#g#w#r#w#d#d#v#h#w#r#i# #8#p#l#o#r#q#r#u#p#r#u#h#r#q#w#k#h#d#v#w#g#d# | #r#i#l#w#p#r#v#w#h#f#h#q#w#
l#v#f#d# | h#d#B#

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Schedule A**Direct Owners and Executive Officers**

41#Frp s dwh#V fkhgxdh#D #cqj #i#| rx#duh#xep lwqj #dq #q lwd#dssdfdwlrq#ru#hsruw#V fkhgxdh#D #dvnv#ir#
 qirup dwlrq#derxw#| rxu#g lufw#z qhuv#dqg#i { hfxwlyh#iilfhu#V h#V fkhgxdh#F #w#d#p hqg#k l#dqirup dwlrq#
 51#G lufw#R z qhuv#dqg#i { hfxwlyh#R iilfhu#V h#V h#z #k#h#qdp hv#i=#
 +d,#hdfk#F k l#i#I { hfxwlyh#R iilfhu#F k l#i#I lqdgfld#R iilfhu#F k l#i#R shudwlrqv#R iilfhu#F k l#i#Ohjd#R iilfhu#
 F k l#i#Frp sddqf#R iilfhu#F k l#i#Frp sddqf#R iilfhu#F k l#i#x lhg#i#| rx#duh#h#j lwhuhg#ru#dssd lqj #ru#
 uh#j lwdwlrq#dqg#fdqqrw#h#p ruh#k dq#q h#qg ly lxdq /#g lufwru#dqg#dq | #r wku#qg ly lxdq#z k#
 v#p ldu#v dwxv#ru#ixqfwlrqv>#
 +e,#i#| rx#duh#rujdq l#hg#dv#d#rusrudwlrq/#hdfk#kduhkrghu#kdw#lv#d#g lufw#z qhu#i#8 (#ru#p ruh#i#d#
 fadv#i#| rxu#yrwqj #vhfxulwlv/#xqdv#v#| rx#duh#d#sxedf#hsruwqj #frp sdq | #d#frp sdq | #xentf#w#
 Vhfwlrq#4 5#ru#4 8 +g,#i#k#h#i { fkdqj h#Dfw,>#
 G lufw#z qhuv#qfoxg#dq | #person kdw#z qv/#ehqhilfld#| #z qv/#kdv#k#h#l#j k#w#r#yrw#/#ru#kdv#k#h#
 srz hu#w#r#h#u#g lufw#k#h#vdh#i#8 (#ru#p ruh#i#d#fadv#i#| rxu#yrwqj #vhfxulwlv#I ru#sxsrvh#i#
 w#l#V fkhgxdh#d#person ehqhilfld#| #z qv#dq | #vhfxulwlv#=#l,#z qhg#e | #k l#2khu#fk l#q /#whs fk l#q /#
 j u d q g f k l #q /#s du h q w /#w h s s du h q w /#j u d q g s du h q w /#v s r x v h /#v l e d q j /#p r w k h u 0 l q 0 a i z /#i d w k h u 0 l q 0 a i z /#v r q 0 l q 0
 a i z /#g d x j k w h u 0 l q 0 a i z /#e u r w k h u 0 l q 0 a i z /#r u #v l w h u 0 l q 0 a i z /#v k d u l q j #k h #v d p h #h v l g h q f h >#r u #l ,#k d w #
 k h 2 v k h #k d v #k h #l #j k w #r #d f t x l u h /#z l k l q #9 3 #g d | v /#k u r x j k #k h #h { h u f l v h #r i d q | #r s w l r q /#z d u d q w /#r u #
 u l j k w #r #s x u f k d v h #k h #h f x u l w | 1#
 +f,#i#| rx#duh#rujdq l#hg#dv#d#sduwqhuvk l s /#d#j h q h u d #s d u w q h u v #d q g #k r v h #d p l n g #d q g #v s h f l d #s d u w q h u v #
 k d w #k d y h #k h #l #j k w #r #h f h l y h #x s r q #g l v r o x w l r q /#r u #k d y h #f r q w l e x w h g /#8 (#ru#p ruh#i#| rxu#f d s l d o #
 +g,#l#g#k#h#f d v h #r i#d#u#xv#kdw#g lufw#| #z qv#8 (#ru#p ruh#i#d#fadv#i#| rxu#yrwqj #vhfxulwlv/#ru#kdw#kdv#
 w#h#l#j k#w#r#h#f h l y h #x s r q #g l v r o x w l r q /#r u #k d v #f r q w l e x w h g /#8 (#ru#p ruh#i#| rxu#f d s l d o /#k h #u#xv#d q g #
 h d f k #u#xv#h >#d q g #
 +h,#i#| rx#duh#rujdq l#hg#dv#d#p l n g #d e l w | #frp sdq | #%00F% ,/#l,#k r v h #p h p e h u v #k d w #k d y h #k h #l #j k w #r #
 u h f h l y h #x s r q #g l v r o x w l r q /#r u #k d y h #f r q w l e x w h g /#8 (#ru#p ruh#i#| rxu#f d s l d o /#d q g #l ,#i#p d q d j h g #e | #
 h d f w h g #p d q d j h u v /#d #h d f w h g #p d q d j h u v 1#
 61#Gr#| rx#kdyh#dq | #qg lufw#z qhuv#w#r#h#hsruwng#q#V fkhgxdh#B### \hv### Q r###
 71#Iq#k#h#G H 2 I H 2 L #f r o x p q #e h a r z /#h q w h u #G H % #i #k h #z q h u #l v #d #g r p h v w l f #h q w l w | /#I H % #i #k h #z q h u #l v #d #h q w l w | #
 l q f r u s r u d w h g #r u #g r p l f k h g #q #d #i r u h l j q #f r x q w l /#r u #L % #i #k h #z q h u #r u #h { h f x w l y h #r i i l f h u #l v #d q #q g l y l g x d d #
 81#Frp s dwh#k#h#V l w h #r u #v d w x v #f r o x p q #e | #h q w h u l q j #e r d u g 2 p d q d j h p h q w #l w d h v >#v d w x v #d v #s d u w q h u /#u#xv#h /#
 v r d #s u r s u l h w r u /#h d f w h g #p d q d j h u /#k d u h k r g h u /#r u #p h p e h u #d q g #r u #k d u h k r g h u /#r u #p h p e h u /#k h #f a d v v #
 r i #h f x u l w l v #z q h g #l #p ruh#k dq#q h#lv#lvxh g ,1#
 91#R z q h u v k l s #f r g h v # Q D #0 d n v v #k d q #8 (# E #0 4 3 (#e x w #d n v v #k d q # G #0 8 3 (#e x w #d n v v #k d q #
 d u h = # 5 8 (# : 8 (#
 D #0 8 (#e x w #d n v v #k d q # F #0 5 8 (#e x w #d n v v #k d q # H #0 : 8 (#r u #p ruh#
 4 3 (# 8 3 (#
 : 1#+d,#Iq#k#h#Control Person froxp q/#h q w h u #\hv#i#k#h#person kdv#control dv#ghilqhg#dq#k#h#J r v v d u | #r i#
 W h u p v #r #I r u p #D G Y /#d q g #h q w h u #Q r % #i #k h #p e r s o n g r h v #q r w #k d y h #c o n t r o l #Q r w h #k d w #k q g h u #k l v #
 g h i l q l w r q /#p r v w h { h f x w l y h #r i i l f h u #d q g #d o #5 8 (#z q h u v /#j h q h u d #s d u w q h u v /#h d f w h g #p d q d j h u v /#d q g #
 w x v w h h v #d u h #c o n t r o l p e r s o n s 1#
 +e,#Iq#k#h#SU#f r o x p q /#h q w h u #S U % #i #k h #z q h u #l v #d #s e d f #h s r u w l q j #f r p s d q | #q g h u #V h f w l r q v #4 5 #r u #4 8 +g ,#
 r i #k h #i { f k d q j h #D f w #
 +f,#Frp s dwh#hdfk#f r o x p q 1#

