

BALLENTINE PARTNERS

**230 Third Avenue, 6th Floor
Waltham, Massachusetts
02451**

(781) 314-1300

**55 Mill Street
Wolfeboro, New Hampshire
03894**

(603) 569-1717

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FORM ADV Part 2A

This brochure provides information about the qualifications and business practices of Ballentine Partners, LLC. If you have any questions about the contents of this brochure, please contact us at (603) 569-1717 or at 55 Mill Street, Wolfeboro, NH 03894, or at www.ballentinepartners.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Ballentine Partners, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Material changes in our business since our last ADV Form filing:

There have been no material changes since our last annual update of our ADV form on March 24, 2014.

Table of Contents

1.	Advisory business: history, ownership & services	1
A.	History of our firm; ownership of our firm	1
B.	Types of services we offer	3
C.	Customized services	7
D.	Our relationships with other investment managers; wrap fee programs	8
E.	Client assets under our advice	8
2.	Fees and compensation	9
3.	Performance-based fees and side-by-side management	11
4.	Types of clients.....	11
5.	Methods of analysis, investment strategies and risk of loss	12
A.	Overview	12
B.	How we analyze your situation	13
C.	Investment strategies and investment risks	14
D.	Frequency of trading; impact of brokerage and transaction costs.....	28
6.	Disciplinary information.....	29
7.	Other financial industry activities and affiliations	29
8.	Code of Ethics, participation or interest in client transactions, and personal trading	31
A.	Code of Ethics	31
B.	Securities in which we have a material financial interest	31
C.	Participation or interest in client transactions	32
9.	Brokerage practices	32
A.	Factors we consider in selecting brokers.....	32
B.	Aggregation of purchase and sale orders	32
C.	Directed brokerage	33
D.	Trade errors	33
10.	Review of accounts	34
A.	Reviews	34
B.	Reporting.....	34
11.	Client referrals and other compensation	35
12.	Custody	35
13.	Investment discretion	36
14.	Voting client securities; our proxy voting policy	37
15.	Financial information.....	38

1. Advisory business: history, ownership & services

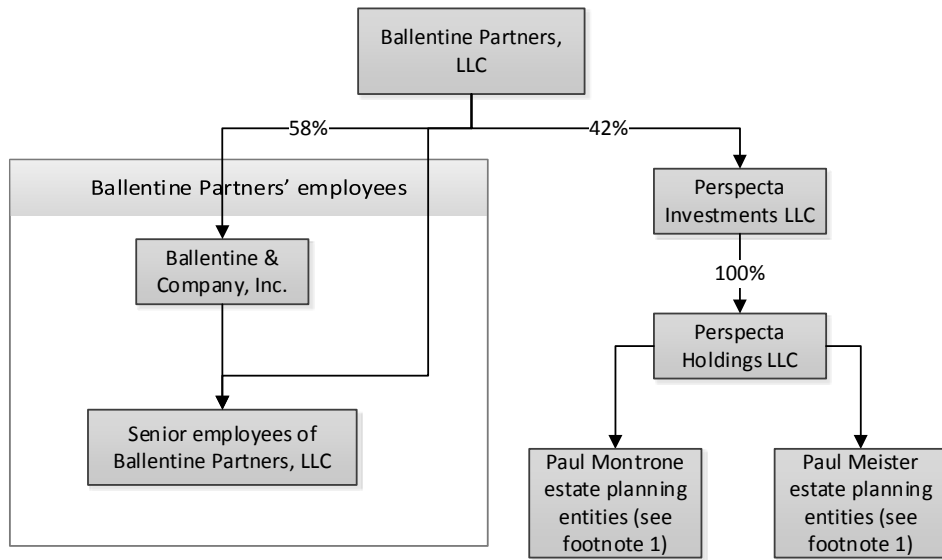
A. History of our firm; ownership of our firm

Many of the decisions we made about how to structure our practice and how to deal with conflicts of interest are based on our founder's, Roy Ballentine, experiences with his own family's situation during the early 1980s – before Roy knew anything about wealth management. Roy's parents had a sophisticated estate plan that included multiple trusts, partnerships, and corporations. But, when his father died in 1984, he learned the hard way about the challenges of managing wealth, balancing family needs, and the wishes of individual family members. After the estate was settled, Roy chose to change careers. He began to search for a better way to address the demanding requirements of family wealth management. Ballentine Partners' mission is to help the families we serve to make wise decisions about all aspects of wealth management.

What the family desperately needed and did not get was *comprehensive, integrated, objective advice* that addressed the issues and problems that later became so acute and painful. They had no advisor to provide guidance about a *strategic plan* for our family's wealth. There was no *team leader* who could help them to realize the benefits of *collaboration* among specialty advisors.

In 1984, Roy founded Ballentine & Company, Inc., a wealth advisory firm, resolving to help other families achieve much better results than Roy's family experienced. In 1997, the firm became Ballentine, Finn & Company, Inc. On January 25, 2010, the shareholders of Ballentine, Finn established Ballentine Partners, LLC ("the Company") and transferred the entire business to that entity.

Figure 1: Ballentine Partners, LLC Ownership¹



The owners of Ballentine Partners, LLC are senior employees of the firm (58%) and Perspecta Investments LLC (42%). Ownership details are shown in the accompanying chart.

Ballentine Partners, LLC is majority-owned and controlled by its senior employees, either through direct ownership or indirect ownership through Ballentine & Company, Inc. In 2013, Ballentine Partners, LLC implemented an equity compensation plan and began making equity grants to senior employees. The Company intends to make additional equity grants to increase the share of equity that is directly owned by the Company's senior employees.

Perspecta Investments LLC was formed by Mr. Meister and Mr. Montrone for the sole purpose of holding their investment in Ballentine Partners, LLC. That entity does not hold any other investments. Paul Montrone and Paul Meister are long-time business partners and well-known private investors. Perspecta Investments LLC does not operate an investment business. Other than Mr. Meister and Mr. Montrone, no clients of Ballentine Partners, LLC are investors in Perspecta Investments LLC.

¹ The Montrone entities are: Bayberry BP LLC, and Bayberry 2006 Trust.

B. Types of services we offer

1. Overview

Ballentine Partners' mission is to help you:

- To protect, preserve, and grow your wealth;
- To feel in control of your wealth, rather than to experience wealth as a burden; and
- To prepare the next generation to be financially self-sufficient and to be good stewards of the family's resources.

We serve families with investment assets of \$3 million or more. Our largest clients have family net worth of more than \$1 billion. We specialize in managing privately-owned wealth.

We have structured our firm to minimize conflicts of interest between ourselves and you. We do not sell any insurance or investment products. We have no proprietary investment funds. We have only one source of income – fees paid to us by our clients. Each client fee agreement is simple, and the costs are fully disclosed to each client.

Our Wealth Management clients – generally families with assets of \$20 million or more, although there is no minimum asset requirement – receive extensive financial planning advice on an on-going basis. This advice includes analysis of cash flows, balance sheet, estate plan, insurance coverage, debt, income tax planning, etc. For each Wealth Management client, we prepare complete quarterly financial statements that cover all major aspects of each client's situation. Our investment advice for these clients is therefore based on our detailed knowledge of each client's situation, and we are able to determine which investments are suitable.

