

**Item 1 Cover Page**

Crossbridge Capital Asia Pte Ltd  
One Wallich Street  
#24-05 Guoco Tower  
Singapore 078881  
<https://www.crossbridgecapital.com>

This brochure (the “Brochure”) provides information about the qualifications and business practices of Crossbridge Capital Asia Pte Ltd. If you have any questions about the contents of this brochure, please contact us at +65 6723 8171 and/or [joel.pang@crossbridgecapital.com](mailto:joel.pang@crossbridgecapital.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Additional information about Crossbridge Capital Asia Pte Ltd also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Crossbridge Capital Asia Pte Ltd’s registration as an investment adviser does not imply a certain level of skill or training.

[\*\*July 23, 2019\*\*]

## **Item 2 Material Changes**

This Brochure is Crossbridge Capital Asia Pte Ltd's initial Brochure. There are, therefore, no material changes to report.

### Item 3 Table of Contents

ITEM 1 COVER PAGE.....	1
ITEM 2 MATERIAL CHANGES .....	2
ITEM 3 TABLE OF CONTENTS.....	3
ITEM 4 ADVISORY BUSINESS .....	4
ITEM 5 FEES AND COMPENSATION .....	6
ITEM 6 PERFORMANCE-BASED FEES.....	8
ITEM 7 TYPES OF CLIENTS .....	9
ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS .....	10
ITEM 9 DISCIPLINARY INFORMATION .....	13
ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS.....	14
ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING .....	15
ITEM 12 BROKERAGE PRACTICES.....	16
ITEM 13 REVIEW OF ACCOUNTS .....	18
ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION .....	19
ITEM 15 CUSTODY.....	20
ITEM 16 INVESTMENT DISCRETION.....	21
ITEM 17 VOTING CLIENT SECURITIES .....	22
ITEM 18 FINANCIAL INFORMATION.....	23

## **Item 4 Advisory Business**

---

### **FIRM DESCRIPTION**

---

Crossbridge Capital Asia Pte Ltd (hereinafter referred to as “Crossbridge Capital”, “we”, “us”, or “our firm”) is a Singapore-incorporated private limited company with its principal office located in Singapore and licensed and regulated by the Monetary Authority of Singapore since 2010. The principal owner of Crossbridge Capital is Crossbridge Capital (Holding) Co. Ltd, of which the majority shareholder is Dominion Employee Benefit Trustees Limited.

Crossbridge Capital is an investment advisory firm that provides investment and risk-management solutions to clients worldwide, including through the use of proprietary technology available through a low-touch, fully-automated online platform, CONNECT by Crossbridge (“CONNECT”). CONNECT is not currently available to United States clients.

As of June 30, 2019, Crossbridge Capital managed approximately US\$1.4 billion of client assets and managed on a non-discretionary basis.

---

### **ADVISORY PROGRAMS**

---

In connection with our investment advisory services, Crossbridge Capital primarily provides advice with respect to equities (common stocks and equivalents), exchange traded funds, U.S. treasuries and bonds. Our advice is generally limited to these types of investments, but we reserve the right to advise or not advise our clients on certain investments should we deem it appropriate based on their particular circumstances. For more information on our investment strategies, please refer to the “Methods of Analysis, Investment Strategies and Risk of Loss” section of this Brochure.

Crossbridge Capital’s advisory services are tailored to the needs of our clients based on their individual investment objectives, risk tolerances, cash or income needs, and any investment restrictions. Although Crossbridge Capital seeks to accommodate reasonable investment restrictions or guidelines set by our clients, we may decline to accommodate certain investment restrictions that are incompatible with our firms’ investment philosophy or that may have an adverse effect on our ability to manage a client account.

Crossbridge Capital enters into formal written agreements with our clients setting forth the terms and conditions under which we will provide our advisory services (the “Terms of Business”). The Terms of Business sets forth the scope of the services to be provided and the compensation we receive from the client for such services.

Our firm may offer all or any combination of the advisory services described below to our clients:

**Investment Management Services.** Crossbridge Capital provides investment management services where client portfolios are managed according to a client's stated financial situation and needs, investment objectives, investment restrictions and risk tolerances. Crossbridge Capital will assess a client's investment objectives, needs and risk profile by guiding the client through a documented investment objective assessment. Crossbridge Capital will then recommend that a client allocate its investment portfolio among various asset classes, then once the appropriate asset allocation has been determined and only when the client's authorization for the chosen investments has been given, the investment transactions are transmitted to the client's broker. The client's portfolio will be monitored and recommendations to rebalance will be made on an ongoing basis as changes in market conditions and client circumstances occur. Crossbridge Capital will also make recommendations to our clients as to specific securities or other investments that may be purchased or sold for a client's portfolio.

