

Item 1. Cover Page

Brochure of
Oakmont Corporation
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March 31, 2015

This brochure provides information about the qualifications and business practices of Oakmont Corporation (“Oakmont”). If you have any questions about the contents of this brochure, please contact us at (213) 891-6300. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Oakmont also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2. Material Changes

There have been no material changes to this Brochure since March 31, 2014, the date that this Brochure was last amended. However, this Brochure does include other updating changes.

Item 3. Table of Contents

	Page
Item 1. Cover Page.....	1
Item 2. Material Changes.....	1
Item 3. Table of Contents.....	2
Item 4. Advisory Business.....	3
Item 5. Fees and Compensation.....	3
Item 6. Performance-Based Fees and Side-By-Side Management.....	4
Item 7. Types of Clients.....	5
Item 8. Methods of Analysis, Investment Strategies and Risk of Loss.....	5
Item 9. Disciplinary Information.....	9
Item 10. Other Financial Industry Activities and Affiliation.....	9
Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	10
Item 12. Brokerage Practices.....	11
Item 13. Review of Accounts.....	13
Item 14. Client Referrals and Other Compensation.....	13
Item 15. Custody.....	13
Item 16. Investment Discretion.....	13
Item 17. Voting Client Securities.....	14
Item 18. Financial Information.....	14
Privacy Policy.....	14

Item 4. Advisory Business

Oakmont is a California corporation that was formed in August 1980. Oakmont considers itself a family office that provides investment advice, financial planning and various administrative services to members of a family and several individuals who have long-standing relationships with one or more family members. These services are provided to the family members and other individuals and to certain entities that they control or are affiliated with, including trusts, foundations, corporations, limited liability companies and partnerships. Oakmont also provides investment advice to an employee benefit plan for the benefit of current and past employees.

Oakmont's owner is Robert A. Day, as trustee of the Robert A. Day Trust dated March 22, 2000, as amended. Mr. Day is also Oakmont's chairman, owner of The Cypress Funds LLC ("Cypress") and a controlling owner of Sword Capital Partners, LLC ("Sword Partners"), which are also SEC-registered investment advisers to investment funds (the "Funds").

Oakmont has selected and monitors an unaffiliated sub-adviser, Peak Investments, LLC ("Peak"), an SEC-registered investment adviser, to provide investment services to Oakmont. Peak's manager, Ronald J. Krystyniak, manages Oakmont's clients' securities portfolios on a day-to-day basis. Oakmont pays a fixed fee to Peak directly, and to Mr. Krystyniak indirectly as Peak's manager, for their services to Oakmont.

Oakmont shares office space with Cypress, Sword Partners and Peak (the "Other Advisers") and certain Oakmont employees provide services to the Other Advisers.

Oakmont invests on a discretionary basis for its clients principally, but not solely, in equity and equity-related securities that are traded publicly in U.S. markets. Oakmont also provides advice regarding debt securities, partnerships investing in marketable securities and venture capital, private equity, real estate and leveraged buyout funds. Oakmont's clients may also invest directly in real estate and privately held companies.

Oakmont tailors its services to the individual needs of each client. Oakmont's clients may impose restrictions on investing in certain securities or types of securities.

As of December 31, 2014, Oakmont had total discretionary assets under management of approximately \$631,227,669, and total non-discretionary assets under management of approximately \$5,594,676.

Item 5. Fees and Compensation

Oakmont does not have a fixed fee schedule. Its compensation varies and may be negotiated or waived as required by law or at Oakmont's discretion. However, fees typically are a fixed annual fee that is negotiated with each client based on the level and types of services provided to that client. Oakmont also may charge an annual asset-based fee of 1%. These fixed and asset-based fees are typically payable in quarterly installments in advance or in arrears, depending on the term of each client's investment management agreement. Oakmont may also charge a one-time or annual fixed, or an asset-based, administrative fee to limited liability companies to which Oakmont serves as administrator. Each of these companies is formed for a particular investment in which Oakmont clients have invested. Clients that invest in mutual funds, venture capital

funds or other investment funds also pay, indirectly, investment advisory fees to the managers of those funds and the other expenses of those funds, including brokerage commissions. The expenses that a mutual fund pays are available in its prospectus. The expenses that a private fund pays are available in its offering documents.

