

FORM ADV

UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

Primary Business Name: **SUNAMERICA ASSET MANAGEMENT, LLC**CRD Number: **107338**

Annual Amendment - All Sections

Rev. 10/2012

WARNING: Frp sdwh#k l#irup #uxwk ixæ | #Idæh#vwdwhp hqwr#ru#rp lvlrqv#p d | #uhvxow#q#gqldg#r i# | rxu#
dssdfdwlrq/#hyrfdwlrq#r i# | rxu#uhj lvudwlrq/#ru#fulp lqdd#survhfxwlrq l# | rx#p xvw#nhhs#k l#irup #
xsgdwhg#e | #ldqj #shulrg l#dp hqgp hqwl#Vhh#irup #DGY#J hqhudg#Lqvwxfwlrq#7 l#

Item 1 Identifying Information

Uhvsrqvhv#r #k l#lwhp #hæ#xv#z kr# | rx#duh/#z khuh# | rx#duh#grlqj #exvlqhvv/#lqg#krz #z h#fdq#frqwdfw# | rx l#

D1# \ rxu#ixæ#hjdqdp h#l# | rx#duh#d#rds#ursulhwru/# | rxu#dvw/#lvw/#lqg#p lggd#qdp hv,#

SUNAMERICA ASSET MANAGEMENT, LLC

E1 Qdp h#xqghu#z klfk# | rx#sulp duk | #frggxfw# | rxu#dgylvru | #exvlqhvv/#lqj lihuqwh#irp #lwhp #1 D1=

SUNAMERICA ASSET MANAGEMENT, LLC

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

F1 L#k l#ldqj #lv#hsruw#qj #d#fkdqjh#lq# | rxu#hjdqdp h#lwhp #1 D1, #ru#sulp du | #exvlqhvv#qdp h#lwhp #
4 lE1,/#hghu#k h#ghz #qdp h#lqg#vshfli | #z khwhu#k h#qdp h#fkdqjh#lv#ri

☐ | rxu#hjdqdp h#ru# ☐ | rxu#sulp du | #exvlqhvv#qdp h#

G1 +4, #l# | rx#duh#uhj lvhuq#z l#k h#VHF #dv#dq#qyhwv hqwdgylvhu# | rxu#VHF #l#h#qxp ehu#**801-19813**

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

H1 L# | rx#kdyh#l#qxp ehu#%CRD Qxp ehu%, #dvvljqhg#e | #k h#FINRA's CRD v | vwhp #ru#e | #k h#DUG #v | vwhp /#
| rxu#CRD qxp ehu#**107338**

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#kv#d#SIR l#Er { ,=

Qxp ehu#lqg#Vwhhw#4 =

KDUERUVIGH#LIQDQFIDO#FHQWHU

F lw| =

MHUVH\#F lW\

Vwdh=

Qhz #Mhuwh|

Qxp ehu#lqg#Vwhhw#5 =

6533#SOD] D#8

Frqxw| =

XQIWHG#WWDWHV

] IS. 72Srvdd#Frgh=

3 : 644 07 < < 5

L#k l#ldgguhvv#lv#d#sulydwh#uhvlghqfh/#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:*

☒ Prqgd|#0 Iulgd|☐ Rwhu=#
Qrup d#exvlghvv#kxuv#dw#k#l#rfdwlrq=
<=33#D1P #0 9=33#S1P 1

+6, Whdskrqh#ixp ehu#dw#k#l#rfdwlrq=
534065709633

+7, Idfvlp lh#ixp ehu#dw#k#l#rfdwlrq=#
53406570965;

J1 P dldqj #dgguhvv/#li#g liuhqwh#iurp #|rxu#*principal office and place of business* dgguhvv=#

Qxp ehu#dgg#Vwhhw#1= Qxp ehu#dgg#Vwhhw#5=
Flw|= Vdwh= Frxqwu|=] IS. 72Srvdd#Frgh=

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

K1 Li#|rx#duh#d#vrdh#sursulhwru/#wdwh#|rxu#x#uhvlgqhfh#dgguhvv/#li#g liuhqwh#iurp #|rxu#*principal office and place of business* dgguhvv#d#l#hp #1 I11=#

Qxp ehu#dgg#Vwhhw#1= Qxp ehu#dgg#Vwhhw#5=
Flw|= Vdwh= Frxqwu|=] IS. 72Srvdd#Frgh=

Yes No

L1 Gr#|rx#kdyh#rqh#r#p ruh#z hevlnhvB#

☒ ☐

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 Surylgh#k#h#qdp h#dgg#frqwdfw#d#iurp dwlrq#r#i#|rxu#Fk#hi#Frp sddqfh#R iilfhu=#Li#|rx#duh#d#q#*exempt reporting adviser*/#|rx#p xv#surylgh#k#h#frqwdfw#d#iurp dwlrq#r#iur#|rxu#Fk#hi#Frp sddqfh#R iilfhu/#i#|rx#kdyh#r#q#h#Li#q#rw#|rx#p xv#Frp schwh#L#hp #1 IN1#ehorz 1#

Qdp h=	Rwhu#dw#v/#i#d#q =	
P DWWKHZ #KDFNHWKDO	FKIHI#FRP SOLDQFH#R IILFHU	
Whdskrqh#ixp ehu=#	Idfvlp lh#ixp ehu=	
534065709694	534065709697	
Qxp ehu#dgg#Vwhhw#1=	Qxp ehu#dgg#Vwhhw#5=	
KDUERUVIGH#I1QDQFIDQ#FHQWHU	6533#SOD] D#B	
Flw =	Vdwh=	Frqxwu =] IS. 72Srvdd#Frgh=
MHUVH\#FLW\	Qhz #Mhwh	XQ LWHG #VWDWHV 3:64407<<5

Hd#fwrqlf#p dl#h#0p dl#dgguhvv/#i#Fk#hi#Frp sddqfh#R iilfhu#kdv#r#q#h=
P KDFNHWKDOC VXQDP HULFD1FRP

N1 DggwlrqddUhjxawru| #Frqdwfw#Shuvrq=#Li#shuvrq#rkhu#kdq#kh#khi#Frp sddqfh#R iilfu#lv#
dxwkrul}hg#r#uhfhlyh#qirup dwlrq#lqg#uhvsrqg#r#cxhvwlrqv#derxw#klv#lrup #DGY/#|rx#p d|#surylgh#
wkdw#qirup dwlrq#khuh1#

Qdp h=

Wlwhv=

JUHJR U\#EUHVVOHU

VHQIR U#YLFH#SUHVIG HQW#DQG #JHQHUDO#FRXQVHO

Whdskrqh#qxp eh=#

Idfv#p lh#qxp eh=#

534065709696

534065709697

Qxp eh#lqg#Vwhhw#4=

Qxp eh#lqg#Vwhhw#5=

KDUERUVIGH#ILQDQFIDO#FQWHU

6533#SOD] D#B

Fw|=

Vwdh=

Frqxw|=

]LS.72Srvwd#Frgh=

MHUVH\#FIW\

Qhz #Muvh|

XQIWHG #WWDWHV

3:64407<<5

Hdfwlrqlf#p dl#h0p dl#lgguhv/#Li#Frqdwfw#Shuvrq#kdv#rgh=

JEUHVVOHUC VXQDP HUIFDIFRP

Yes No

O1 Gr#|rx#p dlqwdlq#vrp h#ru#dcr i#kh#errnv#lqg#uhfrugv#|rx#duh#untx#lgh#r#nhhs#xqghu#
Vhfwlrq#537#r i#kh#Dgylvhu#Dfw#ru#v#p ldu#vwdh#olz /#vrp hz khuh#rkhu#kdq#|rxu#*principal
office and place of business*

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

Yes No

P1 Duh#|rx#uhj lvwhug#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

Q1 Duh#|rx#d#sxedf#uhsruwqj#Frp sdq| #xqghu#Vhfwlrqv#45#ru#48#g,#r i#kh#Vhfxuwlhv#I{fk dqjh#
Dfw#r i#4<67B#
Li#|hv/#surylgh#|rxu#FIN#qxp eh#Fhgwdd#lqgh{#Nh| #qxp eh#kdw#kh#VHF#dvvlj qv#r#ndfk#sxedf#
uhsruwqj#Frp sdq| ,=

Yes No

R1 Glg#|rx#kdyh#4#e ldrq#ru#p ruh#lq#dvvhw#r q#kh#dvw#gd| #r i#|rxu#p rvw#uhfhqw#ilvdd#|hduB#

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

D#*legal entity identifier* lv#d#xqltxh#qxp eh#kdw#Frp sdq#lv#xvh#r#lghqwi| #ndfk#rkhu#lq#kh#ilqdgfld#
p dunhsawfhl#lq#kh#ilvw#kd#r i#5344 /#kh#*legal entity identifier* vwdggdug#z dv#vkd#lq#ghyh#asp hqw#
\rx#p d| #qrw#kdyh#d#*legal entity identifier*1#

SECTION 1.B. Other Business Names

Qr#qirup dwlrq#lgh

SECTION 1.F. Other Offices

Frp sdwh#kx#ir#z lqj #qirup dwrq#iru#ndfk#iilfh/#rwhu#kdq#| rxu#*principal office and place of business*#dw#z klfk#| rx#frqgxfw#qyhw#p hqw#dgy#lru| #xvqhvv1#| rx#p xvw#frp sdwh#d#vhsdudwh#Vfkhgxdh# G #Vhfwrq#4 11#iru#ndfk#rfdwrq1#i#| rx#duh#issq| lqj #iru#VHF #uhj lwadwrq/#i#| rx#duh#uhj lvhuhg#rqq| #z lk# wkh#VHF /#ru#i#| rx#duh#dq#*exempt reporting adviser*/#dw#rqq| #kx#dujhvw#ilyh#iilfhv#| q#hup v#r i#qxp ehuv# r i#*employees*,#

Qxp ehudqg#Vwhhw#4 =
54983#R [QDUG#VWUHHW

Qxp ehudqg#Vwhhw#5 =

F lw| =
Z R R G O D Q G #K I O O V

Vwdwh =
F d d i r u q d

Frqxw| =] IS. 72Srvwd#F rgh=
X Q I W H G #V W D W H V <469:

Li#k l#dgguhvv#b#d#sulydwh#uhvghqfh/#kxhfn#k l#er { =# ☐

Whdskrqh#Qxp eh=#
+; ; ; ,#83505797

Idfv#p lh#Qxp eh=#
+; 4 ; ,#58407<7<

Frp sdwh#kx#ir#z lqj #qirup dwrq#iru#ndfk#iilfh/#rwhu#kdq#| rxu#*principal office and place of business*#dw#z klfk#| rx#frqgxfw#qyhw#p hqw#dgy#lru| #xvqhvv1#| rx#p xvw#frp sdwh#d#vhsdudwh#Vfkhgxdh# G #Vhfwrq#4 11#iru#ndfk#rfdwrq1#i#| rx#duh#issq| lqj #iru#VHF #uhj lwadwrq/#i#| rx#duh#uhj lvhuhg#rqq| #z lk# wkh#VHF /#ru#i#| rx#duh#dq#*exempt reporting adviser*/#dw#rqq| #kx#dujhvw#ilyh#iilfhv#| q#hup v#r i#qxp ehuv# r i#*employees*,#

Qxp ehudqg#Vwhhw#4 =
<<#K L J K #VWUHHW

Qxp ehudqg#Vwhhw#5 =

F lw| =
E R V W R Q

Vwdwh =
P d v d f k x v h w w

Frqxw| =] IS. 72Srvwd#F rgh=
X Q I W H G #V W D W H V 35443

Li#k l#dgguhvv#b#d#sulydwh#uhvghqfh/#kxhfn#k l#er { =# ☐

Whdskrqh#Qxp eh=#
+94 : ,#78 : 08 ; 76

Idfv#p lh#Qxp eh=#
+94 : ,#78 : 05 ; 8 ;

Frp sdwh#kx#ir#z lqj #qirup dwrq#iru#ndfk#iilfh/#rwhu#kdq#| rxu#*principal office and place of business*#dw#z klfk#| rx#frqgxfw#qyhw#p hqw#dgy#lru| #xvqhvv1#| rx#p xvw#frp sdwh#d#vhsdudwh#Vfkhgxdh# G #Vhfwrq#4 11#iru#ndfk#rfdwrq1#i#| rx#duh#issq| lqj #iru#VHF #uhj lwadwrq/#i#| rx#duh#uhj lvhuhg#rqq| #z lk# wkh#VHF /#ru#i#| rx#duh#dq#*exempt reporting adviser*/#dw#rqq| #kx#dujhvw#ilyh#iilfhv#| q#hup v#r i#qxp ehuv# r i#*employees*,#

Qxp ehudqg#Vwhhw#4 =
5<4<#D O O H Q #S D U N Z D \

Qxp ehudqg#Vwhhw#5 =

F lw| = Vwdwh= Frxqwu| =] IS. 72Srvwd#F rgh=
 KR X VWR Q Wh{ dv X Q LWHG #VWDWHV : : 34<

Li#k lv#dgguhvv#lv#d#sulydwh#uhvlg hqfh/#Fkhfn#k lv#er{ =# ☐

Whdskrqh#Qxp eh#=# Idfvlp lh#Qxp eh#=
 : 460; 6407563 : 460; 640; : 88

SECTION 1.I. Website Addresses

Olw#| rxu#z hevln#dgguhvvhv1# rx#p xv#f r p sdwh#d#vhsdudwh#V fkhgxdh#G #Vhfwrq#4 LI#iru#hdfk#z hevln#
 dgguhvv1#

Z hevln#Dgguhvv=# K WWS=22Z Z Z IVDIXQGVIFRP

SECTION 1.L. Location of Books and Records

Frp sdwh#k h#iræz lqj #q irup dwrq#iru#hdfk#r fdwrq#dw#z k lf k#| rx#nhhs#| rxu#errnv#dgg#uhfrugv/#rwkhu#
 wkdg#| rxu#*principal office and place of business*1# rx#p xv#f r p sdwh#d#vhsdudwh#V fkhgxdh#G #Vhfwrq#4 101#
 iru#hdfk#r fdwrq1#

Qdp h#ri#hqw#| #z khuh#errnv#dgg#uhfrugv#duh#hsw=
 VXQDP HULFD#JHWWJHP HQW#P DUNHWV/#Q F 1

Qxp eh#dgg#Vwuhw#4 =# Qxp eh#dgg#Vwuhw#5 =#
 54983#R [QDUG #VWUHHW

F lw| =# Vwdwh=# Frxqwu| =#] IS. 72Srvwd#F rgh=#
 Z R R G O D Q G #K IOOV Fddirugld X Q LWHG #VWDWHV <469:

Li#k lv#dgguhvv#lv#d#sulydwh#uhvlg hqfh/#Fkhfn#k lv#er{ =# ☐

Whdskrqh#Qxp eh#=# Idfvlp lh#Qxp eh#=#
 +; ; ; ,#83505797 +; 4 ; ,#58407<7<

Wk lv#lv#Fkhfn#rgh,=#

- ☒ rgh#ri#| rxu#eudqfk#r iilfhv#ru#diildwhv1#
- ☐ d#k l u g O s d w | #x q d i i l d w h g # u h f r u g n h h s h u l #
- ☐ r w k h u l #

Eulhiq #ghvfuleh#k h#errnv#dgg#uhfrugv#hsw#dw#k lv#r fdwrq=#
 FHUWDIQ #E R R N V #D Q G #J H F R U G V #J H T X I U H G #N R #E H #N H S W #Q #E R P S O I D Q F H #Z I W K #N K H #Q Y H V W P H Q W #
 D G Y L V H U V #D F W #R I #4 < 73 /#D V #D P H Q G H G #D Q G 2 R U #W K H #Q Y H V W P H Q W #E R P S D Q \ #D F W #R I #4 < 73 /#D V #
 D P H Q G H G 1

Qdp h#ri#hqw#| #z khuh#errnv#dgg#uhfrugv#duh#nhs#
IURQ#P R X Q W D I Q

Qxp eh#dgg#Vwuhw#4=#
55#NLP EHUO\#JRDG

Qxp eh#dgg#Vwuhw#5=#

F lw|=#

Vwdwh=#

Frqxw|=#

] IS. 72Srvwd#F rgh=#

HDVW#EUXQVZ LFN

Qhz #Muvh|

X Q LWHG #VWDWHV

3;;49

Li#k#lv#dgguhvv#lv#d#sulydwh#uhvghqfh/#fkhfn#k#lv#er{=# ☐

Whdskrqh#Qxp eh####

Idfv#p lh#qxp eh=#

+:46,#94309:49

Wk#lv#lv#fkhfn#rqh,=#

- ☐ rqh#r i#| rxu#eudqfk#r iilfhv#ru#diildwhv1#
- ☐ d#k#lg0sdw| #xqdiildwhg#uhfrugnhhshul#
- ☒ rkhu1#

Eulhiq| ghvfuleh#k#h#errnv#dgg#uhfrugv#nhs#d#k#lv#rfdwlrq=#

FHUWDIQ#ERRNV#DQG#UHFRUGV#UHTXLUHG#WR#EH#NHSW#Q#R P SOLDQFH#Z LWK#WKH#QYHVWP HQW#
DGYLVHUV#DFW#R I#4<73/#DV#DP HQGHG#DQG2RU#WKH#QYHVWP HQW#R P SDQ\#DFW#R I#4<73/#DV#
DP HQGHG1

Qdp h#ri#hqw#| #z khuh#errnv#dgg#uhfrugv#duh#nhs#
VXQDP HUIFD#DVVHW#P DQDJHP HQW/#OOF

Qxp eh#dgg#Vwuhw#4=#
5<4<#DOOHQ#SDUNZ D\

Qxp eh#dgg#Vwuhw#5=#

F lw|=#

Vwdwh=#

Frqxw|=#

] IS. 72Srvwd#F rgh=#

KRXVWRQ

Wh{dv

X Q LWHG #VWDWHV

: :34<

Li#k#lv#dgguhvv#lv#d#sulydwh#uhvghqfh/#fkhfn#k#lv#er{=# ☐

Whdskrqh#Qxp eh####

Idfv#p lh#qxp eh=#

:460;6407563

:460;640;:88

Wk#lv#lv#fkhfn#rqh,=#

- ☒ rqh#r i#| rxu#eudqfk#r iilfhv#ru#diildwhv1#
- ☐ d#k#lg0sdw| #xqdiildwhg#uhfrugnhhshul#
- ☐ rkhu1#

Eulhiq| #ghvfuleh#k#h#errnv#dgg#uhfrugv#hsw#dw#k#l#r#fdwlrq=#
 FHUWDIQ #ERRNV#DQG #UHFRUGV #UHTXIUHG #NR #EH#NHSW#Q #R P SOLDQ FH#Z LWK #WKH#QYHVWP HQW#
 DGYLVHUV #DFW#R I#<73 /#DV#DP HQGHG #DQG 2R U#WKH#QYHVWP HQW#R P SDQ \#DFW#R I#<73 /#DV#
 DP HQGHG 1

Qdp h#r i#hgw| #z khuh#errnv#dgg#uhfrugv#duh#hsw=
 LURQ #P R X Q W D I Q #V W R U D J H

Qxp eh#dgg#Vwuhw#4=#
 857<#J OHQ P R Q W

Qxp eh#dgg#Vwuhw#5=#

F lw|=#

Vdw#=#

Frqxw|=#

] IS . 72Srvd#Frgh=#

KR X VWR Q

Wh{dv

X Q L W H G #V W D W H V

: : 3 ; 4

Li#k#l#dgguhvv#lv#d#sulydwh#uhvghqfh/#fkhn#k#l#er{=# ☐

Whdskrqh#Qxp ehu####
 : 46094309833

Idfvlp lh#Qxp eh#
 : 460943098<3

Wk#l#lv#fkhn#rqh,=#

- ☐ rqh#r i#| rxu#eudqfk#r iilfhv#ru#diildwhv1#
- ☐ d#k#lg0sduw| #xqdiildwhg#uhfrugnshshu1#
- ☒ rkhu1#

Eulhiq| #ghvfuleh#k#h#errnv#dgg#uhfrugv#hsw#dw#k#l#r#fdwlrq=#
 FHUWDIQ #ERRNV#DQG #UHFRUGV #UHTXIUHG #NR #EH#NHSW#Q #R P SOLDQ FH#Z LWK #WKH#QYHVWP HQW#
 DGYLVHUV #DFW#R I#<73 /#DV#DP HQGHG #DQG 2R U#WKH#QYHVWP HQW#R P SDQ \#DFW#R I#<73 /#DV#
 DP HQGHG 1

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

Qr#Qirup dwlrq#I lhg

Item 2 SEC Registration/Reporting

Uhvsrqvhw#wr#wk#lv#whp #khs#xv#dqg#| rx,#ghwhup lqh#z khwkuh#| rx#duh#h#dj lech#wr#uhj lvwhu#z wk#wkh#VHF 1#
Frp schwh#wk#lv#whp #5 ID 1#rcq# |di#| rx#duh#dssq lqj #iru#VHF #uhj lvwdwlrq#ru#vexp lvwqj #dq#*annual updating
amendment* wr#| rxu#VHF #uhj lvwdwlrq 1#

D1###Wr#uhj lvwhu#ru#hup dq#uhj lvwhug,#z wk#wkh#VHF/#| rx#p xv#fkhfn#**at least one** ri#wkh#whp v#5 ID 1+4 ,#
wkurxjk#5 ID 1+4 5 ,/#ehorz 1#di#| rx#duh#vexp lvwqj #dq#*annual updating amendment* wr#| rxu#VHF #
uhj lvwdwlrq#dqg#| rx#duh#qr#rcqjhu#h#dj lech#wr#uhj lvwhu#z wk#wkh#VHF/#fkhfn#whp #5 ID 1+4 6 ,1#Sduw#4 D #
Iqvwxfwlrq#5 suryghv#qirup dwlrq#wr#khs#| rx#ghwhup lqh#z khwkuh#| rx#p d | #diilp dwlyhd#uhvsrqg#wr#
hdfk#ri#wkhvh#whp v1#
\rx#wkh#dgylvhu,=#

☒ +4, duh#d#**large advisory firm** wkdw#lvwhu#

+d, kdv#uhjxawru| #lvvhw#xqghu#p dqdjhp hqw#ri# 433#p lwrq#lq#X IV 1#graw, #ru#p ruh/#ru#

+e, kdv#uhjxawru| #lvvhw#xqghu#p dqdjhp hqw#ri# <3#p lwrq#lq#X IV 1#graw, #ru#p ruh#d#w
wkh#wp h#ri#ldqj #lv#p rvw#uhfhg#*annual updating amendment* dqg#lv#uhj lvwhug#z wk#
wkh#VHF>#

☐ +5, duh#d#**mid-sized advisory firm** wkdw#kdv#uhjxawru| #lvvhw#xqghu#p dqdjhp hqw#ri# 58#
p lwrq#lq#X IV 1#graw, #ru#p ruh#xw#hvv#wkdq# 433#p lwrq#lq#X IV 1#graw, #dqg#| rx#duh#
hwhu#

+d, qrw#htxluh#wr#eh#uhj lvwhug#dv#dq#dgylvhu#z wk#wkh#*state securities authority* ri#wkh#
vwdwh#z khuh#| rx#p dlqwdlq#| rxu#*principal office and place of business*/#ru#

+e, qrw#xerfw#wr#h{dp lqdwlrq#e | #wkh#*state securities authority* ri#wkh#vwdwh#z khuh#| rx#p
p dlqwdlq#| rxu#*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#| rxu#*principal office and place of business***in Wyoming** +z klfk#grhv#qrw#uhjxawru#
dgylvhu,>#

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

☒ +8, duh#**an investment adviser (or sub-adviser) to an investment company** uhj lvwhug#
xqghu#wkh#lgyhvp hqw#Frp sdq | #Dfw#ri# 4 <73>#

☐ +9, duh#**an investment adviser to a company which has elected to be a business
development company** sxuvxdqw#wr#hfwlrq#8 7#ri#wkh#lgyhvp hqw#Frp sdq | #Dfw#ri# 4 <73#
dqg#kdv#qrw#z wk#gudz q#wkh#hdfwlrq/#dqg#| rx#kdyh#dv#h#dv# 58#p lwrq#ri#uhjxawru| #lvvhw#
xqghu#p dqdjhp hqw>#

☐ +: , duh#d#**pension consultant** z wk#uhvshfw#wr#lvvhw#ri#sawq#kdylqj #dq#dj j uhj dw#ydoxh#ri#dw#
hndv# 533/333/333#wkdw#xaddilv#iru#wkh#h{hp swlrq#lq#xch#536D05+d,>#

☐ +; , duh#d#**related adviser** xqghu#xch#536D05+e, #wkdw#*controls*/#lv#*controlled* e | /#ru#lv#xqghu#
frp p rq#*control* z wk#/#dq#lgyhvp hqw#dgylvhu#wkdw#lv#uhj lvwhug#z wk#wkh#VHF/#dqg#| rxu#
principal office and place of business lv#wkh#vdp h#dv#wkh#uhj lvwhug#dgylvhu>#

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

☐ +< , duh#d#**newly formed adviser** uhq lqj #rq#xch#536D05+f, #ehfdxvh#| rx#h{shfw#wr#eh#h#dj lech#
iru#VHF #uhj lvwdwlrq#z wk lq#453#gq | v>#


```
+43, duh#3#multi-state adviser wkdwh#lvhtxlung#wr#uhjlvhu#q#48#rup ruh#vwdwhv#dgg#lv#uhq lqj#
rq#uxd#536D05+g,>#
```

+44, duh#dq#Internet adviser uhq|lqj#rq#uxdn#536D05+h,>#

+46, duh#no longer eligible wr#uhp dlq#uhj lwhuhg#z lk#kxh#VHF1#

F1###Xgghu#vwdwh#dz v/#VHF0uhj lvwhuhg#dgylvhw#p d| #eh#htx#lühg#x#surylg#x#state securities authorities
d#frs| #r#i#k#h#i#rup #DGY#dgg#dq| #dp hggp hqw#k#h| #il#h#z l#k#k#h#VHF1#l#k#h#lv#d#q#dq#notice filings1#
lq#dgg#lwrq/#exempt reporting advisers p d| #eh#htx#lühg#x#surylg#x#state securities authorities z l#k#h#
frs| #r#i#h#s#r#w#dgg#dq| #dp hggp hqw#k#h| #il#h#z l#k#k#h#VHF1#l#k#h#lv#d#q#dq#lwd#d#ss#d#f#w#r#q#r#u#h#s#r#w#/
fk#h#f#n#k#h#er{ +hv,#gh{ #w#r#k#h#v#wdwh+v,#k#d#w#| rx#z rx#g#d#h#x#r#u#h#f#h#y#h#q#r#w#f#h#r#i#h#k#h#dgg#d#q#x#v#h#t#x#h#q#w#
il#q#j#v#r#u#h#s#r#w#| rx#x#p l#w#r#k#h#VHF1#l#k#h#lv#d#q#dq#dp hggp hqw#r#g#l#h#f#w#| rx#u#notice filings ru#
u#h#s#r#w#r#dgg#lwrq#d#v#wdwh+v,#/fk#h#f#n#k#h#er{ +hv,#gh{ #w#r#k#h#v#wdwh+v,#k#d#w#| rx#z rx#g#d#h#x#r#u#h#f#h#y#h#
q#r#w#f#h#r#i#h#k#h#dgg#d#q#x#v#h#t#x#h#q#w#il#q#j#v#r#u#h#s#r#w#| rx#x#p l#w#r#k#h#VHF1#l#k#h#lv#d#q#dq#dp hggp hqw#r#g#
| rx#u#h#j#lv#w#d#w#r#q#r#v#r#s#| rx#u#notice filings ru#u#h#s#r#w#i#urp #j#r#l#q#j#x#r#v#wdwh+v,#k#d#w#f#x#u#h#q#w#d#u#h#f#h#y#h#
w#k#h#p /#x#g#fk#h#f#n#k#h#er{ +hv,#gh{ #w#r#k#r#v#h#v#wdwh+v,l#

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

SECTION 2.A.(8) Related Adviser

Li#|rx#duh#uhq|lqj#rq#kxh#n{hp swlrq#lq#uxdn#536D05+e,#iurp #kxh#surkle lwrq#rq#uhj lwudwlrq#ehfdxvh#|rx#
control/#duh#controlled e|/#ru#duh#xqghu#frp p rq#control z lk#dq#lqyhvp hqw#dgylvhu#kdw#lv#uhj lvhuhg#
z lk#kxh#VHF#dqg#|rxu#*principal office and place of business* lv#kxh#vdp h#dv#kdw#r i#kxh#uhj lvhuhg#dgylvhu#
surylgh#kxh#irærz lqj#lqirup dwlrq=#

Qdp h#r i#Uhj lvhuhg#lqyhvp hqw#dgylvhu#

CRD Qxp ehur i#Uhj lvhuhg#lqyhvp hqw#dgylvhu#

VHF#Qxp ehur i#Uhj lvhuhg#lqyhvp hqw#dgylvhu#
;34 0

SECTION 2.A.(9) Newly Formed Adviser

Li#|rx#duh#uhq|lqj#rq#kxh#n{hp swlrq#iurp #kxh#surkle lwrq#rq#
uhj lwudwlrq#|rx#duh#uhtx#lgh#r#p dnh#fhuwdlq#uhsuhvghqdwlrqv#derxw#|rxu#ndj le lwl#iuru#VHF#uhj lwudwlrq1#
E|fkhfnlqj#kxh#dssursuldwh#er{hv#|rx#z l#eh#gghp hg#wr#kdyh#p dgh#kxh#uhtx#lgh#uhsuhvghqdwlrqv1#|rx#
p xvwp#p dnh#erwk#r i#kxhvh#uhsuhvghqdwlrqv=#

- ☐ I#dp #qrw#uhj lvhuhg#ru#uhtx#lgh#wr#eh#uhj lvhuhg#z lk#kxh#VHF#ru#d#*state securities authority* dqg#l#kdyh#
d#uhdvrgdedh#shfwdwlrq#kdw#l#z l#eh#ndj le d#wr#uhj lvhu#z lk#kxh#VHF#z lk#lq#453#g d|v#diwuh#kxh#g dwh#
p |uhj lwudwlrq#z lk#kxh#VHF#ehfrp hv#hiihfwyh1#
- ☐ I#xqghuwdnh#wr#z lkgudz #iurp #VHF#uhj lwudwlrq#li/#rq#kxh#453wk#g d|diwuh#p |uhj lwudwlrq#z lk#kxh#VHF#
ehfrp hv#hiihfwyh/#z rx#g#eh#surkle lgh#e|v#hfwlrq#536D+d,r i#kxh#dgylvhu#v#Df#iurp #uhj lvhuqj#z lk#
kxh#VHF1#

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

Li#|rx#duh#uhq|lqj#rq#kxh#n{hp swlrq#iurp #kxh#surkle lwrq#rq#
uhj lwudwlrq#|rx#duh#uhtx#lgh#wr#p dnh#fhuwdlq#uhsuhvghqdwlrqv#derxw#|rxu#ndj le lwl#iuru#VHF#uhj lwudwlrq1#
E|fkhfnlqj#kxh#dssursuldwh#er{hv#|rx#z l#eh#gghp hg#wr#kdyh#p dgh#kxh#uhtx#lgh#uhsuhvghqdwlrqv1#

Li#|rx#duh#lssq|lqj#ru#uhj lwudwlrq#dv#dq#lqyhvp hqw#dgylvhu#z lk#kxh#VHF/#|rx#p xvwp#p dnh#erwk#r i#kxhvh#
uhsuhvghqdwlrqv=#

- ☐ I#kdyh#uhy#lz hg#kxh#lssdfdedh#vwdh#dqg#ihghud#k#lz v#dqg#kdyh#frqfoxghg#kdw#l#dp #uhtx#lgh#e|kxh#
oiz v#r i#48#ru#p ruh#vwdwhv#wr#uhj lvhu#dv#dq#lqyhvp hqw#dgylvhu#z lk#kxh#*state securities authorities* lq#
wkrvh#vwdwhv1#
- ☐ I#xqghuwdnh#wr#z lkgudz #iurp #VHF#uhj lwudwlrq#l#l#l#l#dq#dp hqgp hqw#wr#wk#lv#uhj lwudwlrq#lqglfdwqj#
kdw#l#z rx#g#eh#uhtx#lgh#e|kxh#k#lz v#r i#h#z hu#wk#dq#48#vwdwhv#wr#uhj lvhu#dv#dq#lqyhvp hqw#dgylvhu#z lk#
kxh#*state securities authorities* r i#wkrvh#vwdwhv1#

Li#|rx#duh#xep lwqj#|rxu#*annual updating amendment*#|rx#p xvwp#p dnh#wk#lv#uhsuhvghqdwlrq=#

- ☐ Z lk#lq#3#g d|v#sulu#wr#wk#h#g dwh#r i#l#dqj#wk#lv#dp hqgp hqw#l#kdyh#uhy#lz hg#kxh#lssdfdedh#vwdh#dqg#
ihghud#k#lz v#dqg#kdyh#frqfoxghg#kdw#l#dp #uhtx#lgh#e|kxh#k#lz v#r i#l#w#hdv#48#vwdwhv#wr#uhj lvhu#dv#dq#
lqyhvp hqw#dgylvhu#z lk#kxh#*state securities authorities* lq#wkrvh#vwdwhv1#

SECTION 2.A.(12) SEC Exemptive Order

Li#|rx#duh#uhq|ljj#xsrq#dq#VHF#*order*h{hp swlqj#|rx#iurp #k#h#surkleWlrq#rq#uhj lwudwlrq/#surylg#h#k#h#
irørz ljj#qirup dwlrq=#

Dssdfdwlrq#Qxp ehu=#

;360

Gdwh#ri#*order*=#

Item 3 Form of Organization

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

- ☐ Frusrudwlrq#
- ☐ Vrch#Sursulhwruvks#
- ☐ Olp lhg#Odebw| #Sduwghuvks#OOS,#
- ☐ Sduwghuvks#
- ☒ Olp lhg#Odebw| #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 rqwk#grhv#| rxu#lvfd#| hdu#hgg#ndfk#| hduB#
GHFHP EHU

F1# Xqghu#kh#dz v#i#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
<p>D1## Duh# rx/#dw#kh#wp h#r i#k l#l qj /#vxfhng lqj #r#k h#xv lq hvv#r i#d#h j lwhung#lqyhvp hqw# dgy lhuB#</p>	<input type="radio"/>	<input checked="" type="radio"/>

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

E1# G dwh#r i#Vxfhvv lrq=#P P 2GG 2\\ \\ ,#

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

Q r#l qirup dwlrq#l khg

Item 5 Information About Your Advisory Business - Employees, Clients, and Compensation

Uhvsrqvhw#r#k#l#lwhp #hcs#xv#xqghuvdqq#| rxu#exvlqhv/#l#v#l#v#v#l#q#s#u#s#d#l#q#j#r#u#r#q#o#v#h#h#(dp lqdwlrqv/#
 dgg#surylgh#xv#z l#k#g#d#d#z h#xv#h#z khq#p dnlgj#h#j#x#d#w#r#u#| #s#r#d#f| 1#s#d#w#h#d#l#q#v#w#x#f#w#r#q#8#l#d#l#s#u#r#y#l#g#h#v#
 dgg#l#w#r#q#d#d#j#x#l#g#d#q#f#h#r#q#h#z#q#| #i#r#u#p h#g#d#g#y#l#h#w#i#r#u#f#r#p s#d#w#l#g#j#k#l#l#lwhp #8#1

Employees

If you are organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).

D1###Dssur{lp dwhq|k#r#z#p#dq|#employees gr#|rx#k#dy#h#B#l#q#f#o#g#h#i#x#d#dgg#s#d#w#o#l#p h#employees exw#gr#q#r#w#
 l#q#f#o#g#h#d#q|#f#d#h#u#l#f#d#d#z r#u#n#h#u#v#l#
 4:3

E1# +4,###Dssur{lp dwhq|k#r#z#p#dq|#i#k#h#employees u#h#s#r#w#h#g#l#q#8#D#l#h#u#i#r#u#p #l#q#y#h#v#p h#q#w#d#g#y#l#v#r#u#| #
 i#x#q#f#w#r#q#v#h#l#q#f#o#g#l#g#j#h#v#h#d#u#f#k#B#
 45

+5, Dssur{lp dwhq|k#r#z#p#dq|#i#k#h#employees u#h#s#r#w#h#g#l#q#8#D#l#h#u#h#j#l#w#h#u#g#h#s#u#h#v#h#q#w#d#w#l#y#h#v#r#i#d#
 e#u#r#n#h#u#g#h#d#h#u#B#
 9;

+6, Dssur{lp dwhq|k#r#z#p#dq|#i#k#h#employees u#h#s#r#w#h#g#l#q#8#D#l#h#u#h#j#l#w#h#u#g#z l#k#h#q#h#r#u#p r#u#h#
 s#t#a#t#e#s#e#c#u#r#i#t#i#e#s#a#u#t#h#o#r#i#t#i#e#s#d#v#i#n#v#e#s#t#m#e#n#t#a#d#v#i#s#e#r#r#e#p#r#e#s#e#n#t#a#t#i#v#e#s#B#
 3

+7, Dssur{lp dwhq|k#r#z#p#dq|#i#k#h#employees u#h#s#r#w#h#g#l#q#8#D#l#h#u#h#j#l#w#h#u#g#z l#k#h#q#h#r#u#p r#u#h#
 s#t#a#t#e#s#e#c#u#r#i#t#i#e#s#a#u#t#h#o#r#i#t#i#e#s#d#v#i#n#v#e#s#t#m#e#n#t#a#d#v#i#s#e#r#r#e#p#r#e#s#e#n#t#a#t#i#v#e#s#i#r#u#d#q#l#q#y#h#v#p h#q#w#d#g#y#l#h#u#
 r#w#k#h#u#k#d#q#|r#x#B#
 3

+8,# Dssur{lp dwhq|k#r#z#p#dq|#i#k#h#employees u#h#s#r#w#h#g#l#q#8#D#l#h#u#h#j#l#w#h#u#g#z l#k#h#q#h#r#u#p r#u#h#
 f#r#p#s#d#q|#r#u#d#j#h#q#f#|B#
 3

+9, Dssur{lp dwhq|k#r#z#p#dq|#i#l#p#v#r#u#r#w#k#h#p#e#r#s#o#n#s#v#r#d#f#l#w#d#g#y#l#v#r#u#| #c#l#i#e#n#t#s#r#q#|r#x#u#h#e#h#k#d#d#B#
 3

In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.

