

**PART 2A OF FORM ADV
FIRM BROCHURE**

TRILINC ADVISORS, LLC

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November 1, 2013

This brochure provides information about the qualifications and business practices of TriLinc Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (310) 997-0580. 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. Additional information about TriLinc Advisors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 – MATERIAL CHANGES

Since TriLinc Advisors, LLC's initial Brochure filed with the United States Securities and Exchange Commission ("SEC") on March 25, 2013, there have been no material changes to the information provided. As of September 4, 2013, TriLinc Advisors, LLC is transitioning from SEC to state registration.

In the future, when we amend the Brochure for our annual update, and the amended version contains material changes from the last annual update, we will identify and discuss those changes either on this page or as a separate document accompanying the Brochure. For documentation purposes, we will always provide the date of the last annual update of the Brochure.

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ITEM 4 – ADVISORY BUSINESS

A.	<p>TriLinc Advisors, LLC (“TriLinc Advisors” or the “Advisor”) is a Delaware limited liability company founded in 2012. TriLinc Advisors is a private investment company focusing on impact investments in small and medium size enterprises (“SME’s”) around the world.</p> <p>TriLinc Advisors’ principle owner is Gloria Nelund, through her ownership in TriLinc Global, LLC, the majority owner of TriLinc Advisors.</p>
B.	<p>Pursuant to the Advisory Agreement between TriLinc Advisors and TriLinc Global Impact Fund, LLC (the “Advisory Agreement”), TriLinc Advisors is the investment advisor of TriLinc Global Impact Fund, LLC (the “Client”).</p> <p>TriLinc Advisors, directly or through its wholly owned subsidiary TriLinc Advisors International, Ltd., a Cayman Islands exempted company formed in 2012, (collectively, “TriLinc Advisors” or the “Advisor”), will retain the services of sub-advisors to, subject to the Advisor’s oversight, identify, evaluate, and negotiate the Client’s investments, and to provide asset management services. The Advisor has engaged in an extensive search for leading providers of SME finance to serve as our sub-advisors, and has chosen those with solid track records, deep experience in target geographies and asset classes, and a commitment to sustainable business principles. As further described in Item 8 below, TriLinc Advisors provides loans and credit facilities to SMEs in developing economies. We generally target borrower companies that have demonstrated the ability and willingness to repay creditors and provide substantial collateral, including hard assets and personal guarantees.</p> <p>As of the date of this Brochure, the Advisor has engaged The International Investment Group L.L.C., Asia Impact Capital Ltd and GMG Investment Advisors, LLC as sub-advisors.</p> <p>The Advisor does not believe any material conflicts of interest exist regarding itself, its representatives or any of its employees, which could be reasonably expected to impede the rendering of unbiased and objective advice.</p>
C.	<p>Not applicable. The Advisor neither tailors its advisory services to the individual needs of investors nor accepts investor-imposed investment restrictions with respect to the Client.</p>
D.	<p>Not applicable. The Advisor does not participate in wrap fee programs.</p>
E.	<p>As of June 30, 2013, the Client has \$2,967,844 in assets. All such assets are managed on a discretionary basis. The Advisor does not manage any assets on a non-discretionary basis.</p>

ITEM 5 – FEES AND COMPENSATION

A.	Pursuant to the terms of the Advisory Agreement, TriLinc Advisors charges its Client an asset management fee equal to 2.00% per annum of the Client's gross assets, both calculated and payable quarterly in arrears. The asset management fee is not negotiable. Lower fees for comparable services may be available from other sources.
B.	The Management Fee is deducted from the Client account on a quarterly basis and is paid to the Advisor via bank wire.
C.	<p>The Client will generally bear all of its expenses including the expenses of accountants, auditors, tax preparation, legal, custody, compliance, investment acquisition, and expenses incurred in connection with the due diligence of prospective investments.</p> <p>Operating expenses are expected to be 0.75% of the Client's assets once the Client's maximum offering is reached.</p> <p>The Advisor is entitled to reimbursement of certain qualifying organizational and offering expenditures incurred in relation to the formation of the Client and the offering of the Client's units to investors. Reimbursement of these expenses is expected to be 1.25%, and may not exceed 5.00%, of gross proceeds raised by the Client.</p>
D.	Not applicable. The Client pays management fees in arrears.
E.	Neither the Advisor nor any of its supervised persons accepts compensation for the sale of securities or other investment products.

ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Pursuant to the terms of the Advisory Agreement, TriLinc Advisors charges its Client an incentive fee divided into two parts:

1. An incentive fee on net investment income, which we refer to as the subordinated incentive fee on income, will be calculated and payable quarterly in arrears and will be based upon the Client's pre-incentive fee net investment income for the immediately preceding quarter. No subordinated incentive fee is earned by the Advisor in any calendar quarter in which the Client's pre-incentive fee net investment income does not exceed the preferred return rate of 1.50% (6.0% annualized), or the preferred return. All of the Client's pre-incentive fee net investment income, if any, that exceeds the quarterly preferred return, but is less than or equal to 1.875% (7.5% annualized) on the Client's net assets at the end of the immediately preceding fiscal quarter, in any quarter, will be payable to the Advisor. This portion of the fee is referred to as the catch-up and provides an increasing fee, but is in no event greater than 20%. For any quarter in which the Client's pre-incentive fee net investment income exceeds 1.875% on its net assets at the end of the immediately preceding fiscal quarter, the subordinated incentive fee on income shall equal 20% of the amount of the Client's pre-incentive fee net investment income, because the preferred return and catch up will have been achieved.
2. An incentive fee on capital gains will be earned on investments sold and shall be determined and payable in arrears as of the end of each calendar year during which the Advisory Agreement is in effect. The fee will equal 20% of the Client's realized capital gains, less the aggregate amount of any previously paid incentive fee on capital gains. The incentive fee on capital gains is equal to the Client's realized capital gains on a cumulative basis from inception, computed net of all realized capital losses and unrealized capital depreciation on a cumulative basis.

We have taken multiple steps to structure our relationship with the Client and/or our sub-advisors so that the interests of the Client and those of TriLinc Advisors and the sub-advisors are closely aligned. We believe TriLinc Advisors' incentive compensation structure will align our interests with those of TriLinc Advisors, which will create the conditions to optimize returns and risk tolerance for our unitholders. It should be noted, however, that the possibility that the Advisor could receive performance-based compensation creates a potential conflict of interest in that it may create an incentive for the Advisor to effectuate riskier transactions than would be the case in the absence of such form of compensation. In order to address this potential conflict, the Advisor will make investment decisions based upon the best interests of the Client, consistent with the Advisor's fiduciary obligations. Additionally, the Client's independent Board of Managers will meet quarterly, at a minimum, to review investment decisions, potential conflicts of interest and the valuation of investments.

Fees based on performance will only be charged in accordance with the provisions of Section 260.234 of the California Code of Regulations.

ITEM 7 – TYPES OF CLIENTS

TriLinc Advisors' current client, TriLinc Global Impact Fund, LLC, is an investment vehicle that is registered under the Securities Act of 1933.