Wealth Management clients have access to both public and private investment vehicles. Private investments are always made on a non-discretionary basis. We recommend only those private investments that have been approved by our Investment Policy Committee. However, sometimes clients will request that we search out and perform due diligence on a specific fund or

category of funds that is of specific interest to that client. We will do so at the request of a client.

Some of our clients with assets between \$3 million and \$20 million prefer to focus on investment management and need only occasional financial planning advice. Those clients are served by a dedicated team that uses the same investment research that we apply to larger relationships, and uses mostly liquid investment vehicles that are better suited to those clients' investment needs.

We provide investment advice to charitable foundations and other tax-exempt organizations. Many of the charitable organizations we serve were created by our private clients.

Our primary business is providing families with objective advice about a wide array of financial strategies, and providing an alternative to the cost and complexity of setting up a family office. Families who prefer to maintain a family office rely upon us to provide advice and implementation services beyond what their own staff is able to deliver. The range of services we offer each family depends upon the family's needs, desires, and the complexity of their financial situation.

Our advisory capabilities include:

- Investment strategy and implementation
- Traditional investments – both actively managed investments and index investments
- Alternative asset classes (real estate, private equity, venture capital, etc.)
- Alternative investment styles (hedge funds, commodity trading advisors, etc.)
- Cash flow planning and forecasting
- Bill payment and cash management systems
- Closely held business interests – tax planning for owners, succession planning, preparing the next generation of family owners, preparing for sale, estate planning, financial risk management

- Balance sheet management
- Income tax planning and forecasting
- Charitable giving, administration, and management of family charitable foundations
- Lifetime gifts to family members
- Estate planning
- Property, casualty, and liability insurance
- Life, disability, medical, and long-term care insurance
- Asset protection planning
- Trust accounting and administration
- Family partnerships, LLCs and other family business entities
- Family office administration
- Lifestyle management (aircraft, yachts, vacation homes, household staff, etc.)

A distinguishing feature of our firm is that we put an experienced wealth manager (not a sales person) in charge of every client relationship. These experienced advisors are the primary link with our clients, and they get to know the families they serve very well. This means that every time you want advice about a significant issue, you will be working with an advisor who has deep technical skills and detailed knowledge about your situation to help you seize opportunities and identify potential problems.

When it comes time to implement a recommendation, we are prepared to manage whatever work needs to be done. Our goal is to make wealth management as simple as possible for you.

Most of our family relationships are multi-generational. We often work with younger members of the family to help them become good stewards of wealth and help them acquire

necessary financial skills. We can also provide direction and coordination for our clients' other advisors, so our clients are relieved of day-to-day concerns about the management of their financial affairs.

We have experience with family office planning and administration. We have helped families establish family offices, or reorganize family offices that were already in existence when we began working with them. We have experience managing family office relationships that involve multiple foreign jurisdictions.

2. Investment supervisory services

We serve as your family's Chief Investment Officer. We can help you design and implement investment strategies for all of the investment assets on your family's balance sheet, no matter how those assets are held (directly owned, held in trusts, held in privately owned companies, or held in private foundations), and *regardless* of which investment firm is making the day-to-day investment decisions. The strategies we use are described in Section 5, which begins on page 12.

Most of our clients are individual investors who are required to pay taxes. Our investment advice is customized for you and is guided by four key tenets that are reflected in the following questions:

- What is the optimal strategy or choice for your family? We try to put ourselves in your shoes, applying all of the information we have collected about your situation, and applying all of the technical skills at your command.
- What strategy is consistent with your risk management goals? Risk analysis requires that we gather detailed information about your risk exposures, tolerance for various types of risk, and what you have already done to mitigate risks.

- What is the expected net return, after all trading costs, management fees, market impact² and taxes? For investors who must pay taxes, the net return is the only return that matters.
- What other factors need to be taken into account? Most investment recommendations have implications for your cash flow, tax situation, estate plan, and charitable gift planning.

We provide advice about a wide range of investment possibilities, including advice about many investment products offered by other firms, and (upon your request) advice about direct investments in private companies and real estate. We seek to provide you with access to the best investment products and managers that the marketplace has to offer. A substantial portion of the assets that we oversee is managed by other firms we have recommended.

We search the marketplace for the most attractive investment products. We have no proprietary products. This is a benefit to you because it eliminates a key area of conflicts of interest between us and our clients.

Our investment research includes coverage of real estate funds, hedge funds, private equity funds, venture capital funds, and natural resource funds. These are the areas where active management is most likely to add value in excess of its costs.

Many of our clients make investments in closely held companies. Upon request, we will help you to find the right resources to analyze a private investment opportunity.

C. Customized services

We customize our services and our fees to fit your needs. We customize both our wealth planning services and our investment services. Our wealth planning services are highly

² Market impact – this term refers to the risk that a transaction to purchase or sell a security may actually cause the price of the security to change in a way that is disadvantageous for the investor. For example, if an investor owns some bonds that are seldom traded, the investor's attempted sale of some of her holdings may depress the market price of the bond, thereby adversely affecting the value of the bonds that the investor continues to hold.

customized because every client has a very unique situation that requires a different combination of the services outlined above. Investment portfolios are tailored to fit each client's circumstances. For instance, some clients have large real estate holdings while others have concentrated equity positions in either public or private companies. Some clients have excluded almost all US dollar denominated securities from their portfolios. This kind of customization is routine in our practice.

D. Our relationships with other investment managers; wrap fee programs

We maintain relationships with many investment managers who offer specialized products and investment strategies that are of interest to our clients. Our recommendations are governed solely by our assessment of the quality of the manager's offering and how well that offering fits the needs of our clients.

We decline all offers by outside managers to participate in fee-splitting arrangements and other forms of compensation. We do not participate in any wrap fee programs.³ We use the collective purchasing power of our clients to negotiate favorable fee arrangements. All fee discounts are passed through to our clients. This is a direct benefit to you, and it eliminates another key area of conflicts of interest between us and you.

E. Client assets under our advice

Table 1 shows the approximate amount of client assets under our advice.

³ A wrap fee program is an investment arrangement under which a client opens an investment account with advisor "A", who then parcels out the money to be managed by a number of separate investment management firms, "B", "C" and "D". The client is charged a single fee by advisor A, who then shares that fee with managers B, C and D. In our opinion, these types of programs are not well-suited for the families we serve, and they represent a serious conflict of interest between advisor and client.

Table 1: Assets under our advice as of December 31, 2014

Description	Amount
Client assets managed on a discretionary basis ⁴ by Ballentine Partners	2,288,251,914
Client assets overseen by us ⁵ but managed by other investment firms	2,950,193,634
Other client assets under our advice ⁶	3,679,317,927
Total client assets under our advice	8,917,763,475

2. Fees and compensation

Our only source of compensation is from fees paid to us by our clients in exchange for advice and other services we provide. Our income from our relationship with you is fully disclosed in our service agreement with you. This makes it very easy for you to determine your costs with us. In addition, our fee is clearly disclosed each quarter on an invoice that we send to you. We do not receive any compensation from the sale of investment or insurance products, or from other investment managers whom we may recommend.