Oakmont typically deducts management fees directly from client accounts, but may bill a client for such amounts on request.

Except as may be negotiated otherwise in particular cases, a client may terminate the client's account by giving Oakmont 30 days' prior written notice. Any prepaid but unearned advisory fees will be refunded to a client on termination of the applicable advisory relationship.

Each client account is responsible for its own costs and expenses, including trading costs and expenses (such as brokerage commissions and clearing and settlement charges) and ongoing legal, tax, accounting and bookkeeping fees and expenses. Please see the discussion in Item 12 regarding Brokerage Practices. Each client is also responsible for its proportionate share of the cost of any surprise examination required by applicable custody rules. Not all investment advisers charge this expense to clients.

Oakmont believes that its fees are competitive with fees charged by other investment advisers for comparable services. Comparable services may be available, however, from other sources for lower fees.

Item 6. Performance-Based Fees and Side-By-Side Management

Oakmont does not manage accounts that pay performance-based compensation but Cypress and Sword Partners do. As a controlling owner of Cypress and Sword Partners, Mr. Day receives part of the compensation that the Funds pay Cypress and Sword Partners, including performance-based compensation. This arrangement may create an incentive for Mr. Day to cause Oakmont clients to invest in a Fund instead of an individually managed account at Oakmont because Mr. Day's share of Cypress's and Sword Partners' performance compensation might be greater than the fees Oakmont earns from such an account, and the reduced expenses and administrative burdens of having Cypress and Sword Partners manage a Fund compared to Oakmont managing such an account.

Through Peak, Mr. Krystyniak is also the portfolio manager for Cypress and receives part of the performance-based compensation paid by the Funds of which Cypress is the investment adviser. This arrangement could cause Mr. Krystyniak and the other members of Cypress to receive more compensation from Cypress than from Oakmont, giving him and Cypress's other members an incentive to favor clients of Cypress.

Oakmont and the Other Advisers have addressed the conflicts of interest discussed in this Item 6 by disclosing them to clients and investors and by implementing policies and procedures governing allocation of investment opportunities and regularly reviewing such policies and procedures and such allocations.

Item 7. Types of Clients

Oakmont provides investment advice to high-net-worth individuals, trusts, corporations, foundations, partnerships, limited liability companies and an employee benefit plan. Oakmont's clients and other investors may also be members or partners of entities to which Oakmont provides administrative services. Oakmont does not require a minimum account opening balance.

Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

Investment Strategy

Oakmont's clients typically have long-term investment horizons. Therefore, Oakmont's primary goal for its clients is long-term capital appreciation and its primary risk concern is permanent capital loss, not volatility. Oakmont's clients typically have concentrated portfolios with equity orientations. Oakmont believes that investment performance depends more on individual investment selection than on market timing. Oakmont seeks to accomplish these objectives by using bottom-up, fundamental research and analysis in its investment decision-making process. The goal is to invest in companies with sound businesses at attractive valuations and hold them for the long term.

Oakmont also makes recommendations to clients about outsourcing capital to funds and other investments not managed by Oakmont when Oakmont believes that exposure to such investments is appropriate for the clients but Oakmont lacks the applicable expertise.

This investment strategy summary represents Oakmont's current intentions, is general in nature and is not exhaustive. There are no limits on the types of investments in which Oakmont may take positions on behalf of its clients, the types of positions that it may take, the concentration of its investments or the amount of leverage that it may use. Oakmont may use any trading or investment techniques, whether or not contemplated by the expected investment strategies described above. In addition, there are limitations in describing any investment strategy due to its complexity, confidentiality and indefinite nature. Depending on conditions and trends in securities markets and the economy generally, Oakmont may pursue any objectives or use any techniques that it considers appropriate and in its clients' interest.