The Client requires initial investments of greater than \$2,000.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A.	<p>TriLinc Advisors is centered on a single idea: providing access to finance for SMEs, particularly in developing economies, is both a profitable investment proposition and an effective driver of sustainable economic development. We believe significant opportunity exists in small and growing businesses, which through expansion have the ability to hire more employees, produce more goods for local consumption, provide training to locally-based employees and pay more taxes through increased revenues. By increasing the local production of quality goods and services, these businesses can support the growing middle class in those markets.</p> <p>We believe that the underserved nature of such a large segment of the global economy, coupled with a strong demand for capital from the SMEs themselves, has created significant opportunity for investment. Because of the current investing environment, we believe that SMEs are likely to offer attractive investment terms in the form of current cash yield, deferred interest and equity warrants, and more attractive security features such as stricter loan covenants and quality collateral. Additionally, as compared to larger companies, SMEs often have simpler capital structures and carry less debt, thus aiding the structuring and negotiation process and allowing for greater flexibility in structuring favorable transactions.</p> <p>Investing involves risk of loss that clients should be prepared to bear, and the Advisor has taken steps to mitigate such inherent risks. The senior management team of our Advisor has a long track record and broad experience in managing and operating regulated, multi-billion dollar fund complexes. Among this experience, members of our senior management team have held senior executive positions at large global banks, institutional money managers and independent investment advisors. Furthermore, the senior management team has significant experience in global macro portfolio management, including executing multi-manager global macro investment strategies across asset classes, geographies and industries. This experience emphasizes maximizing risk-adjusted returns, utilizing alternative asset classes and hedging portfolio risk exposures, as well as the importance of a rigorous and disciplined approach to manager due diligence. This macro experience will be complimented by the experience of our sub-advisors, who have deep local networks, a firm understanding of the local culture and regulatory environment, and a reputation for being high-quality investment partners. These qualities have enabled them to realize solid track records, and afford them access to high quality deal flow to the benefit of the Advisor and our clients.</p>
B. C.	<p>A selection of risks unique to our investment strategy is included below. Additional risk factors related to our investment strategy and our investments is included in the Client’s prospectus, prepared pursuant to the Securities Act of 1933, and deemed effective by the Securities and Exchange Commission on February 25, 2013.</p> <p><u><i>Risks Related to our Structure & Business</i></u></p> <p><i>Our success will be dependent on the performance of our sub-advisors.</i></p> <p>The Advisor will employ experienced and reputable sub-advisors in its execution of the investment strategy. Sub-advisors will be responsible for locating, performing due diligence and closing on suitable trade finance or direct SME loans based on their access to local markets, local market knowledge for quality deal flow and extensive local private credit experience. However, because the sub-advisors are separate companies from the Advisor, the risk exists that our sub-advisors will be ineffective or will materially underperform. We may be unable to find suitable investments through our sub-advisors. Our ability to achieve our investment objectives</p>

will be dependent upon the performance of our local sub-advisors in the identification, performance of due diligence on and structuring of suitable trade finance and direct SME loans, and the management and oversight of the individual loans. If our sub-advisors fail to perform according to our expectations, or if the due diligence conducted by the sub-advisors fails to reveal all material risks of the businesses of our target investments, the Client could be materially adversely affected.

Our sub-advisors' failure to identify and make investments that meet our investment criteria or perform their responsibilities under the Sub-Advisory Agreements may adversely affect our ability to realize our investment objectives.

Our ability to achieve our investment objectives will depend, in part, on our sub-advisors' ability to identify and invest in debt and equity instruments that meet our investment criteria. Accomplishing this result on a cost-effective basis will, in part, be a function of our sub-advisors' execution of the investment process, their capacity to provide competent and efficient services to us, and, their ability to source attractive investments. Our sub-advisors will have substantial responsibilities under our agreed upon arrangements. Any failure to manage the investment process effectively could have a material adverse effect on our business, financial condition and results of operations.

Non-U.S. Investment Risk

Our investments in foreign borrowers may involve significant risks in addition to the risks inherent in U.S. investments.

Our investment strategy contemplates targeting foreign borrower companies that have demonstrated the ability and willingness to repay creditors and provide substantial collateral. However, lending in foreign companies may expose us to additional risks not typically associated with investing in U.S. companies. These risks include changes in exchange control regulations, political and social instability, expropriation, imposition of foreign taxes, less liquid markets and less available information than is generally the case in the United States, higher transaction costs, less government supervision of exchanges, brokers and issuers, less developed bankruptcy laws, difficulty in enforcing contractual obligations, lack of uniform accounting and auditing standards and greater price volatility.

Non-U.S. investments involve certain legal, geopolitical, investment, repatriation, and transparency risks not typically associated with investing in the U.S.