Clients

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

F1# +4, W#r#d#s#s#u#r#{lp dwhq|k#r#z#p#dq|#clients g#l#g#|rx#s#u#r#y#l#g#h#v#p h#q#w#d#g#y#l#v#r#u#| #h#u#y#l#f#h#v#h#x#u#l#g#j#|r#x#u#
 p#r#v#h#h#f#h#q#w#| #f#r#p#s#d#w#h#g#l#v#f#d#d#|h#d#u#B#

☐ 3

☐ 4 043

☐ 44 058

☒ 590433

☐ P ruh#kdq#133

Lihp ruh#kdq#133/#krz #p dq|B#

+urxqg#r#k#h#ghduhv#133,

+5, Dssur{lp dwhq#z kdwhshufhqwdjh#i#|rxu#clients duh#qrq0United States personsB#

5 (#

G 1# 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 kdwh#shv#i#clients gr#|rx#kdyhB#lqglfdwh#k#h#dssur{lp dwh#shufhqwdjh#kdwh#ndfk#w|sh#i#client frp sulhv#i#|rxu#rwd#x#p eh#i#clients#l#i#client ilw#lqr#p ruh#kdq#rgh#fdwhjru|/#fkhn#l#kdwh#dssq|l#

		Xs#r#	440	590	840	:90	
	Orgh#	43 (#	58 (#	83 (#	:8 (#	<< (#	433 (#
+d, # lqglylxdo#r#khu#kdq#high net worth individuals, #	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+e, High net worth individuals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+f, Edqnqj#ru#kuliw#lqv#wlrqv#	<input checked="" type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
+h, Exvlghvv#ghyhosp hqw#frp sdqlhv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+i, Srrdng#lqyhvp hqw#y#hk#ldv#r#khu#kdq#lqyhvp hqw#frp sdqlhv, #	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+j, Shqvrlq#lqg#sur ilw#kduqj#s#lqv#exw#qrw#k#s#lq#s#dwl#l#sdgw, #	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+k, Fkduwded#rujdql#dwlrv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+l, Frusrudwlrqv#ru#r#khu#exvlghvv#grw#dwhg#leryh#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+m, Vwdh#ru#p xql#l#sd#government entities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+n, Rwkhu#lqyhvp hqw#lgy#lhuv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+o, lqvxdqfh#frp sdqlhv	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+p, Rwkhu=###	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

+5, lqglfdwh#k#h#dssur{lp dwh#dp rxq#r#i#|rxu#h#x#l#ru|d#vhw#xqghu#p dqdjhp hqw#uhsrwg#lq#lwhp #811#ehorz, #dwulexwded#r#ndfk#r#i#k#h#r#r#z lqj #w|sh#r#i#client1#i#client ilw#lqr#p ruh#kdq#rgh#fdwhjru|/#fkhn#l#kdwh#dssq|l#

		Xs#r#	Xs#r#	Xs#r#	
	Orgh#	58 (#	83 (#	:8 (#	A:8 (
+d, # lqglylxdo#r#khu#kdq#high net worth individuals, #	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

+e, High net worth individuals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+f, Edqnlqj#ru#kuliw#lqv#xwlrqv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+g, Lqyhvw#hqw#frp sdqlhv#	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
+h, Exvlqhv#ghyh#asp hqw#frp sdqlhv#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+i, Srrdng#lqyhvw#hqw#yhlfdv#rwkhu#kdq# lqyhvw#hqw#frp sdqlhv#	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+j, Shqvlrq#dgg#suril#vkduqj#sdlqv#exw#qrw#kh# sdlq#sduwflsdqw,#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+k, Fkduwdeh#rujdql#dwlrvq#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+l, Frusrudwlrqv#ru#rwkhu#exvlqhvvhv#qrw#dvwg# deryh#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+m, Vwdwh#ru#p xqlflsdq#government entities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+n, Rwkhu#lqyhvw#hqw#dgylvhu#	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+o, Lqvxdqfh#frp sdqlhv	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
+p, Rwkhu####	<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#lqyhvw#hqw#dgylvru#|vhuylfhv#e|#+fkhfn#lclwkdw#dssq|,=#

- ☒ +4,### D#shufhqwdjh#i#dvvhw#xqghu#|rxu#p dgdjhp hqw
- ☐ +5, Krxu#|#kdujhv
- ☐ +6, Vxevfulwlrq#ihhv#iru#d#qhz vdwhu#ru#shulrglfdo
- ☐ +7, Il#hg#ihhv#rwkhu#kdq#vxevfulwlrq#ihhv,
- ☐ +8, Frp p lvlrqv
- ☐ +9, Performance-based fees
- ☐ +:, Rwkhu#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#vxshuylvru# ru#p dgdjhp hqw#vhuylfhv#r# vhfxulwlv#sruwlrdrvB#	<input checked="" type="radio"/>	<input type="radio"/>
+5, Li# hv/#z kdw#lv#kch#dp rxqw#i# rxu#uhjxduwru# dvvhw#xqghu#p dgdjhp hqw#dgg#rwdq#xp ehui#i# dfrxqwB		
	X IV1#Grdu#Dp rxqw#	WrwddQ xp ehui#i#dfrxqw#
G lvfuwlrqdu =#	+d,#' #8 : /: : 5/447/944	+g,#< :
Q rqOG lvfuwlrqdu =#	+e,#' #8	+h,#3
Wrwde#	+f,#' #8 : /: : 5/447/944	+i,#< :

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#|sh+v,#i#dgylvru| #vhuylfhv#gr#| rx#surylghB#F khfn#d#kdw#dssq l#

- ☐ +4,### Ikdqfld#s#dqqqj#vhuylfhv
- ☐ +5, Sruwrdr#p dgdjhp hqw#iru#lqglygxdv#dgg2ru#p d#exvlghvvhv
- ☒ +6, Sruwrdr#p dgdjhp hqw#iru#lqyhvp hqw#frp sdqlv#dv#z h#dv#exvlghvv#ghyh#sp hqw#frp sdqlv#kdw#kdyh#p dgh#dq#hdfwlrq#suvxdq#wr#vhfwrq#8 7#r i#kh#lqyhvp hqw#frp sdq| #Dfw#ri#<73,#
- ☒ +7, Sruwrdr#p dgdjhp hqw#iru#srrdg#lqyhvp hqw#yhklfchv#rwhu#kdw#lqyhvp hqw#frp sdqlv,
- ☐ +8, Sruwrdr#p dgdjhp hqw#iru#exvlghvvhv#rwhu#kdw#p d#exvlghvvhv,#ru#lqvwwlrqdd#clients+rwhu#kdw#hjlwhung#lqyhvp hqw#frp sdqlv#dgg#rwhu#srrdg#lqyhvp hqw#yhklfchv,#
- ☐ +9, Shqvlrq#frqvxdqj#vhuylfhv
- ☒ +:, Vhdfwlrq#r i#rwhu#dgylvhu#lfoxglqj#private fund p dgdjhuv,#
- ☐ +; , Sxedfwrq#r i#shulrglfdo#ru#ghz vdwwhuv
- ☐ +<, Vhfxulw| #udwqjv#ru#sulfqj#vhuylfhv
- ☐ +43, P dnhw#p lqj#vhuylfhv
- ☐ +44, Hgxfdwlrqdd#hp lqduv2z runvkrsv
- ☐ +45, R wku+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.

K 1 Li#| rx#surylgh#lkdqfld#s#dqqqj#vhuylfhv/#r#krz #p dq|#clients gl#| rx#surylgh#khvh#vhuylfhv#gxulqj#|rxu#dvw#lvfd#|hduB#

- ☒ 3
- ☐ 4#0 43
- ☐ 44#0 58
- ☐ 59#0 83
- ☐ 84#0 433
- ☐ 434#0 583
- ☐ 584#0 833
- ☐ P ruh#kdw#833

Li# ruh#kdw#833/#krz #p dq|B

+urxqg#r#kh#ghduhv#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.

L 1 Li#| rx#sdwlfldwh#lq#d#wrap fee program/#gr#| rx#fkhfn#d#kdw#dssq ,=#

- ☐ +4,### sponsor wkh#wrap fee programB#
- ☐ +5, dfw#dv#d#sruwrdr#p dgdjhuv#iru#kh#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	Iq#uhvsrqvh#r#Lwhp #7 1E 1#r i#Sdu#5D#r i#Irup #DGY/#gr# rx#qgldwh#kdw# rx#surylgh# lqyhvp hqw#dgylfh#r#q#z lk#uhvshf#r#q#p lhg#w shv#r i#lqyhvp hqwB#	<input type="radio"/>	<input checked="" type="radio"/>

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

Li#| rx#fkhfn#Lwhp #8 1J 1+6 ,/#z kdwl#v#kch#VHF #Ikh#Qxp eh#; 44#ru#; 47#Qxp eh#,#r i#ndfk#r i#kch#uhj lwhuhg#
lqyhvp hqw#frp sdq#lv#dgg#exvlghvv#ghyh#r#sp hqw#frp sdq#lv#r#z klfk#| rx#dfw#dv#dq#dgylvhu#suxvdqw#r#
dq#dgylvru| #frqwdfwB#| rx#p xv#frp sdwh#d#vhsduwh#V fkhgxd#G #Vhfwrq#8 1J 1+6 ,#ru#ndfk#uhj lwhuhg#
lqyhvp hqw#frp sdq| #dgg#exvlghvv#ghyh#r#sp hqw#frp sdq| #r#z klfk#| rx#dfw#dv#dq#dgylvhu

VHF #Ikh#Qxp eh#; 44 036 : 6 ;

VHF #Ikh#Qxp eh#; 44 036 ; 3 :

VHF #Ikh#Qxp eh#; 44 036 ; 69

VHF #Ikh#Qxp eh#; 44 037 : 3 ;

VHF #Ikh#Qxp eh#; 44 037 ; 34

VHF #Ikh#Qxp eh#; 44 03 : 56 ;

VHF #Ikh#Qxp eh#; 44 03 : : 58

VHF #Ikh#Qxp eh#; 44 03 : : < :

VHF #Ikh#Qxp eh#; 44 03 ; : 5 :

VHF #Ikh#Qxp eh#; 44 03 ; : ; <

VHF #Ikh#Qxp eh#; 44 0547 ; 5

SECTION 5.I.(2) *Wrap Fee Programs*

Q r#lqirup dwlrq#lkhg

Item 6 Other Business Activities

Lq#k#lv#Lwhp /#z h#htxhv#lqirup dwlrq#derxw#| rxu#ilp *v#rkhu#exvlqhvv#dfwylwhv1#

D1## \rx#duh#dfwylh#lqjdjhg#lq#exvlqhvv#dv#d#fkhfn#d#kdw#dssq,=#

- ☐ +4,### eurnhu0ghdnu#uhj lwhuhg#ru#xquhj lwhuhg,
- ☐ +5, uhj lwhuhg#uhsuhvhwqdwlyh#r i#d#eurnhu0ghdnu
- ☒ +6, frp p rgw|#errd#shudwru#ru#frp p rgw|#udgqj#dgylvru#z khwku#uhj lwhuhg#ru#h{hp sw# iurp #uhj lwudwlrq,
- ☐ +7, ixwuhv#frp p lvlrq#p hufkdqw
- ☐ +8, uhd#hvwdwh#eurnhu#ghdnu#ru#djhgq
- ☐ +9, lqvudqfh#eurnhu#ru#djhgq
- ☐ +:, edqn#lqf#xgqj#d#vhsdudwh#lqhgwlilded#ghsdwp hqw#ru#glylvlrq#r i#d#edqn,
- ☐ +;, wxvw#frp sdq|
- ☐ +<, uhj lwhuhg#p xqlf#sd#dgylvru
- ☐ +43, uhj lwhuhg#vhfxulw| 0edvhg#vz ds#ghdnu
- ☐ +44, p dmu#vhfxulw| 0edvhg#vz ds#sdwflsdqw
- ☐ +45, dffrxqwdw#ru#dffrxqwdqj#ilp
- ☐ +46, dz |hu#ru#dz #ilp
- ☐ +47, rkhu#ilqdqfld#surgxfw#vdcvshvurq#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#lqjdjhg#lq#dq| #rkhu#exvlqhvv#qrw#lvhg#lq#Lwhp #D1D1#rkhu#kdq# jlylqj#lqyhvp hqw#dgylfh,B# ☒ ☐
- +5, Li#| hv#lv#k#lv#rkhu#exvlqhvv#| rxu#sup du| #exvlqhvvB# ☐ ☒

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#vhuylhv#rkhu#kdq#lqyhvp 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#lqirup dwlrq#lkhg

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

Ghvfuleh#| rxu#sup du| #exvlqhvv#qrw#| rxu#lqyhvp hqw#dgylvru| #exvlqhvv,=

Li#| rx#lqjdjhg#lq#kdw#exvlqhvv#xqghu#d#g lliuhg#wqdp h#surygh#kdw#wqdp h=#

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

Ghvfuleh#rwkhu#surgxfw#ru#vhuylfhv#|rx#h#r#|rxu#client/#\rx#p d|#cp lw#surgxfw#dgg#vhuylfhv#kdw#|rx#
dvwng#lq#Vhfwlrq#91E1+5,#deryh1#

VDDP FR #SUR YIGHV#DFFRXQWQJ #DQG #DGP IQ LVWUDWLYH#VHUYLFHV#WR #WV#QYHVWP HQW#DGYLVRU\#
FOHQWV1#VDDP FR #DOVR #SUR YIGHV#XFK#VHUYLFHV#WR #FHUWDLQ #SRUWIR OIR V#R I#DOLF#FRP SDQ\##
DQG #DOLF#FRP SDQ\##I#KDW#DUH#Q RW#QYHVWP HQW#DGYLVRU\#FOHQWV1

Li#|rx#h#qjdjh#lq#kdw#exvlghvv#xqghu#d#g lihuq#w#qdp h/#surylgh#kdw#qdp h1#

Item 7 Financial Industry Affiliations and *Private Fund* Reporting

Iq#kLv#Lwhp /#z h#htxhv#qirup dwrq#derxw#| rxu#lqdgfldoqgxvwa| #diiddwlrqv#dgg#dfwlylwlv1#WkLv#
 qirup dwrq#gghqwlhv#duhdv#q#z klfk#frqidfwr#i#qghuv#p d| #ffxu#ehwz hhq#| rx#dgg#| rxu#clients1#

D1## WkLv#sdw#i#Lwhp #: #htxlv#| rx#r#surylgh#qirup dwrq#derxw#| rx#dgg#| rxu#related persons/#qfoxglj#
 iruhlj#q#diiddwlv1#| rxu#related persons duh#d#i#| rxu#advisory affiliates dgg#d#| #person wkdw#lv#xqghu#
 frp p rg#control z lwk#| rx1#

\rx#kdyh#d#related person wkdw#lv#d#fkhfn#d#wkdw#dssq,=#

- ☒ +4,### eurnhu0ghddu/#p xqlfisdq#vhfxulwlv#ghddu/#ru#jryhuqp hqw#vhfxulwlv#eurnhu#ru#ghddu#
 +uhjlvwhug#ru#xquhjlvwhug,
☒ +5,# rwkhu#qyhwq hqw#dgylvhu#lqfoxglj#lqdgfldo#sdqghw,
☐ +6,# uhjlvwhug#p xqlfisdq#dgylvru
☐ +7,# uhjlvwhug#vhfxulw| 0edvhg#vz ds#gghddu
☐ +8,# p dmr#vhfxulw| 0edvhg#vz ds#sdwflsdqw
☐ +9,# frp p rglw| #srrd#shudwru#ru#frp p rglw| #wudglj#dgylvru#z khwku#uhjlvwhug#ru#h{hp sw#
 iurp #uhjlvwudwlrq,
☐ +:,# ixwuhv#frp p lvvrq#p hufkdqw
☒ +;,# edqnlgj#ru#kuliw#lqvwlxwlrq
☐ +<,# wxvw#frp sdq|#
☐ +43,# dffrxqwdq#ru#dffrxqwlj#ilp
☒ +44,# olz |hu#ru#olz #ilp
☒ +45,# lqvudqfh#frp sdq|#ru#ljhqf|
☒ +46,# shqvlrq#frqvxdqw
☐ +47,# uhd#hvwdw#eurnhu#ru#gghddu
☐ +48,# vsrqvru#ru#v| qglfdwru#i#p lwhg#sdwghwklsv#ru#htxlyddqw,#h{foxglj#srrdg#
 lqyhwq hqw#yhlfdv
☒ +49,# vsrqvru#hjqhudd#sdwghu/#p dgdjlgj#p hp eh#ru#htxlyddqw,#i#srrdg#lqyhwq hqw#
 yhlfdv

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#dgg#dgylvhu#r#d#q|#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#Vfkhgxdh#G#Vhfwrq#: 1D1#ru#ndfk#related person dwhg#q#lwhp #: 1D1#

41###Ohjd#Qdp h#i#Related Person=#

DLJ #FDSIWDO#VHUYLFHV/#QF1

51# Sup du|Bxvlgvv#Qdp h#i#Related Person=#

DLJ #FDSIWDO#VHUYLFHV/#QF1

61# Related Person's VHF#Lh#Qxp eh#Lh#q|, #h1j1/#; 340/#; 0/#; 990/#; 350,#

; 05; :66

ru#

Rwkh#

71# Related Person's CRD Qxp eh#Lh#q|, =

4648;

81# Related Person lv=#fkhfn#d#kdw#lssq|, #

+d,###☒ ###eurnhu0ghdnu/#p xqlfisdq#vhfxulwh#ghdnu/#ru#jryhuqpgqw#vhfxulwh#eurnhu#ru#ghdnu#

+e,# ☐ ###rwkh#qyhwpgqw#dgylvhu#lqfoxglj#lqdgfld#sdqghu,#

+f,# ☐ uhjlvhuhg#p xqlfisdq#dgylvru#

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

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

+i,# ☐ ###frp p rgw|#srrd#rshudru#ru#frp p rgw|#wdglj#dgylvru#z khwkhuhjlvhuhg#ru#h{hp sw#
iurp #uhjlvudwrq,#

+j,# ☐ ixwuhv#frp p lvlrq#p hufkdqw#

+k,# ☐ edqnlqj#ru#wkuli#lqvwxwrq#

+l,# ☐ wuxv#frp sdq|#

+m,# ☐ dffrxqwdqw#ru#dffrxqwdqj#ilp #

+n,# ☐ dz |hu#ru#dz #ilp #

+o,# ☐ lqvxdqfh#frp sdq|#ru#ljqhf|#

+p,# ☐ shqvlrq#frqvxdqw#

+q,# ☐ ###undchvudwh#eurnhu#ru#ghdnu#

+r,# ☐ vsrqvru#ru#v|qglfdwru#i#p lwhg#sdwghuwlsv#ru#ntxlyddqw,#h{foxglj#srrdg#qyhwpgqw#
yhklfdv#

+s,# ☐ ###vsrqvru/#jhghud#sdwghu/#p dgdj lqj#p hp eh#ru#ntxlyddqw,#i#srrdg#qyhwpgqw#yhklfdv#

	Yes	No
91# Gr# rx#control ru#duh# rx#controlled e #kh#related personB#	<input checked="" type="radio"/>	<input type="radio"/>
: 1# Duh# rx#dgg#kh#related person xqghu#frp p rq#controlB#	<input checked="" type="radio"/>	<input type="radio"/>
; 1# +d,# Grhv#kh#related person dfw#dv#d#t#xdddilh#fxvwrqldq#iru# rxu#clients lq#frqqhfwrq#z lk# dgylvru #vhuylfhv# rx#surylgh#r#clientsB	<input type="radio"/>	<input checked="" type="radio"/>
+e,# Li# rx#duh#uhj lvhuqj #ru#uhj lvhuq#z lk#kh#VHF#dgg# rx#kdyh#dqvz hung# hv/#r# txhvwlrq#; +d,#deryh/#kdyh# rx#ryhufrp h#kh#suhvxp swlrq#kdw# rx#duh#qrw# rshudwlrqd# qghshqghq#suvxdq#r#xch#539+7,0+5,+g,+8,,#urp #kh#related person dgg#kxv#duh#qrw#hntx lhg#r#rewd lq#d#xusubh#h{dp lqdwlrq#iru# rxu#clients' ixqgv#ru# vhfculhv#kdw#duh#p dlqwdlqhg#d#kh#related personB#	<input type="radio"/>	<input type="radio"/>
+f,# Li# rx#kdyh#dqvz hung# hv#r#txhvwlrq#; 1+d,#deryh/#surylgh#kh#rfdwlrq#r#i#kh#related person's riilfh#uhvrgvled#ru#custody ri# rxu#clients' dvvhw=# Qxp ehudgg#Vwhhw#1= Qxp ehudgg#Vwhhw#5= F lw = Vwdwh= Frxgw =]LS. 72Srvwd#F rgh= Li#k lv#dgguhvv#lv#d#sulydwh#uhvlgqfh/#fkhfn#k lv#er { =#		
< 1# +d,# Li#kh#related person lv#dq#qyhw#p hqwdgylvhu/#lv#wh#hp sw#urp #uhj lvudwlrqB#	<input type="radio"/>	<input checked="" type="radio"/>
+e,# Li#kh#dqvz hu#lv# hv/#xqghu#z kdw#h{hp swlrqB		
431# +d,# Lv#kh#related person uhj lvhuq#z lk#d#foreign financial regulatory authority B#	<input type="radio"/>	<input checked="" type="radio"/>
+e,# Li#kh#dqvz hu#lv# hv/#lv#kh#qdp h#dgg#frxgw /#lq#Iqj dvk/#r#i#hdfk#foreign financial regulatory authority z lk#z klfk#kh#related person lv#uhj lvhuq#1 Qr#qirup dwlrq#l lhg		
441# Gr# rx#dgg#kh#related person vkduh#dq #supervised personsB#	<input checked="" type="radio"/>	<input type="radio"/>
451# Gr# rx#dgg#kh#related person vkduh#kh#vdp h#sk vlfdd#rfdwlrqB#	<input checked="" type="radio"/>	<input type="radio"/>

41###Ohjd#Q dp h#r#i#Related Person=# DLJ #IHGHUDO#VDYIQJV#EDQN
51# Su#p du #xvlg hvv#Q dp h#r#i#Related Person=# DLJ #IHGHUDO#VDYIQJV#EDQN
61# Related Person's VHF #l#h#Qxp ehudgg#l#dq ,#h1j 1/#; 340/#; 0/#; 990/#; 350,# 0 ru# R wkh#
71# Related Person's CRD Qxp ehudgg#l#dq ,#
81# Related Person lv=#fkhfn#l#kdw#dssq ,#

+d,### ☐ ###eurnhu0ghddnu/#p xqlfisdq#vhfxulwlv#ghddnu/#ru#j ryhuqp hqw#vhfxulwlv#eurnhu#ru#ghddnu#
 +e,# ☐ ###rwkhu#qyhwv hqw#dgylvhu#lqfoxglqj #lqdgfldq#alqghuv,#
 +f,# ☐ uhj lvhuhg#p xqlfisdq#dgylvru#
 +g,# ☐ uhj lvhuhg#vhfxulw|0edvgh#vz ds#ghddnu#
 +h,# ☐ ###p dnu#vhfxulw|0edvgh#vz ds#sdwlfisdq#
 +i,# ☐ ###erp p rgw|#errd#rshudwru#ru#erp p rgw|#wdglqj #dgylvru#z khwku#uhj lvhuhg#ru#h{hp sw#
 iurp #uhj lvudwlrq,#
 +j,# ☐ ixwuhv#erp p lvlrq#p hufkdq#
 +k,# ☒ edqnlgj #ru#kuliw#qvwlvwlrq#
 +l,# ☐ wxvw#erp sdq|#
 +m,# ☐ dffrxqwdq#ru#dffrxqwgqj #lup #
 +n,# ☐ alz |hu#ru#alz #lup #
 +o,# ☐ lqvudqfh#erp sdq|#ru#djhgqf|#
 +p ,# ☐ shqvlrq#frqvxdq#
 +q,# ☐ ###uhd#hvdwh#eurnhu#ru#ghddnu#
 +r,# ☐ vsrqvru#ru#|qglfdrw#r#dp lhg#sdwghuvk lsv#ru#htxlyddq#/#h{foxglqj #errd#qyhwv hqw#
 yhk lfdv#
 +s,# ☐ ###vsrqvru/#jhghud#sdwghu/#p dqdj lqj#p hp eh#ru#htxlyddq#,#r#errd#qyhwv hqw#yhk lfdv#

Yes No

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

☐ ☒

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

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

+e,# Li#|rx#duh#uhj lvhuqj #ru#uhj lvhuhg#z lk#kh#VHF#dgg#|rx#kdyh#dqvz hung#E|hv/#r#
 txhvwlrq#;+d,#deryh/#kdyh#|rx#ryhufrp h#kh#suhvxp swlrq#kdw#|rx#duh#qrw#
 rshudwlrq#d#lqghshqghq#suxvxdq#wr#lxch#539+7,0+5,+g,+8,,#iurp #kh#related person
 dgg#kxv#duh#qrw#htxlvhg#wr#rewd lq#d#vxusulv#h{dp lqdwlrq#iru#|rxu#clients' ixqgv#ru#
 vhfxulwlv#kdw#duh#p dlqdlqhg#d#wkh#related personB#

☐ ☐

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

Qxp eh#dgg#Vwuhw#4=

Qxp eh#dgg#Vwuhw#5=

F lw|=

Vwdwh=

Frqxw|=

] IS. 72Srvwd#F rgh=

Li#k lv#dgguhvv#lv#d#sulydwh#uhvlgqfh/#fkhfn#k lv#er { =# ☐

Yes No

<1# +d,# Li#kh#related person lv#dq#qyhwv hqw#dgylvhu#lv#lv#h{hp sw#iurp #uhj lvudwlrqB#

☐ ☒

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

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

☐ ☒

+e,# Li#kh#dqvz hu#lv#|hv/#lv#kh#qdp h#dgg#Frqxw|/#q#iqj dvk/#r#i#hdfk#foreign financial regulatory
 authority z lk#z klfk#kh#related person lv#uhj lvhuhg1

Q r#Lqirup dwlrq#I lhg

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

☐ ☒

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



41###Ohjd#Qdp h#i#Related Person=#

DP HUIFDQ#JHQHUDO#OLIH#QVXUDQFH#FRPSDQ\

51# Su#p du|#Exvlqhv#Qdp h#i#Related Person=#

DP HUIFDQ#JHQHUDO#OLIH#QVXUDQFH#FRPSDQ\

61# Related Person's VHF#I#h#Qxp eh#Li#dq|, #hlj1/#; 340/#; 0/#; 990/#; 350,#
0

ru#

Rwkuh#

71# Related Person's CRD Qxp eh#Li#dq|, =

81# Related Person lv=#fkhfn#d#kdw#lssq|, #

+d,###☐ ###eurnhu0ghdnu#p xqlfisd#vhfxulwlv#ghdnu#ru#jryhuqp hqw#vhfxulwlv#eurnhu#ru#ghdnu#

+e,# ☐ ###rwkuh#qyhw#p hqw#dgylvhu#lqfoxglj#lqdgld#s#lqghuv,#

+f,# ☐ uhjlvhu#p xqlfisd#dgylvru#

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

+h,# ☐ ###p dnu#vhfxulw|0edvhg#vz ds#sdwlfisdqw#

+i,# ☐ ###frp p rgw|#srrd#shudwru#ru#frp p rgw|#udglj#dgylvru#z khwkuh#uhjlvhu#ru#{hp sw#
iurp #uhjlvudwlrq,#

+j,# ☐ ixwuhv#frp p lvlrq#p hufkdqw#

+k,# ☐ edqnlqj#ru#kuliw#lqvwlxwlrq#

+l,# ☐ wuxv#frp sdq|#

+m,# ☐ dffrxqwdqw#ru#dffrxqwlqj#lup #

+n,# ☐ dz|h#ru#dz#lup #

+o,# ☒ lqvudqfh#frp sdq|#ru#djhgqf|#

+p,# ☐ shqvlrq#frqvxdqw#

+q,# ☐ ###uhd#hvwdw#eurnhu#ru#ghdnu#

+r,# ☐ vsrqvru#ru#v|qglfdr#ru#i#p lwh#sdwghuvk lsv#ru#htxlyddqw,#h{foxglj#srrdg#qyhw#p hqw#
yhlfdv#

+s,# ☐ ###vsrqvru#hjhqhuds#wghu#p dqdj lqj#p hp eh#ru#htxlyddqw,#i#srrdg#qyhw#p hqw#yhlfdv#

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#lv#d#t#xddilhg#fxvrgldq#iru#|rxu#clients lq#frqghfwlrq#z lk#
dgylvru|vhuylfhv#|rx#surylg#h#clientsB



+e,# Li#|rx#duh#uhjlvhu#lqj#ru#uhjlvhu#z lk#kh#VHF#dgg#|rx#kdyh#dqvz hugh#|hv/#h#r#
txhvwlrq#; +d,#deryh/#kdyh#|rx#ryhufrp h#kh#suhvxp swlrq#kdw#|rx#duh#qrw#



rshudwlrqdc #lqgshgqghq#suxvxdq#r#lxd#539+7,0+5,+g,+8,,#iurp #k#related person dqg#kxv#duh#grw#lhtxlng#r#redlq#d#xusulv#h{dp lqdwlrq#iru# r#u#clients' ixqgv#ru# vhfuxulv#kdw#duh#p dlqdlqhg#d#k#related personB#	
+f,# Li# rx#kdyh#dqvz huhg# hv%#r#xhvwrq#; l+d,#deryh/#surygh#k#rfdwlrq#r#i#k#related person's riilfh#uhvsrqvled#iru#custody ri# r#u#clients' dvvhw=#	
Qxp eh#dqg#Vwhhw#l= Qxp eh#dqg#Vwhhw#5=	
Flw = Vwdwh= Frxqwl =] IS.72Srvwd#F rgh=	
Li#k lv#dgguhvv#lv#d#sulydwh#uhvlgqfh/#fkhn#k lv#er { =#	
<1# +d,# Li#k#related person lv#dq#lqyhw#p hq#dgylvhu/#lv#l#h{hp sw#iurp #uhj lvudwlrqB#	Yes No <input type="radio"/> <input checked="" type="radio"/>
+e,# Li#k#dqvz hu#lv# hv/#kqghu#z kdw#h{hp sw#lrqB	
431# +d,# Lv#k#related person uhj lvwhung#z k#d#foreign financial regulatory authority B#	<input type="radio"/> <input checked="" type="radio"/>
+e,# Li#k#dqvz hu#lv# hv/#lv#k#kdp h#dqg#Frqxwl /#lq#lqj dvk/#r#i#hdfk#foreign financial regulatory authority z k#z klfk#k#related person lv#uhj lvwhungl	
Qr#Lqirup dwlrq#l lhg	
441#Gr# rx#dqg#k#related person vkduh#dq #supervised personsB#	<input type="radio"/> <input checked="" type="radio"/>
451#Gr# rx#dqg#k#related person vkduh#k#vdp h#sk vlfda#rfdwlrqB#	<input type="radio"/> <input checked="" type="radio"/>

41###Ohjd#Q dp h#r#i#Related Person=#
 IVF #VHFXULWIHV#F RUSRUDWIR Q

51# Sup du| #Exvlghvv#Q dp h#r#i#Related Person=#
 IVF #VHFXULWIHV#F RUSRUDWIR Q

61# Related Person's VHF #l l#Q xp eh#l#dq| ,#h1j1/#;340/#;0/#;990/#;350,#
 ;34 07534:
 ru#
 Rwkhu#

71# Related Person's CRD Qxp eh#l#dq| ,=
 :794

81# Related Person lv=#fkhn#d#kdw#lssd| ,#
 +d,###☒ ###eurnhu0ghdnu/#p xqlfisd#vhfxulv#ghdnu/#r#uhj ryhuq#p hq#vhfxulv#eurnhu#r#ghdnu#
 +e,# ☒ ###r#khu#lqyhw#p hq#dgylvhu#lqfoxqlj #lqdfld#s#dqghu#,#
 +f,# ☐ uhj lvwhung#p xqlfisd#dgylvru#
 +g,# ☐ uhj lvwhung#vhfxulv| oedvhg#vz ds#ghdnu#
 +h,# ☐ ###p dmru#vhfxulv| oedvhg#vz ds#sdwlfisdq#
 +i,# ☐ ###r#p rglw| #err#rshudwru#r#r#p rglw| #wdglqj #dgylvru#z khwku#uhj lvwhung#r#h{hp sw#
 iurp #uhj lvudwlrq,#
 +j,# ☐ ixwuhv#r#p lvvlrq#p hufkdq#
 +k,# ☐ edqnlqj #r#kuliw#lqvvlwlrq#

+l,# ☐ wxvw#frp sdq|#
 +m,# ☐ dffrxqwdqw#ru#dffrxqwdqj#ilp#
 +n,# ☐ dz|h#ru#dz#ilp#
 +o,# ☒ lqvxdqfh#frp sdq|#ru#djhqf|#
 +p,# ☒ shqvlrq#frqvxdqw#
 +q,# ☐ ###uhdq#hvwdwh#eurnhu#ru#ghddu#
 +r,# ☐ vsrqvru#ru#v|qgldwru#r#dp lhg#sduqhuvklsv#ru#ntxlyddqw,#h{foxglj#srrdng#qyhw#hqw#
 yhkldv#
 +s,# ☐ ###vsrqvru/#jhghud#sduqhu/#p dqdj lqj#p hp eh#ru#ntxlyddqw,#r#srrdng#qyhw#hqw#yhkldv#

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#t#xddilhg#fxvrgldq#iru#|rxu#clients lq#frqghfwlrq#z lk#
 dgylvru|#huylfhv#|rx#surylg#h#r#clientsB☐ ☒

+e,# Li#|rx#duh#uhj lvwhuqj#ru#uhj lvwhung#z lk#kh#VHF#dqg#|rx#kdyh#dqvz hung#E|hv/S#r#
 txhvwlrq#;+d,#deryh/#kdyh#|rx#ryhufp h#kh#suhvxp swlrq#kdw#|rx#duh#qrw#
 rshudwlrqd#|qgshqghq#suxvxdqw#r#xch#539+7,0+5,+g,+8,,#urp #kh#related person
 dqg#kxv#duh#qrw#ntxlyhg#r#redlq#d#xusulyh#h{dp lqdwlrq#iru#|rxu#clients' ixqgv#ru#
 vhfuxlvhv#kdw#duh#p dlqwdlqhg#d#kh#related personB#

☐ ☒

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

Qxp eh#dqg#Vwhhw#1=

Qxp eh#dqg#Vwhhw#5=

Flw|=

Vwdh=

Frqxw|=

] IS. 72Srvwd#F rgh=

Li#kh lv#dqguhv#dv#d#sulydwh#hvlghqfh/#fkhfn#k#lv#er { =#☐

Yes No

<1# +d,# Li#kh#related person lv#dq#qyhw#hqw#dgylvhu/#dv#h#hp sw#urp #uhj lvwdwlrqB#

☐ ☒

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

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

☐ ☒

+e,# Li#kh#dqvz hu#dv#|hv/#dv#kh#qdp h#dqg#frqxw|#dq#dqv#dv/#r#i#hdfk#foreign financial regulatory
 authority z lk#z klfk#kh#related person lv#uhj lvwhung1

Qr#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|vldd#rfdwlrqB#

☐ ☒

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

UR \DO#DOOLDQFH#DVVR FIDWHV/#QF1

51# Sulp du|#Exvlg hvv#Q dp h#r#i#Related Person=#

UR \DO#DOOLDQFH#DVVR FIDWHV/#QF1

61# *Related Person's* VHF #Lh#Qxp eh#Li#dq|, #h1j1/#; 340/#; 0/#; 990/#; 350, #
; 34 087; 8<
ru#
R wkuh#

71# *Related Person's* CRD Qxp eh#Li#dq|, =
56464

81# *Related Person* lv=#fkhfn#d#kdw#lssq|, #
+d, ### ☒ #eurnhu0ghdnu/#p xqlfisd#vhfxulhv#ghdnu/#ru#ryhuqp hqw#vhfxulhv#eurnhu#ru#ghdnu#
+e, # ☒ #rkhu#qyhw#p hqw#dgylvhu#lqfoxglj #lqdgld#s#lqghuv, #
+f, # ☐ uhjlvhu#p xqlfisd#dgylvru#
+g, # ☐ uhjlvhu#vhfxul#0edvhg#vz ds#ghdnu#
+h, # ☐ #p dnu#vhfxul#0edvhg#vz ds#sduwlfisdqw#
+i, # ☐ #frp p rglw|srrd#shudwru#ru#frp p rglw| #udglj #dgylvru#z khwku#uhjlvhu#ru#{hp sw#
iurp #uhjlvudwlrq, #
+j, # ☐ ixwuhv#frp p lvlrq#p hufkdqw#
+k, # ☐ edqnlqj #ru#kuliw#lqvwlxwlrq#
+l, # ☐ wuxv#frp sdq| #
+m, # ☐ dffrxqwdqw#ru#dffrxqwlqj #ilp #
+n, # ☐ alz | hu#ru#alz #ilp #
+o, # ☒ lqvudqfh#frp sdq| #ru#djhgqf| #
+p, # ☒ shqvlrq#frqvxdqw#
+q, # ☐ #uhd#hvwdh#eurnhu#ru#ghdnu#
+r, # ☐ vsrqvru#ru#v|qglfdr#ru#p lhg#sduwghvk lsv#ru#htxlyddqw, /# { foxglj #srrdg#qyhw#p hqw#
yhklfchv#
+s, # ☐ #vsrqvru/#jhqhuda#sduwghu/#p dqdj lqj #p hp eh#ru#htxlyddqw, #ri#srrdg#qyhw#p hqw#yhklfchv#

Yes No

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

☐ ☒

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

☒ ☐

; 1# +d, # Grhv#kh#related person dfw#lv#d#t xddilhg#fxvrgldq#iru#| rxu#clients lq#frqghfwlrq#z lk#
dgylvru| #huylfhu#| rx#surylgh#wr#clientsB
+e, # Li#| rx#duh#uhjlvhu#lqj #ru#uhjlvhu#z lk#kh#VHF#dqg#| rx#kdyh#dqvz hugh#| hv/#w#
txhwlrq#; +d, #leryh/#kdyh#| rx#ryhufrp h#kh#suhvxp swlrq#kdw#| rx#duh#grw#
rshudwlrqd#| lqghshqghqw#suxvdqw#wr#lxch#539+7, 0+5, +g, +8, , #iurp #kh#related person
dgg#kxv#duh#grw#htxlyhg#wr#rewdlq#d#xusulv#h#{dp lqdwlrq#iru#| rxu#clients' ixqgv#ru#
vhfxulhv#kdw#duh#p dlqdlqhg#d#wkh#related personB#

+f, # Li#| rx#kdyh#dqvz hugh#| hv#wr#txhwlrq#; 1+d, #leryh/#surylgh#kh#rfdwlrq#r i#kh#related
person's riilfh#uhvsrqvledh#ru#custody ri#| rxu#clients' dvvhw=#

Qxp eh#dqg#Vwuhw#5=

Qxp eh#dqg#Vwuhw#5=

F lw|=

Vwdh=

Frqxw|=

] IS. 72Srvwd#F rgh=

Li#k lv#dgguhvv#lv#d#sulydwh#uhvlghqfh/#fkhfn#k lv#er { =# ☐

Yes No

<1# +d,# Li#kch#*related person* lv#dq#qyhwv hqw#dgylvhu/#lv#lwh{hp sw#iurp #uhj lvudwlrqB#
 +e,# Li#kch#dqvz hu#lv#| hv/#xqghu#z kdwh#h{hp swlrqB

431# +d,# Lv#kch#*related person* uhj lvwhung#z wk#d#*foreign financial regulatory authority* B#
 +e,# Li#kch#dqvz hu#lv#| hv/#lv#kch#qdp h#dgg#frxqwu|/#q#Iqj dvk/#r i#hdfk#*foreign financial regulatory authority* z wk#z klfk#kch#*related person* lv#uhj lvwhung1
 Qr#Qirup dwlrq#I lhg

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

451#Gr#| rx#dgg#kch#*related person* vkduh#kch#vdp h#sk| vlfdd#rfdwlrqB#

41###Ohjd#Q dp h#r i#*Related Person*=#
 VD JHSR IQW#I IQDQ FIDO/#Q F1

51# Su#p du| #xv#lghvv#Q dp h#r i#*Related Person*=#
 VD JHSR IQW#I IQDQ FIDO/#Q F1

61# *Related Person's* VHF#I l#h#Qxp eh#u#l#dq| ,#h1j1/#; 340/#; 0/#; 990/#; 350,#
 ; 34 0 97 : 54
 ru#
 R wkh#

71# *Related Person's CRD* Qxp eh#u#l#dq| ,=
 466 : 96

81# *Related Person* lv=#fkhn#l#kdw#lssq| ,#

+d,###☒ ###eurnhu0ghddu/#p xq lflsdd#vhfxulwlv#ghddu/#ru#j ryhuqp hqw#vhfxulwlv#eurnhu#ru#ghddu#
 +e,# ☒ ###rwhu#qyhwv hqw#dgylvhu#lqfoxglqj #ilqdgfld#sdlqghuv,#
 +f,# ☐ uhj lvwhung#p xq lflsdd#dgylvru#
 +g,# ☐ uhj lvwhung#vhfxulw| 0edvhg#vz ds#ghddu#
 +h,# ☐ p dnu#vhfxulw| 0edvhg#vz ds#sduwflsdqw#
 +i,# ☐ ###frp p rg lw| #srrd#rshudwru#ru#frp p rg lw| #udglqj #dgylvru#z khwkh#uhj lvwhung#ru#h{hp sw#
 iurp #uhj lvudwlrq,#
 +j,# ☐ ixwuhv#frp p lvlrq#p hufkdqw#
 +k,# ☐ edqnlqj#ru#kuliw#lqvwlwlrq#
 +l,# ☐ wxvw#frp sdq| #
 +m,# ☐ dffrxqwdqw#ru#lffrxqwlqj#ilp #
 +n,# ☐ dlz | hu#ru#dlz #ilp #
 +o,# ☒ lqvudqfh#frp sdq| #ru#dljhqf| #
 +p ,# ☒ shqvlrq#frqvxdqw#
 +q,# ☐ ###uhdghvwdw#eurnhu#ru#ghddu#
 +r,# ☐ vsrqvru#ru#v| qglfdwru#r i#dp lhg#sduwghuvklsv#ru#ntxlyddqw,#h{foxglqj #srrdng#qyhwv hqw#
 yhk lfdv#