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Status	Date Status Acquired MM/YYYY	Ownership Code	Control Person	PR	CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
---	---------	--------	---------------------------------------	-------------------	-------------------	----	---

J LGDU/# WKR P DV/# SDWULFN	L	FKDIWP DQ /#P DQDJHU	352533<	QD	\	Q	545;65<
J UH DW# ODNHV# DGYLVRUV/# OOF	GH	GIUHFWR Z QHU/#P DQDJLQJ# P H P EHU	352533<	G	\	Q	443:8:
FDVH/# GRXJODV/# Z LOOLDP	L	SUHVIGHQW2FKIHI#QYHVWP HQW# R IILFHU2P DQDJHU	372533<	E	\	Q	7693:;;
NUHEV/# P DWIH/# VX] DQQH	L	FKIHI#FRP SOLDQFH#R IILFHU	372533<	QD	\	Q	79<<847
TXLJOH\/# MR Q /# HGZ DUG	L	YLFH# SUHVIGHQW2VHFUHWDU\2P DQDJHU	372533<	D	\	Q	5986898
SDXOXV/# WKR P DV/# P DUWIQ	L	FKIHI#LIQDQFIDO#R IILFHU /# P DQDJHU	3<25343	QD	\	Q	43:::84
NLOH\/# WKR P DV/# UHJDQ	L	P DQDJHU	3:25344	QD	\	Q	4:8:76<