## Item 5 Fees and Compensation

---

### ADVISORY FEES

---

The following information describes how Crossbridge Capital is compensated for the advisory services we provide to our clients. The specific manner in which fees are charged and the compensation we receive may differ between clients depending upon the individual Terms of Business with each client. Crossbridge Capital reserves the right to negotiate our compensation with clients depending on the scope of our advisory relationship, and we may charge higher or lower fees than are available from other firms for comparable services. Crossbridge Capital has the general discretion to waive all or a portion of our fees, but typically only exercises this discretion for our employees.

**Investment Management Fees.** In consideration for providing investment management services and pursuant to the terms of the Terms of Business with the client, Crossbridge Capital generally charges clients an advisory fee at annual rates ranging from 0.2% to 2% of each client's assets under management, generally payable quarterly in arrears.

If a client chooses, our investment management fees are deducted from the client's account(s) and remitted to us pursuant to the client's written instructions to the broker-dealer holding the account.

**Additional Fees and Expenses.** Clients will incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer through which account transactions are executed. For more information on our brokerage practices, please refer to the "Brokerage Practices" section of this Brochure.

The fees that clients pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds (described in each fund's prospectus) to their shareholders. The fees charged directly by mutual funds and exchange traded funds will typically include a management fee and other fund expenses. Crossbridge Capital does not receive any portion of the fees and expenses charged by mutual funds and/or exchange traded funds.

To fully understand the total costs associated with their investment portfolio, clients should review all the fees charged by mutual funds, exchange traded funds, our firm and others.

**Termination.** Terms of Business' with our clients may generally be terminated by either party upon thirty (30) days' written notice. Upon termination of our status as the client's investment adviser, Crossbridge Capital will not take any further action with respect to the client's account(s) unless specifically notified by the client in writing. Clients will be responsible for instructing their broker-dealer and monitoring their account for the final disposition of assets.

**Refunds.** Upon receipt of a proper notice of termination from the client, as described in the Terms of Business, any earned unpaid fees will be billed on a pro-rata basis based on the amount of work performed by us up to the point of termination.

**Brokerage Commissions.** Crossbridge Capital does not receive brokerage commissions from the sale of securities or other investment products. Our compensation for recommending securities and investment products is limited to the advisory fees described above.

## **Item 6 Performance-Based Fees**

---

### **PERFORMANCE BASED FEES**

---

Currently, Crossbridge Capital does not charge our clients fees based on a share of capital gains on or capital appreciation of the assets in their accounts.



## **Item 7 Types of Clients**

---

### **TYPES OF CLIENTS**

---

Crossbridge Capital offers investment advisory services to a diverse group of clients, including individuals, high net worth individuals, institutional clients, trusts, investment companies and other investment advisers. Client relationships may vary in scope and length of service.

---

### **ACCOUNT REQUIREMENTS**

---

Crossbridge Capital generally requires a minimum account balance of \$5,000,000 for our non-discretionary investment management services.

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

---

### METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

---

Crossbridge Capital analyzes investments and develops investment strategies based on a client's stated financial situation and needs, investment objectives, investment restrictions and risk tolerances. Crossbridge Capital monitors its clients' portfolios and provides ad hoc and/or periodic investment recommendations to ensure portfolios are suitable to the clients' stated investment objective/needs and desired level of risk.

Risk management is integrated into our process through the use of appropriate risk levels on each position.

---

### RISK OF LOSS

---

Investing in securities involves certain investment risks. Securities may fluctuate in value both upwards and downwards. As part of its advisory services, Crossbridge Capital will help clients in determining the appropriate level of risk they can tolerate. However, clients should be prepared to bear potential losses and there are no guarantees that an investment strategy will meet client goals. There is no guarantee that any of the investments that our firm recommends will outperform the investment strategies used by other firms. Past performance is no guarantee of future results.

The investment risks described below may not be all-inclusive but should be considered carefully:

**Equities risk:** Equity securities can decline in value over short or extended periods as a result of changes in a company's financial condition and in overall market, economic and political conditions.

**Market Risk:** Security prices may decrease due in response to direct and indirect events and market conditions, usually caused by factors independent of the specific attributes of the investment security.