We customize the fee arrangement for you, based on the amount of staffing and other resources that your engagement will require. The fee agreement covers all services we contract to deliver to you. Our fees are generally based on one of the following systems:

- A percentage of assets under our advice;
- A flat dollar amount that is periodically renegotiated approximately annually; or

⁴ Discretionary means that we make investment decisions without consulting the client. We are required to make our decisions within the guidelines of the Investment Policy Statement that is approved by each client.

⁵ We provide strategic investment advice and wealth planning advice related to these assets, but we are not responsible for the day-to-day investment decisions.

⁶ This is the approximate value of other client assets that are under our strategic wealth planning advice.

- Hourly fees.

Some of our clients pay fees based on assets under management, while others pay flat fees. We have no preference between these two arrangements. The choice is left up to our clients. Investment accounts are managed the same regardless of the fee arrangement. A flat fee is usually better suited for families with large, complex situations where most of the family's assets are committed to operating companies or other illiquid investments.

Fees are payable in advance at the beginning of each quarter. For partial quarters, the fee is pro-rated based on a seven day week. You may either pay the fee by check or wire transfer, or have the fee deducted from one of your family's investment accounts. A service agreement can be terminated by either party with proper notice to the other party. If you were to terminate a service agreement part way through the quarter, we would promptly refund the unearned portion of the quarterly fee.

Many investment vehicles contain fees that are separate and apart from our fee. Clients sometimes invest in a diversified portfolio of index funds or Exchange Traded Funds (ETFs), and others invest a portion of their assets with one or more private account managers (not affiliated with us), actively managed mutual funds, or private placements. Index mutual funds, ETFs, actively managed mutual funds, privately managed accounts, and private placements all charge separate fees and trading costs which are paid directly by the investor. Our clients pay these costs directly to the outside managers, and they pay trading costs directly to a broker. We assist our clients in negotiating favorable fee agreements. We do not receive any portion of the fees paid by our clients to other investment firms or to product providers. Our objective is to help our clients to avoid paying unnecessary costs. For more information about trading costs, please refer to Section 9 on page 32. For more information about custodial fees, please refer to Section 12 on page 35.

3. Performance-based fees⁷ and side-by-side management⁸

We have no performance-based fee arrangements. Performance-based fees are not a good fit for our clients and the type of advice we provide. As mentioned in the previous paragraph, there are additional management fees that our outside managers charge our clients. Sometimes those have a performance-based component.

We do not engage in “side-by-side management.” All of our clients have access to the same investment opportunities, except for differences between clients due to the size of their portfolios.

4. Types of clients

We provide investment advice to the following types of clients:

- Individuals
- Trusts and estates
- Charitable foundations, charitable trusts, and other non-profit organizations
- Pension and profit sharing plans

Most of our clients are individuals. The trusts, charitable organizations and retirement plans we serve are generally closely related to our individual clients.

We serve families with at least \$3 million of investment assets. Many of our clients are families with large, complex financial situations, who want objective advice, and who are seeking to optimize the use of their financial resources.

⁷ A “performance-based fee” is a fee that is based on the investment gains in an account. In effect, the investment manager receives a portion of any profit that the manager is able to generate.

⁸ “Side-by-side management” refers to the possibility that we may be favoring one group of clients over another because of differences in the way assets are managed or fees are calculated.

5. Methods of analysis, investment strategies and risk of loss

A. Overview

We serve as your family's Chief Investment Officer. We provide you with advice about asset allocation⁹, asset location¹⁰, and risk management¹¹ for many asset classes and investment strategies. We have developed a rigorous investment process that is designed to help you to create a customized portfolio that is right for your family. We implement some investment strategies ourselves, and some through managers we recommend. Our decisions about what we do in-house and what we outsource are driven by our analysis of the quality of implementation, and total cost of execution for our clients. We are happy to share our analysis of these issues with you.

In addition to mathematical and statistical tools, we use scenario analysis to construct investment portfolios. The objective of scenario analysis is to produce better quality thinking about the future than is likely to be achieved using traditional forecasting techniques. Scenario analysis is like using a wind tunnel to test the construction of a portfolio under various conditions to learn how the portfolio may perform in the real world. It relies on understanding causality rather than requiring probability estimates for events that everyone knows are unpredictable.

⁹ "Asset allocation" refers to the decision that each investor makes about which asset classes to own, and how much capital to invest in each of those asset classes. There is no universally agreed upon definition of what constitutes an asset class.

¹⁰ "Asset location" is often just as important as asset allocation. Asset location refers to the decision an investor makes about the manner in which an asset is owned. Wealthy families often have retirement accounts, trusts, corporations, LLCs, and personal accounts. Each of those potential owners has different tax and other characteristics that need to be taken into account. For example, if an investment produces income that is taxed at a high rate, an investor may decide to put that asset in a tax-deferred retirement plan.

¹¹ "Risk management" refers to all types of risk, not just the risk of losses due to poor investment performance. For example, assets may be lost due to tort claims, or due to the failure of a lender to be able to keep its commitments.

B. How we analyze your situation

Our goal is to help you construct the right investment portfolio for your situation. We rigorously analyze your situation and make investment recommendations that are customized for you. Most of our clients hold portfolios that are very broadly diversified. But, some of our clients hold portfolios that are not diversified, because that is the optimal choice for them.

Here are some examples of factors we will analyze when making investment recommendations for you:

- Your investment objectives – What are you trying to achieve and why? What will happen if you fail to achieve your investment objectives?
- Your balance sheet – How large is your pool of investment assets? How much debt do you carry? What is your ratio of liquid to illiquid assets? What is your ratio of personal use assets to investment assets? Do you have concentrations of risk on your balance sheet?
- Your investment assets – What investments do you already own? How are they performing? What is your asset allocation? How are your investments owned? What types of investment risk are you most exposed to, and why?
- Single security – Do you own a large amount of a single security? If so, why? How long will you continue to hold it? What risk factors are associated with it? How do you feel about it?
- Your cash flow – What is your cash flow situation? How dependent are you upon the income generated by your investments? What is the ratio of your cash withdrawal v. the size of your investment assets? How is your cash flow situation projected to change over time?
- Your time horizon – If you are accumulating assets for a specific purpose, how much do you need and by what date? If you are drawing upon your assets, for how long do you need to be able to sustain the withdrawals?
- Currencies – Which currencies are you most dependent upon? How will your financial situation be affected by currency exchange rate fluctuations?
- Your experience – What investment experience have you had? Which types of investments are familiar? Which are new to you? How well do you feel you understand the investments you are about to make?

- Your tolerance for illiquidity – How do you feel about committing to long-term investments that are likely to be very difficult to convert back into cash prior to their maturity? (And, the date of maturity is also uncertain.)
- Your tolerance for complexity – How do you feel about investments that have a high degree of legal, structural and / or tax complexity?
- Your estate goals and lifetime wealth transfer goals – How do your investments relate to your goals for lifetime wealth transfer, charitable giving, and estate planning?
- Your tolerance for risk – What is your tolerance for various types of risk? This cannot be done through the use of simple questionnaires. Our assessment of your risk tolerance is based upon our analysis of the factors described above, and any other relevant factors that we discover in our work with you.
- Your target return objective – What is your return objective? We help you to set a personal return objective. Many of our clients employ several return objectives simultaneously to measure how they are doing.

