

Part 2A & 2B of Form ADV: Firm Brochure

LATTICE CAPITAL MANAGEMENT, LLC

**1014 Market Street, Suite 100 - Kirkland, WA
98033**

CRD Number 141860

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This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Lattice Capital Management, LLC (“**Lattice**” or the “**Advisor**”). If you have any questions about the contents of this Brochure, please contact us at +1 425 828 4300 or by email at info@latticecm.com. You may also visit our website at www.latticecm.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.

Lattice is a registered investment advisor. Registration of an investment advisor does not imply that Lattice or any of its principals or employees possess a particular level of skill or training in the investment advisory business or any other business. The oral and written communications of an investment advisor provide you with information about which you determine to hire or retain an investment advisor.

Additional information about Lattice Capital Management, LLC is also available on the SEC’s website at www.adviserinfo.sec.gov by searching our firm name or by our CRD# 141860.

Item 2 - Material changes

Material Changes

Item 4 has been updated to reflect the name and strategy change of one of the Advisor's private funds.

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Item 4 - Advisory Business

A. Firm Information

Lattice Capital Management, LLC (“**Lattice**”, the “**Advisor**”) is a registered investment advisor located in the State of Washington, which is organized as a limited liability company under the laws of Washington in 2006. Lattice is owned by its Managing Member Ali R.M. Dadgar and operated by Fariba Ronnasi, its Chief Investment Officer and Chief Compliance Officer. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Lattice.

B. Advisory Services Offered

Lattice provides investment advisory services on a discretionary basis through commingled investment vehicles (“Private Funds”) intended for institutional and other sophisticated investors (each such Private Fund referred to as a “Client”). Lattice serves as the General Partner to the Private Funds as described below. Investment advisory services are offered for a percentage of assets under management as well as other compensation structures, as described in more detail in Item 5.

Currently, Lattice provides discretionary investment advisory services to the following investment vehicles (Collectively, the “**Funds**”):

- Dynamic Opportunity Fund, LP (“DOF”)
 - As of April 1, 2019, the Dynamic Overseas Fund changed its name to the Dynamic Opportunity Fund, and revised its underlying strategy. The Partnership invests in and trades Securities, consisting principally, but not solely, of long and short equity and equity-related Securities that are traded publicly, and in ADRs and GDRs that represent such Securities. The Partnership also may invest in Securities of global issuers that do business in emerging markets, including common and preferred stocks, convertible Securities, warrants, rights, options (including covered and uncovered puts and calls and over-the-counter options) and other derivative instruments, bonds and other fixed income Securities, private Securities, and money market instruments. The Partnership expects to invest both long and short, and may also engage in hedging, leverage and other investment strategies. The General Partner has broad discretion to employ any Securities trading or investment techniques, whether or not contemplated by the expected investment strategies and criteria described above. Please refer to the Dynamic Opportunity Fund’s offering documents for additional disclosures.
- Dynamic Alpha Fund, LP (“DAF”)
 - Dynamic Alpha Fund, L.P. *formerly known as Dynamic Market Neutral Fund, LP (“DMNF”)* invests primarily in options (including covered and uncovered puts and calls and over-the-counter options), as well as other U.S. and non-U.S. Securities, including common and preferred stocks, convertible Securities, warrants, rights, futures and other commodity interests, other derivative instruments, notes, bonds and other fixed income Securities, private Securities, derivatives and money market instruments. The Partnership may engage in short selling, hedging, margin trading and other investment strategies. Although the Partnership currently implements its strategy primarily by investing in options, at any time, it may implement its strategy primarily by investing directly in other Securities, such as equity and fixed income Securities. The Partnership also may invest in Portfolio Accounts managed by other Managers. The Partnership seeks to produce consistent risk-adjusted returns by using cash in the portfolio to sell index and equity options to collect options premium as a continuous income stream for the portfolio. The investment objective is to obtain equity equivalent returns with low or no correlation to both the equity and bond markets and low expected volatility. The General Partner has broad discretion to employ any Securities trading or investment techniques, whether or not contemplated by the expected investment strategies and criteria described above. Please refer to the Dynamic Alpha Fund’s offering documents for additional disclosures.

Lattice is also the General Partner for the Funds and will likely fill the same or similar roles in future fund offerings. (Lattice and the General Partner will be referred to herein collectively as “**Lattice**”). The

Funds are private investment funds that are offered to high net-worth, financially sophisticated individual and institutional investors.