+s, # <input type="checkbox"/> ###vsrqvru/#j hghud#sduqhu/#p dgdj lqj #p hp eh#ru#htxlyddqg, #ri#srrdg#lqyhvp hqw#ykh fchv#	Yes	No
91# Gr# rx#control ru#duh# rx#controlled e #kh#related personB#	<input type="radio"/>	<input checked="" type="radio"/>
: 1# Duh# rx#dgg#kh#related person xqghu#frp p rq#controlB#	<input checked="" type="radio"/>	<input type="radio"/>
; 1# +d, # Grhv#kh#related person dfw#lv#d#t xddilhg#fxvrgldq#iru# rxu#clients lq#frqghfwlrq#z lk# dgylvru #huylfhv# rx#surylgh#wr#clientsB	<input type="radio"/>	<input checked="" type="radio"/>
+e, # Li# rx#duh#uhj lvhuqj #ru#uhj lvhuqg#z lk#kh#VHF#dgg# rx#kdyh#dqvz hugh# hv/#wr# txhvwlrq#; +d, #deryh/#kdyh# rx#ryhufrp h#kh#suhvxp swlrq#kdw# rx#duh#grw# rshudwlrqd# lqghshqghq#suxvxdqg#wr#lxch#539+7,0+5,+g,+8,,#urp #kh#related person dgg#kxv#duh#grw#htxlyhg#wr#redlq#d#vxusulyh#h{dp lqdwlrq#iru# rxu#clients' ixqgv#ru# vhfuxlvhv#kdw#duh#p dlqdlqhg#d#wkh#related personB#	<input type="radio"/>	<input type="radio"/>
+f, # Li# rx#kdyh#dqvz hugh# hv#wr#txhvwlrq#; 1+d, #deryh/#surylgh#kh#rfdwlrq#i#kh#related person's riilfh#uhvsrqvled#iru#custody ri# rxu#clients' dvvhw=# Qxp eh#dgg#Vwuhw#=# Qxp eh#dgg#Vwuhw#5= F lw#=# Vwdwh#=# Frxqwl#=#] IS. 72Srvwd#F rgh=# Li#k lv#dgguhvv#lv#d#sulydwh#uhvlgqfh/#fkhfn#k lv#er { =# <input type="checkbox"/>		
< 1# +d, # Li#kh#related person lv#dq#lqyhvp hqw#dgylvhu/#lv#lv#h{hp sw#urp #uhj lvudwlrqB#	Yes	No
+e, # Li#kh#dqvz hu#lv# hv/#xqghu#z kdw#h{hp swlrqB	<input type="radio"/>	<input checked="" type="radio"/>
43 1# +d, # Lv#kh#related person uhj lvhuqg#z lk#d#foreign financial regulatory authority B#	<input type="radio"/>	<input checked="" type="radio"/>
+e, # Li#kh#dqvz hu#lv# hv/#lv#kh#qdp h#dgg#Frqxwl#/#q#iqj dvk/#r i#hdfk#foreign financial regulatory authority z lk#z klfk#kh#related person lv#uhj lvhuqg1 Qr#Lqirup dwlrq#I lhg		
44 1# Gr# rx#dgg#kh#related person vkduh#d #supervised personsB#	<input type="radio"/>	<input checked="" type="radio"/>
45 1# Gr# rx#dgg#kh#related person vkduh#kh#vdp h#sk vlfcd#rfdwlrqB#	<input type="radio"/>	<input checked="" type="radio"/>

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

WKH#Q LWHG #WWDWHV#OLIH#Q V X U D Q F H #F R P S D Q \ #Q #W K H #F I W \ #R I #Q H Z # \ R U N

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

WKH#Q LWHG #WWDWHV#OLIH#Q V X U D Q F H #F R P S D Q \ #Q #W K H #F I W \ #R I #Q H Z # \ R U N

61# Related Person's VHF #I lhg#Q xp eh#Li#d | , #h1j 1/#; 340/#; 0/#; 990/#; 350, #

0

ru#

R wkh#

71# Related Person's CRD Qxp eh#Li#d | , =

81# *Related Person* lv=#fkhfn#dcl#wkdw#dssq|,#
 +d,###☐ ###eurnhu0ghddu#p xqlfisdclvhfxulvhw#ghddu#ru#j ryhuq hqw#vhfxulvhw#eurnhu#ru#ghddu#
 +e,# ☐ ###rwxhu#qyhwv hqw#dgylvhu#lqfoxglqj#lqdgfldclsdqghu#
 +f,# ☐ uhjlvhuhg#p xqlfisdcldgylvru#
 +g,# ☐ uhjlvhuhg#vhfxulv|0edvhg#vz ds#ghddu#
 +h,# ☐ ###p dmr#vhfxulv|0edvhg#vz ds#sdwiflsdqw#
 +i,# ☐ ###frp p rgw|#srrd#rshudwru#ru#frp p rgw|#wdglqj#dgylvru#z khwku#uhjlvhuhg#ru#h{hp sw#
 iurp #uhjlvudwlrq,#
 +j,# ☐ ixwuhv#frp p lvlrq#p hufkdqw#
 +k,# ☐ edqnqj#ru#kuliw#lqvwlxwlrq#
 +l,# ☐ wuxv#frp sdq|#
 +m,# ☐ dffrxqwdqw#ru#dffrxqwlqj#ilp #
 +n,# ☐ clz |hu#ru#clz #ilp #
 +o,☒ lqvudqfh#frp sdq|#ru#djhqf|#
 +p,# ☐ shqvlrq#frqvxdqw#
 +q,# ☐ ###uhdc#hvwclw#eurnhu#ru#ghddu#
 +r,# ☐ vsrqvru#ru#v|qglfdwru#ru#p lwhg#sdwghuwlsv#ru#ntxlyddqg,#h{foxglqj#srrd#qyhwv hqw#
 yhkldhv#
 +s,# ☐ ###vsrqvru#hghudclsdwghu#p dgdj lqj#p hp eh#ru#ntxlyddqg,#ri#srrd#qyhwv hqw#yhkldhv#

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#lv#dcl#xddlhg#fxvrgldq#iru#|rxu#clients lq#frqghfwlrq#z lk#
 dgylvru|vhuylfhw#|rx#surylgh#wr#clientsB

☐ ☐

+e,# Li#|rx#duh#uhjlvhuqj#ru#uhjlvhuq#z lk#kh#VHF#dgg#|rx#kdyh#dqvz hung#h|hv/#wr#
 txhvwlrq#;+d,#deryh/#kdyh#|rx#ryhufrp h#kh#suhvxp swlrq#kdw#|rx#duh#qrw#
 rshudwlrqdcl#lqghshqghq#w#sxvxdqw#wr#uxcl#539+7,0+5,+g,+8,,#iurp #kh#related person
 dgg#kxv#duh#qrw#ntxlyhg#wr#rewdcl#d#xusubh#h{dp lqdwlrq#iru#|rxu#clients' ixqgv#ru#
 vhfxulvhw#kdw#duh#p dlqwdlqhg#d#wkh#related personB#

☐ ☐

+f,# Li#|rx#kdyh#dqvz hung#h|hv#wr#txhvwlrq#;1+d,#deryh/#surylgh#kh#rfdwlrq#ri#kh#related
 person's riilfh#uhvsrqvlecl#ru#custody ri#|rxu#clients' dvvhw=#

Qxp eh#dgg#Vwhhw#1=

Qxp eh#dgg#Vwhhw#5=

Fw|=

Vwdw#

Frqxw|=

]LS.72Srvwdcl#rgh=

Li#k lv#dgguhvv#lv#dcl#sulydwh#uhvlgqhfh/#fkhfn#k lv#er {=☐

Yes No

<1# +d,# Li#kh#related person lv#dcl#qyhwv hqw#dgylvhu#lv#lvh{hp sw#iurp #uhjlvudwlrqB#

☐ ☐

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

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

☐ ☐

+e,# Li#kh#dqvz hu#lv#|hv/#lv#kh#dcl#h#dgg#frqxw#|lq#lqj#dvk/#ri#hdfk#foreign financial regulatory
 authority z lk#z klfk#kh#related person lv#uhjlvhuq#l

Qr#lqirup dwlrq#l lhg

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

☐ ☐

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



41###OhjdQ dp h#r i#Related Person=#

WKH#YDUIDEOH#DQQXLW\#DLIH#QVXUDQFH#RPSDQ\

51# Su#p du|#Exvlghvv#Q dp h#r i#Related Person=#

WKH#YDUIDEOH#DQQXLW\#DLIH#QVXUDQFH#RPSDQ\

61# Related Person's VHF#l#h#Qxp eh#l#l#lq|, #h1j1/#; 340/#; 0/#; 990/#; 350,#

; 34 0 ; 46 ;

ru#

Rwkh#

71# Related Person's CRD Qxp eh#l#l#lq|, =

437894

81# Related Person lv=#fkhfn#d#kdw#lssq|, #

+d,### ☐ ###eurnhu0ghdnu/#p xqlfisdq#vhfxulwlv#ghdnu/#ru#jryhupp hqw#vhfxulwlv#eurnhu#ru#ghdnu#

+e,# ☒ ###rwkh#lqyhvp hqw#dgylvhu#lqfoxglqj#lqdgfld#sdlqghuv,#

+f,# ☐ uhjlvhuhg#p xqlfisdq#dgylvru#

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

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

+i,# ☐ ###frp p rg lw|#srrc#rshudwru#ru#frp p rg lw|#wudglqj#dgylvru#z khwkh#uhjlvhuhg#ru#h{hp sw#
iurp #uhjlvudwlrq,#

+j,# ☐ ixwuhv#frp p lvlrq#p hufkdqw#

+k,# ☐ edqnlqj#ru#kuliw#lqvwlxwlrq#

+l,# ☐ wxvw#frp sdq|#

+m,# ☐ dffrxqwdqw#ru#lffrxqwlqj#lup #

+n,# ☐ dz|h#ru#dz#lup #

+o,# ☒ lqvxdqfh#frp sdq|#ru#lqhgf|#

+p ,# ☐ shqvlrq#frqvxdqw#

+q,# ☐ ###uhdghvwdw#eurnhu#ru#ghdnu#

+r,# ☐ vsrqvru#ru#v|qglfdwru#r i#p lhg#sduqhuvklsv#ru#htxlyddqw,#h{foxglqj#srrdgh#lqyhvp hqw#
yhlfdv#

+s,# ☐ ###vsrqvru/#jhghud#sduqhu/#p dgdjlqj#p hp eh#ru#htxlyddqw,#r i#srrdgh#lqyhvp hqw#yhlfdv#

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#lv#i#t#xddilhg#fxvrgldq#iru#| rxu#clients lq#Erqghfwlrq#z lk#
dgylvru|#huylfhv#| rx#surylgh#wr#clientsB



+e,#



Li# rx#duh#uhj lwuhug# ru#uhj lwuhug#z lw#kxh#VHF#dqg# rx#kdyh#dqvz hung#E hv/S#wr# txhvwlrq#; +d, #deryh/#kdyh# rx#ryhufp h#kxh#suhvxp swlrq#kdw# rx#duh#qrw# rshudwlrqd# dgghshqghq#sxuvxdq#w#xch#539+7,0+5,+g,+8,,#urp #kxh#related person dgg#kxv#duh#qrw#uhx#lhq#w#rewdlq#d#xusubh#h{dp lqdwlrq#iru# rxu#clients' ixqgv#ru# vxfxulwlv#wkdw#duh#p dlqwdlqhg#dw#wkxh#related personB#	
+f, # Li# rx#kdyh#dqvz hung#% hv#wr#t#xhvwlrq#; 1+d, #deryh/#surylgh#kxh#rfdwlrq#r i#wkxh#related person's riilfh#uhvsrqvledh#iru#custody ri# rxu#clients' dvvhw=# Qxp ehudqg#Vwuhhw#1= Qxp ehudqg#Vwuhhw#5= F lw = Vwdwh= Frxqwl=] LS. 72Srvwd#F rgh= Li#wk lv#dgguhvv#lv#d#sulydwh#uhvlgqhfh/#fkhn#kxh#er { =#	
<1# +d, # Li#wkxh#related person lw#dq#qyhwv# hq#wdgylvhu/#lv#lw#h{hp sw#urp #uhj lwudwlrqB# +e, # Li#wkxh#dqvz hu#lv# hv/#xqghu#z kdw#h{hp swlrqB	Yes No <input type="radio"/> <input checked="" type="radio"/>
431# +d, # Lv#wkxh#related person uhj lwuhug#z lw#d#foreign financial regulatory authority B# +e, # Li#wkxh#dqvz hu#lv# hv/#lv#wkxh#qdp h#dqg#frxqwl/#dq#Iqj dvk/#r i#hdfk#foreign financial regulatory authority z lw#z klfk#wkxh#related person lv#uhj lwuhug1 Qr#qirup dwlrq#I lhg	<input type="radio"/> <input checked="" type="radio"/>
441#Gr# rx#dqg#wkxh#related person vkduh#dq #supervised personsB#	<input checked="" type="radio"/> <input type="radio"/>
451#Gr# rx#dqg#wkxh#related person vkduh#wkxh#vdp h#sk vlfdd#rfdwlrqB#	<input checked="" type="radio"/> <input type="radio"/>

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

YDOLF#IIQDQFIDO#DGYLVRUV/#QF1

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

YDOLF#IIQDQFIDO#DGYLVRUV/#QF1

61# Related Person's VHF#I lkh#Qxp ehud#li#dq| ,#h1j1/#; 340/#; 0/#; 990/#; 350,#
; 34 087<85

ru#

Rwkh#

71# Related Person's CRD Qxp ehud#li#dq| ,=

75;36

81# Related Person lv=#fkhn#id#wkdw#dssq| ,#

+d, ###☒ ###eurnhu0ghddu/#p xqlfisd#vxfxulwlv#ghddu/#ru#j ryhuq# hq#wvxfxulwlv#eurnhu#ru#ghddu#+e, # ☒ ###rwkh#qyhwv# hq#wdgylvhu#lqfoxglj#lqdgfld#sdlqghuv,#+f, # ☐ uhj lwuhug#p xqlfisd#dgylvru#+g, # ☐ uhj lwuhug#vxfxulw| Oedvhg#vz ds#ghddu#+h, # ☐ ###p dmru#vxfxulw| Oedvhg#vz ds#sdwlfisdq#+i, # ☐ ###Erp p rgwl#srrd#rshudwru#ru#Erp p rgwl#wudglj#dgylvru#z khwkh#uhj lwuhug#ru#h{hp sw#
urp #uhj lwudwlrq,#

+j, # ☐ ixwuhv#frp p lvlrq#p hufkdqg#
 +k, # ☐ edqnlqj #ru#kuliw#lqvwlxwlrq#
 +l, # ☐ wxvw#frp sdq | #
 +m, # ☐ dffrxqwdqg#ru#dffrxqwlqj #ilp #
 +n, # ☐ ødz | hu#ru#ødz #ilp #
 +o, # ☐ lqvxdqf#frp sdq | #ru#ljjhgf | #
 +p, # ☐ shqvlrq#frqvxdqg#
 +q, # ☐ ###uhdghvwdwh#eurnhu#ru#gghdnu#
 +r, # ☐ vsrqvru#ru#v|qgldwru#ri#dp lhg#sduqhu#klsv#ru#ntxlyddqg,/#h{foxglj#srrdng#lqyhvvp hqg#
 yhkldhv#
 +s, # ☐ ###vsrqvru/#jhghudghsduqhu/#p dqdjlqj #p hp eh#ru#ntxlyddqg,/#ri#srrdng#lqyhvvp hqg#yhkldhv#

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#lv#d#txddilhg#fxvrgldq#iru#|rxu#clients lq#frqghfwlrq#z lk#
 dgylvru| #huylfhv#|rx#surylgh#wr#clientsB

☐ ☒

+e, # Li#|rx#duh#uhj lvwhulqj #ru#uhj lvwhung#z lk#kh#VHF #dgg#|rx#kdyh#ldqvz hung#E|hv/#wr#
 txhvwlrq#; +d, #leryh/#kdyh#|rx#ryhufp h#kh#suhvxp swlrq#kdw#|rx#duh#qrw#
 rshudwlrqdø #lqghshqghqg#sxvxdqg#wr#lxch#539+7,0+5,+g,+8,,#hwrp #kh#related person
 dgg#kxv#duh#qrw#hntx lhg#wr#rewldq#d#xusulv#h#h{dp lqdwlrq#iru#|rxu#clients' ixqgv#ru#
 vhfexulwhv#kdw#duh#p dldwldqhg#d#wkh#related personB#

☐ ☐

+f, # Li#|rx#kdyh#ldqvz hung#E|hv#wr#txhvwlrq#; 1+d, #leryh/#surylgh#kh#rfdwlrq#ri#kh#related
 person's riilfh#uhvsrqvledh#iru#custody ri#|rxu#clients' dvvhw=#

Qxp eh#dgg#Vwhhw#1=

Qxp eh#dgg#Vwhhw#5=

Fw|=

Vwdwh=

Frqxw|=

] IS. 72Srvwd#Frgh=

Li#k lv#dgguhvv#lv#d#sulydwh#uhvlgghqf#/#kfhfn#k lv#er {=#☐

Yes No

< 1# +d, # Li#kh#related person lvldq#lqyhvvp hqg#dgylvhu/#lv#lv#h{hp sw#hwrp #uhj lvwdwlrqB#

☐ ☒

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

43 1#+d, # Lv#kh#related person uhj lvwhung#z lk#d#foreign financial regulatory authority B#

☐ ☒

+e, # Li#kh#ldqvz hu#lv#|hv/#lv#kh#ldp h#dgg#frxqwl/#lq#lqj dvk/#ri#hdfk#foreign financial regulatory
 authority z lk#z klfk#kh#related person lvuhj lvwhung1

Qr#lqirup dwlrq#l lhg

44 1#Gr#|rx#dgg#kh#related person vkduh#dql|#supervised personsB#

☐ ☒

45 1#Gr#|rx#dgg#kh#related person vkduh#kh#vdp h#sk|vldgh#rfdwlrqB#

☐ ☒

41###OhjddQdp h#ri#Related Person=#

YIVIRQ5353#Z HDOWK#P DQDJHP HQW#FRUS1

51# Sub du| #xvlg hvv#Q dp h#i#*Related Person*=#
YLVIRQ5353#Z HDOWK#P DQDJHP HQW#FRUS1

61# *Related Person's* VHF#Lh#Qxp eh#Li#dq|, #hlj1/#; 340/#; 0/#; 990/#; 350,#
; 34 0 :4874
ru#
Rwku#

71# *Related Person's* CRD Qxp eh#Li#dq|, =
48747<

81# *Related Person* lv=#fkhn#id#kdw#lssq|, #
+d,### ☐ ##urnhu0ghdnu/#p xqlflsd#vhfxulhv#ghdnu/#ru#j ryhuqp hqw#vhfxulhv#urnhu#ru#ghdnu#
+e, # ☒ ##rwku#qyhw#p hqw#dgylvhu#lqfoxglqj #lqdfld#saiqghuv, #
+f, # ☐ uhjlvhu#p xqlflsd#dgylvru#
+g, # ☐ uhjlvhu#vhfxul#0edvhg#vz ds#ghdnu#
+h, # ☐ ##p dnu#vhfxul#0edvhg#vz ds#sdwflsdqw#
+i, # ☐ ##frp p rgw|#srrd#rshudru#ru#frp p rgw|#wdglqj #dgylvru#z khwku#uhjlvhu#ru#{hp sw#
iurp #uhjlvudwlrq, #
+j, # ☐ ixwuhv#frp p lvlrq#p hufkdqw#
+k, # ☐ edqnlqj #ru#kuliw#qvwlxwlrq#
+l, # ☐ wxvw#frp sdq| #
+m, # ☐ dffrxqwdqw#ru#dffrxqwdqj #lup #
+n, # ☐ alz |hu#ru#alz #lup #
+o, # ☐ lqvxdqfh#frp sdq| #ru#djhqf| #
+p, # ☐ shqvlrq#frqvxdq#
+q, # ☐ ##und#hvwdh#urnhu#ru#ghdnu#
+r, # ☐ vsrqvru#ru#|qglfdwru#i#dp lhg#sdwghuvk lsv#ru#htxlyddqw, /#n { foxglqj #srrdng#qyhw#p hqw#
yhklfdv#
+s, # ☐ ##vsrqvru/#jhghud#sdwghu#p dqdj lqj#p hp eh#ru#htxlyddqw, #ri#srrdng#qyhw#p hqw#yhklfdv#

Yes No

91# Gr#| rx#control ru#duh#| rx#controlled e| #kh#*related person*B#

☐ ☒

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

☒ ☐

; 1# +d, # Grhv#kh#*related person* dfw#lv#d#txddilhg#fxvrgldq#iru#| rxu#clients lq#frqghfwlrq#z lk#
dgylvru| #huylfhv#| rx#surylgh#w#clientsB

☐ ☒

+e, # Li#| rx#duh#uhjlvhu#lqj #ru#uhjlvhu#z lk#kh#VHF#dqg#| rx#kdyh#dqvz hugh#E| hv/#w#
txhvwlrq#; +d, #deryh/#kdyh#| rx#ryhufrp h#kh#suhvxp swlrq#kdw#| rx#duh#qrw#
rshudwlrqd#| #lqghshqghq#suxvxdq#w#r#xch#539+7, 0+5, +g, +8, , #iurp #kh#*related person*
dqg#kxv#duh#qrw#htxlvhg#w#redlq#d#vxusulh#n { dp lqdwlrq#iru#| rxu#clients' ixqgvru#
vhfxulhv#kdw#duh#p dlqwdlqhg#dw#kh#*related person*B#

☐ ☐

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

Qxp eh#dqg#Vwhhw#F=

Qxp eh#dqg#Vwhhw#F=

F lw|=

Vwdh=

Frqxw|=

] IS. 72Srvwd#rgh=

	Yes	No
1# +d,# Li#k#l#dgguhvv#l#d#sulydwh#uhvlgqhfh/#fkhfn#k#l#er {= <input type="checkbox"/>	<input type="radio"/>	<input checked="" type="radio"/>
<1# +d,# Li#k#h#related person lv#dq#lqyhvvp hqw#dgylvhu/#lv#l#h{hp sw#iurp #uhj lvudwlrqB# +e,# Li#k#h#dqvz hu#lv# hv/#xqghu#z kdwh#h{hp swlrqB	<input type="radio"/>	<input checked="" type="radio"/>
431# +d,# Lv#k#h#related person uhj lvwhung#z k#d#foreign financial regulatory authority B# +e,# Li#k#h#dqvz hu#lv# hv/#lv#k#h#qdp h#dqg#frxqwu /#lq#lqj dvk/#r i#hdfk#foreign financial regulatory authority z k#z klfk#k#h#related person lv#uhj lvwhung1 Q r#lqirup dwlrq#l lhg	<input type="radio"/>	<input checked="" type="radio"/>
441#Gr# rx#dqg#k#h#related person vkduh#dq #supervised personsB#	<input type="radio"/>	<input checked="" type="radio"/>
451#Gr# rx#dqg#k#h#related person vkduh#k#h#vdp h#sk vlfdd#rfdwlrqB#	<input type="radio"/>	<input checked="" type="radio"/>

41###OhjdQ dp h#r i#Related Person=#
 Z RRGEXU\#LIQDQFIDO#HUYLFHV/#QF1

51# Sup du|E xvlqhv#Q dp h#r i#Related Person=#
 Z RRGEXU\#LIQDQFIDO#HUYLFHV/#QF1

61# Related Person's VHF#l#h#Qxp eh#l#dq| ,#h1j1/#; 340/#; 0/#; 990/#; 350,#
 ; 34 087<38
 ru#
 Rwkhu#

71# Related Person's CRD Qxp eh#l#dq| ,=
 754

81# Related Person lv=#fkhfn#l#k#dw#lssq| ,#
 +d,###☒ ###eurnhu0ghdnu/#p xqlflsdd#vhfxulwlv#ghdnu/#ru#j ryhuqp hqw#vhfxulwlv#eurnhu#ru#ghdnu#
 +e,# ☒ ###rkwhu#lqyhvvp hqw#dgylvhu#lqfoxglqj #lqdgfld#s alqghuv,#
 +f,# ☐ uhj lvwhung#p xqlflsdd#dgylvru#
 +g,# ☐ uhj lvwhung#vhfxulw| 0edvhg#vz ds#ghdnu#
 +h,# ☐ ###p dmru#vhfxulw| 0edvhg#vz ds#sduwflsdqw#
 +i,# ☐ ###frp p rg lw| #rrr#rshudwru#ru#frp p rg lw| #wdglqj #dgylvru#z khwkhu#uhj lvwhung#ru#h{hp sw#
 iurp #uhj lvudwlrq,#
 +j,# ☐ ixwuhv#frp p lvlrq#p hufkdqw#
 +k,# ☐ edqnlqj#ru#kuliw#lqvwlxwlrq#
 +l,# ☐ wxvw#frp sdq| #
 +m,# ☐ dffrxqwdqw#ru#lffrxqwlqj#lup #
 +n,# ☐ alz | hu#ru#alz #lup #
 +o,# ☒ lqvudqfh#frp sdq| #ru#ljjhgf| #
 +p ,# ☒ shqvlrq#frqvxdqw#
 +q,# ☐ ###uhdghvwdwh#eurnhu#ru#ghdnu#

+r,#	<input type="checkbox"/>	vsrqvru#ru# qgldwru#i#dp lhg#sduqhuvk lsv#ru#htxlyddqg,#h{foxglj#srrdng#qyhwv hqw# yhkldv#		
+s,#	<input type="checkbox"/>	###vsrqvru/#j hghud#sduqhu/#p dgdj lqj #p hp eh#ru#htxlyddqg,#ri#srrdng#qyhwv hqw# yhkldv#		
			Yes	No
91#	Gr#	rx#control ru#duh# rx#controlled e #kh#related personB#	<input type="radio"/>	<input checked="" type="radio"/>
:	1#	Duh# rx#dgg#kh#related person xqghu#frp p rq#controlB#	<input checked="" type="radio"/>	<input type="radio"/>
;	1#	+d,# Grhv#kh#related person dfw#dv#d#xddilhg#fxvrgldq#iru# rxu#clients lq#frqghfwlq#z lk# dgylvru #huylfhv# rx#surylgh#w#clientsB	<input type="radio"/>	<input checked="" type="radio"/>
+e,#	Li#	rx#duh#uhj lvwhulqj #ru#uhj lvwhung#z lk#kh#VHF#dgg# rx#kdyh#dqvz hung#E hv/#w# t xhwlrq#; +d,#leryh/#kdyh# rx#ryhufp h#kh#suhvxp swlrq#kdw# rx#duh#qrw# rshudwlrqd# #lqghshqghqw#sxuxdqw#w#lxch#539+7,0+5,+g,+8,,#hup #kh#related person dgg#kxv#duh#qrw#htx lhg#w#rewldq#d#xusulv#h# {dp lqdwlrq#iru# rxu#clients' ixqgv#ru# vhf xulvhw#kdw#duh#p d lqwdlqhg#d#kh#related personB#	<input type="radio"/>	<input type="radio"/>
+f,#	Li#	rx#kdyh#dqvz hung# hv#w#t xhwlrq#; 1+d,#leryh/#surylgh#kh#rfdwlrq#i#kh#related person's riilfh#hvsrqvled#iru#custody ri# rxu#clients' dvvhw=# Qxp eh#dgg#Vwuhw#1= Qxp eh#dgg#Vwuhw#5= Fw = Vwdw# Frxqw =] IS. 72Srvwd#F rgh= Li#k lv#dgguhvv#lv#d#sulydwh#hvlghqfh/#fkhfn#k lv#er {= <input type="checkbox"/>		
			Yes	No
<1#	+d,#	Li#kh#related person lv#dq#lqyhwv hqw#dgylvhu/#lv#w# {hp sw#hup #uhj lvwdwlrqB#	<input type="radio"/>	<input checked="" type="radio"/>
+e,#	Li#	kh#dqvz hu#lv# hv/#xqghu#z kdw#h {hp swlrqB		
431#	+d,#	Lv#kh#related person uhj lvwhung#z lk#d#foreign financial regulatory authority B#	<input type="radio"/>	<input checked="" type="radio"/>
+e,#	Li#	kh#dqvz hu#lv# hv/#lv#kh#qdp h#dgg#frxqw /#lq#lqj dvk/#ri#hdfk#foreign financial regulatory authority z lk#z klfk#kh#related person lv#uhj lvwhung1 Qr#Qirup dwlrq#l lhg		
441#	Gr#	rx#dgg#kh#related person vkduh#dq #supervised personsB#	<input type="radio"/>	<input checked="" type="radio"/>
451#	Gr#	rx#dgg#kh#related person vkduh#kh#vdp h#sk vlfdd#rfdwlrqB#	<input type="radio"/>	<input checked="" type="radio"/>

SECTION 7.B.(1) Private Fund Reporting

D1#SULYDWH#IXQG#

Information About the Private Fund

41# +d,#Qdp h#ri#kh#private fund=#

VXQDP HUIFD#DOWHUQDWLYH#WUDWHJ LHV#FD\PDQ#IXQG#OWG1

+e,#Private fund lghqwlldwlrq#qxp eh#

+lfoxgh#kh#;380#suhil{ #dovr,#

;38075:8;<<93:

51# Xqghu#kch#dz v#r i#z kdw#vwdh#ru#frxqwu| #v#kch#private fund rujdqj]hg=#

Vwdh=#

Frqxwu|=#

FD\PDQ#VODQGV

61 Qdp h+v, #r i#J hqhud#Sduwghu/#P dqdjhu/#Wuxvnh/#ru#G lhfwrw#ru#shuvrqv#vhuylqj #q#d#v#p ldu#
fdfsdfw|,=#

Name of General Partner, Manager, Trustee, or Director
MR KQ #WKR P DV #J HQR \
SHWHU #DOOHQ #KDUEHFN

71# Wkh#private fund +fkhn#d#kdw#dssq >#| rx#p xvw#fkhn#dw#ndv#rgh,=#

☐ ##4, #cxdilhv#iru#kch# {foxvrlq#iurp #kch#gihlqlwlrq#r i#qyhvwp hqw#frp sdq| #xqghu#vhfwlrq#6+f,+4, #
r i#kch#qyhvwp hqw#frp sdq| #Dfw#r i#1<73#

☒ ##5, #cxdilhv#iru#kch# {foxvrlq#iurp #kch#gihlqlwlrq#r i#qyhvwp hqw#frp sdq| #xqghu#vhfwlrq#6+f,+:, #
r i#kch#qyhvwp hqw#frp sdq| #Dfw#r i#1<73#

81 Olw#kch#qdp h#dqg#frxqwu| /#q#Iqj dvk /#r i#ndfk#foreign financial regulatory authority z lk#z klfk#kch#
private fund lv#hj lv#hng1#

Q r#Lqirup dwlrq#I lhg

Yes No

91 +d, #lv#kch#l#p dvw#ixqg%#q#d#p dvw#0ihghu#duudqjhp hqwB#

☐ ☒

+e, #Li#| hv/#z kdw#lv#kch#qdp h#dqg#private fund lghqwlilfdwlrq#qxp eh#Li#dq|, #r i#kch#ihghu#ixqgv#
lqyhvwqj #q#kch#private fundB#

Q r#Lqirup dwlrq#I lhg

Yes No

+f, #lv#kch#l#p ihghu#ixqg%#q#d#p dvw#0ihghu#duudqjhp hqwB#

☐ ☒

+g, #Li#| hv/#z kdw#lv#kch#qdp h#dqg#private fund lghqwlilfdwlrq#qxp eh#Li#dq|, #r i#kch#p dvw#ixqg%#q#
z klfk#kch#private fund lqyhvwB#

Qdp h#r i#kch#Private Fund=#

Private Fund lghqwlilfdwlrq#Qxp eh=#

+lqfoxgh#kch#%;380%#suhil{ #dovr, #

QRWH=#\rx#p xvw#frp sdwh#txhvwrq#9#iru#ndfk#p dvw#0ihghu#duudqjhp hqw#hj dugdvv#r i#z khwku#
| rx#duh#lqj #d#v#lqj#V fkhgxd#G /#Vhfwrq#: 1E1+4, #iru#kch#p dvw#0ihghu#duudqjhp hqw#ru#hsrwqj#
rq#kch#ixqgv#vhsdudwhq l#

:1 Li#| rx#duh#lqj #d#v#lqj#V fkhgxd#G /#Vhfwrq#: 1E1+4, #iru#d#p dvw#0ihghu#duudqjhp hqw#dffrug lqj #wz#
kch#qvwuxfwlrqv#wz#kch#Vhfwrq#: 1E1+4, /#iru#ndfk#r i#kch#ihghu#ixqgv#dqvz hu#kch#ir#z lqj#

txhvwrqv=#

Q r#Lqirup dwlrq#I lhg

QRWH=#Iru#sxusrvhv#i#xhvwlrqv#9#lqg#:/#lq#d#p dvw#u0ihhghu#duuqj#hp hqw/#rqh#ru#p ruh#ixqgv#
 +%ihhghu#ixqgv%,#lqyhvw#d#ru#xevwdqwd#d#d#i#khl#dvvhw#lq#d#v#lqj#d#ixqg#%#p dvw#u#ixqg%,1#D#
 ixqg#z rxqg#d#or#eh#d#i#ihhghu#ixqg#%#lqyhvw#lqj#lq#d#%#p dvw#u#ixqg#%#Iru#sxusrvhv#i#khl#xhvwlrq#d#l#
 lvxhg#p xow#sdh#f#dvvhv#ru#v#hulv,#i#k#duh#ru#lqwhuhvw/#lqg#hd#fk#f#dvv#ru#v#hulv,#lqyhvw#
 vxevwdqwd#d#d#i#khl#dvvhw#lq#d#v#lqj#d#p dvw#u#ixqg#1#

Yes No

;1# +d,#lv#k#lv#private fund d#ixqg#i#ixqgv%B#

☐ ☒

+e,#l#|hv/#grhv#khl#private fund lqyhvw#lq#ixqgv#p dgdjhg#e|#|rx#ru#e|#d#related personB#

☐ ☐

QRWH=#Iru#sxusrvhv#i#khl#xhvwlrq#q#q#/#lqvz#hu#%|hv#%#l#khl#ixqg#lqyhvw#13#shufhqw#ru#p ruh#i#
 lw#w#rd#d#dvvhw#lq#r#khu#s#rrdg#lqyhvw# hqw#y#hk#f#dv/#z khw#khu#ru#lq#r#khl|#duh#d#or#private funds/#ru#
 uhj#lv#uhg#lqyhvw# hqw#f#rp sdq#lv#1#

Yes No

<1# Gxulqj#|rxu#d#lv#l#fd#|hdu/#g#l#khl#private fund lqyhvw#lq#v#fxul#lv#lvxhg#e|#lqyhvw# hqw#

☐ ☒

f#rp sdq#lv#uhj#lv#uhg#xqghu#khl#lqyhvw# hqw#f#rp sdq#|D#f#i#1#<73#r#khu#k#dq#%#p rqh|#

p#dunh#ixqgv#%#r#khl#h{whq#s#ury#lghg#lq#lqv#x#f#wlrq#9#1#1,B#

431#Z kdw#|sh#r#i#ixqg#lv#khl#private fundB#

☐ khgj#h#ixqg ☐ d#x#l#l#|#ixqg ☐ sulydwh#htx#l#|#ixqg ☐ uhd#h#vwdh#ixqg ☐ v#fxul#l#hg#dvvhw#ixqg

☐ yhqw#uh#f#ds#ld#d#ixqg ☒ R#khu#private fundZ KR00\ORZ QHG#VXEVI#IDU\#RI#UHJLVWHUH#
 IQYHVWP HQW#F#RP SDQ\1

QRWH=#Iru#ixqgv#i#ixqgv/#h#ih#r#khl#ixqgv#lq#z#k#f#k#khl#private fund lqyhvw#1#Iru#ghil#l#r#qv#i#
 wkhvh#ixqg#w|#shv/#s#d#dv#v#hh#lqv#x#f#wlrq#9#r#i#khl#lqv#x#f#wlrq#v#r#s#duw#1#D1#

441#F#xuhgw#j#urvv#dvvhw#y#dox#h#i#khl#private fund=#

'#1;/9:5/958

Ownership

451#P l#p xp#lqyhvw# hqw#f#rp p#lv# hqw#uhtx#l#hg#i#lq#lqyhvw#ru#lq#khl#private fund=#

'#3

QRWH=#Uhsruw#khl#d#p rxqw#urxw#lghq#|uhtx#l#hg#i#lqyhvw#ru#v#z#kr#duh#lq#r#w#|rxu#related persons +hyhg#d#i#
 glihuhgw#urp#khl#d#p rxqw#v#h#iruw#lq#khl#ruj#d#l#d#wlrq#d#grf#xp hqw#i#khl#ixqg,1#

461#Dssur{l#p dwh#lq#xp eh#i#khl#private fund*v#ehqhil#f#ld#z#qhuv=#

4

471#Z kdw#lv#khl#dssur{l#p dwh#shufhqw#d#j#h#i#khl#private fund ehqhil#f#ld#z#qh#e|#|rx#d#qg#|rxu#related
 persons=#

3(#

481#Z kdw#lv#khl#dssur{l#p dwh#shufhqw#d#j#h#i#khl#private fund ehqhil#f#ld#z#qh#e#lq#khl#d#j#j#uhj#dwh,#e|#
 ixqgv#i#ixqgv=#

3 (#

491#Z kdw#l#k#h#i#ssur { p dwh#shufhqwdjh#r i#k#h#private fund ehqhilfdd# #rz qhg#e | #grq0United
Statespersons=#

3 (#

Your Advisory Services

Yes No

4 : 1 +d, #Duh# | rx#d#x#edgy#lhu#r#k#l#private fundB#

☐ ☒

+e, #Li#k#h#dqvz hu#r#t#xhvwlrq#4 : +d, #lv#% | hv/%#surylg#h#k#h#qdp h#dgg#VHF #ilh#qxp ehu/#li#d#q | /#r i#k#h#
dgy#lhu#r i#k#h#private fund#Li#k#h#dqvz hu#r#t#xhvwlrq#4 : +d, #lv#%qr /%#hdyh#k#l#t#xhvwlrq#e#dqn1#

Q r#Lqirup dwlrq#I lhg

Yes No

4 ; 1 +d, #G r#d#q | #r#k#h#dgy#lhu#r#dgy#lhu#k#h#private fundB#

☒ ☐

+e, #Li#k#h#dqvz hu#r#t#xhvwlrq#4 ; +d, #lv#% | hv/%#surylg#h#k#h#qdp h#dgg#VHF #ilh#qxp ehu/#li#d#q | /#r i#k#h#
r#k#h#dgy#lhu#r#k#h#private fund#Li#k#h#dqvz hu#r#t#xhvwlrq#4 ; +d, #lv#%qr /%#hdyh#k#l#t#xhvwlrq#
e#dqn1#

Name of Other Adviser to private fund	SEC file number	CRD number
IUDQNOIQ #DOWHUQDWLYH#VWUDWHJLHV#DGYLVHUV/#DOF	; 3409<389	46<7 ; ;

Yes No

4 < 1#Duh# | rxu#clients vrdfwhg#r#dgy#lhu#r#k#h#private fundB#

☐ ☒

531#Dssur { p dwh#shufhqwdjh#r i# | rxu#clients kdvdgyhvwg#q#k#h#private fundB#

4 (#

Private Offering

Yes No

541#G rhv#k#h#private fund unq# #r#q#d#q#h { hp swlrq#lurp #uhj lwudwlrq#r i#lw#vhfxulwlv#xqghu#
Uhjxwlrq#G #r i#k#h#Vhfxulwlv#Dfw#r i#4 < 66B#

☐ ☒

551#Li# | hv/%#surylg#h#k#h#private fund#v#lurp #G #ilh#qxp ehu#li#d#q | ,=#

Q r#Lqirup dwlrq#I lhg

E1#VHUYLFH#SURYIGHUV#

Auditors

Yes No

561#+d, #4, #Duh#k#h#private fund#v#lqdgfld#vwdwhp hqw#v#xerhfw#r#d#q#d#q#x#d#d#xg#l#B#

☒ ☐

+5, #Duh#k#h#lqdgfld#vwdwhp hqw#s#uhsduhg#q#l#ffrugdqf#h#z l#k#X IV1#J DDSB#

☒ ☐

Li#k#h#dqvz hu#r#56+d, #4, #lv#% | hv/%#uhvsrqg#r#t#xhvwlrqv#e, #k#urxjk#i, #eh#az 1#Li#k#h#private
fund xvhw#p ruh#k#d#q#r#q#h#d#x#g#l#q#j#i#l#p /# | rx#p xv#w#f#r#p sdwh#t#xhvwlrqv#e, #k#urxjk#i, #
vhsdudwhq# #iru#h#dfk#d#x#g#l#q#j#i#l#p 1#

Additional Auditor Information : 1 Record(s) Filed.