- *Legal Risk:* The legal framework of certain developing countries is rapidly evolving and it is not possible to accurately predict the content or implications of changes in their statutes or regulations. Existing legal frameworks may be unfairly or unevenly enforced, and courts may decline to enforce legal protections covering our investments altogether. The cost and difficulties of litigation in these countries may make enforcement of our rights impractical or impossible. Adverse regulation or legislation may be introduced at any time without prior warning or consultation.
- *Geopolitical Risk:* Given that we will invest in developing economies, there is a possibility of nationalization, expropriation, unfavorable regulation, economic, political, or social instability, war, or terrorism which could adversely affect the economies of a given jurisdiction or lead to a material adverse change in the value of our investments in such jurisdiction.
- *Investment & Repatriation Risks:* Significant time and/or financial resources may be required to obtain necessary government approval for us to invest under certain circumstances. In addition, we may invest

in jurisdictions that become subject to investment restrictions as a result of economic or other sanctions after the time of our investment. Under such circumstances, we may be required to divest of certain investments at a loss.

- *Transparency Risks:* Disclosure, accounting, and financial standards in developing economies vary widely and may not be equivalent to those of developed countries. Although our Advisor will use its best efforts to verify information supplied to it and will engage qualified sub-advisors when appropriate, it cannot be guaranteed that our investments will not be adversely affected by such risks.

The Advisor has retained sub-advisors that have deep local networks, a firm understanding of the local culture and regulatory environment, and a reputation for being high-quality investment partners, which will help to mitigate the above risks, as well as other risks inherent to the Advisor and the Client.

A portion of our investments may be denominated in foreign currencies, and we may be exposed to fluctuation in currency exchange rates, which could result in losses.

While the Advisor anticipates the great majority, if not all, of loans will be made in U.S. dollars, to the extent that any loans are denominated in a foreign currency, the Client will be subject to the risk that the value of a particular currency will change in relation to one or more other currencies. Among the factors that may affect currency values are trade balances, the level of short-term interest rates, differences in relative values of similar assets in different currencies, long-term opportunities for investment and capital appreciation, and political developments. We may employ hedging techniques to minimize these risks, but we can offer no assurance that effective hedging instruments will be available in all cases, that such instruments will be available at economically-feasible pricing or that hedging strategies, when implemented, will be effective.

ITEM 9 – DISCIPLINARY INFORMATION

TriLinc Advisors does not have any legal or disciplinary events to report.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A.	Neither the Advisor nor any of its management persons are registered as a broker-dealer or a registered representative of a broker-dealer.
B.	Neither the Advisor nor any of its management persons are registered as a futures commission merchant, commodity pool operator, a commodity trading advisor or an associated person of the foregoing entities..
C.	<p>Gloria Nelund serves as Chairman and independent trustee of the Board of Trustees of the RS Funds. Ms. Nelund is not involved with the day-to-day management of the RS Funds.</p> <p>Strategic Capital Advisory Services, LLC (“Strategic Capital”) is a minority owner of TriLinc Advisors. Strategic Capital will provide certain services to, and on behalf of, the Advisor, including but not limited to consulting and advisory services related to our formation and the structure of this offering, communications with existing investors, selecting and negotiating with third party vendors and other administrative and operational services. Pursuant to the joint venture agreement and its ownership in TriLinc Advisors, Strategic Capital is entitled to receive distributions equal to 15% of the gross cash proceeds received by TriLinc Advisors from the management and incentive fees payable to TriLinc Advisors under the Advisory Agreement.</p> <p>SC Distributors, LLC (“SC Distributors”), an affiliate of Strategic Capital, is a broker-dealer and will be paid a dealer manager fee on the proceeds from the sale of Client units.</p>
D.	The Advisor does not recommend or select other investment advisers for its client.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A.	TriLinc Advisors and its employees have adopted a Code of Ethics (the “Code”) that is available for review upon request. The Code sets out various principles to guide the daily conduct of all supervised employees, with particular focus on duties to clients, privacy of client information, conflicts of interest, fraudulent or bad acts and personal trading. The policy provides that all employees will follow the highest level of ethical standards and in keeping with the Advisor’s fiduciary duties to its clients. All personnel are required to report actual as well as any potential conflicts of interest.
B.	Not applicable. As described in Item 4, the Client’s assets are managed by sub-advisers and neither the Advisor nor its related persons invest in the same securities as the Client. The Advisor will not have a material financial interest in the securities owned by the Client.
C.	Not applicable. As described in Item 4, the Client’s assets are managed by sub-advisers and neither the Advisor nor its related persons invest in the same securities as the Client. The Advisor will not have a material financial interest in the securities owned by the Client.
D.	Not applicable. Neither the Advisor nor its related persons invest in the same securities as the Client and the Advisor will not have a material financial interest in the securities owned by the Client. However, to ensure a conflict is not created and as part of our Code of Ethics policy, employees are required to disclose any personal brokerage accounts and provide periodic brokerage account statements to the Advisor.