Indirect Owners

+ f, # Frp sdnwh#hdfk#froxp q1#

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Entity in Which Interest is Owned	Status	Date Status Acquired MM/YYYY	Ownership Code	Control Person	PR	CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
	GH			442533 ;	H	\	Q	

Z KDP FR # KROGIQJ # FR P SDQ \		Z IQWUXVW# FDSIWDO# P DQDJHP HQW	FRUSRUDWH# SDUHQW/# P HP EHU					690 64866<9
Z IQWUXVW# ILQDQFIDO# FRUSRUDWIR Q	GH	Z KDP FR # KROGIQJ # FR P SDQ \	GIJHFW# R Z QHU	442533 ;	H	\	\	690 6 ; : 6685
G \NVWUD/# GDYIG /#DODQ	L	Z IQWUXVW# FDSIWDO# P DQDJHP HQW	P DQDJHU	442533 ;	I	\	Q	77<9 : 84
OLOODUG /#MR KQ /# VWR OO	L	Z IQWUXVW# FDSIWDO# P DQDJHP HQW	P DQDJHU	442533 ;	I	\	Q	63<947
Z HIQEHUJHU/# VWDQOH \/# UREHUW	L	Z IQWUXVW# FDSIWDO# P DQDJHP HQW	P DQDJHU	442533 ;	I	\	Q	78 ; ; 4 : 8
JHW] /#EHUW/# DWZ DWHU	L	Z IQWUXVW# FDSIWDO# P DQDJHP HQW	P DQDJHU	442533 ;	I	\	Q	78 ; ; 4 ; 4
KHIWPDQQ /# VFRWW /#NHIWK	L	Z IQWUXVW# FDSIWDO# P DQDJHP HQW	P DQDJHU	442533 ;	I	\	Q	5684533
] IGDU/# WKR P DV/# SDWULFN	L	Z IQWUXVW# FDSIWDO# P DQDJHP HQW	P DQDJHU	442533 ;	I	\	Q	545 ; 65<
JODEH /#P DUOD /# IUIHG P DQ	L	Z IQWUXVW# FDSIWDO# P DQDJHP HQW	P DQDJHU	432533 <	I	\	Q	566<4 : 9

Schedule D - Miscellaneous

\rx#p d| #xvh#kxh#vsdfh#ehαz #r#n{sølg#d#hvsrqvh#r#dg#Lhp #ru#r#surylg#dq|#rkhu#qirup dwlrq1#

DRP Pages**CRIMINAL DISCLOSURE REPORTING PAGE (ADV)**

Q r#Lqirup dwlrq#Ildhg

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

Q r#Lqirup dwlrq#Ildhg

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)

Q r#Lqirup dwlrq#Ildhg

Part 2**Exemption from brochure delivery requirements for SEC-registered advisers**

VHF #uxdv#h{hp sw#VHF 0uhj lwhuhg#dgy lvhuv#iurp #ghdyhulqj #d#ilp #eurfkxuh#wr#vrp h#nlqgv#ri#fahqwl##li#
 wkhvh#h{hp swlrqv#h{fxvh#|rx#iurp #ghdyhulqj #d#eurfkxuh#wr#a//ri#|rxu#dgy lvru| #fahqw/#|rx#gr#grw#kdyh#
 wr#suhduh#d#eurfkxuh1

Yes No

Duh#|rx#h{hp sw#iurp #ghdyhulqj #d#eurfkxuh#wr#d#ri#|rxu#fahqw#kqghu#wkhvh#uxdvB



If no, complete the ADV Part 2 filing below.