Li#kh#dqvz hu#r#56+d,+4,#lv#|hv/%#hvsrqg#wr#t#xhvwrqv#e,#kuxjk#i,#h#z 1#Li#kh#
private fund xvhw#p ruh#kdq#qh#dxglwj#ilp /#|rx#p xv#frp sdwh#t#xhvwrqv#e,#
 wkuxjk#i,#vhsdudwhq#iru#hdfk#dxglwj#ilp 1#

+e,#Qdp h#ri#kh#dxglwj#ilp =#

SULFHZ DWHUKRXVHFRRSHUV#OOS

+f,#Wkh#rfdwrq#r#i#kh#dxglwj#ilp *#r#ilfh#hvsrqvledh#iru#kh#*private fund**#dxglw#

+flw|/vwdwh#dqg#frxgw|,=#

F lw|=

Vwdwh=

Frxgw|=

KRXVWRQ

Wh{dv

XQLWHG#WWDWHV

Yes No

+g,#Lv#kh#dxglwj#ilp #dq#*independent public accountant*B#

☒ ☐

+h,#Lv#kh#dxglwj#ilp #hjlvwhung#z lk#kh#Sxedf#Frpsdq|#Dffrxqwlqj#Ryhuwjkw#

☒ ☐

ErdugB#

+i,#Li#|hv%#r#h,#deryh/#lv#kh#dxglwj#ilp #vxenfw#wr#uhjx#du#qvsfwwrq#e|#kh#

☒ ☐

Sxedf#Frpsdq|#Dffrxqwlqj#Ryhuwjkw#Erdug#q#dfrrugdqfh#z lk#lw#uxdhwB#

Yes No

+j,#Duh#kh#*private fund**#dxglwng#ilqdgfld#wdwhp hqwg#jlvwlexwg#wr#kh#*private fund**#

☒ ☐

lqyhvwruvB#

+k,#Grhv#kh#husrw#h#sdug#e|#kh#dxglwj#ilp #frqwdlq#dq#xqtxddilhg#rslqB#

☒ \hv ☐ Qr ☐ Uhsrw#Qrw#\hw#Uhfhyhg

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

Prime Broker

Yes No

571#d,#Grhv#kh#*private fund* xvhw#qh#ru#p ruh#sup h#eurnhuB#

☐ ☒

Li#kh#dqvz hu#r#57+d,#lv#|hv/%#hvsrqg#wr#t#xhvwrqv#e,#kuxjk#h,#h#z #iru#hdfk#sup h#

eurnhu#kh#*private fund* xvhw1#Li#kh#*private fund* xvhw#p ruh#kdq#qh#sup h#eurnhu/#|rx#p xv#

frp sdwh#t#xhvwrqv#e,#kuxjk#h,#vhsdudwhq#iru#hdfk#sup h#eurnhu#

Qr#qirup dwlrq#ilhg

Custodian

Yes No

581#d,#Grhv#kh#*private fund* xvhw#dq|#fxvrgldqv#lqfoxlqj#kh#sup h#eurnhu#dwng#deryh,#

☒ ☐

wr#krog#rhp h#ru#h#i#lw#dvvhwb#

Li#kh#dqvz hu#r#58+d, #v# | hv/%#hvsrqg#r#t#xhvwlrqv#e, #k#urxjk#i, #eh#r#z #iru#hdfk#fxv#rgldq#
 wk#*private fund* xv#v#p ru#h#k#dq#r#q#h#fxv#rgldq/#| rx#p xv#w#frp sd#wh#
 t#xhvwlrqv#e, #k#urxjk#i, #v#hsdudwh#q#iru#hdfk#fxv#rgldq#

Additional Custodian Information : 1 Record(s) Filed.

Li#kh#dqvz hu#r#58+d, #v# | hv/%#hvsrqg#r#t#xhvwlrqv#e, #k#urxjk#i, #eh#r#z #iru#hdfk#
 fxv#rgldq#wk#*private fund* xv#v#p ru#h#k#dq#r#q#h#fxv#rgldq/#| rx#
 p xv#w#frp sd#wh#t#xhvwlrqv#e, #k#urxjk#i, #v#hsdudwh#q#iru#hdfk#fxv#rgldq#

+e, #Ohjd#qdp h#r#i#fxv#rgldq#

VWDWH#WUHHW#EDQN#DQG#WUXVW#FRPSDQ\

+f, #Sup#du| #exv#l#hv#v#qdp h#r#i#fxv#rgldq#

VWDWH#WUHHW#EDQN#DQG#WUXVW#FRPSDQ\

+g, #Wk#h#r#fdwlrq#r#i#kh#fxv#rgldq#v#r#i#lfh#hvsrqv#le#h#ru#*custody* r#i#kh#*private fund*#
 dv#hw#f#l#w#/#w#dw#h#dgg#frxqwu|, =#

F#l#w#

V#dw#h#

Fr#xqwu#

ERVWRQ

Pdvdfkxvhwv

XQLWHG#VWDWHV

Yes No

+h, #Lv#kh#fxv#rgldq#d#*related person* r#i#| rxu#l#p B#

☐ ☒

+i, # Li#kh#fxv#rgldq#v#d#eurnhu0ghddu/#surylgh#l#w#VHF#h#j#lwudwlrq#qxp ehu#l#ldq|, #

0

FUG#Qxp ehu#l#ldq|, =#

Administrator

Yes No

591#+d, #Grh#v#kh#*private fund* xv#h#d#q#dgp l#l#wudwru#r#k#h#k#dq#| rxu#l#p B#

☒ ☐

Li#kh#dqvz hu#r#59+d, #v# | hv/%#hvsrqg#r#t#xhvwlrqv#e, #k#urxjk#i, #eh#r#z 1#Li#kh#*private fund*
 xv#v#p ru#h#k#dq#r#q#h#dgp l#l#wudwru/#| rx#p xv#w#frp sd#wh#t#xhvwlrqv#e, #k#urxjk#i, #v#hsdudwh#q#iru#
 hdfk#dgp l#l#wudwru#

Additional Administrator Information : 1 Record(s) Filed.

Li#kh#dqvz hu#r#59+d, #v# | hv/%#hvsrqg#r#t#xhvwlrqv#e, #k#urxjk#i, #eh#r#z 1#Li#kh#*private fund*
 xv#v#p ru#h#k#dq#r#q#h#dgp l#l#wudwru/#| rx#p xv#w#frp sd#wh#t#xhvwlrqv#e, #k#urxjk#i, #
 v#hsdudwh#q#iru#hdfk#dgp l#l#wudwru#

+e, #Qdp h#r#i#kh#dgp l#l#wudwru#

VWDWH#WUHHW#FD\PDQ#WUXVW#FRPSDQ\#DWG1

+f, #Orfdwlrq#r i#dgp lq lwudwru#flw| /#wdwh#dgg#frxqwu|, =#
 Flw| = Vwdwh= Frxqwu| =
 JUDQG #FD\PDQ FD\PDQ #VODQGV

Yes No

+g, #Lv#kch#dgp lq lwudwru#d#related person ri#| rxu#ilp B#

☐ ☒

+h, #Grhv#kch#dgp lq lwudwru#suhduh#dgg#vhgg#qyhvwru#dffrxqw#wdwhp hqw#wr#kch#private
 fund*#qyhvwruvB#

☒ \hv#surylggh#wr#d#qyhvwruv, # ☐ Vrp h#surylggh#wr#vrp h#exw#qrw#d#

qyhvwruv, # ☐ Qr#surylggh#wr#qr#qyhvwruv, #

+i, #Li#kch#dqvz hu#wr#59+h, #lv#qr#ru#vrp h/%#z kr#vhggv#kch#qyhvwru#dffrxqw#wdwhp hqw#wr#kch#uhvw#r i#kch, #private fund*#qyhvwruvB#Li#qyhvwru#dffrxqw#wdwhp hqw#duh#qrw#vhqw#wr#kch#uhvw#r i#kch, #private fund*#qyhvwruv/#uhvsrqq#qrw#dssdfedn1#

5 : 1#Gxulqj#| rxu#dvw#ilvfd#| hdu/#z kd#w#shufhgwjdjh#r i#kch#private fund*#dvvhw#e | #ydoxh, #z dv#ydoxhg#e | #
 d#person/vxfk#dv#dgp lq lwudwru/#kdw#lv#qrw#| rxu#related personB#

433 (#

Lqfoxgh#rqd#kkrvh#dvvhw#z khuh#l, #vxfk#shuvrq#fduulhg#rxw#kch#ydoxdwlrq#surfhgxuh#hvdedvkhg#iru#
 wkdw#dvvhw#d#d#| /#lqfoxglqj#rewdlqj#d#| #hdydqw#t xrvh/#dgg#l, #kch#ydoxdwlrq#xvhg#iru#sxusrvhv#
 r i#qyhvwru#xevfulswlrqv/#uhghp swlrqv#ru#glwulxwlrqv/#dgg#ihh#ddfxwlrqv#lqfoxglqj#d#rfdwlrqv, #
 z dv#kch#ydoxdwlrq#ghwhup lqhg#e | #vxfk#shuvrq1#

Marketers

Yes No

5 ; 1#+d, #Grhv#kch#private fund xvhw#kch#vhuylfhv#r i#vrp hrqh#wkhu#wkdq#| rx#ru#| rxu#
 employees iru#p dunhwlgj#sxusrvhvB#

☐ ☒

\rx#p xvw#dqvz hu#| hv#z khwku#kch#shuvrq#dfw#dv#d#sdfhp hqw#dj hqw/#frqvxdqw#ilqghu/#
 lqwgxfhu#p xqlfisd#dgylvru#ru#wkhu#vrdflwru/#ru#v#p ldu#shuvrq1#Li#kch#dqvz hu#wr#5 ; +d, #lv#
 %| hv#/#uhvsrqq#wr#t xhwlrqv#e, #kuxxjk#j, #ehaz #iru#hdfk#vxfk#p dunhwu#wkch#private fund
 xvhw1#Li#kch#private fund xvhw#p ruh#wkdq#qch#p dunhwu#| rx#p xvw#frp sdwh#t xhwlrqv#e, #
 wkuxxjk#j, #vhsdudwh#p #iru#hdfk#p dunhwu#

Qr#Lqirup dwlrq#I lhg

D1#SULYDWH#IXQG#

Information About the Private Fund

4 1# +d, #Qdp h#r i#kch#private fund=#

VXQDP HULFD#JOR EDO#WUHQGV#FD\PDQ#IXQG#OWG1

+e, #

Private fund lghqwlifdwlrq#xpx ehu=#
 +lqfoxgh#kxh#; 380%#suhil{ #dovr, #
 ; 380; 8::: 6<776

51# Xqghu#kxh#diz v#r i#z kdw#vwdwh#ru#frxqwu| #v#kxh#private fund rujdq1}hg=#
 Vwdwh=# Frxqwu|=#
 FD\PDQ#WODQGV

61 Qdp h+v, #r i#J hghud#Sduwghu/#P dqdjhu/#Wuxvwh/#ru#G lufwruv#ru#shuvrqv#vhuylqj #lq#d#v#p ldu#
 fdsdflw|,=#

Name of General Partner, Manager, Trustee, or Director
MR KQ #WKR P DV #J HQR \
SHWHU #DOOHQ #K DUEHFN

71# Wkh#private fund +fkhn#d#kdw#dssq >#| rx#p xv#fkhn#d#kdw#rgh,=#
☐ ##+4, #cxdilhv#iru#kxh#h{ foxvlrq#iurp #kxh#ghilq#lwrq#r i#lqyhvwp hqw#frp sdq| #xqghu#vhwlrq#6+f,+4, #
 r i#kxh#lqyhvwp hqw#frp sdq| #Dfw#r i#1<73#
☒ ##+5, #cxdilhv#iru#kxh#h{ foxvlrq#iurp #kxh#ghilq#lwrq#r i#lqyhvwp hqw#frp sdq| #xqghu#vhwlrq#6+f,+:, #
 r i#kxh#lqyhvwp hqw#frp sdq| #Dfw#r i#1<73#

81 Olw#kxh#qdp h#lqg#frxqwu| /#lq#lqj dvk /#r i#hdfk#foreign financial regulatory authority z l#k#z k lfk#kxh#
 private fund l#uhj lwhuhg1#

Q r#lqirup dwlrq#l lhg

Yes No

91 +d, #l#kxh#l#d#p dvwhu#ixqg%#lq#d#p dvwhu0ihghu#duudqjhp hqwB#
 +e, #l#h| hv/#z kdw#l#kxh#qdp h#lqg#private fund lghqwlifdwlrq#xpx ehu#l#d#q|, #r i#kxh#ihghu#ixqgv#
 lqyhvwqj #lq#kxh#private fundB#

Q r#lqirup dwlrq#l lhg

Yes No

+f, #l#kxh#l#d#p dvwhu#ixqg%#lq#d#p dvwhu0ihghu#duudqjhp hqwB#
 +g, #l#h| hv/#z kdw#l#kxh#qdp h#lqg#private fund lghqwlifdwlrq#xpx ehu#l#d#q|, #r i#kxh#p dvwhu#ixqg%#lq#
 z k lfk#kxh#private fund lqyhvwB#
 Qdp h#r i#kxh#Private Fund=#

Private Fund lghqwlifdwlrq#Qxp ehu=#
 +lqfoxgh#kxh#; 380%#suhil{ #dovr, #

QRWH=#rx#p xv#frp schwh#txhvwrq#9#iru#hdfk#p dvwhu0ihghu#duudqjhp hqw#uhj dugdvv#r i#z khwkuh#
 | rx#duh#lilqj #d#v#lqj ch#v fkhgxdh#G /#vhwlrq#; 1E1+4, 1#ru#kxh#p dvwhu0ihghu#duudqjhp hqw#ru#hsrwqj#
 rq#kxh#ixqgv#vhsdudwhq1#

Li#|rx#duh#ldqj#d#v#lqj#d#V#fkhgxd#G#/#V#fwhrg#:1E1+4,#iru#d#p#dvhu0ihhghu#duudqjhp#hqw#df#frug#lqj#wz#
wkh#lqvwx#fwhrg#wz#wk#l#V#fwhrg#:1E1+4,/#iru#ndfk#r#i#wk#l#ihhghu#ixqgv#dqvz#hu#wk#l#ir#z#lqj#
txhvwlrqv=#

Qr#lqirup#dwhrg#l#hng

QRWH=#Iru#sxusrvhv#r#i#txhvwlrqv#9#ldqg#:#/#lq#d#p#dvhu0ihhghu#duudqjhp#hqw#r#qh#r#u#p#ruh#ixqgv#
+%ihhghu#ixqgv%,#lqyhvw#d#r#u#xevwdqwd#d#d#r#i#wk#l#dvvhw#lq#d#v#lqj#d#ixqg#%#p#dvhu#ixqg%,1#D#
ixqg#z#rxqg#d#l#r#eh#d#i#ihhghu#ixqg#%#lqyhvw#lqj#lq#d#p#dvhu#ixqg#%#iru#sxusrvhv#r#i#wk#l#txhvwlrqv#d#i#w#
lvxhg#p#x#z#d#f#d#vvhv#r#u#v#hulv,#r#i#wk#duhv#r#u#lqwhuhvw/#ldqg#ndfk#f#d#v#r#u#v#hulv,#lqyhvw#
vxevdqwd#d#d#d#r#i#w#l#dvvhw#lq#d#v#lqj#d#p#dvhu#ixqg#1#

Yes No

;1# +d,#lv#wk#l#private fund d#ixqg#r#i#ixqgv%B#

☐ ☒

+e,#li#|hv/#grhv#wk#private fund lqyhvw#lq#ixqgv#p#dqdjhg#e|#|rx#r#u#e|#d#related personB#

☐ ☐

QRWH=#Iru#sxusrvhv#r#i#wk#l#txhvwlrqv#q#q#/#lq#v#z#hu#e|#hv#d#i#wk#l#ixqg#lqyhvw#1#3#shufhg#w#r#u#p#ruh#r#i#
lv#w#r#d#d#dvvhw#lq#r#wk#u#s#r#r#d#g#lqyhvw#p#hqw#y#h#k#f#d#v#/#z#kh#wk#u#r#u#q#r#w#wk#h|#duh#d#l#r#private funds#r#u#
uhj#lv#huhg#lqyhvw#p#hqw#f#r#p#sdq#lv#1#

Yes No

<1# Gxulqj#|rxu#d#lv#l#v#f#d#|hdu/#g#l#g#wk#private fund lqyhvw#lq#v#fxu#lv#h#lvxhg#e|#lqyhvw#p#hqw#

☐ ☒

f#r#p#sdq#lv#uhj#lv#huhg#x#q#ghu#wk#h#lqyhvw#p#hqw#f#r#p#sdq|#d#f#w#r#i#1#<73#r#wk#u#wk#d#q#%#p#r#q#h|#

p#dunhw#ixqgv#%#r#wk#h#n#{w#q#w#s#u#r#y#l#g#h#g#lq#lq#v#w#x#f#w#l#r#q#9#1#1,B#

431#Z#kdw#w#sh#r#i#ixqg#l#wk#h#private fundB#

☐ khgj#h#ixqg ☐ d#x#l#g#l#w#ixqg ☐ s#u#l#y#d#w#h#t#x#l#w#ixqg ☐ u#h#d#h#v#w#d#w#ixqg ☐ v#h#f#x#u#l#w#h#g#d#v#h#w#ixqg

☐ y#h#q#w#u#h#f#d#s#l#d#d#ixqg ☒ R#wk#u#private fundZ KR00\ORZ QHG#V#X#E#V#I#G#I#D#U#\R#I#U#H#L#J#I#V#H#U#H#G#

I#Q#Y#H#V#W#P#H#Q#W#F#R#P#S#D#Q#\1

QRWH=#Iru#ixqgv#r#i#ixqgv/#u#h#i#u#w#r#wk#h#ixqgv#lq#z#k#f#k#wk#h#private fund lqyhvw#1#Iru#g#h#i#l#q#w#l#r#q#v#r#i#
w#k#h#v#h#ixqg#w#|shv/#s#d#d#v#h#v#h#l#q#v#w#x#f#w#l#r#q#9#r#i#wk#h#l#q#v#w#x#f#w#l#r#q#v#w#r#s#d#w#1#D#1#

441#F#x#u#h#q#w#j#u#r#v#v#d#v#h#w#y#d#o#x#r#i#wk#h#private fund=#

'#1;/44</;59

Ownership

451#P#l#l#p#x#p#lqyhvw#p#hqw#f#r#p#p#l#p#hqw#u#h#t#x#l#h#g#r#i#d#q#lqyhvw#r#u#l#q#wk#h#private fund=#

'#3

QRWH=#U#h#s#r#w#wk#h#d#p#r#x#q#w#r#x#w#l#g#h#q#l#u#h#t#x#l#h#g#r#i#lqyhvw#r#u#v#z#k#r#d#u#h#q#r#w#|rxu#related persons +h#y#h#q#d#i#
g#l#i#h#u#h#q#w#u#r#p#wk#h#d#p#r#x#q#w#v#h#w#r#wk#l#q#wk#h#r#u#j#d#q#l#d#w#l#r#q#d#q#r#f#x#p#hqw#r#i#wk#h#ixqg#,1#

461#D#s#s#u#r#{l#p#d#w#h#q#x#p#e#h#r#i#wk#h#private fund*v#e#h#q#h#i#f#l#d#r#z#q#h#u#v=#

4

471#Z kdw#l#k#k#dssur { p dwh#shufhqwdjh#r i#k#k#private fund ehqhilfld# #rz qhg#e | #| rx#lqg#| rxu#related persons=#

3 (#

481#Z kdw#l#k#k#dssur { p dwh#shufhqwdjh#r i#k#k#private fund ehqhilfld# #rz qhg#lq#k#k#dj j uhjdwh,#e | #ixqgv#r i#ixqgv=#

3 (#

491#Z kdw#l#k#k#dssur { p dwh#shufhqwdjh#r i#k#k#private fund ehqhilfld# #rz qhg#e | #grq0United Statespersons=#

3 (#

Your Advisory Services

Yes No

4 : 1 +d,#Duh#| rx#d#vxedgylvhu#r#k#l#private fundB#

☐ ☒

+e,#l#k#k#dq vz hu#r#t#xhvwrq#4 : +d,#l#v#| hv/%surylgh#k#k#qdp h#lqg#VHF#l#h#qxp ehv/#l#lq | /#r i#k#k#dgylvhu#r i#k#k#private fund1#l#k#k#dq vz hu#r#t#xhvwrq#4 : +d,#l#v#qr/%hdyh#k#l#t#xhvwrq#e#lqn1#

Q r#lqirup dwlrq#l lhg

Yes No

4 ; 1 +d,#Gr#lq | #rkhu#lqyhwv hqw#lgylvhu#lgylvh#k#k#private fundB#

☒ ☐

+e,#l#k#k#dq vz hu#r#t#xhvwrq#4 : +d,#l#v#| hv/%surylgh#k#k#qdp h#lqg#VHF#l#h#qxp ehv/#l#lq | /#r i#k#k#rkhu#lgylvhu#r#k#k#private fund1#l#k#k#dq vz hu#r#t#xhvwrq#4 : +d,#l#v#qr/%hdyh#k#l#t#xhvwrq#e#lqn1#

Name of Other Adviser to private fund	SEC file number	CRD number
Z HOOIQJWRQ#P DQDJHPHQW#F R P SDQ \ /#OOS	; 34048<3 ;	4398<8

Yes No

4<1#Duh#| rxu#clients vrdflhg#r#lqyhwv#lq#k#k#private fundB#

☐ ☒

531#Dssur { p dwh#kdw#shufhqwdjh#r i#| rxu#clients kdv#lqyhwv#lq#k#k#private fundB#

4 (#

Private Offering

Yes No

541#Grhv#k#k#private fund uhq#r q#lq#h { hp swlrq#lurp #uhj lvudwlrq#r i#l#w#vhfxulwlv#xqghu#Uhjxawlrq#G #r i#k#k#Vhfxulwlv#D fw#r i#4<66B#

☐ ☒

551#l#| hv/%surylgh#k#k#private fund*#lurp #G #l#h#qxp ehv#l#lq | ,=#

Q r#lqirup dwlrq#l lhg

E1#VHUYIFH#SUR YIGHUV#

Auditors

Yes No

561#+d,#+4 ,#Duh#k#k#private fund*#lqdqfld#vwdwv hqw#vzemfw#r#lq#lqgxd#lxlwB#

☒ ☐

+5, #Duh#kch#lqdgfld#vwdwhp hqgw#suhnduhg#lq#lffrugdqf#z lk#X IV1#J DDSB#

☒ ☐

Li#kch#lqvz hu#r#56+d,+4, #lv#%|hv/%#uhvsrqg#r#t#xhvwrqv#e, #kuxjk#i, #hcz 1#Li#kch#*private fund* xvhw#p ruh#kdg#qh#dxg#lqj #ilp /#|rx#p xv#erp sdwh#t#xhvwrqv#e, #kuxjk#i, #vhsdudwhq #iru#hdfk#dxg#lqj #ilp 1#

Additional Auditor Information : 1 Record(s) Filed.

Li#kch#lqvz hu#r#56+d,+4, #lv#%|hv/%#uhvsrqg#r#t#xhvwrqv#e, #kuxjk#i, #hcz 1#Li#kch#*private fund* xvhw#p ruh#kdg#qh#dxg#lqj #ilp /#|rx#p xv#erp sdwh#t#xhvwrqv#e, #kuxjk#i, #vhsdudwhq #iru#hdfk#dxg#lqj #ilp 1#

+e, #Qdp h#r#i#kch#dxg#lqj #ilp =#

SULFHZ DWHUKRXVHFRRSHUV#OOS

+f, #Wkh#rfdwrq#r#i#kch#dxg#lqj #ilp *v#r#ilfh#uhvsrqv#e#iru#kch#*private fund**#dxg#l#

+flw|/#vwdwh#lqg#frxgw|, =#

F lw| =

Vwdwh =

Fr xgw| =

KRXVWRQ

Wh{dv

XQLWHG#WWDWHV

Yes No

+g, #Lv#kch#dxg#lqj #ilp #lq#*independent public accountant*B#

☒ ☐

+h, #Lv#kch#dxg#lqj #ilp #hj#lwhung#z lk#kch#Sxedf#Frp sdq| #Dffrxqwlqj#Ryhuwjkw#
ErdugB#

☒ ☐

+i, #Li#%|hv#r#h, #deryh/#lv#kch#dxg#lqj #ilp #vxenf#r#uhjxdu#lqvshfwrq#e| #kch#
Sxedf#Frp sdq| #Dffrxqwlqj#Ryhuwjkw#Erdug#lq#lffrugdqf#z lk#lw#uxdvhB#

☒ ☐

Yes No

+j, #Duh#kch#*private fund**#dxg#lqg#lqdgfld#vwdwhp hqgw#j#lwlexwhg#r#kch#*private fund**#
lqyhvrubB#

☒ ☐

+k, #Grhv#kch#uhsrw#suhnduhg#e| #kch#dxg#lqj #ilp #frqwdlq#lq#xqtxddilhg#rslqlrqB#

☒ \hv ☐ Qr ☐ Uhsrw#Qrw#h#Uhfhyhg

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

Prime Broker

Yes No

571#+d, #Grhv#kch#*private fund* xvhw#p ruh#sulp h#eurnhuB#

☐ ☒

Li#kch#lqvz hu#r#57+d, #lv#%|hv/%#uhvsrqg#r#t#xhvwrqv#e, #kuxjk#h, #hcz #iru#hdfk#sulp h#
eurnhu#kch#*private fund* xvhw1#Li#kch#*private fund* xvhw#p ruh#kdg#qh#sulp h#eurnhu/#|rx#p xv#
erp sdwh#t#xhvwrqv#e, #kuxjk#h, #vhsdudwhq #iru#hdfk#sulp h#eurnhu#

Qr#Lqirup dwrq#lqg

Custodian

Yes No

581#+d,#Grhv#kch#private fund xvhdq| #fxvwrqldqv#lqfoxglqj #kch#sup h#urnhuv#dwhg#deryh,#
 wr#krqg#vrp h#ru#dch#i#lw#dvvhwb#
 Li#kch#dqvz hu#r#58+d,#lv#%|hv/%#uhvsrqg#r#t#xhvwrqv#e,#kuxxjk#i,#ehorz #iru#ndfk#fxvwrqldq#
 kch#private fund xvhdq|Li#kch#private fund xvhdq# ruh#kdq#qh#fxvwrqldq/#|rx#p xv#frp sdwh#
 txhvwrqv#e,#kuxxjk#i,#vhsdudwhq| #iru#ndfk#fxvwrqldq|

Additional Custodian Information : 1 Record(s) Filed.

Li#kch#dqvz hu#r#58+d,#lv#%|hv/%#uhvsrqg#r#t#xhvwrqv#e,#kuxxjk#i,#ehorz #iru#ndfk#
 fxvwrqldq#kch#private fund xvhdq|Li#kch#private fund xvhdq# ruh#kdq#qh#fxvwrqldq/#|rx#
 p xv#frp sdwh#t#xhvwrqv#e,#kuxxjk#i,#vhsdudwhq| #iru#ndfk#fxvwrqldq|

+e,#Ohjd#qdp h#r#i#fxvwrqldq=#

VWDWH#WUHHW#EDQN#DQG#NUXVW#FRP SDQ \

+f,#Sup du| #exvlghvv#qdp h#r#i#fxvwrqldq=#

VWDWH#WUHHW#EDQN#DQG#NUXVW#FRP SDQ \

+g,#Wkh#rfdwlrq#r#i#kch#fxvwrqldq*v#r#iilfh#uhvsrqvle#h#ru#custody ri#kch#private fund*v#
 dvvhw#f#lw|/#vwdwh#dqg#frxgw|,=#

F lw|=

Vdwh=

Frxgw|=

ERVWRQ

P dvvdfkxvhwv

XQIWHG #VWDWHV

Yes No

+h,#Lv#kch#fxvwrqldq#d#related person ri#| rxu#ilp B#

+i,# Li#kch#fxvwrqldq#lv#d#urnhu0ghdhu/#surylgh#lw#VHF #uhj#vudwlrq#qxp eh#-li#dq|, #

0

FUG #Qxp eh#-li#dq|,=#

Administrator

Yes No

591#+d,#Grhv#kch#private fund xvhdq#dgp lq#vudwru#rwhu#kdq#| rxu#ilp B#

Li#kch#dqvz hu#r#59+d,#lv#%|hv/%#uhvsrqg#r#t#xhvwrqv#e,#kuxxjk#i,#ehorz 1#Li#kch#private fund
 xvhdq# ruh#kdq#qh#dgp lq#vudwru/#| rx#p xv#frp sdwh#t#xhvwrqv#e,#kuxxjk#i,#vhsdudwhq| #iru#
 hdfk#dgp lq#vudwru#

Additional Administrator Information : 1 Record(s) Filed.

Li#kch#dqvz hu#r#59+d,#lv#%|hv/%#uhvsrqg#r#t#xhvwrqv#e,#kuxxjk#i,#ehorz 1#Li#kch#private
 fund xvhdq# ruh#kdq#qh#dgp lq#vudwru/#| rx#p xv#frp sdwh#t#xhvwrqv#e,#kuxxjk#i,#
 vhsdudwhq| #iru#ndfk#dgp lq#vudwru#

+e,#Qdp h#ri#kh#dgp lq l#wudwru=#

VWDWH#WUHHW#FD\PDQ#WUXVW#FRPSDQ\/#OWG1

+f,#Orfdwlrq#ri#dgp lq l#wudwru#flw|/#wdwh#dgg#frxgw|,=#

F lw|=

Vwdwh=

Frxgw|=

JUDQG#FD\PDQ

FD\PDQ#LVODQGV

Yes No

+g,#Lv#kh#dgp lq l#wudwru#d#related person ri#| rxu#ilp B#

☐ ☒

+h,#Grhv#kh#dgp lq l#wudwru#suhduh#dgg#vhgg#qyhvwru#dffrxqw#wdwhp hqw#wr#kh#private fund*#qyhvwruvB#

☒ \hv#surylgg#wr#d#qyhvwruv,t ☐ Vrp h#surylgg#wr#vrp h#xw#qrw#d#

qyhvwruv,t ☐ Qr#surylgg#wr#qr#qyhvwruv,#

+i,#Li#kh#dqvz hu#wr#59+h,#lv#qr#ru#vrp h/%#z kr#vhggv#kh#qyhvwru#dffrxqw#wdwhp hqw#wr#kh#uhvw#ri#kh,#private fund*#qyhvwruvB#Li#qyhvwru#dffrxqw#wdwhp hqw#duh#qrw#vhqw#wr#kh#uhvw#ri#kh,#private fund*#qyhvwruv/#uhvsrgg#qrw#dssdfedn1%#

5:1#Gxulqj#| rxu#dvw#ilvfd#| hdu/#z kd#w#shufhgdj h#ri#kh#private fund*#dvvhw#e| #ydoxh,#z dv#ydoxhg#e| #d#person/#vxfk#dv#dgp lq l#wudwru/#kdw#lv#qrw#| rxu#related personB#

433 (#

Lqfoxg#rq#| #krvh#dvvhw#z khuh#l,#vxfk#shuvrq#fdulhg#rxw#kh#ydoxdwlrq#surfhgxuh#vwdedvkhg#iru#wdw#dvvhw#li#dq|/#lqfoxglqj#redlqlqj#dq| #uhdydqw#t xrvh/#dgg#l,#kh#ydoxdwlrq#xvhg#iru#sxusrvhv#ri#qyhvwru#xevfulswlrqv/#uhghp swlrqv#ru#glwilexwlrqv/#dgg#ihh#fdcfxwlrqv#lqfoxglqj#dæfdwlrqv,#z dv#kh#ydoxdwlrq#ghwup lqhg#e| #vxfk#shuvrq1#

Marketers

Yes No

5;1#+d,#Grhv#kh#private fund xv#kh#vhuylfhv#ri#vrp hrqh#rkhu#kdq#| rx#ru#| rxu#

☐ ☒

employees iru#p dunhwlgj#sxusrvhvB#

\rx#p xv#dqvz hu#| hv#z khwku#kh#shuvrq#dfw#lv#d#sdfhp hqw#dj hqw/#frqvxodqw/#lqghu/#lqurgxfhu/#p xqlfisd#dgylvru#ru#rkhu#vrdflwu/#ru#vp ldu#shuvrq1#Li#kh#dqvz hu#wr#5;+d,#lv#%| hv#/#uhvsrgg#wr#t xhwlrqv#e,#wkurxjk#j,#ehaz#iru#hdfk#vxfk#p dunhwu#kh#private fund xvvh1#Li#kh#private fund xvvh#p ruh#kdq#qgh#p dunhwu#| rx#p xv#frp sdwh#t xhwlrqv#e,#wkurxjk#j,#vhsdudwh#| #iru#hdfk#p dunhwu#

Qr#Lqirup dwlrq#I lhg

SECTION 7.B.(2) Private Fund Reporting

Qr#Lqirup dwlrq#I lhg

Item 8 Participation or Interest in *Client* Transactions

Iq#k#lv#Lwhp /#z h#htxhv#lqirup d#lrg#derxw#| rxu#sduwflsdwlrq#dgg#lqwhuhvw#lq#| rxu#*clients*#udqvdfwlrqv1#
Wk#lv#lqirup d#lrg#lghqwlilhv#dgg#lrgdcdudhv#lq#z klfk#frqidfw#r i#lqwhuhvw#p d| #ffxu#ehwz h#q#| rx#dgg#| rxu#
*clients*1#

Onh#Lwhp #: /#Lwhp #: #htxlvh#| rx#r#surylgh#lqirup d#lrg#derxw#| rx#dgg#| rxu#*related persons*/#lqfoxglqj#
iruhljg#diilddwhv1#

Proprietary Interest in *Client* Transactions

D1## Gr#| rx#ru#lq| #*related person*=

Yes No

- +4, # ex | #vhfxulwlv#ru#| rxuvhd#lurp #dgy#lru| #*clients*/#ru#h#vhfxulwlv#| rx#z q#r#dgy#lru| #
clients +sulqflsd#udqvdfwlrqv,B ☐ ☒
- +5, ex | #ru#h#ru#| rxuvhd#vhfxulwlv#r#khu#kdg#kduhv#r i#p xwdd#xqgv,#kdw#| rx#dor#
uhfrp p hgg#r#dgy#lru| #*clients*B ☐ ☒
- +6, uhfrp p hgg#vhfxulwlv#ru#r#khu#lqyhvp hq#surgxfw,#r#dgy#lru| #*clients* lq#z klfk#| rx#
ru#lq| #*related person* kd#v#rp h#r#khu#sursulwdu| #rz qhuvkls,#lqwhuhvw#r#khu#kdg#
wkrvh#p hqwlrgqg#lq#Lwhp v#; ID 1+4,#ru#5,,B ☒ ☐

Sales Interest in *Client* Transactions

E1 Gr#| rx#ru#lq| #*related person*=

Yes No

- +4, dv#l#urnhu0ghdnu#ru#h#lwhuhg#h#suhvhqwdwlyh#r i#d#urnhu0ghdnu/#h{ hfxwh#vhfxulwlv#
wdghv#ru#urnhudjh#fxvwrp huv#lq#z klfk#dgy#lru| #*client* vhfxulwlv#d#h#vrg#r#ru#erxjkw#
lurp #k#h#urnhudjh#fxvwrp hu#dj#hgf| #furvv#udqvdfwlrqv,B ☐ ☒
- +5, uhfrp p hgg#sxufkdvh#r i#vhfxulwlv#r#dgy#lru| #*clients* iru#z klfk#| rx#ru#lq| #*related*
person vhuylv#dv#kqghuz ulhu/#j hqhud#ru#p dgdj lqj #sduwqhu/#ru#sxufkdvh#
uhsuhvhqwdwlyhB# ☐ ☒
- +6, uhfrp p hgg#sxufkdvh#ru#vdh#r i#vhfxulwlv#r#dgy#lru| #*clients* iru#z klfk#| rx#ru#lq| #
related person kd#lq| #r#khu#vdh#lqwhuhvw#r#khu#kdg#k#h#h#h#lsw#r i#vdh#
frp p lvlrqv#dv#l#urnhu#ru#h#lwhuhg#h#suhvhqwdwlyh#r i#d#urnhu0ghdnu,B ☒ ☐

Investment or Brokerage Discretion

F1 Gr#| rx#ru#lq| #*related person* kdyh#*discretionary authority* w#ghwup lq#k#h=

Yes No

- +4, vhfxulwlv#r#eh#erxjkw#ru#vrg#ru#l#*client's* dffrxqwB ☒ ☐
- +5, dp rxqw#r i#vhfxulwlv#r#eh#erxjkw#ru#vrg#ru#l#*client's* dffrxqwB ☒ ☐
- +6, urnhu#ru#ghdnu#r#eh#k#vgh#ru#l#sxufkdvh#ru#vdh#r i#vhfxulwlv#ru#l#*client's* dffrxqwB ☒ ☐
- +7, frp p lvlrq#lwhv#r#eh#sdlg#r#l#urnhu#ru#ghdnu#ru#l#*client's* vhfxulwlv#udqvdfwlrqvB ☒ ☐

G1 Li#| rx#lqvz hu#| hv#r#r#1+6,#deryh/#duh#lq| #r i#k#h#urnhu#ru#ghdnu#*related persons*B ☐ ☒

H1 Gr#| rx#ru#lq| #*related person* uhfrp p hgg#urnhu#ru#ghdnu#r#*clients*B# ☒ ☐

I1 Li#| rx#lqvz hu#| hv#r#r#1#deryh/#duh#lq| #r i#k#h#urnhu#ru#ghdnu#*related persons*B ☐ ☒

J1 +4, Gr#| rx#ru#lq| #*related person* uhf#lyh#uhvdufk#ru#r#khu#surgxfw#ru#vhuylfhv#r#khu#kdg#
h{ hfxwlrq#lurp #l#urnhu0ghdnu#ru#l#k#lg#sduw| #vriw#grou#ehqhilw%,#lq#frqqhfwlrq#
z l#k#*client* vhfxulwlv#udqvdfwlrqvB ☒ ☐

- +5, Li#| hv#r#r#1+4,#deryh/#duh#lq#k#h#vriw#grou#ehqhilw%| rx#ru#lq| #*related persons*
uhf#lyh#h#dj#lch#uhvdufk#ru#urnhudjh#vhuylfhv#kqghu#vhfwlrq#5; +h,#r i#k#h#vhfxulwlv#
H{ fkdqj#h#Dfw#r i#1<67B ☒ ☐

K1 Gr#|rx#ru#dq|#related person/#glnhfw|#ru#lglnhfw|/#frp shqvdwh#dq|#person iru#client
uhihudovB



L1 Gr#|rx#ru#dq|#related person/#glnhfw|#ru#lglnhfw|/#hfhlyh#frp shqvdwhrq#urp #dq|#person
iru#client uhihudovB



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.

Item 9 Custody

Iq#k#lv#Lwhp /#z h#dvn#| rx#z khwku#| rx#ru#d *related person* kdv#custody r i#client +rwku#k#dq#clients wkdw#
duh#qyhvw# hqw#Erp sdq#lv#uhj lvhuhg#kqghu#k#h#qyhvw# hqw#Erp sdq | #Dfw#r i#4 < 73 , #dvvhw#dqg#derxw#| rxu#
fxvwrgld#sdfwlfhv1#

D1## +4, # Gr#| rx#kdyh#custody r i#dq | #dgy#lru | #clients'=

Yes No

+d,###fdvk#ru#edqn#dffrxqwb

☐ ☐

+e,###vhfxulwhvB

☐ ☐

If you are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your clients' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)-(2)(d)(5)) from the related person.

+5, Li#| rx#k#hfnhg#| hv%#r#Lwhp #< D1+4, +d, #ru#e, /#z kdw#lv#k#h#dssur { lp dwh#dp rxqwb# r i#client ixqgv#
dqg#vhfxulwhv#dqg#rwd#qxp ehur# i#clients iru#z klfk#| rx#kdyh custody=

X IV1#G rødu#Dp rxqw

Wrwdd#Q xp ehur# i#Clients

+d, # #69/: < 5/785

+e, #5

If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2).

E1 +4, Iq#Erqghfwlrq#z lk#dgy#lru | #vhuylfhv#| rx#surylg#h#r#clients/#gr#dq | #r i#| rxu#related
persons kdyh#custody r i#dq | #r i#| rxu#dgy#lru | #clients'=

Yes No

+d,###fdvk#ru#edqn#dffrxqwb

☐ ☐

+e,###vhfxulwhvB

☐ ☐

You are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b).