Risk Factors

Investing in securities involves risk of loss that clients should be prepared to bear. Below are some of the risks that investors should consider before investing with Oakmont. Any of these risks could materially and adversely affect investment performance, the value of any account or any security held in an account, and could cause investors to lose substantial amounts of money. The list below is only a brief summary of some of the risks that a client or investor may encounter. Each potential client should review all materials from Oakmont carefully, consult with its professional advisers and discuss with Oakmont's representatives any questions that it may have before opening an account.

Market and Counterparty Risks

- Investor sentiment on the market, an industry or an individual security is not predictable and can adversely affect an account's investments.
- An account may hold stocks that disappoint earnings expectations and decline, and may short stocks that beat earnings expectations and rise.
- Some of an account's positions may be or become illiquid, in which case Oakmont may not be able to sell such positions.
- Changes in economic conditions can adversely affect investment performance.
- Counterparties such as brokers, dealers and custodians with which Oakmont does business on behalf of clients may default on their obligations. For example, a client may lose its assets on deposit with a broker if the broker, its clearing broker or an exchange clearinghouse becomes bankrupt.

Risks of an Account Managed by Oakmont

- Clients may not achieve their investment objectives. A strategy may not be successful and investors may lose some or all of their investment.
- Oakmont may not be able to obtain complete or accurate information about an investment and may misinterpret the information that it does receive. Oakmont also may receive material, non-public information about an issuer that prevents it from trading that issuer's securities for a client when the client could make a profit or avoid losses.
- Oakmont may take positions in securities of small, unseasoned companies that are less actively traded and more volatile than those of larger companies.
- An account may have higher portfolio turnover and transaction costs than a similar account managed by another investment adviser. These costs reduce investments and potential profit or increase loss.
- Client accounts may borrow on margin, which increases volatility and risk of loss.
- Oakmont may acquire for a client a large position in an issuer's securities but the client nevertheless is unlikely to have any control over the issuer's management. In addition, if Oakmont's clients hold a large position in an issuer's securities, the client's subsequent sales of those securities could depress the market for them.
- A client's investments may not be diversified. Therefore, a loss in any one position, industry or sector in which a client has invested may cause significant losses.
- Oakmont may cause clients to invest in securities of non-U.S., private and government issuers. The risks of these investments include political risks; economic conditions

of the country in which the issuer is located; limitations on foreign investment; currency exchange risks; withholding taxes; limited information about the issuer; limited liquidity; and limited regulatory oversight.

- Oakmont's activities could cause adverse tax consequences to clients and investors, including liability for interest and penalties.

Risks Related to Particular Types of Investments

- Oakmont's clients may make private equity investments, which investments involve an extraordinarily high degree of risk and can result in complete losses. These companies may be operating at a loss or with substantial variations in operating results from period to period and may need substantial additional capital to achieve or maintain competitive positions. They may face intense competition from companies with much greater financial resources, much more extensive development, production, marketing and service capabilities, and a much larger number of qualified managerial and technical personnel.

- Any real estate in which Oakmont clients invest, whether directly or through a pooled investment vehicle or other fund structure, could suffer losses as a result of the following general risks relating to investing in real estate:

- Adverse changes in economic and market conditions, supply of, or demand for, similar or competing properties, changes in taxes or interest rates and the availability of mortgage funds, all of which may depress the prices of real estate and make sales difficult.

- Uninsurable events such as earthquakes, floods, hurricanes, and wars.

- Stringent environmental regulation. A real estate owner may be liable for cleanup costs or damages caused by hazardous materials or toxic substances even if they were on the property before the current owner acquired it or were released by owners of nearby properties. An investor or a fund in which the investor invests might be required to pay such cleanup costs and might not be able to sell a property that has environmental problems.

- Material title defects, which can render a property worthless.