**Inflation Risk:** Rising inflation reduces the purchasing power of the underlying currency, which is the dollar for U.S. based investments. This also applies to foreign investments, which may be denominated in other currencies.

**Liquidity Risk:** Liquidity is the ability to convert an investment into cash. Investment assets are usually more liquid when established markets exist to trade those securities. In case of extreme market activity, it may not be possible to promptly liquidate certain assets. Also, sales of thinly traded securities could depress the market value of those securities and reduce the investments' profitability or increase its losses.

**Reinvestment Risk:** This is the risk that future gains may be reinvested at less favorable (lower) rates of return than currently available.

**Interest-Rate Risk:** Changes in interest rates may result in fluctuations in the prices of other investment vehicles. For example, when interest rates rise, fixed income securities prices fall.

**Corporate Securities:** Equity and debt securities (stocks and bonds) represent partial ownership interests in companies and partial claims on their assets, respectively. The value of these interests and claims is theoretically dependent upon the performance of the underlying business and the cash flows generated by its operations. However, securities prices may fluctuate independently of these factors due to market factors or for no reason at all. Prices may not change as expected even when the prospects of the business have been correctly assessed.

**Omission of Risks:** This Brochure does not provide a comprehensive list of every possible source of risk. Every potential outcome of an investment cannot be predicted, and it cannot disclose every potential risk factor for every investment to clients. The value of securities that our firm advises our clients to invest in may go up or down in response to factors not within our firm's control, including but not limited to the status of an individual company underlying a security, or the general economic climate. Clients may suffer losses for any reason or no discernible reason.

**Business Risks:** The companies identified for investment face a wide variety of operational risks, including competitive threats, regulatory changes, execution challenges, and responses to external changes. For businesses listed on US exchanges, the Securities and Exchange Commission requires companies to disclose the most significant risk factors that could impact the business. However, these disclosures could be incomplete or inaccurate. An assessment of the relevant risk factors for any business could be incomplete or inaccurate. Both unforeseen and known risk factors may transpire, resulting in a deterioration of corporate performance.

**International Investing:** Our firm may advise our clients to invest in securities of U.S. companies operating internationally, as well as international companies on both domestic and foreign exchanges. Businesses operating in other countries are subject to political and economic risks not present in the U.S., as well as currency risk. Stock markets outside of the U.S. may be more volatile. In some international markets, U.S. shareholders may not be able to exercise the same legal rights as foreign shareholders. There may be more limited access to information about international companies.

**Fundamental Analysis:** Forecasting financial performance is an inexact process of estimation that relies on the accuracy of financial and industry data provided by companies and third parties. This data may contain material errors or omissions. Investing on the basis of fundamental research may also result in errors of judgment or analysis. Investment performance may suffer if the assessment of a business or its prospects is incorrect, and even a correct analysis could result in a loss of capital.

**Interim Underperformance:** The long-term and concentrated nature of a strategy means that even if the strategy is “working properly” and the analysis is correct and leads to profitable realized outcomes, clients may experience multi-year periods of significant underperformance relative to market indexes and other investment strategies. This interim underperformance poses a significant risk of permanent capital loss for clients with short time horizons or who require withdrawals from their account.

**Systemic Risk:** Our firm relies on the stability of the overall financial system to implement its investment strategy. The security of client assets depends on the solvency of their chosen brokerage firm. In the event of a disruption to the broker’s business or the overall functioning of securities markets, our firm may be unable to implement its investment services and clients may experience a significant or complete loss of their capital.

**Strategy:** Our firm cannot guarantee that its recommendations will be implemented at all times and it may make investments not in keeping with the general description provided in this Brochure. There can be no guarantee that suitable investment opportunities will be available at all times.

**Frequent Trading:** Any capital gains due to positions held for less than one year may be taxable at a higher rate. Frequent trading could result in lower returns due to these costs.