+5, Li#| rx#k#hfnhg#| hv%#r#Lwhp #< D1+4, +d, #ru#e, /#z kdw#lv#k#h#dssur { lp dwh#dp rxqwb# r i#client ixqgv#
dqg#vhfxulwhv#dqg#rwd#qxp ehur# i#clients iru#z klfk#| rxu#related persons kdyh#custody=

X IV1#G rødu#Dp rxqw

Wrwdd#Q xp ehur# i#Clients

+d, # #69/: < 5/785

+e, #5

F1 Li#| rx#ru#| rxu#related persons kdyh#custody r i#client ixqgv#ru#vhfxulwhv#dqg#Erqghfwlrq#z lk#dgy#lru | #
vhuylfhv#| rx#surylg#h#r#clients/#k#hfn#d#k#h#r#r#z lqj#k#dw#dssd#=#

+4, # D#t#xddilhg#fxvwrgldq+v, #vhqgv#dffrxqwb#vwdwhp hqw#dw#kdw#t#xdw#uo# #r#k#h#qyhvwruv#dq# ☐
wkh#srrdng#qyhvw# hqw#y#hk lfdh+v, #| rx#p dqdjhl

+5, Dq#independent public accountant dxglw#dqgxd# #k#h#srrdng#qyhvw# hqw#y#hk lfdh+v, #kdw# ☒
| rx#p dqdjhl#dqg#k#h#dxglw#h#lqdgfld#vwdwhp hqw#duh#g#lvulexw#h#r#k#h#qyhvwruv#dq#k#h#
srrø1#

+6,

☐

Dq#independent public accountant frqgxfw#lq#lqgxd#vxusulvh#n{dp lqdlrq#r i#client
ixqgv#lqg#vhfxulv#hv1#

+7, Dq#independent public accountant suhsduhv#dq#qwhuqd#frqwr#uhsruw#z lw#uhvshfw#r#
fxvwrgld#vhuylfhv#z khq#|rx#ru#|rxu#related persons duh#txddilng#fxvwrgldqv#iru#client
ixggv#dgg#vhfxulwhvl#

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).

	Yes	No
G1 Gr# rx#r# rx# <i>related person(s)</i> dfw#dv#t#xddl#hg#fxv#wrgldq#v# rx# <i>clients</i> lq#frqghfwlrg#z l#k#dgylvru #vhuylfhv# rx#surygh#r# <i>clients</i> B#	<input type="radio"/>	<input checked="" type="radio"/>
+4, rx#dfw#dv#d#t#xddl#hg#fxv#wrgldq	<input type="radio"/>	<input checked="" type="radio"/>
+5, rx# <i>related person(s)</i> dfw#dv#t#xddl#hg#fxv#wrgldq+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 Lih| rx#duh#ldqj#| rxu#annual updating amendment dqg#| rx#z huh#vxe#f#w#r#d#xusulv#h#h{dp lqdwlrq#e|#
dq#independent public accountant gxuqj#| rxu#cdvw#lrvfd#| hdu#surygh#k#h#g#dwh#P P 2\\ \\ ,#k#h#
h{dp lqdwlrq#frp p hqf#h#=#

I1 L#|rx#ru#|rxu#related persons kdyh#custody ri#client ixggv#ru#whfxu#lv/#krz #p dq|#shuvrqv/#
lqf#xglqj/#exw#qrw#p lnh#wr/#|rx#dgg#|rxu#related persons, dfw#dv#xddlhg#exv#wrgldqv#iru#|rxu#
clients lq#rqqhfwrq#z lw#dgylvru|#huylfhv#|rx#surygh#wr#clients?

4

SECTION 9.C. *Independent Public Accountant*

```
\rx#p xv#frp schw#kh#r#o#z lqj#lqirup d#r#q#r#u#ndf#k#independent public accountant hqj#dj#h#m#r#
shuirup #d#v#x#u#l#h#n#{d#p lqdw#r#q#h#shuirup #d#q#d#x#g#w#r#i#d#s#r#r#d#g#l#q#y#h#v#p#h#q#w#h#k#l#f#d#h#k#d#w#l#r#x#p#d#q#d#j#h#/#r#u#
suhsduh#d#q#l#q#w#h#q#d#o#f#r#q#w#r#d#h#s#r#w#l#/#r#x#p# xv#frp schw#d#h#s#d#u#d#w#l#v#f#k#h#g#x#d#h#G#h#f#w#l#r#q#k#l#f#l#h#r#u#ndf#k
independent public accountant!#
```

+4, Qdp h#r i#k h#independent public accountant=
SULFHZ DWHUKR XVHFR R SHUV#00S

+5, Wkh#rfdwrg#r i#Wkh#*independent public accountant's* riilfh#uhvsrqvleoh#iru#Wkh#huylfhv#surylghg=#
Qxp ehuldgq#Vwhhw#4= Qxp ehuldgq#Vwhhw#5=
4534#ORXIVLDQD#VWUHHW
F lw|= Vwdwh= Frxgw|=]LS.72Srvddg#Frgh=
KRXXVWRO Wh{dv XOIWHG#VWDWHV ::335

Yes No

- +6, ☐ *independent public accountant* uhj lwhuhg#z lk#kh#Sxedf#Frp sdq | #Dffrxqwlqj#
Ryhuvljkw#ErdugB# ☐
- +7, ☐ hv#r#6,#deryh/*independent public accountant* vxenfw#r#uhjxdu#lqvshfwlrq#e | #
wk#Sxedf#Frp sdq | #Dffrxqwlqj#Ryhuvljkw#Erdug#lq#lffrugdqfh#z lk#lw#uxdhvB ☐
- +8, *independent public accountant* l#nqjdjhg#r=
Dl#☒ dxgl#d#srrdng#lqyhvvp hqw#yhk lfdh
El#☐ shuirup #d#vxusulvh#n{dp lqdwlrq#r i#*clients'* dvvhw
Fl#☐ suhsduh#dq#lqwhugdd#frqwuro#uhsruw#
- +9, Grhv#dq | #uhsruw#suhsduhg#e | #kh#*independent public accountant* wkdw#dxglwng#kh#srrdng#
lqyhvvp hqw#yhk lfdh#ru#kdw#n{dp lqhg#lqwhugdd#frqwuro#frqwdlq#dq#qtxddilhg#sllrqB
☒ \hv
☐ Qr
☐ Uhsruw#Qrw#\hw#Jhfhlyhg

If you check "Report Not Yet Received", you must promptly file an amendment to your Form ADV to update your response when the accountant's report is available.

Item 10 Control Persons

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

Li#| rx#duh#xep lwlqj #dq#q lwdq#dssdfdwlrq#ru#uhsrw/#| rx#p xv#frp sdwh#V fkhgxd#D#dgg#V fkhgxd#E 1#
V fkhgxd#D#dvnv#iru#qirup dwlrq#derxw#| rxu#g luhfw#z qhuv#dgg#h{ hfxwlyh#r iilfhuv1#V fkhgxd#E#dvnv#iru#
qirup dwlrq#derxw#| rxu#qg luhfw#z qhuv1#Li#kLv#Lwhp#dq#dp hggp hqw#dgg#| rx#duh#sgdwqj #qirup dwlrq#| rx#
uhsrw#g#q#h lkh#V fkhgxd#D#ru#V fkhgxd#E#ru#erwk, #kdw#| rx#ilng#z lkh#| rxu#q lwdq#dssdfdwlrq#ru#uhsrw/#
| rx#p xv#frp sdwh#V fkhgxd#E 1#

Yes No

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



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

E1 Li#dq| #person qdp hg#q#V fkhgxd#D/#E /#ru#F /#ru#q#Vhfwrq#4 3 1D1#ri#V fkhgxd#G #v#d#sxedf#uhsrw#qj #
frp sdq| #xgghu#Vhfwrqv#4 5#ru#4 8+g, #r i#kh#Vhfuxlwhv#H{ fkdqjh#Dfw#r i#4 < 67 /#srdvh#frp sdwh#
Vhfwrq#4 3 1E1#ri#V fkhgxd#G 1#

SECTION 10.A. Control Persons

Q r#qirup dwlrq#ilkhg

SECTION 10.B. Control Person Public Reporting Companies

E1## Li#dq| #huvrq#qdp hg#q#V fkhgxd#D/#E /#ru#F /#ru#q#Vhfwrq#4 3 1D1#ri#V fkhgxd#G #v#d#sxedf#uhsrw#qj #
frp sdq| #xgghu#Vhfwrqv#4 5#ru#4 8+g, #r i#kh#Vhfuxlwhv#H{ fkdqjh#Dfw#r i#4 < 67 /#srdvh#surylg#kh#
iræz lqj #qirup dwlrq#| rx#p xv#frp sdwh#d#vhsdudwh#V fkhgxd#G#Vhfwrq#4 3 1E1#iru#hdfk#sxedf#
uhsrw#qj #frp sdq| ,=#

+4, Ixæhjdqdp h#r i#kh#sxedf#uhsrw#qj #frp sdq| ,=# DP HUIFDQ #QWHUQDWIR QDO#
JURXS/#QF1

+5, Wkh#sxedf#uhsrw#qj #frp sdq| *#FIN#qxp ehu#Fhqwdq#Lqgh{ #Nh| #85:5
qxp ehu#kdw#kh#VHF#dvvljqv#r#hdfk#uhsrw#qj #frp sdq| ,=#









https://crd.finra.org/Iad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?Ref... 3/31/2014

	+5, <i>found</i> rx#ru#dq #advisory affiliate wr#kdyh#ehhq#involved lq#d#y#r#d#w#r#q#r#i#VHF#ru#F IWF# uhjx#d#w#r#q#v#ru#v#d#w#x#h#v#B		
	+6, <i>found</i> rx#ru#dq #advisory affiliate wr#kdyh#ehhq#d#f#dxvh#r#i#dq#investment-related exv#q#h#v#v#k#d#y#l#j#d#w#d#x#k#r#u#l#d#w#r#q#r#g#r#exv#q#h#v#v#g#h#q#l#g/#x#v#s#h#q#g#g#h#h#y#r#n#h#g/#r#u# u#h#v#w#u#l#f#w#h#g#B		
	+7, hq#w#h#u#g#d#q#order d#j#d#l#q#v#w# rx#ru#dq #advisory affiliate lq#f#r#q#q#h#f#w#r#q#z#l#k#investment- related d#f#w#y#l#w# B		
	+8, l#p#s#r#v#h#g#d#f#l#y#l#p#r#q#h#s#h#q#d#w# #r#q# rx#ru#dq #advisory affiliate/#ru#ordered rx#ru#dq # advisory affiliate wr#f#h#d#v#h#d#q#g#g#h#v#l#w#h#u#r#p#d#q# d#f#w#y#l#w# B		
G1	Kdv#dq #r#w#k#h#u#h#g#h#u#d#u#h#j#x#d#w#r#u# d#j#h#q#f# /dq #v#d#w#h#u#h#j#x#d#w#r#u# d#j#h#q#f# /#ru#dq #foreign financial regulatory authority=		
	+4, hyhu#found rx#ru#dq #advisory affiliate wr#kdyh#p#d#g#h#d#i#d#o#h#v#d#w#h#p#h#q#w#r#u#r#p#l#v#l#r#q#/#ru# ehhq#g#l#k#r#q#h#v#w#k#q#i#d#l#u#/#r#u#k#q#h#w#k#f#d#d#B		
	+5, hyhu#found rx#ru#dq #advisory affiliate wr#kdyh#ehhq#involved lq#d#y#r#d#w#r#q#r#i# investment-related uhjx#d#w#r#q#v#ru#v#d#w#x#h#v#B		
	+6, hyhu#found rx#ru#dq #advisory affiliate wr#kdyh#ehhq#d#f#dxvh#r#i#dq#investment-related exv#q#h#v#v#k#d#y#l#j#d#w#d#x#k#r#u#l#d#w#r#q#r#g#r#exv#q#h#v#v#g#h#q#l#g/#x#v#s#h#q#g#g#h#h#y#r#n#h#g/#r#u# u#h#v#w#u#l#f#w#h#g#B		
	+7, lq#k#h#s#d#v#h#h#g# h#d#w#/#h#q#w#h#u#g#d#q#order d#j#d#l#q#v#w# rx#ru#dq #advisory affiliate lq# f#r#q#q#h#f#w#r#q#z#l#k#dq#investment-related d#f#w#y#l#w# B		
	+8, hyhu#h#q#l#g/#x#v#s#h#q#g#g#/#r#u#h#y#r#n#h#g# rxu#ru#dq #advisory affiliate's uhj#l#w#d#w#r#q#r#u# d#f#h#q#v#h#/#r#u#r#w#k#h#u#l#h#s#u#h#y#h#q#w#h#g# rx#ru#dq #advisory affiliate/#e# #order/#u#r#p#d#v#r#f#d#w#l#q#j# z#l#k#dq#investment-related exv#q#h#v#v#r#u#h#v#w#u#l#f#w#h#g# rxu#ru#dq #advisory affiliate's d#f#w#y#l#w# B		
H1	Kdv#dq #self-regulatory organization ru#f#r#p#r#g#l#w#h#v#h#{fkdqjh#hyhu=		
	+4, <i>found</i> rx#ru#dq #advisory affiliate wr#kdyh#p#d#g#h#d#i#d#o#h#v#d#w#h#p#h#q#w#r#u#r#p#l#v#l#r#q#B		
	+5, <i>found</i> rx#ru#dq #advisory affiliate wr#kdyh#ehhq#involved lq#d#y#r#d#w#r#q#r#i#l#w#l#x#d#v#r#w#k#h#u# w#k#d#q#d#y#r#d#w#r#q#g#h#v#l#j#q#d#w#h#g#d#v#d#%minor rule violation%#x#q#g#h#u#d#s#d#q#d#s#s#u#r#y#h#g#e# #k#h# VHF,B		
	+6, <i>found</i> rx#ru#dq #advisory affiliate wr#kdyh#ehhq#k#h#f#dxvh#r#i#dq#investment-related exv#q#h#v#v#k#d#y#l#j#d#w#d#x#k#r#u#l#d#w#r#q#r#g#r#exv#q#h#v#v#g#h#q#l#g/#x#v#s#h#q#g#g#h#h#y#r#n#h#g/#r#u# u#h#v#w#u#l#f#w#h#g#B		
	+7, g#l#f#l#s#d#q#h#g# rx#ru#dq #advisory affiliate e #h#{sh#d#q#j#r#u#x#v#s#h#q#g#l#j# rx#ru#k#h#advisory affiliate i#r#p#p#h#p#e#h#v#k#l#s#/#e#d#u#l#q#j#r#u#x#v#s#h#q#g#l#j# rx#ru#k#h#advisory affiliate i#r#p# d#v#r#f#d#w#l#q#z#l#k#r#w#k#h#u#p#h#p#e#h#v#/#r#u#r#w#k#h#u#l#h#s#u#h#y#h#q#w#h#g#l#j# rxu#ru#k#h#advisory affiliate's d#f#w#y#l#w#h#v#B		
I1	Kdv#dq#d#x#k#r#u#l#d#w#r#q#r#g#r#d#f#w#d#v#dq#d#w#r#u#g# /d#f#r#x#q#w#d#w#/#r#u#h#g#h#u#d#f#r#q#w#d#f#w#r#u#j#u#d#q#w#h#g#r#u# rx# ru#dq #advisory affiliate hyhu#ehhq#h#y#r#n#h#g#r#u#x#v#s#h#q#g#g#B		
J1	Duh# rx#ru#dq #advisory affiliate q#r#z#k#h#x#e#h#f#w#r#i#dq #h#j#x#d#w#r#u# s#u#r#f#h#h#g#l#j#k#d#w#f#r#x#g# u#h#v#x#o#f#q#d#i#% h#v#%d#q#v#z#h#u#r#d#q# s#d#w#r#i#l#w#p#4#4#1#F#1/#4#4#1#G#1/#r#u#4#4#1#H#1#B		

Iru#|hv#d#q#v#z#h#u#r#k#h#r#o#r#z#l#j#t#x#h#v#w#r#q#v#/#r#p#s#d#w#h#d#f#l#y#l#p#x#q#l#f#l#d#f#w#l#q#G#U#S#

K1## +4, Kdv#dq | #grp#h#w#l#f#r#u#h#r#h#l#j#q#f#r#x#u#

Yes No

- +d, lq#kxh#sdvw#hng#| hduw/#hqm lqhg#| rx#ru#dq | #advisory affiliate lq#frqghfwlrq#z lk#dq | # investment-related dfwlyw|B  
- +e, hyhu#found wkdw#| rx#ru#dq | #advisory affiliate z huh#involved lq#d#ylrœwlrq#r i# investment-related vdwxwhv#ru#h jxœwlrqvB  
- +f, hyhu#g lvp lvhg/#sxuxdqw#r#d#hwwdhp hqw#dj uhhp hqw#dq#investment-related flyld# dfwlrq#eurxjkw#djdlqv#| rx#ru#dq | #advisory affiliate e | #d#vwdh#ru#foreign financial regulatory authorityB  
- +5, Duh#| rx#ru#dq | #advisory affiliate qrz #kxh#vxenhfw#r i#dq | #flyld#surfhhg lqj #kdw#frxœg# uhvxœw#dq#d#%| hv%#dqvz hu#r#dq | #sdw#r i#lwhp #4 1K 1+4 ,B  

Wkh#VHF#lv#htxlung#e|#kxh#Uhx#dlwru|#d#(lebw|#dfw#r#frqvgluh#kxh#hihf#r#ifw#h#jx#dlwrv#r#q#vp#d#
hqw#lv#l#q#rughu#r#gr#k#l#h#hghg#r#ghwup#qh#z#khkhu#r#x#p#h#wkx#ghilq#wrq#r#i#vp#d#xvlgvv#r#u#
%vp#d#r#ujdq#l#wlrq#x#gghu#ux#d#30:1#

Dqgvz hu#wk lv#whp #4 5#rqd #l# r#x#duh#uhj lvwhung#ru#uhj lvwhulgj#z wk#wk#VHF#and |rx#lqg lfdwhg#lq#uhvsrqv#
wr#whp #8 11+5 ,+f, #kdw# |rx#kdyh#uhjxawru| #dvvhw#kqghu#p dgdjhp hqwr#kdv#kdg# 58#p kdrq l# r#x#duh#
grwhntxlung#wr#ldqvz hu#wk lv#whp #4 5#l# r#x#duh#ldqj#hiru#lqldd#uhj lvwdwlrq#dv#l#vwdh#lgy lvhu/#lp hgg lqj#d#
fxuuhq#wvwdh#uhj lvwdwlrq/#ru#vz lwfk lqj#hup #VHF#wr#vwdh#uhj lvwdwlrq l#

```
Iru#sxusrvhv#ri#k lv#Lwhp #4 5#rqo|=#
```

- WrwddDvvhw#uhuhw#w#k#h#wrwddDvvhw#r#i#d#l#p /#d#wk#h#k#d#q#k#h#d#v#h#w#p#d#d#j#h#g#r#g#e#h#k#d#d#r#i#
clients1#l#g#h#w#p#l#l#g#j#|r#x#u#r#u#d#q#r#w#h#p#person's#wrwddDvvhw#/#r#x#p#d#|k#v#h#k#h#wrwddDvvhw#v#k#r#z#q#
r#g#d#f#x#u#h#g#w#e#d#d#q#f#h#v#k#h#h#w#e#x#w#k#v#h#wrwddDvvhw#h#s#r#u#h#g#r#g#d#f#r#g#v#r#d#g#w#h#g#e#d#d#q#f#h#v#k#h#h#w#z#l#k#
v#x#e#v#g#d#u#l#v#d#g#f#o#g#h#g/#i#h#k#d#w#d#p#r#x#q#w#l#v#d#u#j#h#u#l#h#
Control#p#h#d#g#v#k#h#s#r#z#h#u#w#g#l#h#f#w#r#u#f#d#x#v#h#k#h#g#l#h#f#w#l#g#r#i#h#k#h#p#d#d#j#h#p#h#g#w#r#u#s#r#d#f#l#v#r#i#d#
person/#z#k#h#w#h#u#k#u#r#x#j#k#z#q#h#v#k#l#s#r#i#h#v#f#x#u#l#h#v#/#e#|#f#r#g#w#d#f#w#/#u#f#w#k#h#u#z#l#h#l#D#g#|#person#w#k#d#w#
g#l#h#f#w#d#r#u#f#g#l#h#f#w#d#k#d#v#k#h#l#j#k#w#r#y#r#w#h#5#s#h#u#f#h#g#w#r#u#p#r#u#h#r#i#h#k#h#y#r#w#l#g#j#v#h#f#x#u#l#h#v#/#r#u#f#l#h#g#w#l#h#g#
w#r#5#s#h#u#f#h#g#w#r#u#p#r#u#h#r#i#h#k#h#s#u#r#i#l#w#/#r#i#d#q#r#w#h#p#person#l#v#h#u#v#x#p#h#g#w#r#control#w#k#h#w#k#h#p#person1#

D1## G lg# rx#kdyh#wrwd#dvvhw#r i# 8#p kqr#r#p ruh#q#k#h#dvw#g d |#r i#| rxw#p rvw#hfhqw#h#vfd#
|hduB

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

E1 Gr#|rx=

- ```
+4, control dqrkhu#qyhw p hq#dgylvhu#kdw#kdg#uhjxawru|#dvvhw#xqghu#p dgdjhp hqw#
+fdcfxawhg#dguhvsrqvhw#r#lwhp #811+5,+f,#r i#Irup #DGY,#r i# 58#p lqrq#ru#p ruh#r#g#k#h#
awvwgd|#r i#lw#p rvw#uhfhqw#ilvfd#|hduB#
+5, control dqrkhu#person +rwkhu#kdw#d#gdwud#shuvrq,#kdw#kdg#rwdgd#dvvhw#r i# 8#p lqrq#
ru#p ruh#r#g#k#h#awvwgd|#r i#lw#p rvw#uhfhqw#ilvfd#|hduB#
```

|     |          |
|-----|----------|
| F 1 | Duh# rx= |
|-----|----------|

- ```
+4, controlled e| #ru#qgghu#frp p rq#control z lk#dqrwku#dgyhvw hqw#dgylvhu#kdw#kdg#
uhjxwru| #lvhw#kqghu#p dgdjhp hqw#fdxwng#d#uhvsrqvh#r#lhp #8 11+5,+f,#r#irup #
DGY,#r# 58#p lqrq#ru#p ruh#rq#kxh#dvwgd|#ri#lw#p rvw#uhfhqw#ilvfd#| hduB#

+5, controlled e| #ru#qgghu#frp p rq#control z lk#dqrwku#person +rwku#kdwgd#dgdwudd#
shuvrg,#kdw#kdg#rwd#lvhw#r# 8#p lqrq#ru#p ruh#rq#kxh#dvwgd|#ri#lw#p rvw#uhfhqw#
ilvfd#| hduB#
```

Direct Owners and Executive Officers

FULL LEGAL NAME (Individuals:	DE/FE/I	Status	Date Status	Ownership Code	Control Person	PR	CRD No. If None: S.S. No. and Date of
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Last Name, First Name, Middle Name)			Acquired MM/YYYY				Birth, IRS Tax No. or Employer ID No.
KDUEHFN /#SHWHU /# DOOHQ	L	FHR /#SUHVIGHQW# # GIUHFWRU	3 ; 24 < < 8	QD	\	Q	; : 7 < 34
Z IQWURE /#MD \ /#V1	L	GIUHFWRU	34 24 < < 3	QD	\	Q	7679849
JHQR \ /#MRKQ /# WKR P DV	L	VHQIRU #S /#FKIHI# IIQDQFIDO#) #FKIHI# R SHUDWIRQV# R IILFHU	36 25 33 5	QD	\	Q	784984 ;
EUHVVOHU /# JUHJR U \ /#QHDO	L	VHQIRU #S /# JHQHUDO# FRXQVHO# /#FKIHI# OHJDO#R IILFHU#) # DVVIVWDQW# VHFUHWDU \	39 25 33 8	QD	\	Q	7975 ; 4 :
KDFNHWKDO /# P DWWKHZ /# MHUR P H	L	FKIHI#FRP SOLDQFH# R IILFHU	36 25 33 :	QD	\	Q	5 < 88769
QL[RQ /# FKUIVWLQH	L	GIUHFWRU #DQG# VHFUHWDU \	3 ; 25 33 3	QD	\	Q	8584 < < 8
DPHULFDQ# JHQHUDO#OLIH# IQVXUDQFH# FRP SDQ \	GH	VKDUHKROGHU	45 25 34 5	H	\	Q	58038 < ; 543
P XUSK \ /#NDUD /# P DUIH	L	VHQIRU #S#) #FKIHI# IQYHVWP HQW# R IILFHU	45 25 34 6	QD	\	Q	74 < 55 < 4

Schedule B**Indirect Owners**

41#Frp sdwh#V fkhgxd#E#rcq# #i#| rx#duh#vxe# lwwqj#dq#q#lwd#dssdfdwlrq1#V fkhgxd#E#dlnv#iru#lqirup dwlrq#
derxw#| rxu#lqgluhfw#rz qhuv>#| rx#p xv#lww#Frp sdwh#V fkhgxd#D/#z klk#dlnv#iru#lqirup dwlrq#derxw#
| rxu#lqgluhfw#rz qhuv1#K vh#V fkhgxd#F#r#d#p hgg#k#l#lqirup dwlrq1#

51#lqgluhfw#R z qhuv1#Z lk#uhvshfw#r#hdfk#rz qhu#dvwg#r#q#V fkhgxd#D#h{ fhs#lqglylgxdd#rz qhuv,/dvw#
eharz=#

+d,#lq#k#h#fdvh#r#idq#rz qhu#kdw#lv#d#frusrudwlrq/#hdfk#r#i#lw#kduhkrghuv#kdw#ehghilfld# #rz qv/#kdv#
wkh#uljkw#r#yrwh/#ru#kdv#k#h#srz hu#r#v#h#ru#lqgluhfw#k#h#vdc#r#i/#58 (#ru#p ruh#r#i#d#f#dv#r#i#d#yrwqj#
vhfxulw| #r#i#kdw#frusrudwlrq>#

Iru#sxusrvhv#r#i#k#l#V fkhgxd#/#d#*person* ehghilfld# #rz qv#dq| #vhfxulwlv=#l,#rz qhg#e| #k#lv2khu#
fk#lq/#vwhsfk#lq/#j#udqgfk#lq/#sduhqw/#vwhssduhw/#j#udqgsduhw/#vsrxvh/#v#edqj/#p rkhu0lq0adz /#
idwku0lq0adz /#vrq0lq0adz /#jdxjkwhu0lq0adz /#eurwku0lq0adz /#ru#v#vhu0lq0adz /#vkdulqj#k#h#vdp h#
uhvlgqfh>#ru#l#lkdw#k#h2vkh#kdv#k#h#uljkw#r#dftxlvh/#z lk#lq#93#gd| v/#kuxxjk#k#h#h{ huflvh#r#i#dq| #
rswlrq/#z duudqw/#ru#uljkw#r#sxufkdv#k#h#vhfxulw| 1#

+e,#lq#k#h#fdvh#r#idq#rz qhu#kdw#lv#d#sdwqhuvkls /#d#j#hghud#sdwqhuv#dqg#k#rvh#d#p lhg#dqg#vshfld#
sdwqhuv#kdw#kdyh#k#h#uljkw#r#uhfhlh#k#srq#g#lvrxwlrq/#ru#kdyh#frqwulxwhg/#58 (#ru#p ruh#r#i#k#h#
sdwqhuvkls *#f#dsldo>#

+f,#lq#k#h#fdvh#r#idq#rz qhu#kdw#lv#d#uuxvw/#k#h#uuxvw#dqg#hdfk#uuxvwh>#dqg#

+g,#lq#k#h#fdvh#r#idq#rz qhu#kdw#lv#d#d#p lhg#d#ldw| #frp sdq| #%00F%/#l#k#rvh#p hp ehuv#kdw#kdyh#
wkh#uljkw#r#uhfhlh#k#srq#g#lvrxwlrq/#ru#kdyh#frqwulxwhg/#58 (#ru#p ruh#r#i#k#h#00F *#f#dsldo/dqg#
+l#l#p dqdjhg#e| #hdfwhg#p dqdjhu/#d#hdfwhg#p dqdjhu1#

61#Frqwlqxh#s#k#h#kdlq#r#i#rz qhuvkls#dvwqj#d#58 (#rz qhuw#d#hdfk#h#yhd#R qfh#d#s#edf#h#srwqj#
frp sdq| #d#frp sdq| #vxemfw#r#V hfwlrqv#15#ru#48#g,#r#i#k#h#H{ fkdqjh#Dfw,#lv#hdfkhg/#qr#xwkuh#
rz qhuvkls#lqirup dwlrq#qhhg#eh#jlyhq1#

71#lq#k#h#GH2IH2L#froxp q#eharz /#hqwul#GH#d#i#k#h#rz qhu#lv#d#grp hvwlf#hqwlv| /#IH#d#i#k#h#rz qhu#lv#dq#
hqwlv| #d#frusrudwhg#ru#grp lf#hg#lq#d#iruhljq#frxqwl| /#ru#l#d#i#k#h#rz qhu#lv#dq#lqglylgxdd#

81#Frp sdwh#k#h#Vwdwv#froxp q#e| #hqwulqj#k#h#rz qhu#v#vwdwv#dv#sdwqhu/#uuxvwhh/#hdfwhg#p dqdjhu/#
vkduhkrghu/#ru#p hp ehuv#dqg#iru#vkduhkrghu#ru#p hp ehuv/#k#h#f#dv#r#i#vhfxulwlv#rz qhg#l#p ruh#
wkdq#r#q#h#lv#lvxhg,1#

91#R z qhuvkls#frghv# F#058 (#exw#hvv#kdw# H#0:8 (#ru#p ruh#
duh=# 83 (#
G#083 (#exw#hvv#kdw# I#0R wkuh#j#hghud#sdwqhu/#uuxvwhh/#ru#hdfwhg#
:8 (# p dqdjhu,#

:1#+d,#lq#k#h#*Control Person* froxp q/#hqwul#h#v#d#i#k#h#*person* kdv#*control* dv#ghilqhg#lq#k#h#J arvdu| #r#i#
Whup v#r#l#rup #DGY/#dqg#hqwul#Q r#d#i#k#h#*person* grhv#qrw#kdyh#*control*#Q rwh#kdw#kqghu#k#l#
ghilqlwlrq/#p rvw#h{ hfxwlyh#r#i#l#huv#dqg#d#58 (#rz qhuw/#j#hghud#sdwqhu/#hdfwhg#p dqdjhu/#dqg#
uuxvwhh#duh#*control persons*1#

+e,#lq#k#h#SU#froxp q/#hqwul#SU#d#i#k#h#rz qhu#lv#d#s#edf#h#srwqj#frp sdq| #kqghu#V hfwlrqv#15#ru#48
+g,#r#i#k#h#H{ fkdqjh#Dfw#

+f,#Frp sdwh#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
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								No. or Employer ID No.
VDIJ# UHWLJHPHQW# VHUYLEFHV/#QF1	GH	DLJ#OLI# KROGIQJV/# IQF1	VKDUHKROGHU	3725345	H	\	Q	<80 7:4896<
DPHULFDQ# IQWHUQDWIRQDO# JURXS/#QF1	GH	VDIJ# UHWLJHPHQW# VHUYLEFHV/# IQF1	VKDUHKROGHU	3424<<<	H	\	\	460 58<5694
DLJ#OLI# KROGIQJV/#QF1	GH	DJF#OLI# IQVXUDQFH# FRPSDQ\	VKDUHKROGHU	4525345	H	\	Q	:70 37;6765
DJF#OLI# IQVXUDQFH# FRPSDQ\	GH	DPHULFDQ# JHQHUDO# OLI# IQVXUDQFH# FRPSDQ\	VKDUHKROGHU	4525345	H	\	Q	:90 3363<54

Schedule D - Miscellaneous

\rx#p d| #xvh#kch#vsdfh#ehaz #r#h{sdlq#d#hvsrqvh#r#dq#whp #ru#r#surylg#dq|#r#khu#qirup dwlrq1#
 IWHP #<1F1#DSSOLFQW#DQG #FHUWDLQ #I#LWV#UHODWHG #SHUVRQV#D\D\#EH#GHH#HG #NR #KDYH#FXVWRG\#R I#
 FOHQW#IXQG V#R U#VHF#XULWLV#Z LWK #UHVSHFW#WR #FHUWDLQ #FOHQWV#WKDW#DUH#R IIVKR UH/#Z KROO\O
 RZ QHG #XEVIG IDUIHV #HDFK #D#VXEVIG IDU\%, #R I#R IV1#UHJ LVWHUH#G #QYHVWP HQW#R P SDQ IHV #HDFK #
 D#UHJ LVWHUH#G #IXQG %,1#WKH#ILQDQFIDO#VWDWHP HQWV#R I#IDFK #VXEVIG IDU\#DUH#R QVR OIGDWHG #QWR #
 WKH#ILQDQFIDO#VWDWHP HQWV#R I#WKH#UHVSHFWLYH#UHJ LVWHUH#G #IXQG #DQG #DUH#DXGIWHG #Q #
 FRQQHFWRQ #Z LWK #WKH#DXGIW#R I#WKH#ILQDQFIDO#VWDWHP HQWV#R I#WKH#UHJ LVWHUH#G #IXQG 1#NKL#
 DXGIW#LV #SHUIRUP HG #E\ #WKH#LQGHSHQGHQW#SXEOLF #DFFRXQDQW#OLVWHG #Q #UHVSQVH#NR #VHFWRQ #
 <1#F1#R I#VFKHG XOH#G 1#VFKHG XOH#G /#VHFWRQ #: 1E1+4 , VWDWH#VWUHHW#D\PDQ #WUXVW#R P SDQ\/#OWG 1#
 +DGP IQLVWUDWRU%, #LV#WKH#DGP IQLVWUDWRU#R I#WKH#IDFK #R I#WKH#SULYDWH#IXQGV#LGHQWLIGH#E\#
 VDDPFR #Q #VFKHG XOH#G /#VHFWRQ #: 1E1+4 , +WKH#VXEVIG IDUIHV%,/#Z KLFK #DUH#ERWK #Z KROO\ORZ QHG #
 VXEVIIDUIHV#R I#R IV1#UHJ LVWHUH#G #QYHVWP HQW#R P SDQ IHV #WKH#UHJ LVWHUH#G #IXQGV%,1#WKH#
 DGP IQLVWUDWRU#LV #UHVSQVLEOH#R U#WKH#FDOFXODWIRQ #R I#NKH#QHW#DVVHW#YDOXH#WKH#QDYV%,#R I#
 WKH#VXEVIG IDUIHV1#Q #FDOFXODWIQJ #WKHVH#QDYV/#WKH#DGP IQLVWUDWRU#Z LOO#YDOXH#WKH#SRUWIR OIR #
 VHF#XULWLV#R I#WKH#VXEVIG IDUIHV#Q #DFFRUGDQFH#Z LWK #DOXDWIRQ #SURFHGXUHV#DSSOLFDEOH#NR #
 WKH#UHJ LVWHUH#G #IXQGV/#Z KLFK #KDYH#HHQ #DSSURYHG #E\ #WKH#UHJ LVWHUH#G #IXQGV #ERDUGV#R I#
 GIWHFWRUV1

DRP Pages

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)

Q r#qirup dwlrq#lkhg

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

GENERAL INSTRUCTIONS

Wklv#G lvr#vxuh#Uhsrw#lqj#Sdjh#GUS#DGY,#lv#lqj# ☒ LQ LWID O# **OR** ☒ DP HQ GHG #uhvsrqvh#xvhg#r#uhsrw#ghw#lv#ru#diilp dwlyh#uhvsrqvhv#wr#lwhp v#4 1F 1/#4 1G 1/#4 1H 1/#4 1I 1#ru#4 1J 1#r#i#lrup #DGY 1#

Uhjxawru|#Dfwlrq#

Fkhfn#lwhp +v,#ehlqj#uhvsrqghg#r=#

- | | | | | |
|-------------------------------------|--|-------------------------------------|-------------------------------------|-------------------------------------|
| <input type="checkbox"/> 44 1F +4 , | <input type="checkbox"/> 44 1F +5 , | <input type="checkbox"/> 44 1F +6 , | <input type="checkbox"/> 44 1F +7 , | <input type="checkbox"/> 44 1F +8 , |
| <input type="checkbox"/> 44 1G +4 , | <input type="checkbox"/> 44 1G +5 , | <input type="checkbox"/> 44 1G +6 , | <input type="checkbox"/> 44 1G +7 , | <input type="checkbox"/> 44 1G +8 , |
| <input type="checkbox"/> 44 1H +4 , | <input checked="" type="checkbox"/> 44 1H +5 , | <input type="checkbox"/> 44 1H +6 , | <input type="checkbox"/> 44 1H +7 , | |
| <input type="checkbox"/> 44 1I 1 | <input type="checkbox"/> 44 1J 1 | | | |

Xvh#d#vhsdudwh#GUS#ru#ndfk#nyhqw#ru#*proceeding* 1#Wkh#vdp h#nyhqw#ru#*proceeding* p d|#eh#uhsrw#ghw#lv#ru#p ruh#kdq#r#q#*person* ru#q#wl|#xv#lqj#r#q#GUS 1#l#h#z#lk#d#r#p sdwhg#H{hfxwlrq#Sdjh 1#

Rqh#nyhqw#p d|#uhvxw#lqj#p ruh#kdq#r#q#diilp dwlyh#lqvz hu#wr#lwhp v#4 1F 1/#4 1G 1/#4 1H 1/#4 1I 1#ru#4 1J 1#Xvh#r#q#l#r#q#GUS#wr#uhsrw#ghw#lv#uhawng#wr#k#h#vdp h#nyhqw#l#l#lq#nyhqw#j lyhv#lvh#wr#dfwlrqv#e|#p ruh#wkdq#r#q#uhjxawru/#surylgh#ghw#lv#wr#ndfk#dfwlrq#r#q#d#vhsdudwh#GUS 1#

SDUW#

D 1## Wkh#*person(s)* ru#q#wl|#lv,#ru#z#krp #k#lv#GUS#lv#ehlqj#lkhg#lv#duh,#=

- ☐ \rx#wkh#dgy#lvru|#ilp ,#
- ☐ \rx#lqg#r#q#ru#p ruh#r#i#|rxu#*advisory affiliates*
- ☒ Rqh#ru#p ruh#r#i#|rxu#*advisory affiliates*

L#k#lv#GUS#lv#ehlqj#lkhg#ru#lqj#*advisory affiliate*/#j lyh#k#h#xawng#p h#r#i#k#h#*advisory affiliate* eh#z# +iru#lqg#ly#lxdo/#Odvw#lqdp h/#Hlvw#lqdp h/#P lggd#lqdp h,1

L#k#h#*advisory affiliate* kdvd#d#CRD qxp ehul#surylgh#wkdw#qxp ehul#l#q#rw/#lqg#lfdwh#q#r#q#uhj lvwhung#e|#Fkhfn#lqj#k#h#dssursudwh#er{ 1#

DGY#GUS#0 DGYLV RU\#D I I I O I D W H

CRD

[4648:](#)Wklv#dgy#lvru|#lilddwh#lv# ☒ d#ilp ☐ dq#lqg#ly#lxdo

Qxp ehul#

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VXQDP HUIFD#
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- ☐ Wk l#GUS#kxrxg#eh#hup ryhg#iurp #kch#DGY#uhfrug#ehfdxvh#kch#*advisory affiliate(s)* l#gr#rqqjh#
 dvvrfldwhg#z l#kch#dgylvhu#
☐ Wk l#GUS#kxrxg#eh#hup ryhg#iurp #kch#DGY#uhfrug#ehfdxvh=#4, #kch#hyhqw#ru#*proceeding*
 rffxuhg#p ruh#kdg#hng#| hduv#djr#ru#5, #kch#dgylvhu#lv#hng#ru#dssq lqj#iru#hng#lwdwlrq#
 z l#kch#VHF#dgg#kch#hyhqw#z dv#uhvryhg#lq#kch#dgylvhu#ru#*advisory affiliate's* idyru#

Li#| rx#duh#hng#lwhung#ru#hng#lwhulqj#z l#kch#*state securities authority* /#| rx#p d| #hup ryh#d#GUS#iru#
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 dq| #hyhqw#dwhg#lq#lwhp #4 4#kdw#rffxuhg#p ruh#kdg#hng#| hduv#djr#l#

- ☐ Wk l#GUS#kxrxg#eh#hup ryhg#iurp #kch#DGY#uhfrug#ehfdxvh#l#z dv#lwhg#lq#huuru/#vxfk#dv#gxh#r#
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affiliate vxep lwhg#d#GUS#z l#kch#lurp #DGY/#EG#ru#X 07, #r#kch#DUG#ru#CRD iru#kch#hyhqwB#Li#kch#
 dqvz hu#lv#%#hv/%#qr#rwhu#lqirup dwhrq#r#q#k l#GUS#p xv#eh#surylgghl#