ITEM 12 – BROKERAGE PRACTICES

A.	Not applicable. The Advisor invests in private companies or investments that are not traded on an exchange and does not utilize broker-dealers for such transactions.
B.	Not applicable. The Advisor has only one client.

ITEM 13 – REVIEW OF ACCOUNTS

A.	<p>The Client’s account is monitored on a regular basis by TriLinc Advisor’s investment team and investment committee members, each supervised by the Chief Investment Officer. Geographic and industry allocations are monitored and their compositions are adjusted according to current and projected conditions, performance and client needs. Various portfolio management reports are generated and reviewed on a daily, weekly and monthly basis by the Advisor’s Chief Investment Officer and Chief Executive Officer.</p> <p>The Client’s administrator is responsible for maintaining official books and records for and, accordingly, independently account for, review process and reconcile the Client’s transactions and banking activities. Daily reconciliations are performed by both the Client’s administrator and the Advisor. Daily accounting processes are supervised by the Chief Financial Officer.</p>
B.	<p>See Item 13.A above. Client accounts are reviewed daily.</p>
C.	<p>The Advisor will formally meet with the Client’s independent Board of Managers at a minimum on a quarterly basis until the Client breaks escrow and declares a dividend, and then will begin meeting formally on a monthly basis. The Advisor will also have interim meetings and communications with the Board of Managers as either the Advisor or Board of Managers deems necessary.</p>

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

A.	The Advisor does not provide investment advice or other advisory services to any parties who are not clients, and does not receive economic benefit from any parties who are not clients.
B.	<p>SC Distributors, LLC (“SC Distributors”), a member firm of the Financial Industry Regulatory Authority (FINRA), will serve as the dealer manager for the offering of interests in the Client. SC Distributors will receive dealer manager fees, selling commissions and distribution fees, all pursuant to the terms of the three classes of units issued by the Client, and certain reimbursements for services relating to this offering. Additionally, selling commissions will be paid to broker-dealers who sell interests in the Client to their respective clients.</p> <p>No client referral fees are paid by the Advisor or the Client.</p>

ITEM 15 – CUSTODY

The Advisor does not hold any Client assets at its own offices, but rather utilizes the services of qualified custodians where assets are held in an account in the Client's name. Both the Advisor and the Client's independent fund administrator receive and review account statements from the qualified custodians on a monthly basis. Account information is also available on a daily basis.

Management fees are calculated both by the Client's independent fund administrator and the Advisor, and such calculations are reconciled if any variances exist prior to the payment of fees. All fees are charged in arrears.

A qualified custodian sends account statements at least quarterly to the investors in the pooled investment vehicle we manage. An independent public accountant audits annually the pooled investment vehicle we manage and the audited financial statements are distributed to the investors in the pool.

ITEM 16 – INVESTMENT DISCRETION

The Advisory Agreement provides the Advisor with full discretionary authority to manage the Client's investments pursuant to the investment objective stated in the Advisory Agreement. As described in Item 4 and Item 8, the Advisor has delegated a portion of its discretionary authority to its sub-advisors.

ITEM 17 – VOTING CLIENT SECURITIES

A.	Due to the nature of the Client’s investments, we do not anticipate any situations that would require a proxy vote. However, we have adopted policies in the unlikely event that one of the Client’s investments requires a proxy vote. Such policies are focused on the best interest of the Client. A copy of the Advisor’s proxy voting policies and procedures is available upon request by contacting the Advisor.
B.	Not applicable.