- Delays in construction work and unsatisfactory performance by contractors, which could cause real estate improvements to cost more and take longer than expected.

- Competing for tenants and maintaining rental rates and occupancy levels in a highly competitive market, which may cause rental income to be insufficient to meet a property's operating expenses.

- Non-compliance with building codes, which may cause properties to be subject to remedial actions or other legal recourse by government agencies, fines or other monetary remedies.

- Liability to customers, tenants and guests.

- A client may invest in restricted securities that are subject to long holding periods or that are not traded in public markets. These securities are difficult or impossible to sell at prices comparable to the market prices of similar publicly-traded securities and may never become publicly traded.

Conflicts of Interest

- Oakmont determines the value of securities held in client portfolios, whether or not a public market exists for those instruments. If Oakmont's valuation is inaccurate and it charges a client an asset-based fee, it might receive more compensation from that Client than it should.

- In some cases, the client and not Oakmont may be responsible for any trade errors that Oakmont makes in an account, even when the error hurts the client.

- Oakmont and its affiliates and agents generally are not responsible to any client or investor for losses incurred in an account unless the conduct resulting in the loss breached Oakmont's fiduciary duty to the client or investor.

- Oakmont may provide certain investors or clients more frequent or detailed work reports, special compensation arrangements and withdrawal rights that it does not provide to other investors or clients.

Risks Related to Investing in Private Funds

- There is not and will not be an active market for the limited liability company and partnership interests that Oakmont clients may purchase. It may be impossible to transfer any such interests or withdraw from the investment vehicle, even in an emergency.

- The partnerships in which Oakmont clients invest typically do not make distributions, but instead reinvest substantially all income and gain. Therefore, a client may have taxable income from a partnership without a cash distribution to pay the related taxes.

Economic and Regulatory Risks

- In past years, economic conditions in the U.S. and elsewhere deteriorated significantly, resulting in volatile securities markets and large investment losses. Government actions responding to these conditions could lead to inflation and other negative consequences to investors.

- Federal, state and international governments may increase regulation of investment advisers and private investment funds, which may increase the time and resources that Oakmont must devote to regulatory compliance, to the detriment of investment activities.

Item 9. Disciplinary Information

Not applicable.

Item 10. Other Financial Industry Activities and Affiliation

As discussed above, Robert A. Day, Oakmont's controlling owner, also controls Cypress and Sword Partners. Oakmont's client accounts are managed on a day-to-day basis by Peak and Mr. Krystyniak, Peak's manager. Through Peak, Mr. Krystyniak is also the portfolio manager of Cypress. Each of Cypress and Sword Partners is the general partner and investment adviser of Funds in which certain of Oakmont's clients are investors. Please see Item 4 for the definitions of capitalized terms used in this Item 10.

Oakmont may solicit some of its clients to invest in the Funds. As a controlling owner of Cypress and Sword Partners, Mr. Day receives part of the compensation that the Funds pay them, including performance-based compensation. Through Peak, Mr. Krystyniak is also the portfolio manager for Cypress and receives part of the performance-based compensation that Cypress receives. The conflicts of interest created by these arrangements are discussed in Item 6.

Oakmont, Cypress and Sword Partners may invest in the same investment opportunities. They also have discretion to determine how to allocate those opportunities among their clients, the Funds, themselves and their affiliates. An investment that might be appropriate for Oakmont clients who are not investors in the Funds might be more profitable or otherwise benefit Mr. Day, Mr. Krystyniak, Cypress or Sword Partners if those clients do not participate. This conflict of interest could influence Oakmont not to make such an investment for those clients even though participation might benefit them.

In addition, as discussed above, Oakmont serves as the administrator of companies, each of which was formed for a particular investment in which Oakmont clients have invested. At its discretion and depending on the size of the investment opportunity, Oakmont may permit employees, affiliates and sometimes others to participate in these investments.