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QRWH=#Wkch#frp schwlrq#r i#k l#lurp #grhv#qrw#hndhyh#kch#*advisory affiliate* r i#lwh#redj dwhrq#r#xsgdwh#
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SDUW#LI#

41## Uhjxawru|#Dfwhrq#lq lwdwhg#e|=

☐ VHF## ☐ Rwhu#lghud## ☐ Vwdwh## ☐ SRO ☐ Iruhlg

+Ixawru h#r i#uhjxawru/#*foreign financial regulatory authority*/lghudq#vwdwh/#ru#SRO, #

51 Sukflsdq#Vdqfwhrq=

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☐ H{dfw ☐ H{sdlqdwlrq

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71 Grfnhw2Fdvh#Qxp eh=

81

Advisory Affiliate Hp s cr | lqj #I l p #z khq #d f w l y l w | #r f f x u h g #z k l f k #h g #w r #w k h #h j x d w r u | #d f w l r q #i #
d s s d f d e d h , =

91 S u l q f l s d d # S u r g x f w # W | s h =

R w k h u # S u r g x f w # W | s h v = #

: 1 G h v f u l e h # w k h # d o h j d w l r q v # u h d w h g # w r # w k l v # h j x d w r u | #d f w l r q # | r x u # u h v s r q v h # p x v w # i l w z l k l q # w k h # v s d f h #
s u r y l g h g , =

; 1 F x u h q w # V w d w x v B ##### ☐ S h q g l q j ☐ R q # D s s h d o ☐ I l q d o

< 1 L i # r q # d s s h d o # h j x d w r u | #d f w l r q # d s s h d o g # w r # V H F / # S R O , I n g h u d o # r u # V w d w h # r x u w , # d q g # G d w h # D s s h d o #
I l h g = #

L i # I l q d o # r u # R q # D s s h d o # f r p s d w h # d o # l w h p v # e h a r z I # I r u # S h q g l q j # D f w l r q v # f r p s d w h # l w h p # 6 # r q d I #

431 K r z # z d v # p d w h u # u h v r q y h g = #

441 U h v r o x w l r q # G d w h # P P 2 G G 2 \ \ \ \ , =

☐ H { d f w ☐ H { s o l q d w l r q
L i # q r w # h { d f w # s u r y l g h # h { s o l q d w l r q =

451 U h v r o x w l r q # G h w d l o =

D 1 # # Z h u h # d q | # r i # w k h # i r o r z l q j # V d q f w l r q v # *Ordered* + f k h f n # d o # d s s u r s u l d w h # l w h p v , B #

☐ P r q h w d u | 2 I l q h # D p r x q w = '

☐ U h y r f d w l r q 2 H { s x o v l r q 2 G h q l d o #

☐ G l v j r u j h p h q w 2 U h v w l w x w l r q

☐ F h q v x u h

☐ F h d v h # d q g # G h v l w 2 L q m x q f w l r q

☐ E d u

☐ V x v s h q v l r q

E 1 R w k h u # V d q f w l r q v # *Ordered*:

V d q f w l r q # g h w d l o = # i # x v s h q g h g / # *enjoined* r u # e d u h g / # s u r y l g h # g x u d w l r q # l q f o x g l q j # w d u w # g d w h # d q g #
f d s d f l w h v # l i i h f w h g # J h q h u d o # V h f x u l w h v # S u l q f l s d o # I l q d q f l d o # R s h u d w l r q v # S u l q f l s d o # h w f l , I # L i #
u h t x d d i l f d w l r q # e | # h { d p 2 u h w d l q l q j # z d v # d # f r q g l w l r q # r i # w k h # v d q f w l r q / # s u r y l g h # h g j w k # r i # w l p h #
j l y h q # w r # u h t x d d i | 2 u h w d l q / # w | s h # r i # h { d p # u h t x l u h g # d q g # z k h w k h u # f r q g l w l r q # k d v # e h h q # v d w l v i l h g I # L i #
g l v s r v l w l r q # u h v x o h g # l q # d # i l q h / # s h q d o w | / # u h v w l w x w l r q / # g l v j r u j h p h q w # r u # p r q h w d u | # f r p s h q v d w l r q / #
s u r y l g h # w r d o # d p r x q w # s r u w l r q # h y l g # d j d l q v w # | r x # r u # d q # *advisory affiliate* g d w h # s d l g # d q g # i # d q | #
s r u w l r q # r i # s h q d o w | # z d v # z d l y h g = #

461 S u r y l g h # d # e u l i # v x p p d u | # r i # g h w d l o # u h d w h g # w r # w k h # d f w l r q # v d w x v # d q g # r u , # g l v s r v l w l r q # d q g # l q f o x g h #
u h n y d q w # h u p v / # f r q g l w l r q v # d q g # g d w h v # | r x u # u h v s r q v h # p x v w # i l w z l k l q # w k h # v s d f h # s u r y l g h g , I #

GENERAL INSTRUCTIONS

Wk l#G l#f#r#v#x#h#U#h#s#r#w#l#q#j#S#d#j#h#G#U#S#D#G#Y#,#l#v#l#q#I#Q#L#W#I#D#O#**OR** D#P#H#Q#G#H#G#U#h#v#s#r#q#v#h#x#v#h#g#r#U#h#s#r#w#
g#h#w#l#v#h#r#u#d#i#l#p#d#w#l#y#h#U#h#v#s#r#q#v#h#v#r#U#h#p#v#4#4#1#F#1/#4#4#1#G#1/#4#4#1#H#1/#4#4#1#I#1#r#u#4#4#1#J#1#r#i#I#r#u#p#D#G#Y#1#

U#h#j#x#l#w#r#u#|D#f#w#l#r#q#

F#k#h#f#n#U#h#p#+v#,#e#h#l#q#j#U#h#v#s#r#q#g#h#g#r#=#

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| <input checked="" type="checkbox"/> 44 1F +4 , | <input checked="" type="checkbox"/> 44 1F +5 , | <input type="checkbox"/> 44 1F +6 , | <input checked="" type="checkbox"/> 44 1F +7 , | <input checked="" type="checkbox"/> 44 1F +8 , |
| <input type="checkbox"/> 44 1G +4 , | <input type="checkbox"/> 44 1G +5 , | <input type="checkbox"/> 44 1G +6 , | <input type="checkbox"/> 44 1G +7 , | <input type="checkbox"/> 44 1G +8 , |
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| <input type="checkbox"/> 44 1I 1 | <input type="checkbox"/> 44 1J 1 | | | |

X#v#h#d#v#h#s#d#u#d#h#G#U#S#r#u#h#d#f#k#h#y#h#q#w#r#u#*proceeding* 1#W#k#h#v#d#p#h#h#y#h#q#w#r#u#*proceeding* p#d#|e#h#U#h#s#r#w#h#g#r#u#
p#r#u#h#k#d#q#r#q#h#*person* r#u#h#g#w#l#|x#v#l#q#j#r#q#h#G#U#S#1#I#l#h#z#l#k#d#f#r#p#s#d#w#h#g#H#{h#f#x#w#l#r#q#S#d#j#h#1#

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SDUW#

D#1#W#k#h#*person(s)* r#u#h#g#w#l#+l#v#,#r#u#z#k#r#p#k#l#v#G#U#S#l#v#e#h#l#q#j#l#h#g#l#v#d#u#h#=#

- ☐ \r#x#w#k#h#d#g#y#l#r#u#l#|l#p#,#
- ☐ \r#x#d#g#g#r#q#h#r#u#p#r#u#h#r#i#|r#x#U#h#d#v#s#o#r#y#a#f#f#i#l#i#e#s
- ☒ R#q#h#r#u#p#r#u#h#r#i#|r#x#U#h#d#v#s#o#r#y#a#f#f#i#l#i#e#s

I#l#k#l#v#G#U#S#l#v#e#h#l#q#j#l#h#g#l#r#u#d#q#*advisory affiliate*/#j#l#y#h#k#h#x#o#l#q#p#h#r#i#k#h#*advisory affiliate* e#h#z#
+i#r#U#h#g#g#l#y#g#x#d#o#/#O#d#v#h#q#d#p#h#/#I#l#w#h#q#d#p#h#/#P#g#g#h#q#d#p#h#1

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e#|#F#k#h#f#n#l#q#j#k#h#d#s#s#u#r#s#u#d#h#e#r#{1#

D#G#Y#G#U#S#0#D#G#Y#I#V#R#U#\#D#I#I#O#I#D#W#H

CRD Wk l#d#g#y#l#r#u#l#|d#i#l#d#h#l#v#☒ d#I#l#p ☐ d#q#l#g#g#l#y#g#x#d#o

Q#x#p#e#h#=#

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- ☐ Wk l#G#U#S#v#k#r#x#o#e#h#U#h#p#r#y#h#g#r#u#p#k#h#D#G#Y#U#h#f#r#u#g#e#h#f#d#x#v#h#k#h#*advisory affiliate(s)* l#v#q#r#r#q#j#h#
d#w#r#f#l#d#w#h#g#z#l#k#k#h#d#g#y#l#h#l#
- ☒ Wk l#G#U#S#v#k#r#x#o#e#h#U#h#p#r#y#h#g#r#u#p#k#h#D#G#Y#U#h#f#r#u#g#e#h#f#d#x#v#h#=#4#,#k#h#h#y#h#q#w#r#u#*proceeding*
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Li#| rx#duh#uhj lwhuhg#ru#uhj lwhulqj#z l#k#d#state securities authority /#| rx#p d| #uhp ryh#d#GUS#iru#
dq#hyhqw#| rx#uh#srwhg#rq#| #q#uh#vsrqvh#r#lwhp #4 1G+7, /#dqg#rq#| #l#kdw#hyhqw#ffxuhg#p ruh#
wkdg#h#q#| hduv#dj r1#l#| rx#duh#uhj lwhuhg#ru#uhj lwhulqj#z l#k#k#VHF /#| rx#p d| #uhp ryh#d#GUS#iru#
dq| #hyhqw#lwhg#q#lwhp #4 4#kdw#ffxuhg#p ruh#kdg#h#q#| hduv#dj r1#

☐ Wk l#GUS#kx#x#q#eh#uhp ryhg#iurp #k#h#DGY#uh#frug#eh#fdxvh#lwhz dv#l#h#q#l#uuru/#v#fk#dv#g#x#h#r#
d#f#du#l#fd#d#ru#g#d#d#h#q#u#| #p lwdnh1#H {s#l#q#k#h#f#l#f#x#p vwdq#fhv=#

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affiliate vxep lwhg#d#GUS#z l#k#l#rup #DGY/#EG#ru#X 07, #r#k#h#DUG#ru#CRD iru#k#h#hyhqwB#l#k#h#
dqvz hu#l#v#%#h#v#%#q#r#r#k#h#l#q#irup d#l#r#q#r#q#k#l#GUS#p xv#v#eh#s#ury#l#ghg1#

☐ \hv ☒ Qr

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SDUW#L#

41## Uhj#x#l#wru#| #d#f#l#r#q#q#l#d#h#g#e#| =

☒ VHF## ☐ R wku#l#h#ghud## ☐ Vwdwh## ☐ SRO ☐ Iruh#j#q
+I#x#l#q#dp h#r#i#uhj#x#l#wru/#foreign financial regulatory authority/#h#ghudo#v#wdwh/#ru#SRO,#
X IV1#VHF#X UIWIHV#DQG#H [FKDQJH#F R P P LVVIRQ

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R wku#Vd#q#f#w#l#r#q#v#=#
FHDVH#DQG#G H V L V W/#G L V J R U J H P H Q W/#X Q G H U W D N I Q J

61 Gdwh#l#q#l#d#h#g#P P 2G G 2\\ \\ \\,=#
3<24425336 ☒ H {dfw ☐ H {s#l#q#d#w#l#r#q#
Li#q#r#w#h {dfw#s#ury#l#ghg#h {s#l#q#d#w#l#r#q#=#

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81 Advisory Affiliate Hp s#r| l#j#l#l#p #z khq#l#f#w#l#l#| #r#f#f#x#u#h#g#z k#l#f#k#h#g#r#k#h#h#j#x#l#wru#| #l#f#w#l#r#q#l#l#
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91 Su#q#f#l#s#d#Surg#x#f#w#W|sh#=
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:1 Ghvfuleh#k#h#l#d#h#j d#l#r#q#v#h#d#h#g#r#k#l#l#uhj#x#l#wru#| #l#f#w#l#r#q#| rxu#uh#vsrqvh#p xv#v#l#l#z l#k#l#q#k#h#v#s#d#f#h#
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VHH#G H V F U L S W I R Q #X Q G H U #L W H P #4 6

;1

Fxuhqw#VwdwxvB##### Shqglkj Rq#Dsshdo Ikd0

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D l## Z huh#dq | #r i#kh#ir#rz lqj #Vdqfwrqv#Ordered +fkhn#d#lssursuldwh#dwhp v,B#

☒ Prqhwdul 2Ilqh#Dp rxqw=' #13/333/333133

☐ Uhyrfdwlrq2H{sxavlrq2Ghqld#

☒ G ljrurjhp hqw2Uhvvlwlrq

☐ Fhqvxuh

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☐ Edu

☐ Vxvshqvlrq

E1 R wkuh#Vdqfwrqv#Ordered:

VHH#WHP #16#GHVFULSWIR Q

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fdsdflwhv#lihfwhg#J hghud#Vhfuxlwhv#Sulqf#ldq#I lqdgfld#R shudwlrqv#Sulqf#ldq#hwf1, l#Li#

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uhdydqw#uhup v/#frqglwlrqv#dgg#gjdwv#| rxu#uhvsrqvh#p xv#i#l#z lkl#kh#v#sdfh#surylghg, l#

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YIR ODWHG #VFWIR Q #13+E, #R I#WKH#H [FKDQJH#DFW#DQG #JUXOH#13E08#E\#LVVXIQLJ #DQ #Q VVUDQFH#

SROLF\#R #EULJ KSR LQW#LQF1/#R U#WKH#SXUSRVH#R I#VVLVWIQLJ #EULJ KWSR LQW#LQ #R Q FHDOLQJ #

OR VVHV1#DV#D #JHVXOW/#EULJ KWSR LQW#DGH#DWHUIDO#D LVVWDWHP HQWV#LQ #LWV#SXEOLE#ILOIQJV#

Z LWK#WKH#VHF1#WKH#VHF#DOVR #R XQG #WKDW#DLJ #Z DV#D#FDXVH#R I#D #EULJ KWSR LQW#R IILFHU#V#

YIR ODWIR Q #R I#JUXOH#16E505R I#WKH#H [FKDQJH#DFW#E\#LVVXIQLJ #DQ #Q VVUDQFH#SROLF\#WKDW#

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WR #L, #FHDVH#DQG #GHVLVW#IURP #R QWLOXIQJ #R U#FDXVILQJ #DQ \#YIR ODWIR QV/#R U#DQ \#IXWXUH#

YIR ODWIR QV/#R I#VFWIR Q #13+E, #DQG #JUXOHV#13E08#DQG #16E505R I#WKH#H [FKDQJH#DFW>#LL, #

GLVJR UJH# 46 : /86817 : >#DQG #LL, #JHWDILQ #DQ #Q GHSHQG HQW#R QVXOWDQW#DQG #R #DGRSW/#

IP SOHP HQW#DQG #P DIQWDIQ #LQWHUQDO#R QWUROV /#SOLF IHV /#SUDFWLFHV /#DQG #SUR FHGXUHV#
 UHFR P P HQGHG #E \#WKH#R QVXOWDQW#LQ #D #SDUDOOHO#SUR FHHG IQJ /#DLJ #R QVHQWHG #WR #WKH#
 HQWU \#R I #D #LQDO#XGJ P HQW#E \#WKH#VHF #Q #Z KLFK #DLJ #Z DV #LIQH # 43/333/3331

GENERAL INSTRUCTIONS

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 ghwdlv#ru#diilp dwyh#hvsrqvhv#r#Lhp v#4 1F 1/#4 1G 1/#4 1H 1/#4 1I 1#ru#4 1J 1#r#rup #DGY 1#

Uhjxwru| #Dfwlrq#

Fkhfn#Lhp +v,#ehlqj#hvsrqghg#r=#

- | | | | | |
|--|--|-------------------------------------|--|--|
| <input checked="" type="checkbox"/> 44 1F +4 , | <input checked="" type="checkbox"/> 44 1F +5 , | <input type="checkbox"/> 44 1F +6 , | <input checked="" type="checkbox"/> 44 1F +7 , | <input checked="" type="checkbox"/> 44 1F +8 , |
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| <input type="checkbox"/> 44 1I 1 | <input type="checkbox"/> 44 1J 1 | | | |

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Rqh#nyhqw#p d | #hvxw#Lq#p ruh#kdq#rgh#diilp dwyh#dqvz hu#r#Lhp v#4 1F 1/#4 1G 1/#4 1H 1/#4 1I 1#ru#4 1J 1#
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 Wkdq#rgh#uhjxwru/#surygh#ghwdlv#r#ndfk#dfwlrq#r#l#vhsdudwh#G US 1#

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D1## Wkh#*person(s)* ru#hqw| +lv,#ru#Z krp #Wklv#G US#lv#ehlqj#lghg#lv#duh,=#

- ☐ \rx#Wkh#dgylvru| #ilp ,#
- ☐ \rx#dqg#rgh#ru#p ruh#r#i# rxu#*advisory affiliates*
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DGY#G US#0 DGYLVR U \#D I I I O I D W H

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Qxp ehv=#

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P lggd, #

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E1 Li#k#advisory affiliate l#h#hduv#l#r#ru#l#h#hduv#l#r#ru#l#h#hduv#l#r#ru#l#h#hduv#l#r#ru#
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☐ \hv ☒ Qr

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SDUW#L#

4 l## Uhjxawru| #Dfwlrq#d#l#h#hduv#l#r#ru#l#h#hduv#l#r#ru#l#h#hduv#l#r#ru#l#h#hduv#l#r#ru#

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4426325337 ☒ H{dfw ☐ H{sawdwrq
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91

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 Qr#Surgxfw
 R wkh#Surgxfw#W|shv=#

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☒ Glvjrujhp hqw2Uhvwl#w#wlrq

☐ Fhqvxuh

☐ Fhdvh#d#g#g#G#h#v#l#w#2Lq#k#q#f#wlrq

☐ Edu

☐ Vxvshqv#lrq

E1 R wkh#V#d#q#f#wlrq#v#Ordered:

D#L#J#H#Z#D#V#H#R#U#G#H#U#H#G#H#W#R#H#U#H#W#D#I#Q#D#Q#H#Q#G#H#S#H#Q#G#H#Q#W#F#R#Q#V#X#O#W#D#Q#W#H#R#H#[D#P#I#Q#H#F#H#U#W#D#I#Q#H#R#I#
 I#W#V#H#S#U#I#R#U#H#U#D#Q#V#D#F#WIR#Q#V#D#Q#G#H#R#H#I#V#W#D#E#O#L#V#K#H#D#H#U#D#Q#V#D#F#WIR#Q#H#Y#I#H#Z#H#F#R#P#P#L#W#H#H#H#R#H#
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 Z#I#W#K#H#H#G#H#S#D#U#W#P#H#Q#W#H#R#I#H#X#V#W#I#F#H#H#%G#R#M#%#
 V#d#q#f#wlrq#h#g#w#d#l#h#h#x#v#h#q#g#h#g#/#enjoined ru#e#d#u#h#g#/#sury#l#g#h#g#x#u#d#wlrq#d#q#f#o#g#l#q#j#h#w#d#w#h#g#d#h#d#g#g#

fdsdflwlv#dlihfwhg#J hqhude#Vhfxulwlv#Sulqflsdo#Hlqdgfld#R shudwlrqv#Sulqflsdo#hwf1,1#i#
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 surylg#rwd#dp rxqw/#srwlrq#hyhg#djdqvw#|rx#r#ldq#*advisory affiliate* gdwh#sdlg#ldqg#li#d|q|#
 srwlrq#r i#shqdw|#z dv#z dlyhg=#
 DLJ /#z LWKR XW#DGP LWLQJ #R U#GHQ \IQJ #WKH#DOOHJ DWIR QV#Q #WKH#VHF #FRP SODIQW/#
 FRQVHQWHG #NR #WKH#LVXDQF#R I#D#LIQDO#MXGJPHQW=#D,#SHUPDQHQWO\#IQMR LQIQJ #W#
 DQG #WV#HP SOR \HHV#DQG #JHODWHG #SHUVRQV#EURP #YIR ODWIQJ #VHFWRQ #4 3+E, #R I#WKH#
 VHFUXULWLV#H [FKDQJH#DFW#R I#4<67#%H [FKDQJH#DFW%,/H [FKDQJH#DFW#UXOH#43E08/#DQG #
 VHFWRQ #4 :+D, #R I#WKH#VHFUXULWLV#DFW#R I#4<66#%VHFUXULWLV#DFW%,#DQG #EURP #DLGIQJ #
 DQG #DEHWWIQJ #YIR ODWIR QV#R I#VHFWRQV#4 6+D, #DQG #4 6+E, +5, +D, #R I#WKH#H [FKDQJH#DFW#
 DQG #H [FKDQJH#DFW#UXOHV#45E053 /#46D04 /#DQG #46D04 6>#E, #R UGHUIQJ #W#WR #GLVJRUIJH#
 WKH# 6</; 54/333 #Q #IHHV#WKDW#W#JHFHLYHG #EURP #WKH#SQF#WUDQVDFWIR QV/#SOXV#
 SUHMXGJPHQW#QWUHVW#R I# 9/878/333>#DQG #F, #SURYIGIQJ #RU#DLJ #WR #JHWDIQ #DQ #
 IQGSHSQGHQW#FRQVXOWDQW#WR #H [DP IQH#F#HUWDIQ #WUDQVDFWIR QV#QWUHG #QWR #
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461 Surylg#d#eulh#vxp p du|#r i#ghwdlv#uhawhg#r#kch#dfwlrq#vdxwv#ldqg#ru, #glsvrvlwlrq#ldqg#lqfoxgh#
 uhdhdq#w#hup v/#frqglwlrqv#ldqg#gdwv#|rxu#uhvsrqvh#p xv#l#w#z lwq#kch#vsdfh#surylg#h,1#
 DLJ #z DV#R UGHUHG #NR #JHWDIQ #DQ #QGHSHQGHQW#FRQVXOWDQW#WR #H [DP IQH#F#HUWDIQ #R I#WV#
 SUIRU#WUDQVDFWIR QV#DQG #WR #IVWDEOLVK #D#WUDQVDFWIR QJ#UHYLHZ #FRPP LWVH#WR #UHYLHZ #
 WKH#SSUR SUIDWHQHVV#R I#F#HUWDIQ #IXWXUH#WUDQVDFWIR QV1#WKH#VHWWOHP HQW#z LWK #WKH#
 GHSDUWP HQW#R I#MXVWLFH#%GRM%,

GENERAL INSTRUCTIONS

Wklv#G lfvxuh#Uhsrwldqj#Sdjh#GUS#DGY, #lv#ldq# LIQWIDO#OR DP HQGHG #uhvsrqvh#xvhg#r#uhsrw#
 ghwdlv#iru#diilp dwlyh#uhvsrqvhv#r#lwhp v#4 1F 1/#4 1G 1/#4 1H 1/#4 1I 1#ru#4 1J 1#r i#lrup #DGY1#

Uhjxawru|#dfwlrq#

Fkhfn#lwhp +v, #ehlqj#uhvsrqghg#r=#

- | | | | | |
|---|---|------------------------------------|------------------------------------|------------------------------------|
| <input type="checkbox"/> 44 1F +4, | <input type="checkbox"/> 44 1F +5, | <input type="checkbox"/> 44 1F +6, | <input type="checkbox"/> 44 1F +7, | <input type="checkbox"/> 44 1F +8, |
| <input checked="" type="checkbox"/> 44 1G +4, | <input checked="" type="checkbox"/> 44 1G +5, | <input type="checkbox"/> 44 1G +6, | <input type="checkbox"/> 44 1G +7, | <input type="checkbox"/> 44 1G +8, |
| <input type="checkbox"/> 44 1H +4, | <input type="checkbox"/> 44 1H +5, | <input type="checkbox"/> 44 1H +6, | <input type="checkbox"/> 44 1H +7, | |
| <input type="checkbox"/> 44 1I 1 | <input type="checkbox"/> 44 1J 1 | | | |

Xvh#d#vhsdudwh#GUS#iru#ndfk#nyhqw#r#*proceeding* 1#kch#vdp h#nyhqw#r#*proceeding* p d|#eh#uhsrwng#iru#
 p ruh#kdg#rgh#*person* ru#hqw|#xvldqj#rgh#GUS1#l#h#z lwk#d#frp sdwhg#H {hfxwlrq#Sdjh1#

Rqh#nyhqw#p d|#uhvxong#p ruh#kdg#rgh#diilp dwlyh#ldqvz hu#r#lwhp v#4 1F 1/#4 1G 1/#4 1H 1/#4 1I 1#ru#4 1J 1#
 Xvh#r#qj#rgh#GUS#r#uhsrw#ghwdlv#uhawhg#r#kch#vdp h#nyhqw#l#ldq#nyhqw#jlyhv#lvh#r#dfwlrqv#e|#p ruh#
 wkdq#rgh#uhjxawru/#surylg#ghwdlv#r#ndfk#dfwlrq#r#d#vhsdudwh#GUS1#

SDUW#

D1## Wkh#*person(s)* ru#hqw|#lvh, #iru#z krp #k v#GUS#lv#ehlqj#ldhg#lv#duh,=#

- ☐ \rx#wkh#dgy#lru|#lup ,#
- ☐ \rx#dgg#rgh#rup ruh#r#|rxu#*advisory affiliates*
- ☒ Rgh#rup ruh#r#|rxu#*advisory affiliates*

Li#k#l#GUS#l#eh#lj#l#h#lru#d#*advisory affiliate*/#j#l#h#k#h#ix#d#p h#r#i#k#h#*advisory affiliate* eh#z#
 +iru#d#g#l#y#l#x#d#r/#d#v#w#l#d#p h/#l#l#v#w#l#d#p h/#p#l#g#g#h#l#d#p h,1
 Li#k#h#*advisory affiliate* kdv#d#CRD qxp eh#u/#s#u#r#y#l#g#h#k#d#w#l#x#p eh#u#l#i#q#r#w/#d#g#l#f#d#w#h#q#r#q#u#h#j#l#w#h#u#g#%#
 e|#k#h#f#n#l#j#k#h#d#s#u#r#s#u#l#d#w#h#e#r#{1#

DGY#GUS#0 DGY#LVRU\#DIILOLDWH

CRD	
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Uhj#l#w#h#u#g#=#	<input type="radio"/> \hv <input checked="" type="radio"/>
	Qr
Qdp h#=#	DP HULFDQ# LQWHUQDWLRQDO# JURXS/#QF1 +Iru#d#g#l#y#l#g#x#d#r/# Odvw#l#l#v#w/# P l#g#g#h#,#

- ☐ Wk#l#GUS#k#r#x#g#e#h#l#h#p ryh#g#l#u#p #k#h#DGY#h#f#r#g#e#h#f#d#x#v#h#k#h#*advisory affiliate(s)* l#q#r#r#q#j#h#u#
 d#v#r#f#l#d#w#h#g#z l#k#k#h#dgy#l#h#u#l#
- ☐ Wk#l#GUS#k#r#x#g#e#h#l#h#p ryh#g#l#u#p #k#h#DGY#h#f#r#g#e#h#f#d#x#v#h#=#4,#k#h#h#y#h#g#w#r#u#*proceeding*
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 z l#k#k#h#V#H#F#d#g#g#k#h#h#y#h#g#w#z d#v#h#v#r#g#h#g#l#g#k#h#dgy#l#h#u#v#r#u#*advisory affiliate's* idyru#l#

Li#|rx#d#u#h#l#h#j#l#w#h#u#g#r#u#h#j#l#w#h#u#l#g#j#z l#k#d#l#*State securities authority* /#|rx#p#d|#l#h#p ryh#d#GUS#l#r#u#
 d#q#h#y#h#g#w#|rx#h#u#s#r#u#h#g#r#q#d#l#g#h#v#s#r#q#v#h#r#l#w#h#p #44IG+7,/d#g#g#r#q#d#l#i#k#d#w#h#y#h#g#w#r#f#f#x#u#h#g#p ruh#
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- ☐ Wk#l#GUS#k#r#x#g#e#h#l#h#p ryh#g#l#u#p #k#h#DGY#h#f#r#g#e#h#f#d#x#v#h#l#w#z d#v#l#l#g#l#g#h#u#r#u#/#x#f#k#d#v#g#x#h#r#r#
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- ☐ \hv ☒ Qr

QRWH=#Wk#h#f#r#p s#d#w#l#r#g#r#i#k#l#h#l#r#u#p #g#r#h#v#q#r#w#h#d#h#y#h#k#h#*advisory affiliate* r#i#l#w#h#e#d#j#d#w#l#r#g#r#x#s#g#d#w#h#
 l#w#DUG#r#u#CRD u#h#f#r#g#v#l#

SDUW#l#l#

41##

Uhjxæwru| #dfwlrq#lqldwhg#e|=

☐ VHF## ☐ Rwkhu#lghud## ☐ Vwdwh## ☐ SRO ☐ Iruhjq

+Ixæ#jdp h#i#uhjxæwru/#foreign financial regulatory authority/#hghudq#vwdwh/#ru#SRO,#
GHSDUWP HQW#R I#MX VWLFH

51 Sulqflsdd#Vdqfwrq=

Flyl#ldgg#Dgp lylwudwlyh#Shqdw+lv,#2Iqh+v,
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4426325337 ☒ H{dfw ☐ H{sældwlrq
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71 Grfnhw2Fdvh#Qxp eh=

FLY03753:3

81 *Advisory Affiliate* Hp sçr| lqj #lup #z khq#ldfwrlyw| #rffxuuhg#z klfk#hgh#r#kch#uhjxæwru| #ldfwrq#li#
dssæfdeh,=

91 Sulqflsdd#Surgxfw#W|sh=

Qr#Surgxfw

Rwkhu#Surgxfw#W|shv=#

:1 Ghvfuleh#kch#ldwhjdwrqv#uhæwhg#r#kch#uhjxæwru| #ldfwrq#| rxu#uhvsrqvh#p xvw#lwhz lklq#kch#v sdfh#
surylggh,=

WKH#GHSDUWP HQW#R I#MX VWLFH#%GRM%,#ILOHG #D#F ULP IQDO#F R P SODIQW#DJ DIQVW#DLJ OIS#SDJ LF #
HTX LW\ #KROG IQJ #F R USI#%DLJ OIS#SDJ LF %,/#D#Z KROO\ORZ QHG #VXEVIG IDU\ #R I#DLJ #LIQDQFIDO#
SURGXFWV #F R USI#%DLJ OIS%,/#Q #W XUQ #D#Z KROO\ORZ QHG #VXEVIG IDU\ #R I#DP HULFDQ #
IQWHUQDQWIRQDO#J URXS/#QF1#%DLJ %,1#WKH#F R P SODIQW#DOOHJ HG #N KDW#DLJ OIS#SDJ LF #YIR ODWHG #
IHGHUDO#VHF XUWLVH#ODZ V#E\ #DIG IQJ #DQG #DEHWIQJ #VXHF XUWLVH#ODZ #YIR ODWIRQV#E\ #D#
SXEOIF #F R P SDQ\ #SQF #LIQDQFIDO#VHUYLFHV#J URXS/#QF1#%SQF %,/#QFRQQHFWRQ #Z LWK #D#
WUDQVDFWIRQ #IQWHUHG #QWR #Q #5334#Z LWK #SQF #N KDW#Z DV#QWHQGHG #NR #IQDEOH#SQF #WR #
UHP RYH#F HUWDIQ #DVVHWV #IURP #LWV #EDODQFH#V KHHW1#WKH#F R P SODIQW#DOOHJ HV #N KDW#DLJ OIS#
SDJ LF #NQHZ /#R U#Z DV#GHOLEHUDWHO\ #J QRUQW#Q #Q R W#NQRZ IQJ /#N KDW#NKH#SQF #
WUDQVDFWIRQ #GIG #Q R W#VDWLVI\ #NKH#JHTXIUHP HQWV#R I#J DDS#R U#Q R Q OFRQVR OIGDWIRQ #R I#
VSHFIDO#SXUSR VH#IQWLVH1#NKH#DLJ OIS#SDJ LF #WUDQVDFWIRQ #Z DV#NKH#ODVW#R I#N KUHH#
VLP IODU#WUDQVDFWIRQV#G HYHOR SHG /#P DUNHWHG #DQG #IQWHUHG #QWR #E\ #DLJ OIS#DQG #LWV#
VXEVIG IDUIHV#Z LWK #SQF #GXUIQJ #53341#NKH#GRM#KDV#Q R WLIHG #DLJ OIS#N KDW/#Q #WV#YIHZ /#DLJ
OIS#DFWIQJ #N KURXJK #F HUWDIQ #R I#LWV#IP SOR\HHV#P D\ #KDYH#YIR ODWHG #IHGHUDO#F ULP IQDO#
ODZ #Q #F R Q QHFWRQ #Z LWK #NKH#SQF #WUDQVDFWIRQV#DQG #WKH#P DUNHWIQJ #R I#VLP IODU#
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GLVROYHG #LHEUXDU\#6/#5339

;1 Fxuhqw#VwdwxvB##### ☐ Shqglqj ☐ Rq#Dsshd ☒ Ilqdo

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Ilhg=#

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431 Krz #z dv#p dw#hu#hvrqyhg=#
Vhwdhg

441 Uhvrxwlrq#G dwh#P P 2G G 2\\ \\ \\,=

4426325337 H{dfw H{saldwlrq
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451 Uhvrxwlrq#G hwdl#

Dl## Z huh#dq | #r i#k#h#r#z lqj#Vdqfwrqv#*Ordered* +fkhn#l#lssursulwh#lwhp v,B#

☒ Prqhwdl|2lqgh#Dp rxqw=' #; 3/333/333l33

☐ Uhyrfdwlrq2H{saxlrq2Ghqld#

☐ G ljrurjhp hqw2Uhvwlwlrq

☐ Fhqvxuh

☐ Fhdvh#dgg#G hvlvw2lqmkqfwlrq

☐ Edu

☐ Vxvshqvlrq

E1 Rwkhu#Vdqfwrqv#*Ordered*:

WKH#VHWWOHP HQW#Z LWK #WKH#GRM#FRQVIVWV#R I#VHSDUDWH#DJ UHHP HQWV#Z LWK #DLJ #DQG #DLJ
OIS#DQG #D#FRP SODIQW#LOHG #DJ DIQVW/#DQG #GHIHUHG #SURVHFVWIRQ #DJ UHHP HQW#Z LWK #/
DLJ OIS#SDJ LF l#XQGHU #WKH#WHUP V#R I#WKH#VHWWOHP HQW/#DLJ OIS#DIG #D#R QHWDU\#
SHQDOW\#R I# ; 3/333/333#DQG #SURYLGHG #WKDW#DLJ /#DLJ OIS#DQG #DLJ OIS#SDJ LF #VDWLV I\#
WKHLU#R EOLJ DWIRQV#XQGHU #WKH#GRMDJ UHHP HQWV/#WKH#GRM#Z LOO#VHHN #D#G LVP LVVDO#
Z LWK #SUHMXGLFH#R I#WKH#DLJ OIS#SDJ LF #FRP SODIQW#DIWHU#l6#R QWV#DQG #Z LOO#QRW#
SURVHFVWH#DLJ #RU#DLJ OIS#Q #RQQHFVIRQ #Z LWK #WKH#SQF #WUDQVDFVIRQV#RU#WKH#
EULJ KWSR IQW#WUDQVDFVIRQ #WKDW#Z DV#VHWWOHP #E\#DLJ #Z LWK #WKH#VHF #Q #5336l#WKH#
REOLJ DWIRQV#RU#DLJ /#DLJ OIS#DQG #DLJ OIS#SDJ LF #XQGHU #WKH#GRMDJ UHHP HQWV#UHODWH#
SUIQFISDOO\#WR #FRR SHUDWIQJ #Z LWK #WKH#GRM#DQG #R WKHU#IHGHUO#DJ HQFIHV#Q #
FRQQHFVIRQ #Z LWK #WKHLU#UHODWHG #QYHVWLDWIRQV1

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fdfsdlwlv#l#lhwng#J hghud#Vhfxulwlv#Sulqfisdq#H lqdgfld#R shudwlrqv#Sulqfisdq#hwf1,l#l#
uhtxddlfdwlrq#e | #h{dp 2uhwldlqj#z dv#l#frqglwlrq#r i#k#h#vdqfwrq/#surylgh#hjqjw#r i#w#p h#
jlyhq#w#uhtxddi|2uhwldlq/#w|sh#r i#h{dp #uhtxlng#lqg#z khwku#frqglwlrq#cdv#hhq#vdlwlvhg1#l#
glsvrvwlrq#hvxohg#lq#l#lqh/#shqdw|/h#v#w#wlrq/#gljrurjhp hqw#ru#p rqhwdl|frp shqvdlwlrq/#
surylgh#wrwd#dp rxqw#sruwlrq#hylg#ljdqvw#|rx#ru#lq#*advisory affiliate* gdw#sdlg#lqg#l#lq|
sruwlrq#r i#shqdw|#z dv#z dlyhg=#

SHQDOW\#R I# ; 3/333/333/#SDIG #l426325337

461 Surylgh#l#eulh#vxp p du| #r i#gghw#l#h#wng#w#k#h#l#fwrq#v#w#w#lqg#ru,gglsvrvwlrq#lqg#lqfoxgh#
uhdydqw#hup v/#frqglwlrqv#lqg#gghw#v#|rxu#hvsrqvh#p xv#l#w#z lwq#k#h#vsdfh#surylghg,l#

WKH#VHWWOHP HQW#Z LWK #WKH#GRM#FRP SUIVHG #VHSDUDWH#DJ UHHP HQWV#Z LWK #DLJ #DQG #DLJ OIS#
DQG #D#FRP SODIQW#LOHG #DJ DIQVW/#DQG #GHIHUHG #SURVHFVWIRQ #DJ UHHP HQW#Z LWK #DLJ OIS#
SDJ LF l#XQGHU #WKH#WHUP V#R I#WKH#VHWWOHP HQW/#DLJ OIS#SDIG #D#R QHWDU\#SHQDOW\#R I#

' ; 3/333/333#DQG #WKH#GRMDJ UHHP #L,#WKDW#LW#Z LOO#QRW#SURVHFVWH#DLJ #RU#DLJ OIS#Q #
FRQQHFVIRQ #Z LWK #WKH#SQF #WUDQVDFVIRQV#RU#WKH#EULJ KWSR IQW#WUDQVDFVIRQ #WKDW#Z DV#
VHWWOHP #E\#DLJ #Z LWK #WKH#VHF #Q #5336#DQG #l#L,#WR #VHHN #D#G LVP LVVDO#Z LWK #SUHMXGLFH#R I#
WKH#DLJ OIS#SDJ LF #FRP SODIQW#Q #GHFHEHU#5338/#Q #HDFK #FDVH#SURYLGHG #WKDW#DLJ /#DLJ OIS#
DQG #DLJ OIS#SDJ LF #VDWLV I\#WKHLU#R EOLJ DWIRQV#XQGHU #WKH#GRMDJ UHHP HQWVl#WKH#

REOLJDWIRQV#R I#DLJ /#DLJ OIS#DQG#DLJ OIS#SDJ LF #Q GHU#WKH#GRM#DJ UHHP HQWV#UHODWH#
 SUIQFISDOO\#WR #FR R SHUDWIQJ #Z LWK#WKH#GRM#DQG #R WKHU#HGHUODO#DJ HQFIVH#Q #FR Q QHFWRQ #
 Z LWK#WKH#HJ#UHODWHG #Q YHVWLJ DWIRQV1#WKH#GRM#ILOHG #WKH#P RWIRQ #WR #G IVP IVV#Z LWK #
 SUHMXGLFH#WKH#DLJ OIS#SDJ LF #R P SODIQW#R Q #G HFHP EHU#49/#5338>#WKH#FR XUW#VLJ QHG #WKH#
 RUGHU#J UDQWIQJ #WKH#P RWIRQ #WR #G IVP IVV#WKH#DLJ OIS#SDJ LF #R P SODIQW#R Q #MDQXDU\#4:/#
 5339/#JHVXOWLIQJ #Q #D #ILODO#G ILSR VIWIRQ #R I#WKH#DLJ OIS#SDJ LF #P DWWHU1