**Operational Risk:** Our firm is responsible for developing, implementing and operating appropriate systems and procedures, where required, to transmit all investment transactions and monitor risk on behalf of each client. Our firm will rely on its systems, procedures and other data processing systems to provide its services. Certain elements of our firm’s operations are dependent upon systems operated by third parties, including the systems of clients’ broker-dealer(s). Our firm may not be in a position to verify the reliability of such third-party systems or data. Failure of or errors in such systems could result in mistakes or delays in the execution, confirmation or settlement of transactions for clients, or in transactions not being properly booked, evaluated or accounted for. The increasing reliance on internet-based programs and applications to communicate, conduct transactions and store data also creates increased security risks. Targeted cyber-attacks, or accidental events, can lead to a breach in computer and data systems and access by unauthorized persons to sensitive transactional or personal information. Data taken in breaches may be used by criminals to commit identity theft, obtain loans or payments under false identities, and other crimes. Cybersecurity breaches at our firm or our service providers or counterparties may directly or indirectly affect clients, and could lead to theft, data corruption, interference with business operations, disruption of operational systems, interference with our firm’s ability to provide services, direct financial loss or reputational damage, or violations of applicable laws related to data and privacy protection and consumer protection.

Clients should be aware their investment is not guaranteed and understand that there is a risk of loss of value in their investment.

## Item 9 Disciplinary Information

---

### REQUIRED DISCLOSURES

---

Crossbridge Capital and its management persons have not been the subject of any material legal proceeding required to be disclosed in response to this item.

## **Item 10 Other Financial Industry Activities and Affiliations**

---

### **OUTSIDE BUSINESS ACTIVITIES**

---

None of Crossbridge Capital, its employees and management persons is registered or has registered or have an application pending in the United States to register as a broker-dealer or registered representative of a broker-dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

---

### **AFFILIATED ENTITIES**

---

Crossbridge Capital has several affiliates, some of which provide regulated financial services. None of them provide services in connection with the advisory services offered by this brochure.

#### **Crossbridge Capital LLP**

Crossbridge Capital LLP is a UK-based firm that provides non-discretionary and discretionary investment services to high net worth clients.

#### **Crossbridge Capital (Monaco) SAM**

Crossbridge Capital (Monaco) SAM is a Monaco-based firm that provides non-discretionary investment services to high net worth clients.

#### **Crossbridge Capital (UK) Ltd**

Crossbridge Capital (UK) Ltd is a UK-based entity that provides administrative services and support to Crossbridge Capital LLP.

#### **Crossbridge Capital Limited**

Crossbridge Capital Limited is a Malta-based firm that provides administrative services to Crossbridge Capital Group and its clients.

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

---

### **CODE OF ETHICS**

---

Crossbridge Capital has adopted a Code of Ethics (the “Code”) that sets forth a standard of business conduct for our firm and all our associated persons. The purpose of the Code is to set out ideals for integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence for our firm and our associated persons to espouse in the interest of our clients and investor protection. The Code includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All employees of Crossbridge Capital are required to handle their personal securities transactions in such a manner as to avoid any actual or potential conflicts of interest or any abuse of position of trust and responsibility. Annually, we require all employees to certify that they have read, understand and will comply with the Code.

Clients and prospective clients may request a full copy of our firm’s Code of Ethics by contacting our firm in writing at Crossbridge Capital Asia Pte Ltd, One Wallich Street, #24-05 Guoco Tower, Singapore 078881 or emailing our firm at [joel.pang@crossbridgecapital.com](mailto:joel.pang@crossbridgecapital.com).

---

### **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

---

Crossbridge Capital and/or individuals associated with our firm may invest in the same and/or different securities than those that are recommended to and/or purchased for our clients. Crossbridge Capital has adopted procedures designed to ensure that the personal securities transactions, activities and interests of Crossbridge Capital and/or individuals associated with our firm will not interfere with our ability to make investment decisions in the best interest of our clients.

---

### **PERSONAL TRADING**

---

Crossbridge Capital maintains and enforces written policies and procedures reasonably designed to prevent the misuse of material non-public information by our firm or any access persons of our firm with regards to their personal securities transactions. Personal trading activities are continually monitored to reasonably prevent conflicts of interest between our firm and our clients.

## Item 12 Brokerage Practices

---

### SELECTION OF BROKER-DEALERS

---

Before Crossbridge Capital begins providing advisory services, each client must open a brokerage account and transfer funds to that account. Crossbridge Capital will transmit all trades authorized by a client for execution by the client's broker-dealer. If requested, Crossbridge Capital may assist clients in selecting a United States-based broker-dealer for this purpose.

Clients who independently select a particular broker must be aware that the direction may limit Crossbridge Capital's ability to achieve best execution by, for example, executing trades in large orders. As a result, clients may pay higher commissions, have higher transaction costs and/or receive less favorable prices. In general, we require client direction to use a particular broker to be in writing.