C. Investment strategies and investment risks

1. Our investment strategies and their primary risks

You cannot completely avoid risk; you can only try to manage the types of risk to which your capital is most exposed. After analyzing your situation, we design a customized investment portfolio using some or all of the components listed in Table 2. Our goal is to create a portfolio that:

- allows you to meet your long-term financial goals;
- is highly tax-efficient;
- will produce acceptable returns under a broad range of economic conditions;
- makes intelligent use active management; and
- allows you to sleep soundly by limiting your risk exposures to levels you are comfortable with.

Table 2: Asset Class Components of Ballentine Partners' Investment Portfolios

Liquid Investments (all are traded in the public markets)	Illiquid Investments (none of these are traded in the public markets)
Cash	Hedge funds
Bonds	Private equity funds
Stocks	Venture capital funds
Real estate funds (public) ¹²	Real estate funds (private)
Energy funds (public)	Energy funds (private)
Commodity funds	Managed futures funds ¹³
	Timber funds

If you have investment capital of \$20 million or less, you may prefer a portfolio that is composed of assets that are liquid (that is, can be quickly and easily converted back into cash).

If you have a larger amount of investment capital, you may prefer to invest some portion of your capital in the investments that are described as “illiquid” in the chart above. “Illiquid” means that the asset cannot be quickly and easily converted into cash, and that you may lose a substantial portion of your value if you attempt to convert the investment into cash before it matures.

We do not engage in market timing.¹⁴ “Market timing” means making sizeable short-term purchase or sale decisions of financial assets (often stocks) based on a prediction about future market price movements. However, we do make tactical purchase and sale decisions

¹² Real estate mutual funds and real estate investment trusts (“REITs”) are traded in the public markets. We also use private real estate funds that are not traded in the public markets.

¹³ A managed futures fund is a private investment fund (not traded on the public markets), but the investments made by the fund are in publicly traded options and futures contracts. So, this investment could be classified as liquid. We classify it as illiquid because the investment vehicle is a private investment.

¹⁴ Some of the outside managers we recommend, hedge funds for example, may engage in market timing. However, market timing is not one of our core strategies in discretionary accounts.

based on the relative value of one asset versus another. We make about a dozen decisions in a typical year to increase or decrease the allocation to an asset class, or to add or remove an asset class. The extent to which a particular decision is actually implemented in your accounts will depend upon a large number of factors including the size of each account, your tax situation, and which family member or entity owns a specific account. The criteria we weigh when we make tactical decisions include:

- Is any asset class significantly over or under-valued?
- What are the possible explanations for its over or under-valuation?
- Are those explanations consistent with our economic outlook?
- Is the over or under-valuation likely to persist for at least 12 months?
- Are the costs (tax costs and transaction costs) associated with making the adjustment low enough to make the adjustment worthwhile?

Table 3 describes the investment strategies we employ and their primary risks. It is not possible or practicable for us to list every risk that could possibly apply to each investment category. This table is intended to be a guide and may not be fully inclusive of all risks. You should study the risks associated with any securities you own by carefully reading the prospectus that is available through your custodian, or the offering memorandum that is available through sponsors of private investments. The notation “Private” in the third column of the chart means that type of investment is held only in non-discretionary accounts. Private investments can be purchased only by the account owner, not by Ballentine Partners, LLC.¹⁵

¹⁵ We have classified strategies based on the underlying investments rather than the type of vehicle in which the investment activity occurs. For example, a managed futures fund may be organized as a Limited Liability Company and have an incentive fee for its manager. This is commonly referred to as a hedge fund structure. However, we classify it as a managed futures fund. Any reference to hedge funds in this document is based on a narrower and more useful definition of hedge funds – that is, funds that use short sales, options, derivatives, and other hedging techniques to manage risk, and that may use borrowing to boost returns.

A glossary of investment risks can be found beginning on page 39 of this document.

Table 3: Ballentine Partners' Asset Class Descriptions, Strategies and Risks

Name of Asset Class	Strategies	How We Access the Market & Primary Securities Used¹⁶	Primary risks¹⁷
Public Equity	Ownership interests in US and foreign companies, including: <ul style="list-style-type: none"> • Small and large public companies • Growth stocks • Value stocks • Emerging market stocks 	Exchange Traded Funds ("ETFs") Index mutual funds Actively managed mutual funds Actively managed separate accounts holding individual stocks (Private) Individual stocks, publicly traded Individual stocks, privately traded (Private)	Market risk Timing risk Manager selection risk Business risk Counter-party risk Exchange rate risk (foreign stocks) Principal risk Tax risk Tracking error risk (ETFs, index funds) Valuation risk
Equity			
Private Equity (including venture capital)	Participation in US and foreign private funds that invest in debt and equity of private companies ranging from start-ups to well established firms	Funds of private equity and venture capital funds (Private) Individual private equity and venture capital funds (Private) Direct investments (Private)	Manager selection risk Business risk Lender failure risk Liquidity risk Litigation risk Market risk Principal risk Tax risk Timing risk Valuation risk

¹⁶ Private securities are purchased and sold only by the account owner and must be held in a non-discretionary account.

¹⁷ We have attempted to list the *primary* risks that apply to each strategy. The risks are listed alphabetically. The investment world is a very complex system with many interactions. A risk that appears to be very low today may suddenly become more prominent due to a change in some other part of the financial system.

Name of Asset Class	Strategies	How We Access the Market & Primary Securities Used ¹⁶	Primary risks ¹⁷
Real Assets			
Real Estate	Participation in US and foreign investment companies and private partnerships that own commercial, industrial and/or residential real estate	US and foreign Real Estate Investment Trusts (“REITs”) Real estate mutual funds US and foreign private real estate funds (Private) Direct (Private)	Market risk Manager selection risk Business risk Lender failure risk Exchange rate risk (foreign real estate) Liquidity risk (private funds) Litigation risk (if private) Principal risk Sovereign default risk Tax risk Timing risk Valuation risk
Commodities	Participation in a fund that invests in a broadly diversified basket of commodities through the commodities futures markets	Commodity mutual funds Commodity index funds Exchange Traded Notes (“ETNs”) Commodity Trading Advisors (“CTAs”) (Private)	Market risk Timing risk Manager selection risk Counter-party risk Lender failure risk Leverage risk Litigation risk (if private) Exchange rate risk Principal risk Tax risk Tracking error risk Valuation risk
Timber	Participation in a private fund that purchases tracts of timber and conducts logging operations	Timber funds (Private)	Business risk Lender failure risk Manager selection risk Liquidity risk Litigation risk Tax risk Timing risk Valuation risk

Name of Asset Class	Strategies	How We Access the Market & Primary Securities Used¹⁶	Primary risks¹⁷
Energy	Participation in a fund that invests in a broadly diversified portfolio of energy investments, typically operating businesses	MLP energy mutual funds MLP Exchange Traded Notes (“ETNs”) MLP separately managed accounts MLP partnerships (Private) E&P partnerships (Private)	Market risk Business risk Credit risk Manager selection risk Lender failure risk Exchange rate risk Liquidity risk Litigation risk (if private) Principal risk Regulatory risk Tax risk Timing risk Valuation risk
Precious Metals	Participation in a fund that owns shares in mining companies; purchasing metals directly; purchasing coins	Exchange Traded Funds (ETFs) Ingots and bars Coins	Counter-party risk Exchange rate risk Government seizure Liquidity risk Market risk Manager selection risk Timing risk Tracking error risk Valuation risk