GENERAL INSTRUCTIONS

Wklv#G lfvxuh#Uhsruwqj#Sdjh#GUS#DGY, #lv#dq# IQLWIDO#**OR** DP HQGHG #hvsrqvh#xvhg#r#hvsruw#
 ghwdlv#iru#diilp dwyh#hvsrqvhv#r#lwp v#41F1/#41G1/#41H1/#41I1#ru#41J1#r#rup #DGY1#

Uhjxwru| #dfwrq#

Fkhfn#lwp +v, #ehlqj #hvsrqghg#r=#

- | | | | | |
|---|---|----------------------------------|----------------------------------|---|
| <input checked="" type="checkbox"/> 441F+4, | <input checked="" type="checkbox"/> 441F+5, | <input type="checkbox"/> 441F+6, | <input type="checkbox"/> 441F+7, | <input checked="" type="checkbox"/> 441F+8, |
| <input type="checkbox"/> 441G+4, | <input type="checkbox"/> 441G+5, | <input type="checkbox"/> 441G+6, | <input type="checkbox"/> 441G+7, | <input type="checkbox"/> 441G+8, |
| <input type="checkbox"/> 441H+4, | <input type="checkbox"/> 441H+5, | <input type="checkbox"/> 441H+6, | <input type="checkbox"/> 441H+7, | |
| <input type="checkbox"/> 441I1 | <input type="checkbox"/> 441J1 | | | |

Xvh#d#vhsdudwh#GUS#iru#ndfk#nyhqw#r#*proceeding*1#Wkh#vdp h#nyhqw#r#*proceeding* p d| #h#hvsruw#iru#
 p ruh#kdq#rgh#*person* ru#hqw| #xvlqj #rgh#GUS1#l#z lk#d#frp sdwhg#H{hfxwlrq#Sdjh1#

Rqh#nyhqw#p d| #hvxw#dq# ruh#kdq#rgh#diilp dwyh#dqvz hu#r#lwp v#41F1/#41G1/#41H1/#41I1#ru#41J1#
 Xvh#r#dq#rgh#GUS#r#hvsruw#ghwdlv#hwhg#r#lk#h#vdp h#nyhqw#l#dq#nyhqw#j lyhv#lvh#r#dfwrqv#e| #p ruh#
 wkdq#rgh#uhjxwru/#surygh#ghwdlv#r#ndfk#dfwrq#r#d#vhsdudwh#GUS1#

SDUW#L#

D1## Wkh#*person(s)* ru#hqw| +lv, #iru#z krp #klv#GUS#lv#ehlqj #ilng#lv#duh,=#

- ☐ \rx#wk#dgylvru| #ilp ,#
- ☐ \rx#dqg#rgh#r#p ruh#r#i# rxu#*advisory affiliates*
- ☐ Rqh#r#p ruh#r#i# rxu#*advisory affiliates*

Ll#klv#GUS#lv#ehlqj #ilng#iru#dq#*advisory affiliate*/#j lyh#lk#h#xw#dq# h#r#lk#h#*advisory affiliate* ehaz #
 +iru#dqg#lygxdw/#Odvw#qdp h/#I luv#qdp h/#P lggd#qdp h,1
 Ll#lk#h#*advisory affiliate* kdvd#CRD xqp ehul#surygh#kdw#xqp ehul#l#grw/#dqg#ldwh#%qrq0uhj lvwhug#%
 e| #fkhfn#lqj #lk#h#issursudwh#er{1#

DGY#GUS#0 DGYLVRU\#DILOLDWH

CRD

Qxp ehul#

Wklv#dgylvru| #diildwh#lv# ☐ d#ilp ☐ dq#dqg#lygxdw

Uhj lvwhug=# ☐ \hv ☐

Qr

Qdp h=#

DP HUIFDQ#

IQWHUQDWIRQDO#

JURXS/#QF1
+Iru#lqglylxdo/#
Odvw/#I luv/#
P lggch, #

- ☐ Wk l#GUS#kxrx#eh#hup ryhg#iurp #kch#DGY#uhfrug#ehfdxvh#kch#*advisory affiliate(s)* l#qr#rjqjh#
dvvrflwhg#z l#kch#dgylvhu#
- ☐ Wk l#GUS#kxrx#eh#hup ryhg#iurp #kch#DGY#uhfrug#ehfdxvh=#4, #kch#hyhqw#ru#*proceeding*
rffxuhg#p ruh#kdg#hng#| hduv#l j r#ru#5, #kch#dgylvhu#lv#h j lvhuhg#ru#dssd l j j#iru#h j lvudwlrq#
z l#kch#VHF#dgg#kch#hyhqw#z dv#hvrqyhg#l j #kch#dgylvhu#ru#*advisory affiliate's* idyru#

Li#| rx#duh#h j lvhuhg#ru#h j lvhuq j #z l#kch#*state securities authority* /#| rx#p d| #hup ryh#d#GUS#iru#
d q#hyhqw#| rx#husrwhg#r q d| #l j #hvsrqvh#r#lvhp #4 4 IG +7, /#dgg#r q d| #l j #kdw#hyhqw#rffxuhg#p ruh#
kdg#hng#| hduv#l j r l#Li#| rx#duh#h j lvhuhg#ru#h j lvhuq j #z l#kch#VHF/#| rx#p d| #hup ryh#d#GUS#iru#
d q| #hyhqw#lvwhg#l j #lvhp #4 4 #kdw#rffxuhg#p ruh#kdg#hng#| hduv#l j r l#

- ☐ Wk l#GUS#kxrx#eh#hup ryhg#iurp #kch#DGY#uhfrug#ehfdxvh#lv#z dv#l j #l j #huuru/#vxfk#dv#gxh#r#
d#fdufdd#ru#gdw dOhquw| #p lvdnhl l#H { s d l j #kch#f l f x p vwdqfhv=#

E1 Li#kch#*advisory affiliate* lv#h j lvhuhg#kuxxj k#kch#DUG#v| vwhp #ru#CRD v| vwhp /#kdv#kch#*advisory*
affiliate vxep lvwhg#d#GUS#z l#kch#l r u p #DGY/#EG#ru#X 07, #r#kch#DUG#ru#CRD iru#kch#hyhqwB#Li#kch#
dqvz hu#lv#%#hv/%#qr#rwhu#l j irup dwlrq#r q #k l#GUS#p xv#eh#sury l j h g l#

☐ \hv ☒ Qr

QRWH=#kch#f r p schwrq#r i#k l#l r u p #g r h v#q r w#h d h y h#kch#*advisory affiliate* r i#lv#cedj dwlrq#r#xsgdwh#
lv#DUG#ru#CRD uhfrugv l#

SDUW#L#

4 l## Uhjx d wru| #Dfwlrq#l j lvwhg#e| =

☒ VHF## ☐ R wku#l hghud## ☐ Vdwh## ☐ SRO ☐ Iruh l j q
+Ix d p h#r i#h j x d wru/#*foreign financial regulatory authority* /#l hghud#v d w h /#ru#SRO, #
VHFxU l W l H V #D Q G #H [F K D Q J H #R P P L V V I R Q

51 Su l f l s d d #V d q f w l r q =
l q m q f w l r q
R w k u #V d q f w l r q v = #
G L V J R U J H P H Q W > #F L Y I O #D Q G #D G P I Q L V W U D W L Y H #S H Q D O W \ + I H V , 2 #I Q H V + V , > #X Q G H U W D N I Q J

61 G d w h #l j lvwhg#P P 2 G G 2 \ \ \ \ , = #
3 5 2 3 < 2 5 3 3 9 ☒ H { d f w ☐ H { s d l j d w l r q
L i #q r w #h { d f w #s u r y l j h #h { s d l j d w l r q =

71 G r f n h w 2 F d v h #Q x p e h u =
V G Q \ #0 F D V H #Q R l #3 9 #F L Y #l 3 3 3

81 *Advisory Affiliate* H p s r | l j #l l p #z k h q #l f w l y l w | #r f f x u h g #z k l f k #h g #r #kch#h j x d w r u | #l f w l r q #l j #
d s s d f d e d h , =

91 SuqfIsdc\$Surgxfw#W|sh=
Qr#Surgxfw
Rwku#Surgxfw#W|shv=#

:1 Ghvfuleh#kch#dohj dwhrqv#uhdwhg#wr#kkl#uhjxdlwru|#dfwlrq#|rxu#uhvsrqvh#p xvw#l#z lklq#kch#vsdfh#
surylgghg,=
WKH#VHF#FRP SODIQW#DOOHJHG#WKDW#URP #5333#QWIO#5338/#DLJ#P DWHUIDOO\#IDOVLIHGH#WV#
ILQDQFIDQ#VWDWHP HQWV#Q#R UGHU#NR #VWUHQJWKHQ#WKH#SSHDDUDQFH#R I#WV#ILQDQFIDQ#
UHVXOWV#WR #DQDO\#VWV#DQG#QYHVWRUV#Q#R #GRQJ/#WKH#VHF#DOOHJHG#WKDW#DLJ#KDG#
YIRODWHG#VHFWRQ#4: +D, #R I#WKH#VHF#XULWLV#DFW#R I#4 < 66#DQG#VHFWRQ#V#4 3 +E, /#4 6 +D, /#4 6 +E,
+5, #DQG#4 6 +E, +8, #DQG#UXOHV#4 3E08 /#4 5E053 /#4 6D04 /#4 6D046#DQG#4 6E504#R I#WKH#H [FKDQJH#DFW#
R I#4 < 671

;1 Fxuhqw#VwdwxvB##### Shqglj Rq#Dsshd Iqdo

<1 Li#rq#dsshd#uhjxdlwru|#dfwlrq#dsshdng#wr#VHF/#SRO, Ihghud#ru#Vwdwh#rxw, #dgg#Gdwh#Dsshd#
Ihghg=#

Li#Iqdo#ru#Rq#Dsshd#frp sdwh#dwhp v#harz l#Iru#Shqglj#Dfwrqv#frp sdwh#dwhp #4 6#rqd l#

431 Krz #z dv#p dwhu#uhvryhg=#
Vhwdhg

441 Uhvrxwlrq#Gdwh#P P 2GG2\\\",=
3524:25339 H{dfw H{sdlqdwlrq
Li#qrwh{dfw#surylgghg{sdlqdwlrq=

451 Uhvrxwlrq#Ghwdl#

D1## Z huh#dq|#i#kch#ir#z lqj#Vdqfwlrqv#Ordered +fkhn#d#dssursuldwh#dwhp v,B#

☒ Prqhwdl|2Ilgh#Dp rxqw=' #; 58/333/333133

☐ Uhyrfdwlrq2H{sxavlrq2Ghqld#

☒ Gbrjrujhp hqw2Uhvwlxwlrq

☐ Fhqvxuh

☒ Fhdvh#dgg#Ghvbw2Lqmxqfwlrq

☐ Edu

☐ Vxvshqvlrq

E1 Rwku#Vdqfwlrqv#Ordered:

VHH#WHP #46

Vdqfwlrq#ghwdl#li#xvshqghg/#enjoined ru#duhng/#surylgghg#xudwlrq#lqfoxglj#vduw#gdwh#dgg#
fdsdf#lwhv#lihfwhg#J hghud#Vhfxulwhv#SuqfIsdc#H lqdgfld#R shudwlrqv#SuqfIsdc#hwl, l#l#
uhtxdilfdwlrq#e|#n{dp 2uhwdlqlqj#z dv#d#frggwlrq#i#kch#vdqfwlrq/#surylgghg#nqjwk#i#w#p h#
jlyhq#wr#uhtxdil|2uhwdlq/#w|sh#i#n{dp #uhtxlng#dgg#z khwku#frggwlrq#kdv#hhq#vduwvlg1#li#
glvrvwlrq#uhvxohg#lq#d#lqh/#shqdw|/#uhvwlxwlrq/#glbrujhp hqw#ru#p rqhwdl#frp shqvdwlrq/#
surylgghg#rdcdp rxqw#srwlrq#hyhg#dldqvw#|rx#ru#dq#advisory affiliate gdwh#sdg#dgg#li#dq|#
srwlrq#i#shqdw|#z dv#z dlyhg=#

VHH#WHP #46

GENERAL INSTRUCTIONS

```
\rx#dgg#rgh#rup ruh#ri# rxu#advisory affiliates
```

☒ Rqh#ru#p ruh#ri#| rxu#*advisory affiliates*

Li#kLv#GUS#lv#ehlj#ldng#iru#dq#*advisory affiliate*/#j lyh#kxh#x#qdp h#ri#kxh#*advisory affiliate* eh#z #
+iru#lqg#ly#l#xdo#/#Odvw#lqdp h/#l lwv#lqdp h/#P lggch#lqdp h,1
Li#kxh#*advisory affiliate* kd#i#CRD qxp eh#sury#lgh#kdw#lqxp eh#l#l#grw/#lqglfdwh#qqrq0uhj lwuhg%#
e| #kxhfnlqj #kxh#lssursulwh#er{ 1#

DGY#GUS#0 DGYLVRU\#DILOLDWH

CRD
Qxp eh# WkLv#dgy#lvru| #lilbldwh#lv# ☒ d#l#lp ☐ dq#lqg#ly#l#xdo
Uhj lwuhg=# ☐ \hv ☒
Qr
Qdp h=# DP HUIFDQ#
JHQHUDO#OLIH#
LQVXDQFH#
FRPSDQ\
+Iru#
lqg#ly#l#xdo#/#
Odvw/#l lwv#/#
P lggch,#

- ☐ WkLv#GUS#kxrx#eh#lhp ryhg#lurp #kxh#DGY#lhf#rug#ehf#dxvh#kxh#*advisory affiliate(s)* lv#qr#rqjhu#
dvvrflwhg#z l#kxh#dgy#lvhu#l#
☐ WkLv#GUS#kxrx#eh#lhp ryhg#lurp #kxh#DGY#lhf#rug#ehf#dxvh=#4, #kxh#nyhqw#ru#*proceeding*
rffxuhg#p ruh#kdw#lq#h#q#| hduv#l#j r#ru#5, #kxh#dgy#lvhu#lv#uhj lwuhg#ru#lssq#lqj #iru#uhj lwudwlrq#
z l#kxh#VHF#lqg#kxh#nyhqw#z dv#l#vrgyhg#lq#kxh#dgy#lvhu#lv#ru#*advisory affiliate's* idyru#l#

Li#| rx#l#uh#uhj lwuhg#ru#uhj lwuhlqj#z l#k#i#*state securities authority* /#| rx#p d| #lhp ryh#l#GUS#iru#
dq#nyhqw#| rx#l#hsruwhg#r#q#| #lq#l#v#srqvh#r#l#whp #4 1G+7, /#lqg#r#q#| #l#kdw#nyhqw#r#ffxuhg#p ruh#
kdw#lq#h#q#| hduv#l#j r#l#l#| rx#l#uh#uhj lwuhg#ru#uhj lwuhlqj#z l#kxh#VHF/#| rx#p d| #lhp ryh#l#GUS#iru#
dq#| #nyhqw#lwhg#lq#l#whp #4 4 #kdw#r#ffxuhg#p ruh#kdw#lq#h#q#| hduv#l#j r#l#

- ☐ WkLv#GUS#kxrx#eh#lhp ryhg#lurp #kxh#DGY#lhf#rug#ehf#dxvh#lv#z dv#l#l#ng#lq#huuru/#v#fk#dv#gxh#r#z
d#f#hulfd#r#u#g#dwd0hqwu| #p lwdnh#l#H{ s#lq#kxh#f#lufxp vwdqfhw=#

E1 Li#kxh#*advisory affiliate* lv#uhj lwuhg#kxrx#jk#kxh#DUG#v|vwhp #ru#CRD v|vwhp /#kdv#kxh#*advisory*
affiliate vxep lwng#l#GUS#z l#k#l#rup #DGY/#EG#ru#X 07, #r#kxh#DUG#ru#CRD iru#kxh#nyhqwB#l#kxh#
dqvz hu#lv#%#hv/%#qr#r#khu#lq#irup dwlrq#r#q#kxh#GUS#p xv#eh#sury#lgh#l#

☐ \hv ☒ Qr

QRWH=#Wkxh#l#r#p schwlrq#r#i#kLv#l#rup #grhv#l#r#w#l#h#dhyh#kxh#*advisory affiliate* r#l#w#r#edj dwlrq#r#r#xsgdwh#
lw#DUG#ru#CRD uhfrugv#l#

SDUW#LI#

41## Uhj#x#l#wru| #Dfwlrq#lq#lwdwhg#e| =

☒ VHF## ☐ Rwkhu#l#ghud## ☐ Vwdwh## ☐ SRO ☐ Iruh#lj#q

431 Krz #z dv#p dw#u#uhv#q#hg=#

Ghflv#l#r#q# #R ughu#r i#R iihu#r i#Vhwd#p hqw

441 Uhvroxw#l#r#q#G dwh#P P 2G G 2\\ \\ \\ ,=

3<25;2533: H{dfw H{s#l#q#d#w#l#r#q

Li#q#r#w#h{dfw/#s#u#r#y#l#g#h#h{s#l#q#d#w#l#r#q=

451 Uhvroxw#l#r#q#G hwd#b=

D1## Z huh#d#q | #r i#k#h#i#r#o#r#z l#j#V d#q#f#w#l#r#q#v#*Ordered* +f#k#h#f#n#d#o#d#s#s#u#r#s#u#l#d#h#l#h#p v,B#

☐ P r#q#h#w#l# 2I l#q#h#D#p r#x#q#w='

☐ U#h#y#r#f#d#w#l#r#q#2H{s#x#o#l#r#q#2G h#q#l#d#

☐ F#h#q#v#x#u#h

☐ Edu

☐ G l#v#r#u#j#h#p h#q#w#2U#h#v#w#l#w#l#w#l#r#q

☒ F#h#d#v#h#d#q#g#G h#v#l#w#2L#q#m#q#f#w#l#r#q

☐ V#x#v#s#h#q#v#l#r#q

E1 R w#k#h#u#V d#q#f#w#l#r#q#v#*Ordered*:

Q R Q H

V d#q#f#w#l#r#q#G h#w#d#b=#i#v#x#v#s#h#q#g#h#g/#*enjoined* r#u#e#d#u#h#g/#s#u#r#y#l#g#h#g#x#u#d#w#l#r#q#d#q#f#o#g#l#j# #v#w#d#u#g#d#h#d#q#g#

f#d#s#d#f#l#w#h#v#d#i#h#f#w#h#g#J h#q#h#u#d#V h#f#x#u#l#w#h#v#S#u#l#q#f#l#s#d#q#H l#q#d#q#f#l#d#R s#h#u#d#w#l#r#q#v#S#u#l#q#f#l#s#d#q#H#w#f#1,1#i#

u#h#t#x#d#i#f#d#w#l#r#q#e | #h{d#p 2u#h#w#d#l#q#l#j#z#d#v#d#f#r#g#g#l#w#l#r#q#r i#k#h#v#d#q#f#w#l#r#q/#s#u#r#y#l#g#h#g#j#k#r i#h#p h#

j#l#y#h#q#r#u#h#t#x#d#i# 2u#h#w#d#l#q#/#w| s#h#r i#h{d#p #u#h#t#x#l#h#g#d#q#g#z k#h#w#k#h#u#f#r#g#g#l#w#l#r#q#<d#v#e#h#h#q#v#d#w#i#l#g#1#i#

g#l#s#r#v#w#l#r#q#u#h#v#x#o#h#g#d#q#d#i#l#q#h/#s#h#q#d#w#l#r#q#/#h#v#w#l#w#l#w#l#r#q#/#g#l#v#r#u#j#h#p h#q#w#r#u#p r#q#h#w#d#l# #f#r#p s#h#q#v#d#w#l#r#q/#

s#u#r#y#l#g#h#r#w#d#d#p r#x#q#w/#s#r#w#l#r#q#h#y#l#g#d#j#d#l#q#v#w#l#r#x#r#u#d#q#*advisory affiliate* g#d#w#h#s#d#l#g#d#q#g#d#i#d#q | #

s#r#w#l#r#q#r i#s#h#q#d#w#l#r#q#z#d#v#z#d#l#y#h#g=#

V#H#H#W#H#P #: 1

461 S#u#r#y#l#g#h#d#e#u#h#i#v#x#p p d#u | #r i#g#h#w#d#b#u#h#o#i#h#g#r#z#k#h#d#f#w#l#r#q#v#w#d#w#v#d#q#g#r#u#g#l#s#r#v#w#l#r#q#d#q#g#d#q#f#o#g#h#

u#h#d#y#d#q#w#h#u#p v/#f#r#g#g#l#w#l#r#q#v#d#q#g#d#h#v# | r#x#u#h#v#s#r#q#v#h#p x#v#w#l#w#z l#w#l#q#k#h#v#s#d#f#h#s#u#r#y#l#g#h#1#

V#H#H#W#H#P #: 1

GENERAL INSTRUCTIONS

W#k#l#G l#f#o#r#v#x#u#h#s#r#w#l#q#j#S#d#j#h#G#U#S#D#G#Y, #v#d#q# LQ LWID O#*OR* D P H Q G H G #u#h#v#s#r#q#v#h#x#v#h#g#r#u#h#s#r#w#l#
g#h#w#d#b#i#r#u#d#i#l#p d#w#l#y#h#u#h#v#s#r#q#v#h#r#u#h#p v#4 4 1F 1/#4 4 1G 1/#4 4 1H 1/#4 4 1I 1#r#u#4 4 1J 1#r#i#f#r#u#p #D#G#Y#1#

U#h#j#x#o#i#w#r#u | #D#f#w#l#r#q#

F#k#h#f#n#l#h#p +v,#e#h#l#q#j#u#h#v#s#r#q#g#h#g#r#z#

☐ 44 1F +4 ,

☐ 44 1F +5 ,

☐ 44 1F +6 ,

☐ 44 1F +7 ,

☐ 44 1F +8 ,

☐ 44 1G +4 ,

☒ 44 1G +5 ,

☐ 44 1G +6 ,

☒ 44 1G +7 ,

☐ 44 1G +8 ,

☐ 44 1H +4 ,

☐ 44 1H +5 ,

☐ 44 1H +6 ,

☐ 44 1H +7 ,

☐ 44 1I 1

☐ 44 1J 1

X#v#h#d#h#s#d#u#d#h#G#U#S#i#r#u#h#d#f#k#h#y#h#q#w#r#u#*proceeding* 1#W#k#h#v#d#p h#h#y#h#q#w#r#u#*proceeding* p d | #e#h#u#h#s#r#w#h#g#i#r#u#
p r#u#h#k#d#q#r#q#h#*person* r#u#h#g#w#l | #x#v#l#q#j#r#q#h#G#U#S#1#l#h#z l#w#l#d#f#r#p s#d#w#h#g#H{h#f#x#w#l#r#q#S#d#j#h#1#

R#q#h#h#y#h#q#w#p d | #u#h#v#x#o#h#g#p r#u#h#k#d#q#r#q#h#d#i#l#p d#w#l#y#h#d#q#v#z#h#u#h#p v#4 4 1F 1/#4 4 1G 1/#4 4 1H 1/#4 4 1I 1#r#u#4 4 1J 1#

Xvh#rqd#rqh#GUS#r#hsrw#gwdlv#h#lwhg#r#k#h#vdp h hyhqw#l#dq#hyhqw#j lyhv#lvh#w#dfwlrqv#e | #p ruh#
wkdq#rqh#h#j x#lwrw/#surylg#h#gwdlv#w#h#dfk#dfwlrq#rq#d#vhsdudwh#GUS1#

SDUW#

D1## Wkh#*person(s)* ru#hqw# | +lv, #ru#z krp #k#lv#GUS#lv#ehlj# #lgh#lv#duh,=#

- ☐ \rx#wkh#dgylvru| #ilp ,#
- ☐ \rx#lqg#rqh#ru#p ruh#i# | rxu#*advisory affiliates*
- ☒ Rqh#ru#p ruh#i# | rxu#*advisory affiliates*

L#k#lv#GUS#lv#ehlj# #lgh#ru#dq#*advisory affiliate*/#j lyh#k#h#x#qdp h#i#k#h#*advisory affiliate* eh#z #
+iru#lqglylgxd#/#Odvw#qdp h/#l#lvw#qdp h/#p lgg#h#qdp h,1

L#k#h#*advisory affiliate* kdv#d#CRD xqp eh#u/#surylg#h#wkdw#xqp eh#u#l#qrw/#lqglfdwh#%qrq0uhj lvwhug#%
e | #fkhfnlj# k#h#dssursudwh#er { 1#

DGY#GUS#0 DGYLVRU \#DIIOLDWH

CRD

Qxp eh# Wk#lv#dgylvru| #lilddwh#lv# ☒ d#ilp ☐ dq#lqglylgxd#

Uhj lvwhug=# ☐ \hv ☒

Qr

Qdp h=# DP HULFDQ#

JHQHUDO#OLIH#

LQVXUDQFH#

FRPSDQ\

+Iru#

lqglylgxd#/#

Odvw/#l#lvw/#

P lgg#h,#

- ☐ Wk#lv#GUS#wkrx#e#h#h#p ryh#h#p #k#h#DGY#h#frug#ehfdxvh#k#h#*advisory affiliate(s)* lv#qr#xqjhu#
dvvrfdwhg#z l#k#k#h#dgylvhu#
- ☐ Wk#lv#GUS#wkrx#e#h#h#p ryh#h#p #k#h#DGY#h#frug#ehfdxvh=#4, #k#h#hyhqw#ru#*proceeding*
rffxuug#p ruh#wkdq#h#q# | hduv#dj#r#ru#5, #k#h#dgylvhu#lv#h#j lvwhug#ru#dssd#lj# #iru#h#j lvudwlrq#
z l#k#k#h#VHF#lqg#k#h#hyhqw#z dv#h#vrqyhg#lq#k#h#dgylvhu#v#ru#*advisory affiliate's* idyru#

L# | rx#d#h#h#j lvwhug#ru#h#j lvwhulq#z l#k#d#*state securities authority* /# | rx#p d | #h#p ryh#d#GUS#iru#
dq#hyhqw# | rx#h#srw#h#g#rqd#lq#h#vsrqvh#w#lv#h#p #4 1G+7, /#lqg#rqd#l#k#dw#hyhqw#rffxuug#p ruh#
wkdq#h#q# | hduv#dj#r#l#L# | rx#d#h#h#j lvwhug#ru#h#j lvwhulq#z l#k#k#h#VHF /# | rx#p d | #h#p ryh#d#GUS#iru#
dq | #hyhqw#lvwhg#lq#lv#h#p #4 4 #k#dw#rffxuug#p ruh#wkdq#h#q# | hduv#dj#r#l#

- ☐ Wk#lv#GUS#wkrx#e#h#h#p ryh#h#p #k#h#DGY#h#frug#ehfdxvh#lv#z dv#lgh#lq#huuru/#x#fk#dv#g#x#h#r#
d#fduulfd#ru#g#dwd0hqw# | #p lvdnhl#H { s#lq#k#h#f#lufxp vwdqfhv=#

E1 L#k#h#*advisory affiliate* lv#h#j lvwhug#k#urx#j#k#k#h#DUG#v | vwhp #ru#CRD v | vwhp /#kdv#k#h#*advisory*
affiliate vxep lvwhg#d#GUS#z l#k#l#rup #DGY/#EG#ru#X 07, #r#k#h#DUG#ru#CRD iru#k#h#hyhqw#B#l#k#h#
dqvz hu#lv#h#h#v/%qr#r#wku#lqirup dwlrq#rq#wk#lv#GUS#p xv#eh#surylg#h#l#

- ☐ \hv ☒ Qr

QRWH=#Wkh#frp schwlrq#i#k#lv#irup #grhv#qrw#hndhyh#k#h#*advisory affiliate* r#lw#redjdwlrq#r#xsgdwh#
lw#DUG #ru#CRD uhfrugv1#

SDUW#I#

41## Uhjxawru| #dfwlrq#q#ldwhg#e|=

☐ VHF## ☐ R wkh#lghud## ☒ Vdwh## ☐ SRO ☐ Iruhjq
+Ixawdp h#i#uhjxawru/#*foreign financial regulatory authority*/#hghudq#vdwh/#ru#SRO,#
YHUP R QW#GHSUWP HQW#R I#EDQNLQJ /#QVXUDQFH/#VHF XUWLVH#) #KHDOWKFDUH#
DGP LQ LVWUDWIR Q #E LVKFD%,

51 Suqlfisdq#Vdqfwrq=
Fhdvh#ldg#Ghvlw
R wkh#Vdqfwrqv=#
UHVWLWXWIR Q

61 Gdwh#Lqldwhg#P P 2GG2\\ \\,=#
3<25325343 ☒ H{dfw ☐ H{sawdwlrq
Li#qrw#h{dfw/#surylgh#h{sawdwlrq=

71 Grfnhw2Fdvh#Qxp ehu=
4303:90V

81 *Advisory Affiliate* Hp s#r| lqj#l#p #z khq#dfwlyw| #rffxuhg#z klfk#hng#r#k#h#uhjxawru| #dfwlrq#l#
dssdfdeh,=

91 Suqlfisdq#Surgxfw#W|sh=
Dqgxw|+lv,#0 Ydukedh
R wkh#Surgxfw#W|shv=#

:1 Ghvfeuh#k#h#dwhjdwlrqv#hndwhg#r#k#lv#uhjxawru| #dfwlrq#| rxu#uhvsrqvh#p xvw#l#z l#lq#k#h#vsdfh#
surylghg,=
WKLW#GUS#UHODWHV#WR #VXQDP HUIFD#DQXXIW\#DQG#OLIH#DVVXUDQFH#R P SDQ\#%VDODF%,1#
VDODF/#WKH#IRUP HU#VROH#VKDUHKROGHU#R I#WKH#JHJ LVWUDQW/#P HUJHG #QWR #DP HUIFDQ#
JHQHUDO#OLIH#QVXUDQFH#R P SDQ\#%DJOLF%, ,#Q#GHFHP EHU#53451#DJOLF#LV#QRZ #WKH#VROH#
VKDUHKROGHU#R I#WKH#JHJ LVWUDQW#E LVKFD#DOOHJHG #WKDW#VDODF#XIR ODWHG #WKH#XUP R QW#
XQLIRUP #VHF XUWLVH#DFW#E\#4, #XVLQJ #D#SURVSHFWXV#WKDW#Z DV#DPELJRXV#Q#GHVFULEIQJ#
LVW#DXWRP DWLF#DVVHW#JHEDODQFIQJ#SURJUDP #HDWXUH#SSOLFDEOH#WR #HUWDLQ#DUIDEOH#
DQXXIWHV/#DQG#5, #QRW#JHEDODQFIQJ#HUWDLQ#XEDFFRXQWV#Z LWLQ#WKH#DQXXIWHV#WR #
UHWXUQ#WR #DOORFDWIRQV#JLYHQ#Q#WKH#DFFRXQW#R Z QHUV#ODVW#WUDGH#QVWUXFWIRQV1

;1 Fxuhgw#Vdwxb##### ☐ Shgglqj ☐ Rq#Dsshdo ☒ Ilqdo

<1 Li#r#q#sshdc#uhjxawru| #dfwlrq#sshdcng#r#VHF/#SRO, lghud#ru#vdwh#r#xw,#ldg#Gdwh#Dsshdc#
Ilhg=#

Li#l qd#ru#R q#Dsshdq/#frp sdwh#d#lwhp v#eharz l#Iru#Shgg lqj #Dfwlrqv/#frp sdwh#lwhp #46#rqd l#

431 Krz #z dv#p dwhu#uhvrq/hg=#

Vwlsxwlrq#lqg#Frqvhw

441 Uhvroxwlrq#Gdwh#P P 2GG2\\\\,=

3<25325343 H{dfw H{sdlqdwlrq

Li#qrw#h{dfw/#surylg#h{sdqdwlrq=

451 Uhvroxwlrq#Ghwdl#

D1## Z huh#dq | #ri#kh#ir#arz lqj #Vdqfwlrqv#*Ordered* +fkhn#d#lssursulwh#lwhp v,B#

☒ Prghwdu|2Ilqh#Dp rxqw=' #433/333133

☐ Uhyrfdwlrq2H{sxvrlq2Ghqlid#

☐ Glvjrujhp hqw2Uhwvwxwlrq

☐ Fhqvxuh

☐ Fhdvh#lqg#Ghvlw2Lqmkqfwlrq

☐ Edu

☐ Vxvshqvrlq

E1 Rwkhu#Vdqfwlrqv#*Ordered*:

VDODF#SDIG #ELVKFD#D#WRWDO#R I# 433/333#DV#IR OOR Z V=#4, # 73/333#DV#DQ#

DGP IQLVWUDWLYH#SHQDOW\/#5, # 73/333#WR #EH#DSSOIHG #WR #XHUP R QW#VHF XUIWIHV#

IQYHVWRU#HGXFDWIR Q #DQG #NUDIQ IQJ #IXQG /#DQG #6, # 53/333#IRU#FRVWV#QFXUUHG #E\#

ELVKFD#DV#D#UHVVXOW#R I#WKH#H [DP IQIDWIR Q 1

Vdqfwlrq#ghwdl#li#vxvshqghg/#enjoined ru#duwhg/#surylg#hgxwlrq#lqfoxglqj #wduw#gdw#lqg#

fdsdflwhv#lihfwhg#J hghudq#Vhfxulwhv#Sulqfisdq#I lqdfldq#R shudwlrqv#Sulqfisdq#hwf1, l#li#

uhtxddilfdwlrq#e | #h{dp 2uhwulq lqj #z dv#l#frqglwlrq#ri#kch#vdqfwlrq/#surylg#h#h#qjwk#ri#wlp h#

jlyhg#r#uhtxddi| 2uhwulq/#w| sh#ri#h{dp #uhtx lhg#lqg#z khwku#frqglwlrq#kdv#hhq#vduv lhg1#li#

glvrvwlrq#uhvxwng#lq#d#lqh/#shqdw| /#uhvwxwlrq/#glvjrujhp hqw#ru#p rghwdu| #frp shqvdwlrq/#

surylg#h#wdd#dp rxqw/#sruwlrq#hy lhg#ljdqvw#| rx#ru#lq#*advisory affiliate* gdwh#sdlg#lqg#li#lq | #

sruwlrq#ri#shqdw| #z dv#z dlyhg=#

IQ #DGG LWIR Q #WR #WKH# 433/333#Q #DJ J UHJ DWH#SD\ P HQWV#WR #ELVKFD/#Z LWKIQ #63#GD\ V#R I#

VDODF #V#UH FHL SW#R I#UHOHDVH#DJ UHHP HQWV#IRU P #DIIHFWHG #DFFRXQW#R Z QHUV/#

VXQDP HULFD#DQ QX LW\ #DQG #OLIH#DVVXUDQ FHF#R P SDQ\ #Z DV#UHTXIUHG #WR #UHYHUVH#WKH#

DXWR P DWLF #DVVHW#UHEODQ F IQJ #WUDQVDFWIR Q V#WR #433 (#R I#WKH#VHSWHP EHU#63/#533; #

DP RXQWV#IRU #XFK#DFFRXQWV#Z KR #GHOLYHUHG #UHOHDVH#DJ UHHP HQWV1

461 Surylg#h#eulh#xp p du| #ri#ghwdl#uhwng#r#kch#lfdwlrq#wdwv#lqg#ru, #glvrvwlrq#lqg#lqfoxgh#

uhdydqw#hup v/#frqglwlrqv#lqg#gdwv#| rxu#uhvsrqvh#p xv#l#wz lklq#kch#vsdfh#surylg#h, l#

Z LWKR XW#DGP LWLQJ #R U#GHQ\ IQJ #WKH#VWDWHP HQW#R I#HDFWV#DQG #FRQFOXVIR Q V#R I#ODZ #

FRQWDLQHG #Q #WKH#R UGHU/#VDODF#FRQVHQWHG #WR #WKH#IQWU\#R I#WKH#R UGHU1

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)

GENERAL INSTRUCTIONS

Wklv#G l#f#arvxuh#Uhsruw lqj #Sdjh#GUS#DGY, #l#lq# IQLWIDO#*OR* DP HQGHG #uhvsrqvh#xvhg#r#uhsruw#
ghwdl#ru#lilp dwlyh#uhvsrqvh#r#lwhp #41K l#ri#sduw#D#ru#lwhp #511 l#ri#sduw#E#ri#rup #DGY1#

F lyk#xglld#

Fkhfn#SDW#4D#Lhp +v,#ehlqj#uhvsrqghg#r=#

☐ 441K+4,+d,☐ 441K+4,+e,☒ 441K+4,+f,☐ 441K+5,

Fkhfn#SDW#4E#Lhp +v,#ehlqj#uhvsrqghg#r=#

☐ 51I+4,☐ 51I+5,☐ 51I+6,☐ 51I+7,☐ 51I+8,

Xvh#d#vhsdudwh#GUS#iru#ndfk#nyhqw#ru#*proceeding* 1#Wkh#vdp h#nyhqw#ru#*proceeding* p d| #eh#uhsruwhg#iru#
p ruh#kdg#rgh#*person* ru#hgw| #xvlqj#rgh#GUS1#l#h#z wk#d#frp sdwhg#H{hfxwlrq#Sdjhl#

Rqh#nyhqw#p d| #uhvxw#lq#p ruh#kdg#rgh#dilup dwlyh#dqvz hu#r#Lhp #441K1#r i#SDW#4D#r#Lhp #51I1#r i#SDW#
4E1#Kvh#r#q#rgh#GUS#r#uhsruwhg#hwdlv#h#dwhg#r#k#h#vdp h#nyhqw#l#K quh#dwhg#f#lyl#xg l#d#d#fwrqv#p xv#
eh#uhsruwhg#r#q#vhsdudwh#GUSv1#

SDUW#L#

D1## Wkh#*person(s)* ru#hgw| +lv,#iru#z krp #k#l#GUS#lv#ehlqj#l#h#lv#duh,=#

- ☐ \rx#k#h#dgy#lru| #ilup ,#
- ☐ \rx#lqg#rgh#ru#p ruh#r i#| rxu#*advisory affiliates*
- ☒ Rqh#ru#p ruh#r i#| rxu#*advisory affiliates*

L#k#l#GUS#lv#ehlqj#l#h#r#d#q#*advisory affiliate*/#j lyh#k#h#ix#qdp h#r i#k#h#*advisory affiliate* eh#z #
+iru#lqg#ly#l#xdo/#Odvw#l#qdp h/#l#lvw#l#qdp h/#p l#ggd#l#qdp h,1
L#k#h#*advisory affiliate* kd#v#d#CRD x#p eh#u#suryl#h#k#dw#x#p eh#u#l#h#grw#l#qg l#dwh#q#r#q#uhj l#whuhg#%#
e| #Fkhfn#lqj#k#h#dssursuldwh#er{ 1#

DGY#GUS#0 DGYLVRU\#DIILODWH

CRD

Qxp eh#=#

Wk#l#dgy#lru| #d#l#dwh#lv#☒ d#l#lup ☐ d#l#lqg#ly#l#xdoUhj l#whuhg=#☒ \hv ☐

Qr

Qdp h=# DP HULFDQ#
IQWHUQDWIR QDO#
JURXS/#QF1
+Iru#lqg#ly#l#xdo/#
Odvw/#l#lvw/#
P l#ggd#l#h#

- ☐ Wk#l#GUS#k#rx#q#eh#h#p ryh#h#urp #k#h#DGY#h#frug#eh#f#dxvh#k#h#*advisory affiliate(s)* lv#gr#
#r#q#h#d#v#r#f#l#dwhg#z wk#k#h#dgy#lv#h#
- ☐ Wk#l#GUS#k#rx#q#eh#h#p ryh#h#urp #k#h#DGY#h#frug#eh#f#dxvh=#4 ,#k#h#nyhqw#ru#*proceeding*
r#f#x#uhg#p ruh#k#dg#h#q#| h#d#v#d#j#r#ru#5 ,#k#h#dgy#lv#h#lv#h#j l#whuhg#ru#d#ss#l#qj#iru#h#j l#w#d#wlrq#
z wk#k#h#H#F#d#qg#k#h#nyhqw#z dv#h#v#r#q#h#g#l#q#k#h#dgy#lv#h#v#ru#*advisory affiliate's* idyru#l#

L#h#| rx#d#uh#h#j l#whuhg#ru#h#j l#whulqj#z wk#d#*state securities authority* /#| rx#p d| #h#p ryh#d#GUS#iru#
d#q#nyhqw#| rx#h#sruwhg#r#q#l#q#h#v#s#r#q#v#h#r#Lhp #441K1+4,+d,/d#qg#r#q#l#d#k#dw#nyhqw#r#f#x#uhg#p ruh#

wkdq#hng#| hduv#djr1#i#| rx#duh#uhj lwhung#ru#uhj lwhuqj#z wk#kh#VHF/#| rx#p d| #uhp ryh#dGUS#iru#
dq| #hyhqw#dwhg#q#lwhp #44#kdw#rffxuhg#p ruh#kdwq#hng#| hduv#djr1#