C. Types of Investments

The Funds were formed to invest and trade in investments including, but not limited to, equity securities (including exchange-listed securities, securities traded over the counter and securities of foreign issuers), warrants, corporate debt, commercial paper, certificates of deposit, municipal securities, United States government securities, option contracts on securities, futures contracts on tangibles and intangibles and interests in partnerships investing in real estate. However, in general, the Funds have no limits regarding the use of any investment strategy, types of investments, positions taken, leverage, or concentration of investments to achieve its investment goals and objectives.

D. Assets Under Management

As of February 28, 2019 Lattice manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$215,194,777
Non-Discretionary Assets	\$0
Total	\$215,194,777

Clients may request more current information at any time by contacting the Advisor.

Item 5 - Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor:

A. Fees for Advisory Services

The typical management fee is described below, and it is in addition to performance-based fees, the special profit allocation fee, and the performance fee paid to the Portfolio Manager. The special profit allocation fee is subject to a "high water mark" as described in Item 6, and it will only be charged to accounts of those investors who are "qualified clients," as defined in Rule 205-3 of the Investment Advisers Act of 1940, as amended. The performance-based fees are described in more detail in Item 6 below.

Lattice's typical management fee for the pooled investment vehicles is as follows:

Dynamic Opportunity Fund, LP

- 1.00% per year
- payable quarterly in advance
- based on the net asset value of the Capital Account of each Limited Partner on the first day of the Fiscal Quarter
- 10% Special Profit Allocation Fee

It is important to note that the underlying fund(s) investments charge expenses, management fees and performance fee that are separate and distinct from any fees charged by the Dynamic Opportunity Fund. Any fees or expenses charged by the underlying fund(s) are paid to the underlying fund manager directly and the Dynamic Opportunity Fund does not receive any portion of those fees.

Dynamic Alpha Fund, LP

- 1% per year management fee

- payable quarterly in advance
- based on the net asset value of the Capital Account of each Limited Partner on the first day of the Fiscal Quarter
- 10% Special Profit Allocation Fee
- 7% Performance Fee paid to the Portfolio Manager

The management fees, performance-based fees, and special profit allocation fee are generally subject to waiver or reduction by the General Partner with respect to some or all of a Fund's investors in the general partner's sole discretion, as further described in the applicable Fund Governing Documents.

B. Fee Billing

Investment advisory fees are calculated by the Funds' third party Administrator and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of each calendar quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Lattice at the end of each quarter. Please see Item 12 – Brokerage Practices for more information regarding custody and brokerage practices.

The Special Profit Allocation and the 7% Performance Fee paid to the Portfolio Manager will be calculated at the end of each year and deducted from Client accounts directly by the Custodian. In aggregate, there will be a Special Profit Allocation fee of 10% and Performance Fee will be equal to 7% of any gains in the Client account during the preceding year. The Advisor will receive the Performance Fees only to the extent that there are cumulative gains since the last Performance Fees calculation in the Client's account at the end of each year.

Performance Fees calculated in the first quarter of service is prorated to the inception date of the account to the end of the first quarter.

Please see Item 6 - Performance-Based Fees and Side-By-Side Management for more information regarding Performance Fees.

C. Other Fees and Expenses

The Partnerships bear all costs of organization and operation, including costs of its investment program (such as brokerage, banking and custody charges, interest, taxes, telecommunications and postage), professional fees of its auditors and attorneys and attorneys for the General Partner. The Partnership also pays the fees and reasonable expenses charged by the Administrator for its accounting, bookkeeping, compliance services, research and administrative services. The amount and nature of these expenses is based on the service provider's fee schedule(s) at the provider's sole discretion. These expenses are separate and distinct from any fees charged by the Advisor.

The Advisor may include ETFs and other managed products or partnerships in Clients' portfolios. Clients may be charged for the services by the providers/managers of these products in addition to the management fee paid to the Advisor. These fees will generally include a management fee and other administrative fees. The fees and expenses charged by the product providers are separate and distinct from the management fee charged by the Advisor. Accordingly, the Client should review both the fees charged by the funds and the applicable program fee charged by the Advisor to fully understand the total amount of fees to be paid by the Client and to thereby evaluate the advisory services being provided.

If it is determined that a Client portfolio shall contain corporate debt or other types of over the counter securities, the Client may pay a mark-up or mark-down or a "spread" to the broker or dealer on the other side of the transaction that is built into the purchase price of the security.