Dp hqg /#uhwuh#ru#iln#qhz #eurfkxuhv=

Brochure ID	Brochure Name	Brochure Type(s)	Action
<76<7	DGY#SDUW#5D	Iqglylgxdv/#K ljk#qhw#z ruwk# lqglylgxdv/#Shqvlrq#sdlqv2surilw# vkduqj#sdlqv/#Shqvlrq#frqvxoqj/# Irxqgdwlrqv2fkduwlv/# Jryhuqp hqw2p xqlflsdq/#R wkuh# lqvwxwlrqdo/#Z uds#surjudp /# Vhdfwlrq#ri#R wkuh# Dgy lvhuv2V rdlwruv	Uhwuh
	DGY#SDUW#5DbDXJ#5346	Iqglylgxdv/#K ljk#qhw#z ruwk# lqglylgxdv/#Shqvlrq#sdlqv2surilw# vkduqj#sdlqv/#Shqvlrq#frqvxoqj/# Irxqgdwlrqv2fkduwlv/# Jryhuqp hqw2p xqlflsdq/#R wkuh# lqvwxwlrqdo/#Z uds#surjudp /# Vhdfwlrq#ri#R wkuh# Dgy lvhuv2V rdlwruv	Qhz

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

Vljgdwxuh=#	Gdwh=#P P 2GG2\\ \\ \\ #
P DWIH#V1#NUHEV	3<23<25346
Sulqwhg#Q dp h=	Wlwh=#
P DWIH#V1#NUHEV	FKIHI#FR P SOLDQ FH#R IILFHU
Dgylvhu#CRD Qxp eh=#	
47<9:3	

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

E |#l#j#q#l#q#k#l#r#p#D#G#Y#I#h#f#x#w#l#r#q#S#d#j#h#/# r#x#k#h#x#g#g#h#v#l#j#q#g#h#g#l#g#y#l#h#u#l#u#h#y#r#f#d#e#d#l#s#r#l#g#w#h#d#f#k#r#i#k#h#
V#h#u#h#w#d#l#r#i#k#h#V#H#F#l#g#g#k#h#V#h#u#h#w#d#l#r#i#k#h#V#w#d#h#r#u#r#k#h#u#h#j#d#a#l#g#h#v#l#j#q#d#w#h#g#r#i#l#f#h#u#r#i#d#q#l#r#k#h#u#v#w#d#h#l#g#
z#k#l#f#k#/# r#x#d#h#r#x#p#l#w#l#g#j#d#**notice filing**#d#v#l#r#x#u#d#j#h#g#w#r#r#u#h#f#h#y#h#r#h#u#y#l#h#l#g#g#l#j#u#h#k#d#w#r#x#f#k#s#h#u#r#g#v#
p#d#l#f#f#h#s#w#h#u#y#l#h#r#q#l#r#x#u#h#k#d#l#r#i#d#q#l#r#w#l#f#h#r#x#s#r#h#q#d#r#x#p#r#g#v#**order** l#w#w#k#w#l#g#**proceedings**#/

ghp dgg#iru#due lwdwlrq/#ru#rkhu#surfhvv#ru#sdshuv/#dgg#| rx#ixuwku#dj uhh#kdw#vxfk#vhuylfh#p d | #eh#p dgh#
e | #h#j lwhung#ru#fhuwlihg#p d#p/#d#q | #hghud#ru#vwdwh#dflwrq/#dgp lq lwdwlyh#*proceeding* ru#due lwdwlrq#
eurxjkw#dj dlvw#| rx#d#q | #sdfh#vxemfw#rk#k#xulvg lfwlrq#r i#k#h#q lwhg#Vwdwhv/#d#k#h#dflwrq/#*proceeding*
ru#due lwdwlrq#d, #dublv#r#xw#r i#d#q | #dflwly lw | #d#q#frqqhfwlrq#z l#k# | rxu#dgyhvwp hqw#dgy lvrul | #xvlg hvv#kdw#lv#
vxemfw#rk#k#xulvg lfwlrq#r i#k#h#q lwhg#Vwdwhv/#dgg#e, #lv#*founded*/#g lwhfwq | #ru#dgg lwhfwq | #ksrq#k#h#
surylvrvq#r i=#l, #k#h#Vhfxulwlv#Dfw#r i#4 < 66 /#k#h#Vhfxulwlv#H { fkdqjh#Dfw#r i#4 < 67 /#k#h#Wuxvw#Lqghqwxuh#Dfw#
r i#4 < 6 < /#k#h#dgyhvwp hqw#Frp sdq | #Dfw#r i#4 < 73 /#ru#k#h#dgyhvwp hqw#Dgy lvhu#Dfw#r i#4 < 73 /#ru#d#q | #uxd#ru#
uhjxwlvwlrq#xqghu#d#q | #r i#k#hvh#dflw/#ru#l, #k#h#d#z v#r i#d#q | #vwdwh#d#q#z k lfk# | rx#duh#vxep lwdqj d#*notice*
*filing*1