ITEM 18 – FINANCIAL INFORMATION

A.	The Advisor does not require or solicit prepayment of more than \$500 in fees per client six months or more in advance. For the avoidance of doubt, the Advisor does not collect any fees in advance.
B.	The Advisor does not require or solicit prepayment of more than \$500 in fees per client six months or more in advance. For the avoidance of doubt, the Advisor does not collect any fees in advance.
C.	The Advisor has not been the subject of a bankruptcy petition.

ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

A. Gloria S. Nelund, Chief Executive Officer

Gloria S. Nelund has served as our Chairman and Chief Executive Officer since our formation in April 2012. In addition, she has served as the Chairman and Chief Executive Officer of our Advisor since its formation in April 2012 and as the Chairman and Chief Executive Officer of our Sponsor since its formation in August 2008. From October 2006 until August 2008, Ms. Nelund served as the President and founder of Titus Development Group, LLC, a consulting firm focusing on strategy development, business planning and launch for start-up companies, as well as growth planning for small to mid-sized firms. Prior to founding Titus Development, LLC, Ms. Nelund spent her career as a high level executive in the international Asset Management Industry. Most recently, Ms. Nelund served as Head of the U.S. Private Wealth Management Division at Deutsche Bank, the world's fifth largest financial institution. In this capacity, Ms. Nelund held fiduciary responsibility for more than \$50 billion in investment assets, including more than \$20 billion in emerging markets and credit instruments. In addition to this role, Ms. Nelund served as the only female member of the Global Private Wealth Management Executive Committee. Ms. Nelund had served as the Managing Director of Scudder Kemper Investments, prior to its purchase by Deutsche Bank.

Prior to her tenure at Deutsche Bank, Ms. Nelund spent sixteen years as an executive at Bank of America / Security Pacific Bank, most notably as President and CEO of BofA Capital Management, Inc., an investment management subsidiary managing \$35 billion in assets for both retail and institutional investors. In addition to managing fixed-income and equity mutual funds in both the U.S. and internationally, Ms. Nelund's division was responsible for managing assets on behalf of public funds, common trust funds and corporate funds. Ms. Nelund also spent five years as Manager of Worldwide Sales and Marketing of BofA Global Asset Management and three years as CEO of InterCash Capital Advisors, Inc., a \$15 billion investment management subsidiary of Security Pacific Bank.

Ms. Nelund has been a pioneer in the development of Social Impact products for institutional and high net worth investors. While at Scudder, she supported the development and growth of one of the industry's first socially responsible investment (SRI) products. In addition, Ms. Nelund was instrumental in making Deutsche Bank a major institutional supporter of microcredit, creating multiple programs for Private Wealth Management clients.

Ms. Nelund brings to us more than 30 years of experience in executive management of financial institutions, as well as deep expertise in the creation, sale and distribution of financial products within the wealth management community.

In addition to her activities with TriLinc, Ms. Nelund acts as Independent Trustee for RS Investments, a mutual fund complex with more than \$20 billion in assets under management. She is also a life-long supporter of development-oriented philanthropic causes. While at Deutsche Bank, Ms. Nelund served on the Board of the Deutsche Bank Americas Community Development Group, with responsibility for providing loans, investments and grants to targeted organizations throughout the U.S. and Latin America. She has also volunteered as a teacher of at-risk youth in the Los Angeles Unified School District and the YMCA of Los Angeles. Ms. Nelund currently sits on the board of multiple not-for-profit organizations and actively supports entrepreneurship research and education. She is an active speaker and guest lecturer on Impact Investing at conferences and several top business schools, including Wheaton, Kellogg and the Massachusetts Institute of Technology. Ms. Nelund attended the University of Dayton in Dayton, Ohio as a Business and Economics major, and she is a graduate of the University of Virginia Colgate Darden Graduate School's Sales and Marketing Executives Program.

