



Form ADV Part 1

Item 7A: Financial Industry Affiliates

*Instructions: Complete a separate form for **EACH** of your firm's Financial Industry Affiliates/Related Persons. The information reported on this form will be reported on your firm's Form ADV.*

DEFINITIONS

Advisory Affiliate: Your advisory affiliates are (1) all of your officers, partners, or directors (or any person performing similar functions); (2) all persons directly or indirectly controlling or controlled by you; and (3) all of your current employees (other than employees performing only clerical, administrative, support or similar functions).

Control: The power, directly or indirectly, to direct the management or policies of a person, whether through ownership of securities, by contract or otherwise.

- Each of your firm's officers, partners, or directors exercising executive responsibility (or Persons having similar status or functions) is presumed to control your firm.
- A person is presumed to control a corporation if the person: (i) directly or indirectly has the right to vote 25% or more of a class of the corporation's voting securities; or (ii) has the power to sell or direct the sale of 25% or more of a class of the corporation's voting securities.
- A person is presumed to control a partnership if the person has the right to receive upon dissolution or has contributed 25% or more of the capital of the partnership.
- A person is presumed to control a limited liability company ("LLC") if the person: (i) directly or indirectly has the right to vote 25% or more of a class of the interests of the LLC; (ii) has the right to receive upon dissolution or has contributed, 25% or more of the capital of the LLC; or (iii) is an elected manager of the LLC.
- A person is presumed to control a trust if the person is a trustee or managing agent of the trust.

Related Person: Any advisory affiliate and any person that is under common control with your firm.

ACKNOWLEDGEMENT

I, _____, have completed and signed this form on behalf of, and with the authority of, the adviser. I further certify that the information provided herein is true and accurate.

Signature

Date

QUESTIONNAIRE

1. Name of Related Person: _____
2. Primary Business Name of Related Person: _____
3. Related Person's SEC File Number: 801-_____ ☐ N/A
4. Related Person's CRD Number: _____ ☐ N/A
5. Related Person is: (check all that apply)
 - ☐ Broker Dealer, Municipal Securities Dealer, or Government Securities Broker or Dealer
 - ☐ Other Investment Adviser (Including Financial Planners)
 - ☐ Registered Municipal Advisor
 - ☐ Registered Security-Based Swap Dealer

- ☐ Major Security-Based Swap Participant
- ☐ Commodity Pool Operator or Commodity Trading Advisor (Whether Registered or Exempt from Registration)
- ☐ Futures Commission Merchant
- ☐ Banking or Thrift Institution
- ☐ Trust Company
- ☐ Accountant or Accounting Firm
- ☐ Lawyer or Law Firm
- ☐ Insurance Company or Agency
- ☐ Pension Consultant
- ☐ Real Estate Broker or Dealer
- ☐ Sponsor or Syndicator of Limited Partnerships (or Equivalent), Excluding Pooled Investment Vehicles
- ☐ Sponsor, General Partner, Managing Member (or Equivalent) of Pooled Investment Vehicles

6. Does the RIA control or is the RIA controlled by the Related Person? ☐ Yes ☐ No

7. Is the RIA and the Related Person under common control? ☐ Yes ☐ No

8. Does the Related Person act as a qualified custodian for the RIA's clients in connection with advisory services you provide to clients? ☐ Yes ☐ No

- If the RIA is registering or registered with the SEC and has answered "Yes", to Question 8 above, has the RIA overcome the presumption that it is not operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the Related Person and thus is not required to obtain a surprise examination for client funds or securities that are maintained at the Related Person? ☐ Yes ☐ No

- If "Yes" to Question 8 above, provide the location of the Related Person's office responsible for custody of the RIA's client assets:

Address: _____

9. If the Related Person is an investment adviser, is it exempt from registration? ☐ Yes ☐ No

- If "Yes", under what exemption? _____

10. Is the Related Person registered with a foreign financial regulatory authority? ☐ Yes ☐ No

- If "Yes", list the name and country of each foreign financial regulatory authority with which the Related Person is registered. _____

11. Does the RIA and the Related Person share any supervised persons? ☐ Yes ☐ No

12. Does the RIA and the Related Person share the same physical location? ☐ Yes ☐ No