**Research and Other Soft Dollar Benefits.** Crossbridge Capital currently receives products or services from broker-dealers other than execution that assist our firm in managing and administering client accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution, facilitate payment of our fees from clients' accounts, and assist with back office functions, record keeping and client reporting. These services may be used to service all or a substantial number of client accounts.

Crossbridge Capital may also receive services from broker-dealers that are intended to help our firm manage and further develop our business.

While the benefits we receive from broker-dealers do not depend on the amount of brokerage transactions directed to such broker-dealer, as a fiduciary we are required to disclose that there may be a potential conflict of interest when our firm recommends that clients maintain their assets at a specific broker-dealer.

**Brokerage for Client Referrals.** Crossbridge Capital does not consider broker-dealer or third-party referrals in selecting or recommending broker-dealers to our clients as this would create a conflict of interest.

---

### TRADE ERRORS

---

From time to time, our firm may make a trade error when servicing a client's account. When this occurs, we will attempt to correct the trade as soon as reasonably possible. Trade errors will generally be corrected at no cost to clients. In most cases, we will correct trade errors via our executing broker-dealer's trade error desk. If there is a cost associated with this correction, such cost is generally borne by Crossbridge Capital and not the client. Note that we do not credit accounts for market losses unrelated to our error.





## **Item 13 Review of Accounts**

---

### **ACCOUNT REVIEWS**

---

Crossbridge Capital conducts reviews of client's investment objectives at least once every year. The frequency of the review depends upon a variety of factors, such as the client's risk profile, activity in the account, economic and market conditions, and the client's stated preferences, if any. Additional reviews may be triggered by changes in the investment objectives or guidelines for a particular client or specific arrangements with the client.

Formal client review meetings are generally conducted remotely (via telephone, Skype or similar) on a regular basis at intervals mutually agreed upon by Crossbridge Capital and the client. During these reviews, any changes in the client's investment objectives are discussed so we can review our previous recommendations and make any necessary adjustments.

---

### **ACCOUNT REPORTS**

---

Those clients to whom Crossbridge Capital provides investment management services will receive at least quarterly reports summarizing their account(s) and investment results from their custodian. Additionally, Crossbridge will also provide such account reporting as is agreed upon with individual clients.

## **Item 14 Client Referrals and Other Compensation**

---

### **CLIENT REFERRALS**

---

Our firm does not currently compensate third-parties (or “solicitors”) to promote the investment advisory services offered by our firm, because the solicitor would have to satisfy requirements under Rule 206(4)-3 of the Advisers Act or similar state rules regarding solicitation arrangements before a cash referral fee could be paid to them.

---

### **OTHER COMPENSATION**

---

Crossbridge Capital does not receive an economic benefit from anyone who is not a client in exchange for our provision of investment advice or other advisory services.

## **Item 15 Custody**

---

### **CUSTODY OF CLIENT FUNDS AND SECURITIES**

---

Crossbridge Capital does not hold physical custody over client assets or accounts. However, Crossbridge Capital could have “deemed custody” of client funds solely as a consequence of our ability to deduct fees from client accounts.

## **Item 16 Investment Discretion**

---

### **NON-DISCRETIONARY AUTHORITY**

---

Crossbridge Capital manages investment accounts for United States clients on a non-discretionary basis.

## **Item 17 Voting Client Securities**

---

### **AUTHORITY TO VOTE CLIENT PROXIES**

---

Crossbridge Capital does not accept authority from clients with respect to voting of proxies solicited by, or with respect to, the issuers of any securities held in client portfolios. Client arrangements with brokers should require the broker to send the client all proxy statements it receives, so that the client may take whatever action the client deems appropriate. Crossbridge Capital does not offer clients any consulting assistance regarding proxy issues.

## Item 18 Financial Information

---

### REQUIRED DISCLOSURES

---

Crossbridge Capital has no financial commitments that would impair our firm's ability to meet our contractual and fiduciary commitments to our clients and has not been the subject of a bankruptcy proceeding.

## **Form ADV Part 2B: Brochure Supplement**

Crossbridge Capital Asia Pte Ltd  
One Wallich Street  
#24-05 Guoco Tower  
Singapore 078881  
<https://www.crossbridgecapital.com/>

This brochure supplement provides information about our supervised persons that supplements the Crossbridge Capital Asia Pte Ltd brochure. You should have received a copy of that brochure. Please contact our firm if you did not receive Crossbridge Capital Asia Pte Ltd's brochure or if you have any questions about the contents of this supplement.