The Oakmont employees who provide services to Cypress and Sword Partners also have conflicts of interest over the amount of time they spend on Oakmont's activities and the activities of Cypress and Sword Partners. If it is more profitable for Mr. Day and those employees to spend time on Cypress's and Sword Partners' activities compared to Oakmont's, they have an incentive to allocate more time to those activities.

Oakmont and the Other Advisers have addressed the conflicts of interest discussed in this Item 10 by disclosing them to clients and investors by implementing policies and procedures governing allocation of investment opportunities and regularly reviewing such policies and procedures and such allocations.

Securities transactions for the Funds are made through Oakmont's trading desk by Oakmont's employees. The conflicts of interest raised by this arrangement are discussed in Item 12.

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

Oakmont has adopted a Code of Ethics in compliance with Rule 204A-1 under the Investment Advisers Act of 1940, that establishes standards of conduct for its supervised persons. The Code of Ethics includes general requirements that supervised persons comply with their fiduciary obligations to clients and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest and confidentiality of client information. It requires supervised persons to comply with the personal trading restrictions described below and periodically to report their personal securities transactions and holdings to Oakmont's Compliance Officer, and requires the Compliance Officer to review those reports. It also requires supervised persons to report any violations of the Code of Ethics promptly to the Compliance Officer. Each supervised person receives a copy of the Code of Ethics and any amendments to it and must acknowledge in writing having received those materials. Annually, each supervised person must certify that he or she complied with the Code of Ethics during the preceding year. Clients and prospective clients may obtain a copy of Oakmont's Code of Ethics by contacting Oakmont.

Under the Code of Ethics and the codes of ethics of each of the Other Advisers, Oakmont, the Other Advisers and their members, shareholders and employees may personally invest in the same securities that Oakmont purchases for its clients and may own the same securities that Oakmont subsequently purchases for its clients. The Other Advisers may also purchase and sell such securities for their clients. This practice creates a conflict of interest in that any of such persons can use his or her knowledge about actual or proposed securities transactions and recommendations for a client account to profit personally, or to profit the Other Advisers' clients, by the market effect of such transactions and recommendations. To address this conflict, Oakmont and the Other Advisers have adopted policies and procedures governing the allocation of investment opportunities among clients and regularly review such policies and procedures.

In addition, all securities transactions by Oakmont's supervised persons and the Other Advisers' employees, other than open-ended mutual funds (but not exchange-traded funds), U.S. government securities, money market instruments and shares of money market funds, must be pre-approved in writing by Oakmont's compliance officer or the compliance officer of the appropriate Other Adviser. In addition, such employees and supervised persons may not buy or sell a security for their own accounts until the trading day after orders for clients in that security have been filled and there is no buying or selling program in progress. Oakmont, the Other Advisers and their employees may also buy or sell specific securities for their own accounts based on personal investment considerations aside from company or industry fundamentals, which Oakmont does not believe appropriate to buy or sell for clients.

Because Oakmont manages more than one account, and Peak and Mr. Krystyniak manage more than one account on behalf of Oakmont and Cypress, there may be conflicts of interest over their time devoted to managing any one account and allocating investment opportunities among all accounts that they manage. For example, Mr. Krystyniak selects investments for each client of Oakmont and Cypress based solely on investment considerations for that client. Different clients may have differing investment strategies and expected levels of trading. Mr. Krystyniak may buy or sell a security for one type of client but not for another, or may buy (or sell) a security for

one type of client while simultaneously selling (or buying) the same security for another type of client. Mr. Krystyniak may give advice to, and take action on behalf of, any client of Oakmont or Cypress that differs from the advice that he gives or the timing or nature of action that he takes on behalf of any other such client. None of Oakmont, Peak or Mr. Krystyniak is obligated to acquire for any account any security that his or its members, managers, shareholders, directors, officers or employees may acquire for their own accounts or for any other client, if in the absolute discretion of Oakmont, Peak or Mr. Krystyniak, it is not practical or desirable to acquire a position in such security for that account.