Name of Asset Class	Strategies	How We Access the Market & Primary Securities Used¹⁶	Primary risks¹⁷
Alternative Investments			
Public Alternatives	Tactical asset allocation strategies, quantitative strategies, and other strategies that attempt to replicate the results of private hedge funds through investments in public securities	Managed mutual funds	Market risk Timing risk Manager selection risk Business risk Credit risk Lender failure risk Exchange rate risk Liquidity risk Principal risk Regulatory risk Tax risk Valuation risk
Managed Futures	Participation in a fund that invests in options and futures contracts that represent bets on the future direction of stock prices, interest rates, commodity prices, etc. in a wide variety of markets	Managed mutual funds Funds of managed futures funds (private investment, but completely liquid under normal market conditions) (Private)	Market risk Manager selection risk Counter-party risk Lender failure risk Leverage risk Litigation risk (if private) Exchange rate risk Tax risk Timing risk Valuation risk

Name of Asset Class	Strategies	How We Access the Market & Primary Securities Used¹⁶	Primary risks¹⁷
Hedge Funds	Participation in: <ul style="list-style-type: none"> • Equity long-short funds • Event-driven funds • Global macro funds • Relative value funds • Distressed debt funds 	Funds of hedge funds (Private) Individual hedge funds (Private)	Market risk Manager selection risk Business risk Credit risk Lender failure risk Litigation risk Exchange rate risk Liquidity risk Principal risk Regulatory risk Tax risk Timing risk Valuation risk
Cash			
Cash	Ready money and investments that can be converted into cash quickly and easily under normal market conditions. However, money market funds and other similar investments are not guaranteed and can suffer loss of principal and loss of liquidity under extreme market conditions.	Bank cash deposits, money market accounts, certificates of deposit (“CDs”), and similar instruments	Credit risk Exchange rate risk (non-US dollar deposits) Inflation risk Interest rate risk Liquidity risk Market risk Market failure risk

Name of Asset Class	Strategies	How We Access the Market & Primary Securities Used ¹⁶	Primary risks ¹⁷
Fixed Income			
Taxable Fixed Income	Debt instruments issued by US and foreign governments, agencies of governments, and corporations.	Separately managed bond accounts Bond mutual funds Bond Exchange Traded Funds Individual bonds	Credit risk Default risk Exchange rate risk (foreign bonds) Inflation risk Insurance failure risk Interest rate risk Liquidity risk Market risk Market failure risk Principal risk Reinvestment risk Sovereign default risk Tax risk
Tax-Exempt Fixed Income	Debt instruments issued US by municipalities, states, and government agencies where the debt instrument is exempt from federal ordinary income tax. (The instrument may still be subject to federal alternative minimum tax and state income tax.)	Separately managed bond accounts Bond mutual funds Bond Exchange Traded Funds Individual bonds	Credit risk Default risk Inflation risk Insurance failure risk Interest rate risk Liquidity risk Market risk Market failure risk Principal risk Reinvestment risk Tax risk

Name of Asset Class	Strategies	How We Access the Market & Primary Securities Used¹⁶	Primary risks¹⁷
Inflation-Protected Securities	Debt instruments issued by governments, with inflation protection features are incorporated into the design of the instrument	US Treasury Inflation-Protected Securities (TIPs) Foreign and other government inflation-protected securities Separately managed bond accounts holding inflation-protected securities Bond mutual funds holding inflation-protected securities Bond Exchange Traded Funds that track inflation-protected securities	Credit risk Default risk Inflation risk Insurance failure risk Interest rate risk Liquidity risk Market risk Market failure risk Principal risk Reinvestment risk Sovereign default risk Tax risk
Private Credit	Direct lending US Small Business Administration Loans	Funds of funds (Private) Bond funds (Private) Individual bonds (Private)	Business risk Credit risk Default risk Inflation risk Interest rate risk Liquidity risk Litigation risk Market risk Manager selection risk Market failure risk Principal risk Reinvestment risk Tax risk Valuation risk

2. Risks associated with portfolio construction

The major risks associated with portfolio construction are:

- a. Diversification failure. We attempt to construct broadly diversified portfolios. Under certain economic and market conditions, diversification may fail and several of the major components of your portfolio may suffer

substantial losses simultaneously. In a well-constructed portfolio, this is theoretically unlikely to happen. However, it does happen. The most recent occurrence was in 2008 – 2009 when the mortgage crisis in the US rippled through the world financial markets. With the increasing integration of the world's financial markets, events like the one in 2008 – 2009 may occur more frequently.

- b. Estimating the future behavior of asset classes. To construct a portfolio, we must forecast the expected return and several other statistical parameters for each asset class.¹⁸ The larger the number of asset classes under consideration, the more complex this process becomes.¹⁹ It is impossible for anyone to develop a perfect forecast of the parameters for even a single asset class, never mind a half-dozen or more asset classes. It is inevitable that the forecast will have errors in it. Errors in the forecast mean that the portfolio we recommend for you may not perform as well as we had hoped.
- c. Decisions about tactical movements between asset classes. When we make a decision to reduce your exposure in one area and increase it in another, we may be wrong about the direction of the move, or the timing, or both. However, these are usually modest-sized adjustments, and we

¹⁸ For each asset class, we must forecast its expected average return, the standard deviation of returns, and the correlation of its returns with every other asset class that is proposed for inclusion in the portfolio.

¹⁹ Portfolio construction with 5 asset classes requires forecasting 20 parameters. Portfolio construction with 7 asset classes requires forecasting 35 parameters.

make the changes only when we are expecting a trend to persist for a year or more.

- d. Timing. Losses may occur because we invest in an asset class at the wrong time. An asset class may become very over-valued or very under-valued, and may remain that way for a long time. Examples of over-valuation include residential real estate in most developed countries (especially the US in the decade leading up to 2008), and internet stocks from 1995 – 2000.
- e. We may misunderstand your financial situation, including your tolerance for various types of investment risk. Or, you may misunderstand your own tolerance for losing capital. For most people, the right portfolio is one that allows you to sleep soundly, even when it is declining in value.
- f. We may not be able to predict extreme events. An extreme event, such as a terrorist attack on the US or some other major economy, the sudden outbreak of war, or a natural disaster may cause the values in many asset classes to decline at the same time.
- g. We may fail to predict a shock to the financial markets. Shocks to the financial markets can occur due to a wide variety of factors. Shocks are very difficult to predict, and can be severe. During the financial shock of 2008, entire markets ceased to function and quickly disappeared. For example, the markets for many types of commercial and municipal fixed income investments that had been thought to be very safe suddenly ceased to function. Even investors who held high quality commercial and

municipal fixed income securities suffered significant losses as investors panicked and moved into US Treasury notes.