Mark Torline, President and Chief Operating Officer

Mark Torline has served as our President and Chief Operating Officer and as a member of our board since our formation in April 2012. In addition, Mr. Torline has served as the President and Chief Operating

	<p>Officer of our Advisor since its formation in April 2012 and as the President and Chief Operating Officer of our Sponsor since July 2011. Mr. Torline has extensive experience in the financial services, fixed income asset management and capital markets industries, as well as significant successful entrepreneurial experience. From June 2008 until June 2011, Mr. Torline served as Managing Director of Macquarie Allegiance Capital (a subsidiary of Macquarie Funds Group) after identifying, negotiating and executing the sale of his private investment company, Allegiance Capital, in 2008. At Macquarie Allegiance Capital, Mr. Torline established and oversaw all North American fixed income investment management activities, including administration, investments and distribution. From October 1988 until June 2008, Mr. Torline co-founded and served as CEO and Chief Compliance Officer of Allegiance Capital, a provider of fixed income investment solutions with a \$5.5 billion AUM from institutions and individuals. During Mr. Torline's twenty year post at Allegiance, he was responsible for all investment management activities and served as Chief Compliance Officer, establishing policies and procedures and a culture of compliance ultimately resulting in no material compliance violations during two routine SEC examinations. Earlier in his career, Mr. Torline held various senior banking roles including serving as the Chief Credit Officer, Trust Department for Security Pacific Bank. In this role, he oversaw and approved all lending activity. Mr. Torline holds an MBA from Northwestern University, Kellogg School of Management and a B.A. from Wichita State University.</p> <p><u>Paul Sanford, Chief Investment Officer</u></p> <p>Paul Sanford has served as our Chief Investment Officer since our formation in April 2012. In addition, Mr. Sanford has served as the Chief Investment Officer of our Advisor since its formation April 2012 and as Chief Investment Officer of our Sponsor since July 2011. From September 2007 until July 2011, Mr. Sanford was Managing Director and Chief Investment Officer for a Los Angeles-based boutique Registered Investment Advisor, where he was responsible for developing and implementing the firm's Global Investment Strategy, performing manager due diligence, and managing all fund investment relationships. Mr. Sanford's extensive experience in the banking and investment industry also includes portfolio manager positions at Deutsche Bank from January 2007 until September 2007, HSBC and Morton Capital Management.</p> <p>Mr. Sanford has twelve years of experience developing, managing and executing global macro investment strategies at both large global banks and boutique investment firms. Throughout his career, Mr. Sanford has followed and invested in emerging markets as part of his various investment mandates, including conducting extensive research on developing economies and reviewing and selecting leading managers of emerging market debt and equities, most prominently as Portfolio Manager for Latin American accounts at the U.S. Private Bank of HSBC. Mr. Sanford has a deep understanding of macroeconomics and geo-politics, and an in-depth knowledge of traditional and alternative asset classes in both public and private capital markets. For over a decade, Mr. Sanford has been a global macro investor with a focus on Central Bank policy, GDP growth trends, global interest rates, global currencies and foreign government policies.</p> <p>Mr. Sanford holds a B.A. in Business Economics from California State University, Long Beach and previously served in the United States Marine Corps. He is a member of the CFA Society of Los Angeles and the CFA Institute. Mr. Sanford serves on the Investment Committee for the City of Hope, an independent biomedical research, treatment and education institution, leading the fight to conquer cancer, diabetes, HIV/AIDS and other life-threatening diseases. Mr. Sanford is a member of the Board of Directors and investment committee for Little Company of Mary Hospital, a non-for-profit healthcare system with over 25 sites delivering comprehensive quality healthcare for individual communities in the Los Angeles area with a focus on providing low cost or free healthcare to the most underserved populations including low income families, single mothers, and the homeless.</p>
B.	There are no additional business activities other than those disclosed in Item 10 of the Brochure.
C.	Neither the Advisor nor any of its supervised persons are compensated for advisory services other than as disclosed in Item 5 of the Brochure.

D.	Not applicable. Neither the Advisor nor any management person has been found liable in any such claims.
E.	There are no additional relationships other than those described in Item 10.C. of the Brochure.