Item 12. Brokerage Practices

Except when Oakmont chooses to delegate such authority to Peak and Mr. Krystyniak, Oakmont has complete discretion in selecting the broker that it uses for client transactions and the commission rates that clients pay such brokers. In addition, the Other Advisers direct the Funds' securities transactions through Oakmont's trading desk by Oakmont's trading staff. In selecting a broker for any transaction or series of transactions, Oakmont may consider a number of factors, including, for example:

- net price, clearance, settlement and reputation;
- financial strength and stability;
- efficiency of execution and error resolution;
- block trading and block positioning capabilities;
- willingness to execute related or unrelated difficult transactions in the future;
- special execution capabilities;
- offering to Oakmont on-line access to computerized data regarding clients' accounts;
- computer trading systems; and
- the availability of stocks to borrow for short trades.

Oakmont may also purchase from a broker or allow a broker to pay for the following (each a "soft dollar" relationship):

- research reports, services and conferences, including third-party research fees;
- technical data;
- periodical subscription fees;
- consultations;
- performance measurement data;
- on-line pricing;
- news wire and data processing charges;
- quotation services;
- custody, recordkeeping and similar services;
- proxy voting services; and
- computer hardware and software.

Oakmont may receive soft dollar credits based on principal, as well as agency, securities transactions and Oakmont may direct a broker that executes transactions to share some of its commissions with a broker that provides soft dollar benefits to Oakmont or the Other Advisers.

Section 28(e) of the Securities Exchange Act of 1934 provides a “safe harbor” to investment advisers who use commission dollars of their advised accounts to obtain investment research and brokerage services that provide lawful and appropriate assistance to the adviser in performing investment decision-making responsibilities. Conduct outside of the safe harbor of section 28(e) is subject to the traditional standards of fiduciary duty under state and federal law. If Oakmont uses commission dollars to pay for products or services that provide administrative or other non-research assistance to itself or its affiliates, such payments may not fall within the section 28(e) safe harbor.

Oakmont may pay to a broker commissions and mark-ups that exceed those that another broker might charge for effecting the same transaction because of the value of the brokerage, research, other services and soft dollar relationships that such broker provides. Oakmont determines in good faith that such compensation is reasonable in relation to the value of such brokerage, research, other services and soft dollar relationships, in terms of either the specific transaction or Oakmont’s overall fiduciary duty to its clients. An account may, however, pay higher commissions and mark-ups than are otherwise available or may pay more commissions or mark-ups based on account trading activity.

Oakmont generally considers the amount and nature of the research, execution and other services provided by brokers as well as the extent to which Oakmont’s clients and the Funds rely on such services, and attempts to allocate the brokerage transactions of its clients and the Funds on that basis. Oakmont and the Other Advisers may, however, use the investment information and other services that each receives from brokers in servicing all of their accounts. Specifically, soft dollars generated by trades for Oakmont’s clients may also pay for services to the Funds. Oakmont believes, however, that allocating brokerage transactions in this manner helps it obtain research and execution capabilities that benefit its clients.

Oakmont’s relationships with brokers that provide soft dollar services influence its judgment and create conflicts of interest in allocating brokerage business between firms that provide soft dollar services and firms that do not. Oakmont has an incentive to select or recommend a broker based on Oakmont’s and the Other Advisers’ interest in receiving soft dollar services rather than clients’ interest in receiving the most favorable execution. These conflicts of interest are particularly influential to the extent that Oakmont and the Other Advisers use soft dollars to pay expenses they would otherwise be required to pay themselves.

Oakmont addresses these conflicts of interest by annually evaluating the trade execution services that it receives from the brokers that it uses. Such evaluation includes comparing those services to the services available from other brokers. Oakmont considers, among other things:

- alternative market makers and market centers;
- the quality of execution services;
- the desirability of continuing with various soft dollar services;
- adding brokers or futures commission merchants to, or removing them from, the approved list of merchants that Oakmont uses; and
- increasing or decreasing targets for each broker or futures commission merchant and the appropriate level of commission rates.