- h. Mistakes by active managers. Some investments, such as hedge funds and private equity funds, require active management. There is a risk that we may select a manager who substantially underperforms similar investments we could have selected. There is also a risk that the manager will under-perform relative to the results you and we expected, and that losses will exceed the amounts you and we expected.
- i. Market failure. Securities purchased in the public markets depend upon the continued smooth functioning of those markets to set prices and provide investors with liquidity. Market failure can occur suddenly, and for a wide range of reasons including: extreme events, market shocks, sudden changes in investors' perceptions of risk, and natural or manmade disasters.²⁰ The failure may be temporary or permanent. Market failure exposes investors to the potential losses discussed in the following paragraph, "Illiquid investments."
- j. Illiquid investments. Examples of illiquid investments include private funds of all types (private equity, real estate, hedge funds, etc.). Public investments that do not trade very often (which include many municipal bonds) are also illiquid. It is particularly disadvantageous if an investment you already own that was liquid suddenly becomes illiquid. If you

²⁰ For example, the US stock market closed for a period following the attack on the World Trade Center in 2001. It also closed in 2012 due to a severe tropical storm.

purchase an illiquid investment (or an investment you already own suddenly becomes illiquid) you may be forced to hold that investment until it matures. Even at maturity, you may not be able to recover all of your capital, and you may incur a large opportunity cost.²¹ If you attempt to sell an illiquid investment prior to maturity, a sale may only be possible at a steep discount from the investment's nominal value. During the time you hold an illiquid investment, it may be difficult or impossible for anyone to provide you with accurate information about the investment's rate of return or its market value.

- k. Tracking error. All investments that are designed to track a broad market index have some degree of tracking error. There is a risk that we will select an index investment whose tracking error proves to be higher than we estimated it would be, and the investment therefore under-performs its benchmark by a material amount.
- l. Fraud by investment manager. Our investigation of a manager may fail to detect that a manager is committing fraud. We are not able to independently audit each manager's investment results. We rely on the report of the independent auditor engaged by each manager, if such a report is available.
- m. Fraud by company or government managers. The managers of a company or government entity in which you have invested may commit fraud to

²¹ Opportunity cost refers to the amount you might have earned had you been able to make another investment rather than having your capital locked up in an investment that was not performing well.

inflate the value of the securities issued by that organization. We are not able to independently audit each organization's financial results. If you have engaged another investment firm to select securities for your account, it is their responsibility to be alert to the risk of fraud by the organization's managers. Otherwise, we rely on the report of the independent auditor engaged by each organization, if such a report is available.

n. Regulatory violation by investment manager or company management.

An organization's managers may engage in illegal behavior, such as trading on inside information, to inflate their investment results. This type of behavior is extremely difficult to detect, and is unlikely to be detected by our due diligence process.

D. Frequency of trading; impact of brokerage and transaction costs

Frequent trading in any portion of your portfolio results in costs that create a drag on portfolio performance. The costs include: potential tax inefficiencies, trading costs, and potential market impact²². When we research an asset class and managers within an asset class and develop our recommendations, we consider all of those costs.

The frequency of our own trading activity in your accounts is usually very low. For example, when we purchase an index fund or an Exchange Traded Fund, we expect to hold that investment for years. However, for tax planning purposes we may, under certain market conditions, sell the entire position and replace that security with a similar one. Those trading

²² "Market impact" refers to the possibility that a purchase or sale transaction in a thinly traded security may move the price of the security in a way that is disadvantageous to you.

costs are very low and the transactions generate tax savings. We seldom change outside managers. So, at the portfolio level, the volume of transactions and associated trading costs is usually very low.

Some of the strategies we use require active trading by managers we recommend. Table 4 shows the relative frequency of trading by the managers within each major strategy.

Table 4: Investment Strategies and Frequency of Trading

Investment Strategy	Frequency of trading
Cash	Very low
Bonds	Low
Stocks	Low
Real estate funds	Low
Commodity funds	Moderate
Hedge funds	Moderate to high
Private equity funds	Very low
Venture capital funds	Very low
Managed futures	High
Timber	Very low

6. Disciplinary information

There is no disciplinary information to report.

7. Other financial industry activities and affiliations

We have no affiliation with any broker-dealer, insurance agent, or with any other product sales organization. Although we make specific product recommendations, we are not involved with the sale of insurance or investment products. We do not accept commissions. We do not

participate in fee-sharing arrangements with money managers we recommend. Our only source of income is from fees paid to us to by our clients in a fully disclosed manner.

We are affiliated with a private trust company, Perspecta Trust LLC. Ballentine Partners, LLC and Perspecta Trust LLC are related parties because the owners of Perspecta are investors in Ballentine Partners. Perspecta is chartered as a State of New Hampshire non-depository trust company that specializes in serving families of substantial means who want highly customized trust and wealth advisory services. Ballentine Partners does not actively solicit clients for Perspecta Trust. Neither Ballentine Partners nor its employees receive any compensation for referring clients to Perspecta Trust.

The owners of Perspecta Trust have organized several LLCs to make private investments. These LLC's are special purpose investment funds or other entities that are exempt from SEC registration. The names of the entities involved are:

- Perspecta Capitol RA LLC
- Perspecta Capitol RA Companion LLC
- Perspecta RA Vials LLC
- Latona Associates Fund I, LLC
- Perspecta Credit I, LLC
- Perspecta Credit II, LLC
- Perspecta RE Recovery I, LLC
- Perspecta Trident, LLC

Ballentine Partners and its employees have never encouraged any clients (other than Mr. Meister and Mr. Montrone who own Perspecta Trust, LLC) to make an investment in these entities. If a client of Ballentine Partners were to invest, neither Ballentine Partners nor its

employees would receive any compensation as a result of that transaction.

8. Code of Ethics, participation or interest in client transactions, and personal trading

A. Code of Ethics

Upon request, we will be glad to provide you with a copy of our Code of Ethics. Our Code of Ethics is based on the principle that your interests come first. We instruct our employees to avoid activities that run contrary to that principle. Our Code of Ethics includes:

1. Standards of business conduct that reflect our fiduciary obligations to our clients;
2. Provisions requiring our employees to comply with applicable Federal securities laws;
3. Provisions that require all advisory staff to report, and us to review, their personal securities transactions and holdings periodically;
4. Provisions requiring all employees to report any violations of our Code of Ethics promptly to an appropriate officer; and
5. Provisions requiring us to provide each employee with a copy of our Code of ethics and any amendments, and requiring our employees to provide us with a written acknowledgment of their receipt of the Code and any amendments.

In addition, most of our senior employees have earned professional credentials (CFA, CFP) whose organizations maintain very strict ethics rules to which the members must adhere.

B. Securities in which we have a material financial interest

Neither Ballentine Partners, LLC nor its employees have any material interest in the securities or the investment companies we recommend.

C. Participation or interest in client transactions

We have no material interest or participation in our clients' securities transactions. From time to time we recommend investments in LLCs or limited partnerships ("limited offerings") managed by unaffiliated third parties. We do not receive any separate compensation in conjunction with making these recommendations. Our employees are allowed to invest in limited offerings on the same terms we negotiate for clients. Our employees may, from time to time, buy or sell shares in publicly traded securities which have been recommended to you. Transactions by our employees are done on the same terms as your transactions. The securities our employees buy and sell are generally highly liquid and broadly traded. Our employees' transactions are unlikely to affect the price at which the securities trade.