Additional information about the supervised persons mentioned in this brochure supplement is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

[\*\*July 23, 2019\*\*]

**SUPERVISED PERSONS:** Yai Sukonthabhund

Crossbridge Capital Asia Pte Ltd  
Form ADV Part 2B – Yai Sukonthabhund



---

**EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

---

**Name:** Yai Sukonthabhund

**Year of Birth:** 1972

**Education:** Bachelor of Science, Mechanical Engineering  
Cornell University, 1994

**Experience:** Partner & CEO  
Crossbridge Capital Asia Pte Ltd; Singapore  
Nov. 2010 – Present

Executive Director, Head of FX Sales, Asia  
Bank Julius Baer; Singapore  
Sept. 2006 – Nov. 2010

VP, Investment Counselor  
Citigroup; Singapore  
Sept. 2002 – Aug. 2006

VP  
Deutsche Bank; Thailand, Singapore  
March 1995 – Sept. 2002

---

**DISCIPLINARY INFORMATION**

---

Mr. Yai Sukonthabhund has not been involved in any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the integrity of our management.

---

**OTHER BUSINESS ACTIVITIES**

---

No other business activities.

---

**ADDITIONAL COMPENSATION**

---

Mr. Sukonthabhund's compensation is derived from business income related to client engagements. Mr. Sukonthabhund does not receive any additional compensation or other economic benefit from any other source for providing investment advisory services.

Crossbridge Capital Asia Pte Ltd  
Form ADV Part 2B – Yai Sukonthabhund

---

## **SUPERVISION**

---

Crossbridge Capital has adopted and implemented written supervisory policies and corresponding procedures which are reasonably designed to prevent violations of applicable federal securities laws. All personnel associated with Crossbridge Capital, including those supervised persons who formulate investment advice for clients and who have direct client contact are required to comply with applicable securities laws and Crossbridge Capital's policies and procedures. Crossbridge Capital's Compliance Officer and Chief Operating Officer have primary responsibility for ensuring that personnel are complying with these requirements as well as the oversight and responsibility to ascertain whether Crossbridge Capital is complying with all applicable policies and procedures. If you have any questions regarding Crossbridge Capital's policies and procedures, please contact Mr. Joel Pang, Compliance Officer and Chief Operating Officer, at +65 6723 8171.

## **Form ADV Part 2B: Brochure Supplement**

Crossbridge Capital Asia Pte Ltd  
One Wallich Street  
#24-05 Guoco Tower  
Singapore 078881  
<https://www.crossbridgecapital.com/>

This brochure supplement provides information about our supervised persons that supplements the Crossbridge Capital Asia Pte Ltd brochure. You should have received a copy of that brochure. Please contact our firm if you did not receive Crossbridge Capital Asia Pte Ltd's brochure or if you have any questions about the contents of this supplement.

Additional information about the supervised persons mentioned in this brochure supplement is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

[\*\*July 23, 2019\*\*]

**SUPERVISED PERSONS:** Charles O'Flaherty

Crossbridge Capital Asia Pte Ltd  
Form ADV Part 2B – Charles O'Flaherty

---

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

---

**Name:** Charles O’Flaherty

**Year of Birth:** 1970

**Education:** Bachelor of Business Administration, Finance  
University of Miami, 1992

**Experience:** Non-Equity Partner & Head of Digital Strategy & Distribution  
Crossbridge Capital Asia Pte Ltd; Singapore  
2015 – Present

Principal & Founder  
Dai Lou Holdings; Fort Lauderdale, FL  
2010 - 2015

Consultant  
Bank of Ireland; Fort Lauderdale, FL  
2010 - 2013

Executive Vice President  
Bank of Ireland; Fort Lauderdale, FL  
2010 - 2013

Managing Director & Co-Head, Private Investor Products, North America  
ABN AMRO Inc.; New York, NY  
2006 – 2008

Managing Director, Structured Products Group  
Incapital LLC; Fort Lauderdale, FL  
2004 – 2006

Director of Fixed Income Sales  
Countrywide Securities Corp.; Fort Lauderdale, FL  
2001 – 2004

President & CEO  
AsiAlliance Limited; Hong Kong, China  
1999 – 2001

Country/Region Manager – VP  
HSBC Securities (HK) Incorporated; Hong Kong, China & London, UK

Crossbridge Capital Asia Pte Ltd  
Form ADV Part 2B – Charles O’Flaherty

1996 – 1999

Co-Founder

Index Air Cargo Incorporated; Nairobi, Kenya

1997 – 2004

U.S. Government Agency Trader

Prudential Securities Incorporated; New York, NY

1992 - 1996

---

## **DISCIPLINARY INFORMATION**

---

Mr. Chares O’Flaherty has not been involved in any legal or disciplinary events that would be material to a client’s or prospective client’s evaluation of the integrity of our management.