Oakmont may aggregate securities sale and purchase orders for a client with similar orders being made contemporaneously for other client accounts or the Funds. In such event, Oakmont may charge or credit a client the average transaction price of all securities purchased or sold in such transactions. As a result, however, the price may be less favorable to the client than it would be if Oakmont were not executing similar transactions concurrently for other accounts. Oakmont may also cause a client to buy or sell securities directly from or to another client, if such a cross-transaction is in the interests of both clients.

Item 13. Review of Accounts

Mr. Krystyniak is primarily responsible for regularly reviewing each security account that Oakmont manages. Oakmont's Managing Director of Alternative Investments periodically reviews the other investments in a client's portfolio. Those reviews consider investment objectives, company and market prospects and the client's liquidity needs. Reports are made to clients at the frequency clients request.

Item 14. Client Referrals and Other Compensation

Not applicable.

Item 15. Custody

The custodian of each client's securities and cash sends account statements at least quarterly to the client or investor. Each client should carefully review those statements and compare them with any statements or other reports that such client receives directly from Oakmont.

Item 16. Investment Discretion

Oakmont has discretionary authority to manage securities accounts on behalf of certain clients pursuant to a grant of authority in those clients' advisory agreements with Oakmont. Oakmont has delegated this authority to Peak and Mr. Krystyniak as discussed in Item 4 above. The discretionary authority that those clients grant directly to Oakmont and indirectly to Peak and Mr. Krystyniak is limited by the requirement that clients advise Oakmont of:

- the investment objectives of the account;
- any changes or modifications to those objectives; and
- any specific investment restrictions relating to the account.

A client must promptly notify Oakmont in writing if the client considers any investments recommended or made for the account to violate such objectives or restrictions. A client may at any time direct Oakmont to sell any securities or take such other lawful actions as the client may specify to cause the account to comply with the client's investment objectives. In addition, a client may notify Oakmont at any time not to invest any funds in the client's account in specific securities or specific categories of securities.

Item 17. Voting Client Securities

Oakmont votes all proxies on behalf of each account over which it has proxy voting authority based on its determination of such account's best interests. In determining whether a proposal serves an account's best interests, Oakmont considers a number of factors, including:

- the proposal's economic effect on shareholder value;
- the threat that the proposal poses to existing rights of shareholders;
- the dilution of existing shares that would result from the proposal;
- the effect of the proposal on management or director accountability to shareholders; and
- if the proposal is a shareholder initiative, whether it wastes time and resources of the company or reflects the grievance of one individual.

Oakmont abstains from voting proxies when Oakmont believes that it is appropriate to do so.

If a material conflict of interest over proxy voting arises between Oakmont and a client, Oakmont will vote all proxies in accordance with the policy described above. If Oakmont determines that this policy does not adequately address the conflict of interest, Oakmont will notify the client of the conflict and request that the client consent to Oakmont's intended response to the proxy solicitation. If the client consents to Oakmont's intended response or fails to respond to the notice within a reasonable time specified in the notice, Oakmont will vote the proxy as described in the notice. If the client objects in writing to Oakmont's intended response, Oakmont will vote the proxy as the client directs.

A client can obtain a copy of Oakmont's proxy voting policy and a record of votes cast by Oakmont on behalf of that client by contacting Oakmont.

Item 18. Financial Information

Not Applicable.

Privacy Policy

Oakmont and the Funds for which it serves as general partner or investment adviser:

- collect non-public personal information about their clients and investors from the following sources:
 - information received from clients or investors on applications or other forms, and
 - information about clients' or investors' transactions with Oakmont, its affiliates or others;
- do not disclose any non-public personal information about their current and former clients or investors to anyone, except to service providers that perform services and functions for them and as permitted by law;

- restrict access to non-public personal information about their clients and investors to their employees who need to know that information to provide services to clients; and
- maintain physical, electronic and procedural safeguards that comply with federal standards to guard clients' and investors' personal information.

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