☐ WkLv#GUS#krxg#eh#uhp ryhg#iurp #kch#DGY#uhfrug#ehfdxvh#lwhz dv#ldhg#q#huuru/#vxfk#dv#gxh#kr#
d#fchulfd#ru#gdwd0hqwu| #p lwdnh1#i {sdlq#kch#lufxp vwdqfhw=#

E1 Li#kh#*advisory affiliate* lwhj lwhung#kurxjk#kh#DUG#v|vwhp #ru#CRD v|vwhp /#kdv#kh#*advisory
affiliate* vxep lwhg#dGUS#z wk#lirup #DGY/#EG#ru#X07,#kr#kh#DUG#ru#CRD iru#kh#hyhqwB#i#kh#
dqvz hu#lv#%#hv/%#qr#rwhu#qirup dwhrq#r#q#kLv#GUS#p xvw#eh#surylggh1#

☒ \hv ☐ Qr

QRWH=#kh#frp schwrq#r#i#kLv#irup #grhv#qrw#uhdhyh#kh#*advisory affiliate* r#lwh#redj dwhrq#r#ksgdwh#
lw#DUG#ru#CRD uhfrugv1#

SDUW#I#

41## Frxu#Dfwlrq#qldwhg#e|=#Qdp h#r#ihjxawru/#*foreign financial regulatory authority, SRO*,
frp p rgldhv#h {fkdqjh/#djhqf| /#ilup /#sulydwh#sdlqldi/#hwf1,#
QHZ #\RUN#DWW1#JHQHUDO#DQG#QHZ #\RUN#VWDWH#QVXUDQFH#GHSUWP HQW

51 Suqlfisdq#Uhdhi#Vrxjkw=
Iqmxqfwlrq
RwkhUhdhi#Vrxjkw=#
FRP SOLDQW#DOVR #JHTXHVWHG #GLVJR UJHP HQW/#UHVWLWXWIRQ/#RQH\#GDPDJHV#DQG#SXQIWLYH#
GDPDJHV1

61 Ildqj#Gdwh#r#frxu#Dfwlrq#P P 2GG2\\ \ \ \ ,=
3825925338 ☒ H {dfw ☐ H {sdlqdwlrq
Li#qrw#h {dfw/#surylggh#h {sdlqdwlrq=

71 Suqlfisdq#Surgxfw#W|sh=
Iqvxdqfh
RwkhU#Surgxfw#W|shv=#

81 Irup dd#Dfwlrq#z dv#eurxjk#q#lqfag#h#qdp h#r#ihghudo#Vdwh#ru#IruhJq#Fruxw/#Orfdwlrq#r#i#Fruxw#0
Flw| #ru#Fruxw#| #dgg Vdwh#ru#Fruxw#| /#Grfnhw2Fdv#Qxp ehu,=#
VXSUHPH#FRXUW#R I#WKH#VWDWH#R I#QHZ #\RUN/#FRXQW\#R I#QHZ #\RUN/#LQGH[#
QXP EHU=734:5325338

91 *Advisory Affiliate* Hp s#r| lqj#ilup #z khq#ldfwy#w| #rffxuhg#z klfk#hgh#r#kh#flyld#xgld#ldfwlrq#i#
dssdfdedh,=#
Q2D

:1 Ghvfulh#kh#ldhjdwhrqv#uhdwhg#r#kLv#flyld#ldfwlrq#| rxu#uhvsrqvh#p xvw#lwhz wkLv#kh#vsdfh#
surylggh,=#
RQ#P D\#59/5338/#WKH#QHZ #\RUN#DWWRUQH\#JHQHUDO#DQG#WKH#QHZ #\RUN#VXSHUIQWHQGHQW#
R I#QVXUDQFH#ILOHG#D#F LYIO#FRP SOLDQW#D DIQVW#D P HULFDQ#Q WHUQDWIRQDO#J URXS/#QF1#
+%DLJ%,#DV#z HOO#DV#WV#RUP HU#F KDLP DQ#DQG#F K IHI#I [HFXYLYH#R IILFHU#DQG#RUP HU#F LFH#

FKDIUJP DQ #DQG #FKIHI#IQQDQFIDO# IILFHU /#Q #WKH#VXSUHP H#FRXUW# I#WKH#VWDWH# I#QHZ #
 \RUNI#WKH#FRP SODIQW#DVVHUWV#ODIP V#QGHU#QHZ #\RUN#V#DUWIQ#DFW#DQG#QVXUDQFH#
 ODZ /#DPRQJ#WKHUV/#DQG#DNHV#DOOHJDWIRQV#FRQFHUQIQJ#FHUWDIQ#WUDQVDFWIRQV#DQG#
 FHUWDIQ#SUDFWLFIHV#HQWHUH#QWR#E#DLJ#DQG#FHUWDIQ#I#WV#XEVIGIDUIHV1

;1 Fxuhqw#Vdwxb# Shgglj Rq#Dsshdo Iqdo

<1 Li#q#dsshdo#dfwlrq#dsshddg#r#surylgh#qdp h#i#rxuw,#dgg#Gdwh#Dsshdo#lkhg#P P 2GG2\\\",=#

431 Li#shgglj/#gdwh#qrwlfh2surfhvv#z dv#vhuylg#P P 2GG2\\\",=

H{dfw H{sodqdwlrq
 Li#qrwh{dfw/#surylgh#h{sodqdwlrq=

Li#lqdc#r#Rq#Dsshdo/#frp sdwh#dwhp v#hcz l#ru#Shgglj#Dfwrqv/#frp sdwh#lhp #7#rqd l#

441 Krz #z dv#p dwhu#uhvrg#hg=
 Vhwchg

451 Uhvrxwlrq#Gdwh#P P 2GG2\\\",=

3523<25339 H{dfw H{sodqdwlrq
 Li#qrwh{dfw/#surylgh#h{sodqdwlrq=

461 Uhvrxwlrq#Ghwdl-

D1## Z huh#dq |#i#kh#i#r#z lqj#Vdqfwrqv#R ughuhg#ru#Uhdh#J uqwhg+fkhn#dssursuldwh#lhp v,B#

- | | |
|---|--|
| <input checked="" type="checkbox"/> P rghwdu 2lqh#Dp rxqw=# #776/333/333133 | <input checked="" type="checkbox"/> G ljruihp hqw2Uhwvwxwlrq |
| <input type="checkbox"/> Uhyrfdwlrq2H{sxwlrq2Ghqldo | <input type="checkbox"/> Fhdvh#dgg#G hvw2Lqmxqfwrq |
| <input type="checkbox"/> Fhqvxuh | <input type="checkbox"/> Vxvshqvrq |
| <input type="checkbox"/> Edu | |

E1 R wku#Vdqfwrqv=
 VHH#WHP #47

F1 Vdqfwrq#ghwdl-#l#v#shgghg/#enjoined ru#duhg/#surylgh#gxdwlrq#lqfoxglj#vduw#gdwh#dgg#
 fdsdf#lwh#dlihfwhg#J hghud#Vhfxbwhv#Sulqf#ldo#l#lqdgf#ld#R shudwlrqv#Sulqf#ldo#hwl1,l#l#
 uhtxddlfdwlrq#e |#h{dp 2uhwldlq#z dv#d#frqglwlrq#r i#kh#vdqfwrq/#surylgh#h#qjw#r i#w#p h#
 jlyhg#r#uhtxdi|2uhwldlq/#w|sh#r i#h{dp #uhtx#lgh#dgg#z khwku#frqglwlrq#kdv#h#h#q#v#dwv#lgh1#l#
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 FHUWDIQ#z RUNHUV#FRP SHQVDWIRQ#SUHP LXP#WD [HV#DQG#R WKHU#DVVHVVP HQWV#WKH#

DJ UHHP HQ WV #VHWOHG #FODLP V #QGHU #QHZ #R UN #V #P DUWIQ #DFW #DQG #QVXUDQ FH #DZ / #D P R Q J #
 RWKHU #SUR YLVIR Q V / #Z K L F K #Z HUH #R ULJ IQ DOO #E UR X J K W #E \ #W K H #Q \ D J #D Q G #G R I #Q #D #F I Y I O #
 FR P SODIQ W #I O H G #R Q #P D \ #5 9 / #5 3 3 8 1 #K Q G H U #W K H #D J U H H P H Q W / # 6 : 8 #P L O O I R Q #Z D V #S D I G #Q W R #D #
 I X Q G #K Q G H U #W K H #V X S H U Y L V I R Q #R I #W K H #Q \ D J #D Q G #W K H #G R I #R U #D O O H J H G #L Q M X U L H V #F D X V H G #E \ #
 F H U W D I Q #S U D F W L F H V #Z L W K #J H V S H F W #N R #H [F H V V #F D V X D O W \ #Q V X U D Q F H 1 #Q #D G G I W I R Q / #
 D S S U R [I P D W H O \ # 6 7 6 1 8 #P L O O I R Q #Z I O O #E H #K V H G #N R #F R P S H Q V D W H #I D F K #R I #W K H #I L I W \ #V W D W H V #Q #
 F R Q Q H F W I R Q #Z L W K #W K H #S D \ P H Q W #R I #F H U W D I Q #Z R U N H U V #F R P S H Q V D W I R Q #S U H P I X P #W D [H V #D Q G #
 R W K H U #D V V H V V P H Q W V 1 #Q #D G G I W I R Q / #D L J #S D I G #D # 4 3 3 #P L O O I R Q #D V #D #I Q H #W R #W K H #V W D W H #R I #
 Q H Z #R U N 1 #D V #S D U W #R I #W K H V H #V H W O H P H Q W V / #D L J #K D V #D J U H H G #W R #J H W D I Q #R U #D #S H U I R G #R I #
 W K U H H #H D U V #D Q #Q G H S H Q G H Q W #F R Q V X O W D Q W #Z K R #Z L O O #F R Q G X F W #D J H Y I H Z #W K D W #Z L O O #
 I Q F O X G H #W K H #D G H T X D F \ #R I #D L J #V #Q W H U Q D O #F R Q W U R O V #R Y H U #I Q D Q F I D O #J H S R U W I Q J #D Q G #W K H #
 U H P H G I D W I R Q #S O D Q #W K D W #D L J #K D V #P S O H P H Q W H G #D V #D #J H V X O W #R I #W V #R Z Q #Q W H U Q D O #J H Y I H Z 1

GENERAL INSTRUCTIONS

Wk l v #G l v f o r v x u h #U h s r u w l q j #S d j h #G U S #D G Y , #l v #l q # I Q L W I D O #OR D P H Q G H G #u h v s r q v h #x v h g #r #u h s r u w #
 g h w l b #i r u #d i l u p d w l y h #u h v s r q v h v #w r #l w h p #4 1 K 1 #r i #S d u w #4 D #r u #l w h p #5 1 I 1 #r i #S d u w #4 E #r i #l r u p #D G Y 1 #

F l y l #M x g l f l d #

F k h f n #S d u w #4 D #l w h p + v , #e h l q j #u h v s r q g h g #r = #

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F k h f n #S d u w #4 E #l w h p + v , #e h l q j #u h v s r q g h g #r = #

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X v h #l #h s d u d w h #G U S #i r u #n d f k #n y h q w #r u #proceeding 1 #W k h #v d p h #n y h q w #r u #proceeding p d | #e h #u h s r u w h g #i r u #
 p r u h #k d q #r q h #person r u #h q w l | #x v l q j #r q h #G U S 1 #l h #z l w #l #f r p s d w h g #H { h f x w l r q #S d j h 1 #

R q h #n y h q w #p d | #u h v x o #l q #p r u h #k d q #r q h #d i l u p d w l y h #l q v z h u #r #l w h p #4 1 K 1 #r i #S d u w #4 D #r u #l w h p #5 1 I 1 #r i #S d u w #
 4 E 1 #K v h #r q d | #r q h #G U S #r #u h s r u w #g h w l b #h #d w h g #r #W k h #v d p h #n y h q w l #K q u h d w h g #F l y l #M x g l f l d #l d f w l r q v #p x v w #
 e h #u h s r u w h g #r q #h s d u d w h #G U S v 1 #

SDUW # #

D 1 # # W k h #person(s) r u #h q w l | + l v , #i r u #z k r p #W k l v #G U S #l v #e h l q j #l h g #l v #d u h , = #

☐ \ r x #W k h #d g y l v r u | #l l u p , #

☐ \ r x #l q g #r q h #r u #p r u h #r i # | r x u #advisory affiliates

☒ R q h #r u #p r u h #r i # | r x u #advisory affiliates

L i #W k l v #G U S #l v #e h l q j #l h g #i r u #l q #advisory affiliate / #j l y h #W k h #x o #l q d p h #r i #W k h #advisory affiliate e h o z #
 + i r u #l q g l y l x d o / #O d v #l q d p h / #I l v w #l q d p h / #P l g g h #l q d p h , 1

L i #W k h #advisory affiliate k d v #l #C R D q x p e h u / #s u r y l g h #W k d w #q x p e h u #L i #q r w #l q g l f d w h #q r q 0 u h j l w h u h g #
 e | #F k h f n l q j #W k h #l s s u r s u d w h #e r { 1 #

D G Y #G U S #0 D G Y L V R U \ #D I I I O L D W H

CRD
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Li#| rx#duh#uhj lwhuhg#ru#uhj lwhulqj #z l#kh#*state securities authority* /#| rx#p d| #hp ryh#d#GUS#iru#
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- ☐ Wk l#GUS#kxq#eh#hp ryhg#urp #kh#DGY#uhfrug#ehfdxvh#l#z dv#l#ng#l#huuru/#vxfk#dv#gxh#r#
 d#chulfd#ru#gdw#l#hgw#| #p lwdnh l#I { s#lq#kh#f lufxp vwdqfhw=#

E1 Li#kh#*advisory affiliate* l#uhj lwhuhg#kuxjk#kh#DUG #v| vwhp #ru#CRD v| vwhp /#kdv#kh#*advisory*
affiliate vxep lwhg#d#GUS#z l#kh#lru#p #DGY /#EG #ru#X 07, #r#kh#DUG #ru#CRD iru#kh#nyhgwB#l#kh#
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\hv Qr

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 lwh#DUG #ru#CRD uhfrugv l#

SDUW#L#

41## Frxu#Dfwlrq#l#ldwhg#e | =#Qdp h#r i#uhj xawru/#*foreign financial regulatory authority, SRO*,
 frp p rglwhv#h { fkdqjh/#dj hqf | /#lup /#sulydwh#s#lqwl#i/#hwf l, #
 VHF XUWLVH V#DQG #H [F K D Q J H # R P P L V V I R Q

51 Suqlf lsdq#Uhdh i#Vrxjkw=

Lqmxqfwlrq

Rwkh#Uhdh i#Vrxjkw=#

G I V J R U J H P H Q W >#F L Y I O #D Q G #D G P I Q L V W U D W I Y H #S H Q D O W \ + I H V , 2 #I Q H + V , >#X Q G H U W D N I Q J

61 I lqj #G dwh#r i#Fr xu#Dfwlrq#P P 2 G G 2 \ \ \ \ , =

3523 < 25339 H { dfw H { s#lqdwlrq

Li#qrw#h { dfw#surylggh#h { s#lqdwlrq=

71 S

q
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VHFXUIWIHV#DQG#H[FKDQJH#F R P P LVVIR Q

91 *Advisory Affiliate* Hp sr| lqj#llp #z khq#dfwlylw| #rffxuuhg#z klfk#hng#r#kkh#flylh#xglfld#dfwlrq#-li#
dssdfdedh,=#
Q2D

:1 Ghvfuleh#kkh#dohjdwlrqv#uholhng#r#kkl#flylh#dfwlrq#-|rxu#uhvsrqvh#p xvw#llw#z lklq#kkh#vsdfh#
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IIQDQFIDO#VWDWHPHQWV#Q#R UGHU#NR #VWUHQJWKHQ#WKH#DSSHDUDQFH#R I#WV#IIQDQFIDO#
UHVXOWV#WR #DQDO\ VWV#DQG#QYHVWRUV1#Q#VR #GRIQJ /#WKH#VHF#DOOHJHG#WKDW#DLJ#KDG#
YIRODWHG#VHFWIRQ#4: +D, #R I#WKH#VHFXUIWIHV#DFW#R I#4<66#DQG#VHFWIRQV#43+E, /#46+D, /#46+E,
+5, #DQG#46+E, +8, #DQG#UXOHV#43E08/45E053/46D04/46D046#DQG#46E504#R I#WKH#H[FKDQJH#DFW#
R I#4<671

;1 Fxuuhqw#VwdwxvB# Shqglqj Rq#Dsshdo Ildo

<1 Li#rq#dsshdo#dfwlrq#dsshdng#r#surylgh#qdp h#r i#frxuw,#lqg#G dwh#Dsshdo#Ilhng#P P 2GG2\\\",=#

431 Li#shqglqj/#gdw#qrwlfh2surfhvv#z dv#uhyhg#P P 2GG2\\\",=
 H{dfw H{solqdwlrq
Li#qrw#h{dfw/#surylgh#h{solqdwlrq=

Li#I lqdo#rq#Dsshdo#frp sdwh#doh#p v#eharz l#Iru#Shqglqj#Dfwlrqv#frp sdwh#uhp #47#rqd l#

441 Krz #z dv#p dwhu#uhvrqhg=
Vhwchg

451 Uhvroxwlrq#G dwh#P P 2GG2\\\",=#
3524:25339 H{dfw H{solqdwlrq
Li#qrw#h{dfw/#surylgh#h{solqdwlrq=

461 Uhvroxwlrq#G hwlo=
D1## Z huh#dq| #r i#kkh#irorz lqj#Vdqfwlrqv#R ughung#ru#Uhohi#J udqwhg+fkhfn#dissursuldwh#uhp v,B#
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☐ Edu ☐ Vxvshqvlrq
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VHH#WHP #&47

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glvsvlwrq#uhvxohg#lq#d#lgh/#shqdw|/#hvw#wlrq/#gljrujhp hqw#r#p rghwdu| #frp shqvdwrq/#
surylgh#r#wdd#p rxqw/#srwrq#hy#lgh#djlqvw#| rx#r#ldq#advisory affiliate gdw#sdlg#ldgg#i#ldq| #
srwrq#r i#shqdw| #z dv#z dlyhg=#

VHH#WHP #& 47

471 Surylgh#d#eulh#xpp du| #r i#flfxp vwdqf#v#hghwghg#r#k#h#ldfwrq+v,/#d#hjdwrq+v,/#glvsvlwrq+v,#
dgg2ru#ldgglj+v,/#glv#fvhg#deryh#| rxu#hvsrqvh#p xvw#l#z lklq#k#h#vsdfh#surylghg,#
DLJ #IQWHUHG #QWR #D#VHWWOHP HQW#DJ UHHP HQW#z LWK #NKH#VHF #Q #FRQQHFWRQ #z LWK #NKH#
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R I#NKH#VHWWOHP HQW#z LWK #NKH#VHF /#NKH#VHF #ILOHG #D #F'LYLO#FRP SODIQW/#DOOHJ IQJ #NKKDW#EURP #
5333#QWLO#5338/#DLJ #P DWHUIDOO\#IDOVLIHGH #LWV #ILQDQFIDO#VWDWHP HQWV #NKKURXJK #D#
YDUIHW\ #R I#NUDQVDFWRQV #DQG #HQWLWHV #Q #R UGHU #WR #VWUHQJ WKHQ #NKH#SSHUUDQFH#R I#LWV#
ILQDQFIDO#UHVXOWV #WR #DQDO\VVW #DQG #QYHVWRUV 1#R #Q #HEUXDU\#-/#5339/#DLJ #z LWKRXW#
DGP LWIQLJ #R U#GHQ\IQJ #NKH#DOOHJ DWIRQV #Q #NKH#VHF #FRP SODIQW/#FRQVHQWHG #WR #NKH#
LVVXDQFH#R I#D#ILQDO#XGJPHQW=#D, #SHUPDQHQWO\#UHVWUDLIQJ #DQG #IQMR LQIQJ #DLJ #EURP #
YIRODWIQLJ #VHFWRQ #4 : +D, #R I#NKH#VHF#UWLVH #DFW#R I#4 < 66#VHF#UWLVH #DFW, #DQG #VHFWRQV #
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WKH#I [FKDQJH#DFW#R I#4 < 67#H [FKDQJH#DFW, >#E, #R UGHUIQJ #DLJ #WR #SD\ #GIVJRUJHP HQW#Q #
WKH#DPRXQW#R I# : 33#P LOOIRQ >#DQG #F, #R UGHUIQJ #DLJ #WR #SD\ #D #F'LYLO#SHQDOW\ #Q #NKH#
DPRXQW#R I# 433#P LOOIRQ 1#DLJ #DOVR #IQWHUHG #QWR #DQ #DJ UHHP HQW#z LWK #NKH#Q LWHG #VWDWHV#
GHSDUWP HQW#R I#XVWLFH#Q #FRQQHFWRQ #z LWK #NKH#DFFRXQWQJ #DQG #ILQDQFIDO#UHSR UWIQJ #
SUDFWLFHV #R I#DLJ #DQG #LWV #VXEVIG IDUIHV 1#DV #SDUW#R I#NKKDW#DJ UHHP HQW/#DLJ #SDIG #D# 58#
P LOOIRQ #ILQH#GHSRVLWHG #QWR #NKH#Q LWHG #VWDWHV #SRVWDO#QVSHFWIRQ #FRQVXP#HU#UDXG#
IXQG 1#DV #SDUW#R I#NKHVH#VHWWOHP HQWV /#DLJ #KDV #DJ UHHP #WR #UHWDIQ #R U#D #SHULRG #R I#NKHUHH#
\HDUV #DQ #QGHSHQG HQW#FRQVXOWDQW#z KR #z LOO#FRQGXFW#D #UHYIHZ #NKKDW#z LOO#Q FOXGH#NKH#
DGHTXDF\ #R I#DLJ #V#QWUHQDO#FRQWUROV #R YHU#ILQDQFIDO#UHSR UWIQJ #DQG #NKH#UHP HGIDWIRQ #
SODQ #NKKDW#DLJ #KDV #P SOHP HQWHG #DV #D #UHVXOW#R I#LWV#R Z Q #QWUHQDO#UHYIHZ 1

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

VHF #xchv#n{hp sw#VHF 0uhj lvwhug#dgy lvhu#iurp #ghdyhulqj #d#ilp #eurfkxuh#vr#vrp h#nlqgv#ri#fchqwl##Li#
 wkhvh#n{hp swlrqv#n{fxvh#|rx#iurp #ghdyhulqj #d#eurfkxuh#vr#all ri#|rxu#dgy lvru| #fchqw/#|rx#gr#grw#kdyh#
 vr#suhsduh#d#eurfkxuh1

Yes No

Duh#|rx#n{hp sw#iurp #ghdyhulqj #d#eurfkxuh#vr#d#ri#|rxu#fchqw#kqghu#wkhvh#xchvB



If no, complete the ADV Part 2 filing below.

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

Brochure ID	Brochure Name	Brochure Type(s)	Action
7 ; < 46	VXQDP HULFD#DVVHW#P DQDJHP HQW# FRUS1	R wkhv	Dp hqg

Execution Pages**DOMESTIC INVESTMENT ADVISER EXECUTION PAGE**

\rx#p xv#f#rp sdwh#k#h#r#z lqj#H{hfxw#r#q#s#d#j#h#r#i#r#p #DGY1#WkL#h{hfxw#r#q#s#d#j#h#p xv#e#h#v#l#j#q#h#g#d#g#g#dwd#f#k#h#g#r#z#|rxu#lq#w#d#v#x#p lv#r#q#r#i#r#p #DGY#r#z#k#h#V#H#F#d#g#g#d#d#p hqgp hq#w#l#

Dssr#l#q#p hq#w#r#i#D#j#h#q#w#r#u#V#huy#l#f#h#r#i#S#ur#f#h#v#

E|#v#l#j#q#l#j#k#k#l#r#p #DGY#H{hfxw#r#q#s#d#j#h#|rx/#k#h#x#g#h#v#l#j#q#h#g#d#g#y#l#h#u#f#l#u#h#y#r#f#d#e#d#dssr#l#q#w#k#h#V#h#f#u#h#d#u|#r#i#V#d#w#h#r#u#r#k#h#u#h#j#d#d#|g#h#v#l#j#q#d#w#h#g#r#i#l#f#h#u#r#i#k#h#v#d#w#h#l#q#z#k#l#f#k#|#rx#p#d#l#q#w#d#l#q#|#rxu#*principal office and place of business* d#g#g#d#q#|#r#k#h#u#v#d#w#h#l#q#z#k#l#f#k#|#rx#d#u#h#x#p#l#w#l#q#j#d#*notice filing*/#d#v#|#rxu#d#j#h#q#w#r#z#h#f#h#y#h#v#huy#l#f#h#d#g#g#d#j#u#h#k#d#w#x#f#k#*persons* p#d#|#d#f#f#h#s#w#huy#l#f#h#r#q#|#rxu#e#h#k#d#d#r#i#d#q#|#q#r#w#l#f#h#/#x#e#s#r#h#q#d#/#x#p#p#r#q#v#/#*order* l#q#v#w#l#w#l#q#j#*proceedings*/#g#h#p#d#g#g#r#u#d#u#e#l#w#d#w#r#q#/#r#u#r#k#h#u#s#u#r#f#h#v#r#u#s#d#s#h#v#/#d#g#g#|#rx#i#x#u#k#h#u#d#j#u#h#k#d#w#x#f#k#v#huy#l#f#h#p#d#|#e#h#p#d#g#h#e#|#h#j#l#w#h#u#g#r#u#f#h#w#l#l#h#g#p#d#l#q#d#q#d#q#|#i#h#g#h#u#d#r#u#v#d#w#h#d#f#w#r#q#/#d#g#p#l#q#l#w#d#w#y#h#*proceeding* r#u#d#u#e#l#w#d#w#r#q#e#u#r#x#j#k#w#d#j#d#l#q#v#w#|#rx#l#q#d#q#|#s#d#f#h#x#e#h#f#w#r#k#h#x#u#l#g#l#w#r#q#r#i#k#h#x#q#l#h#g#V#d#w#h#/#i#k#h#d#f#w#r#q#/#*proceeding*/#r#u#d#u#e#l#w#d#w#r#q#d#d#d#u#l#h#v#r#x#w#r#i#d#q#|#d#f#w#y#l#w#l#q#|#l#q#f#r#q#q#h#f#w#r#q#z#l#w#|#rxu#l#q#y#h#v#p#h#q#w#d#g#y#l#r#u#|#e#x#v#l#h#v#v#k#d#w#l#v#x#e#h#f#w#r#k#h#x#u#l#g#l#w#r#q#r#i#k#h#X#q#l#h#g#V#d#w#h#/#d#g#g#e#|#l#v#/#*founded*/#g#l#h#f#w#d#|#r#u#l#q#g#l#h#f#w#d#/#k#s#r#q#k#h#s#u#r#y#l#r#q#v#r#i#=#1#|#k#h#V#h#f#x#u#l#w#h#D#f#w#r#i#4<66/#k#h#V#h#f#x#u#l#w#h#H{f#k#d#q#j#h#D#f#w#r#i#4<67/#k#h#V#u#x#v#w#l#q#g#h#q#w#u#h#D#f#w#r#i#4<6</#k#h#l#q#y#h#v#p#h#q#w#f#r#p#s#d#q#|#D#f#w#r#i#4<73/#r#u#k#h#l#q#y#h#v#p#h#q#w#D#g#y#l#h#u#v#D#f#w#r#i#4<73/#r#u#d#q#|#u#x#d#h#r#u#h#j#x#d#w#r#q#x#q#g#h#u#d#q#|#r#i#k#h#v#h#d#f#w#r#u#h#l#|#k#h#k#d#z#v#r#i#k#h#v#d#w#h#l#q#z#k#l#f#k#|#rx#p#d#l#q#w#d#l#q#|#rxu#*principal office and place of business* r#u#r#i#d#q#|#v#d#w#h#l#q#z#k#l#f#k#|#rx#d#u#h#x#p#l#w#l#q#j#d#*notice filing*1

V#l#j#q#d#w#u#h

L/#k#h#x#g#h#v#l#j#q#h#g#/#v#l#j#q#k#k#l#r#p #DGY#r#q#e#h#k#d#d#r#i#d#g#g#z#l#w#k#h#d#x#w#r#u#l#w#|#r#i#/#k#h#l#q#y#h#v#p#h#q#w#d#g#y#l#h#u#l#W#k#h#l#q#y#h#v#p#h#q#w#d#g#y#l#h#u#d#g#g#H#e#r#w#k#f#h#w#l#l#/#x#g#h#u#s#h#q#d#w#|#r#i#s#h#u#x#u#|#x#g#h#u#k#h#k#d#z#v#r#i#k#h#x#q#l#h#g#V#d#w#h#v#r#i#D#p#h#u#l#f#d#/#k#d#w#k#h#l#q#i#r#p#d#w#r#q#d#g#g#v#d#w#h#p#h#q#w#p#d#g#h#l#q#k#k#l#r#p#DGY#/#l#q#f#o#x#g#l#j#h#|#k#l#l#w#d#g#g#d#q#|#r#k#h#u#l#q#i#r#p#d#w#r#q#v#x#p#l#w#h#g#/#d#u#h#u#x#h#d#g#g#f#r#u#h#f#w#d#g#g#k#d#w#l#d#p#v#l#j#q#l#j#k#k#l#r#p #DGY#H{hfxw#r#q#s#d#j#h#d#v#d#i#u#h#h#d#g#g#y#r#o#x#q#w#d#u#|#d#f#w#l

L#f#h#w#l#l#|#k#d#w#k#h#d#g#y#l#h#u#v#e#r#r#n#v#d#g#g#u#h#f#r#u#g#v#z#l#e#h#s#u#h#v#h#y#h#g#d#g#g#d#y#d#k#d#e#d#r#u#l#q#v#h#f#w#r#q#d#v#u#h#t#x#l#h#g#e#|#k#d#z#l#H#l#q#d#d#/#l#d#x#w#r#u#l#h#d#q#|#*person* k#d#y#l#j#*custody* r#u#s#r#v#h#v#l#r#q#r#i#k#h#v#h#e#r#r#n#v#d#g#g#u#h#f#r#u#g#v#r#z#p#d#n#h#k#h#p#d#y#d#k#d#e#d#r#u#l#h#g#h#u#d#d#g#g#v#d#w#h#u#h#j#x#d#w#r#u#l#u#h#s#u#h#v#h#q#w#d#w#y#h#v#l

V#l#j#q#d#w#u#h#=#

G#d#w#=#P#2#G#G#2#\\#

SHWHU#D1#K#DUEHFN

3#6#2#6#4#2#5#3#4#7

S#u#l#q#w#h#g#Q#d#p#h#=#

W#l#w#h#=#

SHWHU#D1#K#DUEHFN

S#U#H#V#I#G#H#Q#W#/#F#H#R#D#Q#G#G#I#U#H#F#W#R#U

D#g#y#l#h#u#CRD#Q#x#p#e#h#=#

43:66;

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

\rx#p xv#f#rp sdwh#k#h#r#z lqj#H{hfxw#r#q#s#d#j#h#r#i#r#p #DGY1#WkL#h{hfxw#r#q#s#d#j#h#p xv#e#h#v#l#j#q#h#g#d#g#g#dwd#f#k#h#g#r#z#|rxu#lq#w#d#v#x#p lv#r#q#r#i#r#p #DGY#r#z#k#h#V#H#F#d#g#g#d#d#p hqgp hq#w#l#

41#Dssr#l#q#p hq#w#r#i#D#j#h#q#w#r#u#V#huy#l#f#h#r#i#S#ur#f#h#v#

E | #v|j q|qj #k|v#Irup #DGY#H { hfxwlrq#Sdj h/#| rx/#k|h#xqghuvlj qhg#dgy lvhu/#luhyrfded| #dssrlqw#ndfk#r i#k|h# Vhfuhwdu| #r i#k|h#VHF /#dgg#k|h#Vhfuhwdu| #r i#v|w|w|h#r#u#k|h#u#h|j d#d| #ghv|j qdwhg#r i|lfhu/#r i#d|q | #r#k|h#v|w|w|h#d|q# z k|fk#| rx#d|h#v#xep lwqj #d#*notice filing*/#d|v#| rxu#d|j hqw#r#u#h#f|h#y#h#v#huy lf h/#dgg#d|j uhh#k|d#w#v#f#k#s#huvr#qv# p d| #d|ffhsw#v#huy lf h#r#q#| rxu#e#hkda/#r i#d|q | #grwlfh/#v#esrhqd/#v#p p r#qv/#*order* lqv#lw#w|qj #*proceedings*/# ghp dgg#iru#due lwdwlrq/#ru#r#k|h#s#ur#f#v#v#r#u#s#dshuv/#dgg#| rx#i#x#u#k|h#d|j uhh#k|d#w#v#f#k#s#huy lf h#p d| #eh# p dgh#e | #h|j lvwhug#r#u#f#h#w|l|h#g#p d|v/#d|q#d|q | #hghud#r#u#v#d#w|h#d|f#w|q/#dgp lq lwdwlyh#*proceeding* ru# due lwdwlrq#e#ur#x|j#w#d|j d|qvw#| rx#d|q#d|q | #s#d|f#h#v#x#e#h#f#w#r#k|h#x#u#l#g|f#w|q#r i#k|h#x#q|l#h#g#v#d#w|h#v/#d|j#k|h#d|f#w|q/# *proceeding* ru#due lwdwlrq#d, #d|u#v#h#v#r#x#w#r i#d|q | #d|f#w|y|w| #d|q#f#r#q#h#f#w|q#z lwk#| rxu#d|q#y#h#v#p hqw#dgy lvru| # exv|ghv#v#k|d#w#v#x#e#h#f#w#r#k|h#x#u#l#g|f#w|q#r i#k|h#x#q|l#h#g#v#d#w|h#v/#dgg#e, #v#*founded*/#g|u#h#f#w| #r#u#dgg|u#h#f#w|/# xsrq#k|h#s#ury lv|r#q#v#r#i#e#l, #k|h#v#h#f#x#u#l#w|h#v#D f#w#r i#d| < 66 /#k|h#v#h#f#x#u#l#w|h#v#H { f#k#d#q#j#h#D f#w#r i#d| < 67 /#k|h#v#x#v#w# lqghq#w#u#h#D f#w#r i#d| < 6 /#k|h#v#dgyh#v#p hqw#f#r#p s#d|q | #D f#w#r i#d| < 73 /#r#u#k|h#v#dgyh#v#p hqw#dgy lvhu#v#D f#w#r i#d| < 73 /# ru#d|q | #u#d|h#r#u#h|j#x#d#w|q#x#qghu#d|q | #r i#k|h#v#h#d|f#w/#r#u#l, #k|h#v#d|z v#r i#d|q | #v#d#w|h#d|q#z k|fk#| rx#d|h# v#xep lwqj #d#*notice filing*1

51#Dssrlqw hqw#dgg#f#r#qv#hqw=#H iihfw#r#q#Sduwqhuvk ls v

Li#| rx#d|h#ruj dql}hg#d|v#d|s#duwqhuvk ls /#k|v#luhyrfded#s#r#z hu#r i#d#w#r#u#h | #dgg#f#r#qv#hqw#r#u#huy lf h#r i# sur#f#v#v#z k#f#r#q#w|q#x#h#d|q#h iihfw#d|i#d|q | #s#duwqhuvk lwk#d#z v#i#urp #r#u#l#v#d|g#p lwng#r#k|h#s#duwqhuvk ls /#s#ury lghg# wkdw#k|h#d|g#p lv|r#q#r#u#z lwk#d#z d#g#r#h#v#q#r#w#f#u#d#w|h#d|q#h#z #s#duwqhuvk ls 1#Li#k|h#s#duwqhuvk ls#g|lv|r#q#h#v/#k|v# luhyrfded#s#r#z hu#r i#d#w#r#u#h | #dgg#f#r#qv#hqw#v#k#d#e#h#d|q#h iihfw#r#u#d|q | #d|f#w|q#e#ur#x|j#w#d|j d|qvw#| rx#r#u#d|q | #r i# | rxu#i#rup hu#s#duwqhuvl

61#*Non-Resident* lqyhv#p hqw#Dgy lvhu#x#qghu#d#n#l#qj #U#h#j#dug#l#j #E#r#r#n#v#d#q#g#U#h#f#r#u#g#v

E | #v|j q|qj #k|v#Irup #DGY/#| rx#d#v#r#d|j uhh#r#s#ury lgh/#d#w#| rxu#r#z q#h { shqvh/#r#k|h#x IV 1#v#h#f#x#u#l#w|h#v#dgg# H { f#k#d#q#j#h#f#r#p p lv|r#q#d|w#l#w#s#u#q#f#l#s#d#r i|lfh#d|q#z d#v#k|qj#w#r#q#G 1F 1/#d#w#d|q | #U#h#j#l#r#q#d#r#u#G l#w|u#f#w#R i|lfh#r i#k|h# F#r#p p lv|r#q/#r#u#d#w#d|q | #q#h#r i#l#w#r i|lfh#v#d|q#k|h#x#q|l#h#g#v#d#w|h#v/#d|v#v#sh#f#l|h#g#e | #k|h#f#r#p p lv|r#q/#f#r#u#h#f#w/# f#x#u#h#q#w#d|q#g#f#r#p s#d#w#h#f#r#s#l#v#r#r i#d|q | #r#u#d#e#h#u#h#f#r#u#g#v#k#d#w#| rx#d|h#u#h#t#x#l#h#g#r#p d|q#w|d|q#k#qghu#U#x#d#53705# xqghu#k|h#l#qy#h#v#p hqw#Dgy lvhu#v#D f#w#r i#d| < 73 1#Wk|v#x#qghu#d#n#l#qj #v#k#d#e#h#e lqg#l#j #x#s#r#q#| rx/#| rxu#k|h#l#w/# v#x#f#h#v#r#v#d#q#g#d#v#l#j#q#v/#d|q#g#d|q | #*person* v#x#e#h#f#w#r#r#| rxu#z u#l#w#h#q#luhyrfded#f#r#qv#hqw#r#u#s#r#z hu#r i# d#w#r#u#h | #r#u#d|q | #r i#| rxu#j#h#q#h#u#d#s#duwqhuv#d|q#g#*managing agents*1

Vlj qdwxuh

L/#k|h#x#qghuvlj qhg/#v|j q#k|v#Irup #DGY#r#q#e#hkda#r#i/#d|q#g#z lwk#k|h#d#x#w#r#u#l# #r#i/#k|h#*non-resident* lqyhv#p hqw#dgy lvhu#l#w|h#d|qy#h#v#p hqw#dgy lvhu#d|q#g#e#r#w#k#f#h#w|l| /#x#qghu#s#h#q#d#w| #r i#s#h#u#x#u| #x#qghu#k|h#v#d|z v#h r i#k|h#x#q|l#h#g#v#d#w|h#v#r i#D p h#u#l#f#d/#k|d#w#k|h#d|q#i#r#p d#w|q#d|q#g#v#d#w|h#p hqw#p dgh#d|q#k|v#DGY/#d|q#f#o#g#l#j# h { k|e lw#d|q#g#d|q | #r#k|h#u#d|q#i#r#p d#w|q#v#xep lwng/#d|h#u#x#h#d|q#g#f#r#u#h#f#w/#d|q#g#k|d#w#l#d|p #v|j q|qj #k|v#Irup #DGY# H { hfxwlrq#Sdj h#d|v#d|u#h#h#d|q#g#y#r#o#g#w|u| #d|f#w|

L#f#h#w|l| #k|d#w#k|h#dgy lvhu#v#e#r#r#n#v#d#q#g#u#h#f#r#u#g#v#z k#e#h#s#u#h#v#huy#h#g#d|q#g#d|y#d#l#e#d#r#u#d|q#v#h#f#w|q#d|v#u#h#t#x#l#h#g# e | #d|z 1#H l#q#d#d| /#L#d#x#w#r#u#l#h#d|q | #*person* k#d#y#l#j #*custody* ru#s#r#v#h#v#l#r#q#r i#k|h#v#h#e#r#r#n#v#d#q#g#u#h#f#r#u#g#v#r# # p#d#n#h#k|h#p #d|y#d#l#e#d#r#u#h#g#h#u#d#d|q#g#v#d#w|h#u#h#j#x#d#w#r#u| #u#s#u#h#v#h#q#w#d#w|y#h#v1

Vlj qdwxuh=#

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

Suqwhg#Qdp h=

Wlwh=#

Dgy lvhu#CRD Qxp eh=#

43 : 66 ;

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