---

## **OTHER BUSINESS ACTIVITIES**

---

No other business activities.

---

## **ADDITIONAL COMPENSATION**

---

Mr. O’Flaherty’s compensation is derived from business income related to client engagements. Mr. O’Flaherty does not receive any additional compensation or other economic benefit from any other source for providing investment advisory services.

---

## **SUPERVISION**

---

Crossbridge Capital has adopted and implemented written supervisory policies and corresponding procedures which are reasonably designed to prevent violations of applicable federal securities laws. All personnel associated with Crossbridge Capital, including those supervised persons who formulate investment advice for clients and who have direct client contact are required to comply with applicable securities laws and Crossbridge Capital’s policies and procedures. Crossbridge Capital’s Compliance Officer and Chief Operating Officer have primary responsibility for ensuring that personnel are complying with these requirements as well as the oversight and responsibility to ascertain whether Crossbridge Capital is complying with all applicable policies and procedures. If you have any questions regarding Crossbridge Capital’s policies and procedures, please contact Mr. Joel Pang, Compliance Officer and Chief Operating Officer, at +65 6723 8171.

Crossbridge Capital Asia Pte Ltd  
Form ADV Part 2B – Charles O’Flaherty

## **Form ADV Part 2B: Brochure Supplement**

Crossbridge Capital Asia Pte Ltd  
One Wallich Street  
#24-05 Guoco Tower  
Singapore 078881  
<https://www.crossbridgecapital.com/>

This brochure supplement provides information about our supervised persons that supplements the Crossbridge Capital Asia Pte Ltd brochure. You should have received a copy of that brochure. Please contact our firm if you did not receive Crossbridge Capital Asia Pte Ltd's brochure or if you have any questions about the contents of this supplement.

Additional information about the supervised persons mentioned in this brochure supplement is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

[\*\*July 23, 2019\*\*]

**SUPERVISED PERSONS:** Joel Zhen-Hong Pang

Crossbridge Capital Asia Pte Ltd  
Form ADV Part 2B – Joel Zhen-Hong Pang

---

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

---

**Name:** Joel Pang Zhen Hong

**Year of Birth:** 1988

**Education:** MBA, Business Management  
Imperial College London, 2020

M.A., Economics  
Nanyang Technological University, 2014

**Experience:** Chief Operating Officer, Head of Compliance  
Crossbridge Capital Asia Pte Ltd; Singapore  
May 2017 – Present

Vice-President, Head of Compliance  
One Asia Investment Partners Pte Ltd; Singapore  
Nov. 2015 – April 2017

Vice-President, Compliance Officer  
UT REIT Pte Ltd; Singapore  
Aug. 2014 – April 2015

---

## DISCIPLINARY INFORMATION

---

Mr. Joel Pang has not been involved in any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the integrity of our management.

---

## OTHER BUSINESS ACTIVITIES

---

No other business activities.

---

## ADDITIONAL COMPENSATION

---

Mr. Pang's compensation is derived from business income related to client engagements. Mr. Pang does not receive any additional compensation or other economic benefit from any other source for providing investment advisory services.

---

## SUPERVISION

---

Crossbridge Capital Asia Pte Ltd  
Form ADV Part 2B – Joel Zhen-Hong Pang

Crossbridge Capital has adopted and implemented written supervisory policies and corresponding procedures which are reasonably designed to prevent violations of applicable federal securities laws. All personnel associated with Crossbridge Capital, including those supervised persons who formulate investment advice for clients and who have direct client contact are required to comply with applicable securities laws and Crossbridge Capital's policies and procedures. Crossbridge Capital's Compliance Officer and Chief Operating Officer have primary responsibility for ensuring that personnel are complying with these requirements as well as the oversight and responsibility to ascertain whether Crossbridge Capital is complying with all applicable policies and procedures. If you have any questions regarding Crossbridge Capital's policies and procedures, please contact Mr. Joel Pang, Compliance Officer and Chief Operating Officer, at +65 6723 8171.