9. Brokerage practices

A. Factors we consider in selecting brokers

We select brokers based on their ability to skillfully execute trades at a very competitive cost. On a regular basis, our investment team conducts a study of the performance and costs associated with the brokers we have used. We use the results of those studies to improve our selection of brokers, and to negotiate with brokers on your behalf.

We receive no compensation from the brokers we recommend. We do not participate in "soft dollar" programs. A "soft dollar" program is an arrangement under which a broker provides an investment manager with computers, research or other compensation in exchange for the manager directing business to that broker. In our opinion, soft dollar arrangements are detrimental to your interests as an investor.

B. Aggregation of purchase and sale orders

We aggregate purchase and sale orders for client accounts when we determine that

aggregation is likely to help minimize costs and contribute to best execution of trades.

C. Directed brokerage

We recommend that you allow us to select the broker to execute trades in your accounts, rather than directing us to use a particular broker. If you require us to direct your brokerage business to a particular broker, we will comply to the extent that it is possible for us to do so. However, we may not be able to achieve the most favorable execution of your brokerage transactions. We will not be able to aggregate your trades with those of our other clients. You are likely to pay higher brokerage commissions and/or receive less favorable pricing of trades than our other clients. It is also likely that trades in your account will be delayed until after all other accounts have been traded. This could be disadvantageous to you if the security is illiquid or market conditions are volatile. If you are the sponsor of a qualified pension or retirement plan subject to ERISA, directed brokerage may be inconsistent with your fiduciary duty to your employees.

D. Trade errors

From time to time, we may experience a trade error caused by us or by an executing broker. If a trade error occurs, we will ensure that you are “made whole” by putting you in the same position with regard to gain or loss as if the error had never occurred. We will not commit future brokerage commissions to compensate a broker either directly or indirectly if a broker offers to absorb any portion of the cost of correcting an error. We attempt to minimize trade errors by promptly reconciling confirmations with order tickets and intended orders, and by reviewing past trade errors to understand the internal control breakdown that resulted in an error.

10. Review of accounts

A. Reviews

Your situation is reviewed at least once a quarter, and more often if necessary. In addition to our regular cycle of reviews, a review may be triggered by a change in market conditions, a question from you, a change in your situation, change in tax laws, new information about a particular investment, etc. The objective of each review is to determine whether or not we need to recommend a change in any of your financial strategies. Reviews are performed by the Investment Analyst and Wealth Planner assigned to you, under the supervision of the Senior Client Advisor assigned to you. Our team members are instructed to consider your investment policy, risk tolerance, income tax situation, and cash flow – among other factors. Our team members are also encouraged to consult with your other advisors (CPA, attorney, insurance agents and outside investment advisors) when necessary.

B. Reporting

Unless a client instructs us otherwise, each client receives a written quarterly investment report that includes performance measurements net of our fee, if you have authorized us to deduct our fee from your account. Otherwise, performance is reported gross of our fee but net of fees that are included in any products or managers we have recommended.

For many clients, we provide complete quarterly financial statements in addition to investment reports. The quarterly financial statements typically include balance sheets, cash flow forecasts, tax forecasts, and asset allocation charts for family members, trusts, partnerships and other entities that play a role in wealth transfer planning. Financial statements may also provide a summary of insurance arrangements, estate plan arrangements, and a variety of other supporting financial schedules that are customized for the needs of each family. Our reporting

systems are designed to accommodate complex investment structures and multiple custody platforms. When feasible, we measure investment results net of fees and net of taxes. After-tax performance calculations are generally done once a year because the after-tax results cannot be determined until the year has ended.

11. Client referrals and other compensation

Fees paid to us by our clients are our only source of compensation. We do not pay third parties for referrals, nor do we accept compensation in exchange for making a referral to another firm or advisor.

12. Custody

We work with more than a dozen custody agents. You decide which custody agent to employ. We will be glad to help you decide which to use. The custody agent provides a quarterly report that is completely independent of the report prepared by us. Most custody agents also have web sites that allow you to check your accounts on demand. You should carefully review your custody statements and compare them to the statements we provide.

Private investments such as hedge funds, private equity funds, and real estate funds will take custody of your investment capital themselves, or through their designated custody agent. The risk of unauthorized transactions, including theft of your capital, is higher in these investments. It is particularly important that you carefully review their statements, and their auditor's report.

We sometimes have custody of our clients' assets due to clients asking us to facilitate deposits, transfers of funds, and bill payment. In a few cases, we have custody of our clients' assets because clients have granted us broad powers to initiate and execute financial transactions without involving the clients. When a client gives us permission to deduct our fee from an

account, under SEC rules we are deemed to have custody of that account. Perspecta Trust Company LLC provides custodial services for some of our clients. Perspecta Trust is affiliated with Ballentine Partners but is operationally independent.

13. Investment discretion

We manage assets on both a discretionary and non-discretionary basis. Most of our clients have both discretionary and non-discretionary accounts with us. “Discretionary” means that you authorize us to buy and sell securities in your account. “Non-discretionary” means that we must obtain your approval before making any changes to an investment account.

For discretionary accounts, we exercise our discretion within the limits of your written investment guidelines, as described in this Section 13. “Investment Policy Statement” means the written investment instructions that we help each client to prepare.

To open either type of account, you sign an Account Application and a Limited Power of Attorney that gives us trading authority over your account, and we assist you in writing an Investment Policy Statement for the account. The Investment Policy Statement contains instructions about how the account will be managed. The account-opening paperwork is provided by the custodian, and we provide the Investment Policy Statement.

We require our portfolio managers to adhere to the instructions in your Investment Policy Statement. Either party may request a change to the Investment Policy Statement at any time. Requests to change the Investment Policy Statement must be in writing and must explicitly state that the writer is requesting a change of the Investment Policy Statement. The party requesting the change must allow a reasonable time period for the other party to object to the change before it becomes effective.

Any material change to the Investment Policy Statement, or a material change in the size

of an account, must allow a reasonable transition period for us to make portfolio changes. Market volatility, tax considerations, lack of liquidity, and lack of marketability are examples of factors that may have to be taken into account when making significant changes to a portfolio. Some investments, such as specialized securities and private placements (for example, hedge funds, private equity, venture capital and real estate funds), may not be readily marketable. It may therefore take a very long time to make changes in those positions. During that transition period, it may not be possible for us to comply with the asset allocation guidelines in your Investment Policy Statement. In fact, our attempting to rapidly force the account into compliance may be inconsistent with our fiduciary duty to you. Our goal is to manage the account by *taking into account all relevant factors*, and bring the account into compliance with your Investment Policy Statement within a reasonable period of time.

14. Voting client securities; our proxy voting policy

Generally, our clients retain the right to vote when a shareholder vote is required, and our clients decide how to respond to class action lawsuits related to securities they own. Voting is optional; you are not required to vote. Your custody agent will provide you with proxy voting and shareholder class action documents.