51#Dssrlqwp hqw#dgg#F rqvhwq#H iihfw#r#q#Sduwqhuvk lsv

Li# | rx#duh#ruj dql | hg#dv#d#sduwqhuvk lsv /#k l#lv#luhyrfedn#srz hu#r i#d#wruqh | #dgg#frqvhwq#r#vhuylfh#r i#
surfhvv#z l#frqwlqxh#d#q#h iihfw#li#d#q | #sduwqhuv#z l#kgudz v#iurp #ru#lv#dgp lwhg#r#k#h#sduwqhuvk lsv /#surylg hg#
kdw#k#h#dgp lvrq#ru#z l#kgudz d#grhv#grw#fudwh#d#q#hz #sduwqhuvk lsv 1#Li#k#h#sduwqhuvk lsv#g lvrq/hv/#k l#v#
luhyrfedn#srz hu#r i#d#wruqh | #dgg#frqvhwq#vkd#eh#d#q#h iihfw#ru#d#q | #dflwrq#eurxjkw#dj dlvw#| rx#ru#d#q | #r i#
| rxu#iurp hu#sduwqhuv1

61#*Non-Resident* Lqyhvwp hqw#Dgy lvhu#X qghuwnlqj #Uhj dug lqj #Errnv#dgg#Uhfugv

E | #v#j q lqj #k l#v#iurp #DGY /# | rx#dovr#dj uhh#r#surylg h/#d#w | rxu#r#z q#h { shqvh/#r#k#h#X IV 1#Vhfxulwlv#dgg#
H { fkdqjh#Frp p lvrq#d#w#lv#sukflsd#r iilfh#d#q#z dvk lqj wrq#G 1F 1/#d#w#d#q | #Uhj lrqd#ru#G lvulfw#R iilfh#r i#k#h#
Frp p lvrq/#ru#d#w#d#q | #q#h#r i#lv#r iilfhv#d#q#k#h#q lwhg#Vwdwhv/#dv#vshflilhg#e | #k#h#Frp p lvrq/#ru#hfw/#
fxuhqw#dgg#frp sdwh#Frs lrv#r i#d#q | #ru#d#u#hfrugv#kdw# | rx#duh#uhtx lwhg#r#p d lqwd lq#kqghu#Uxd#53705#
xqghu#k#h#Lqyhvwp hqw#Dgy lvhu#Dfw#r i#4 < 73 1#Wk l#v#xqghuwnlqj #vkd#eh#e lqg lqj #ksrq# | rx/# | rxu#k#h#lv/#
vxfhvvrwv#dgg#dvvlj qv/#dgg#d#q | #*person* vxemfw#r# | rxu#z ulwhq#luhyrfedn#frqvhwq#ru#srz hu#r i#
d#wruqh | #ru#d#q | #r i# | rxu#j hghud#sduwqhuv#dgg#*managing agents*1

Vlj qdwxuh

L/#k#h#xqghuvlj qhg /#v#j q#k l#v#iurp #DGY#r#q#ehkd#d#r i/#dgg#z l#k#k#h#d#w#rulw | #r i/#k#h#*non-resident*
lqyhvwp hqw#dgy lvhu#k#h#dgyhvwp hqw#dgy lvhu#dgg#e#erwk#fhuwli /#xqghu#shqdw | #r i#s#huxu | #xqghu#k#h#d#z v#r i#
k#h#q lwhg#Vwdwhv#r i#Dp hulfd/#kdw#k#h#d#q#irup dwrq#dgg#vwdwhp hqw#p dgh#d#q#k l#v#DGY /#d#q#f#q lqj #h { k l#lv#
dgg#d#q | #rkhu#d#q#irup dwrq#v#xep lwhg/#duh#muxh#dgg#fruhfw/#dgg#kdw#L#d#p #v#j q lqj #k l#v#iurp #DGY#
H { hfxwlrq#sdjh#dv#d#u#h#dgg#yr#qwdul | #dflw1

L#fhuwli | #kdw#k#h#dgy lvhu#v#errnv#dgg#uhfrugv#z l#eh#s#uhvuyhg#dgg#dyd#ledn#iru#dqvshfwlrq#dv#uhtx lwhg#e | #
d#z 1#I lqda /#e#d#w#rul#h#d#q | #*person* kdylqj #*custody* ru#srvvhvvlrq#r i#k#hvh#errnv#dgg#uhfrugv#r#p dnh#
w#hp #dyd#ledn#r#h#hghud#dgg#vwdwh#uhjxwlvw | #uhsuhvhwqdwlyh v1

Vlj qdwxuh=#

G dwh=#P P 2GG2\\ \ \ \

Sulqwhg#Qdp h=#

W lwh=#

Dgy lvhu#CRD Qxp eh=#

47<9:3