If we agree to vote proxies and respond to class action law suits for you, and you have so instructed your custody agent, the custody agent will send proxy voting and class action documents to us instead of you. We will exercise our powers in your best interests. Since we have no interest in any company we invest in, it is unlikely that we will have any conflict of interest. If we do have a conflict of interest, we will disclose it to you. Upon request, we will disclose how we voted your securities. Our policy is to vote in favor of proposals supported by management, unless we determine that is not your best interests, or you specifically instruct us to

vote in some other manner.

15. Financial information

We have no financial conditions that are likely to prevent us from meeting our contractual commitments to our clients.

Glossary of Investment Risks

Following is a description of various types of investment risk. The risks are listed alphabetically, and we provide a brief description.

Risk	Description
Business risk	The risk of doing business in a particular industry or environment is called business risk. Consider the Gulf of Mexico oil spill of 2010 and its impact on the drilling industry. Companies that had nothing to do with the spill lost a considerable portion of their value.
Counter-party risk	The possibility that some or all of your capital will be lost because a bank or other financial intermediary will not be able to fulfill its contractual obligations to you. Many types of investments involve counter-party risk, including, for example, Exchange Traded Notes (ETNs), derivative contracts, options, and futures.
Creditor failure risk	The risk that a lender upon whom your investment depends for a mortgage or other loan will experience financial pressures that cause it to demand immediate repayment of a loan, or refuse to advance funds on a line of credit that a company needs for operations. This happened during the banking crises of the late 1980s and 2008 – 2009.
Credit risk	The possibility that the financial condition of an organization will deteriorate after a security has been issued. Because investors perceive that the borrower is less credit-worthy than before, the prices of all securities issued by the borrower will decline in value.
Default risk	The possibility that a borrower will default on an obligation. This risk applies to bonds and other debt instruments, options, futures and other types of derivatives. For example, a bond issuer may fail to make interest payments when due, and may fail to repay your principal when the bond matures.
Exchange rate risk (currency risk)	The risk of loss due to a decline in the relative value of the currency upon which your investment depends. For example, if you purchase stocks of companies in the Euro zone, and the Euro declines in value relative to the US dollar, your investment performance will reflect that loss when your performance is measured in US dollars. Similarly, if you have an obligation that must be paid in another currency, and that currency appreciates relative to the US dollar, then you will experience an increase in the size of the obligation, when its size is measured in US dollars.

Risk	Description
Forced sale risk	The risk that an investment is liquidated involuntarily due to a company takeover, fund closure, or redemption by the issuer. This risk applies to bonds that have call features, hedge funds, and many other investments. This risk also applies to any investment account that has a margin loan associated with it.
Government seizure of your investment	Governments sometimes seize the capital of private investors. In 2013, private investors holding deposits in Cypriot banks were confronted with this risk. In the 1930s, the US required citizens holding gold to sell their holdings to the government at an artificially low price.
Inflation risk	The chance the money you have invested will decline in real value due to inflation.
Insurance failure risk	The possibility that an insurance arrangement that is supposed to protect an investment will fail to perform as expected, or will completely fail. For example, many municipal bonds are insured with respect to their interest and principal payments. Municipal bankruptcies on a large scale might stress the insurance arrangements to the point of failure. Municipal bond insurance <u>does not</u> protect your investment from loss, unless the issuer actually defaults.
Interest rate risk	Bonds and other securities that are dependent upon interest payments lose value when market interest rates increase, or when a change in the credit quality of a particular issuer causes investors to demand a higher interest rate for lending to that issuer. All debt instruments are exposed to this risk. Long-term bonds are most exposed.
Liquidity risk	The possibility you won't be able to sell or convert a security into cash when you need the money or simply want to remove the security from your portfolio. When liquidity risk strikes, it may not be possible to find a buyer at <u>any</u> price, or only at a price that is a steep discount from the value you expected to receive.
Litigation risk	Investors in private investments can be sued by their partners for undue enrichment if the investment manager fails to manage the investment in the best interests of all of the investors. The classic example of this was the Madoff affair when investors who received substantial distributions from Madoff's fund were sued for recovery of those distributions. There are other recent instances when investors have been sued by other investors.

Risk	Description
Market failure risk	The risk that a market will simply cease to function. The US securities markets closed for a period following the 2001 attack on the World Trade Center. The market for many types of fixed income securities suddenly failed in 2008 with little or no warning. Money market funds are generally regarded as very safe. But, in 2008 government intervention was required to prevent money market funds from failing. When a market fails, securities that have traded in that market usually become very illiquid, and they lose a significant portion of their value. (See liquidity risk.)
Market risk	The likelihood that a broad investment market, such as the bond or stock market, will decline in value, taking the value of your investments with it.
Political risk (country risk)	Political instability or a political change that investors believe will result in damage to a region's economy can cause investments to lose value. Political risk is a factor in the US federal government and in individual states within the US.
Principal risk	The chance that your original investment will decline in value or be lost entirely due to a problem that was specific to a security you purchased. (As opposed to a loss due to a general market decline or interest rate risk.)
Regulatory risk	The risk of a regulatory change that could adversely affect an investment. This includes a wide range of factors such as unfavorable changes in environmental laws, laws that restrict international capital movements, and new rules that restrict activity in certain industries.
Reinvestment risk	The risk that cash distributions will not be reinvested, or cannot be reinvested at the same rate as before, so that the return you were expecting is not actually achieved. Many types of investments are exposed to this risk. Bonds, for example, are exposed to reinvestment risk.

Risk	Description
Sovereign default risk	<p>The possibility that a sovereign country may default on its debt. For example, in 2012 Greece defaulted on its sovereign debt. When a sovereign default occurs the damage may result in contagion that affects financial markets and instruments far beyond the site of the default. The world financial markets are very complex, and there are many connections between the various markets.</p> <p>As illustrated by Greece's default in 2012, investors may be forced to accept a negotiated solution that they do not want, and that they have had no role in crafting. Also, there is no assurance that credit default agreements or other forms of insurance will perform as expected.</p> <p>Sovereign default risk is extremely dangerous because it can trigger many other risks, such as collapse of the value of currency, hyperinflation, bank failures, bond and equity market failures, political risk, etc. etc. It can also occur quite suddenly.</p>
Tax risk	<p>The possibility that tax rates will change in a manner that will cause an investment to lose value because investors perceive that its after-tax return is not as attractive as before. For example, the interest rates for municipal (i.e. tax-exempt) bonds tend to change in relation to the interest rates for taxable bonds. The relationship between the interest rates changes as the tax rate changes. But, the tax rate is just one of several factors affecting this relationship.</p>
Timing risk	<p>The risk of buying or selling an investment at an inappropriate time. Consider the investors who sold their stocks at the market bottom in March of 2009 because they could no longer endure the pain of losses. March 2009 turned out to be the turnaround point.</p>
Tracking error risk	<p>The risk that an investment designed to track a specific market index deviates from that index. Tracking error risk applies to many types of investments, including Exchange Traded Funds ("ETFs"), stock index mutual funds, bond index mutual funds, and actively managed portfolios that are intended to track an index. It also applies to many types of derivatives.</p>
Valuation risk	<p>The risk that an investment is overvalued and is about to experience a sudden, sharp decline in value. Also, the risk that the estimated value of a security is subsequently found to be quite different from its actual cash value. For example, a valuation study may over- or under-estimate the true value of investment, even if the study is performed by an expert.</p>