D. Advance Payment of Fees and Termination

Withdrawal of Capital - DOF

A Limited Partner may withdraw all or part of the Capital Account balance of that Limited Partner, on at least 45 days' advance notice, as of the last day of any Fiscal Quarter. In all cases the amount of any partial withdrawal must be at least \$50,000 and must not reduce that Limited Partner's Capital Account balance below the lesser of \$1,000,000 and the amount of that Limited Partner's initial subscription to the Partnership. The General Partner may waive these withdrawal restrictions for any Limited Partner. Any amount withdrawn by a Limited Partner is reduced by the Special Profit Allocation allocable to the General Partner on the withdrawal date with respect to the amount withdrawn.

The Underlying Fund Allocation Date shall be each date the Partnership makes a subscription to the Funds (each subscription, an "Underlying Fund Allocation"), and which Underlying Fund Allocation is comprised of any portion of the Limited Partner's Capital Account (such portion, "Allocated Capital Contribution"). In all cases the amount of any partial withdrawal must be at least \$50,000 and must not reduce that Limited Partner's Capital Account balance below the lesser of \$1,000,000 and the amount of that Limited Partner's initial subscription to the Partnership. The General Partner may waive these withdrawal restrictions for any Limited Partner.

If a Limited Partner makes a withdrawal, subject to the limitation on payments related to Illiquid Securities described below, the Partnership pays the withdrawing Limited Partner, within 10 days after the effective date of the withdrawal, an amount equal to the lesser of the amount to be withdrawn and 95% of the General Partner's estimate of the balance of that Limited Partner's Capital Account as of the effective date of withdrawal. As soon as the General Partner determines that it is reasonably practicable after the Partnership receives the Partnership's financial statements for the Fiscal Year in which the withdrawal occurs, the Partnership pays the balance, if any, of the amount withdrawn (such balance does not bear interest and is not considered to be invested in the Partnership).

Withdrawal of Capital - DAF

A Limited Partner may withdraw all or part of the Capital Account balance of that Limited Partner, on at least 45 days' advance notice, as of the last day of any Fiscal Quarter. In all cases the amount of any partial withdrawal must be at least \$50,000 and must not reduce that Limited Partner's Capital Account balance below the lesser of \$1,000,000 and the amount of that Limited Partner's initial subscription to the Partnership. The General Partner may waive these withdrawal restrictions for any Limited Partner.

Any amount withdrawn by a Limited Partner is reduced by the Special Profit Allocation allocable to the General Partner on the withdrawal date with respect to the amount withdrawn.

If a Limited Partner makes a withdrawal, subject to the limitation on payments related to Illiquid Securities described below, the Partnership pays the withdrawing Limited Partner, within 10 days after the effective date of the withdrawal, an amount equal to the lesser of the amount to be withdrawn and 95% of the General Partner's estimate of the balance of that Limited Partner's Capital Account as of the effective date of withdrawal. As soon as the General Partner determines that it is reasonably practicable after the Partnership receives the Partnership's financial statements for the Fiscal Year in which the withdrawal occurs, the Partnership pays the balance, if any, of the amount withdrawn (such balance does not bear interest and is not considered to be invested in the Partnership).

The General Partner may permit exceptions to the foregoing withdrawal restrictions and procedures.

E. Compensation for Sales of Securities

Lattice does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Item 6 - Performance Fees

As General Partner, Lattice is entitled to a Special Profit Allocation Fee for the funds listed below. Dynamic Alpha Fund also pay a 7% Performance Fee to the Funds' Portfolio Manager. Dynamic Opportunity Fund does not pay Performance Fee to the Fund's Portfolio Manager. The Performance Fees are calculated based on the net gains as described below.

Dynamic Opportunity Fund, LP

- The General Partner receives a Special Profit Allocation with respect to each Limited Partner of 10%
 - of the amount by which the Profits (including realized and unrealized gains and losses) of the Partnership otherwise allocable to that Limited Partner in the applicable measurement period exceed that Limited Partner's Unrecouped Losses. "Unrecouped Losses" of a Limited Partner are all Losses allocated to that Limited Partner in a Fiscal Year reduced (but not below zero) by all Profits subsequently allocated to that Limited Partner in that Fiscal Year or in any subsequent Fiscal Year. This is what is sometimes referred to as a "high water mark."
 - The Special Profit Allocation is made with respect to each Limited Partner at the end of each Fiscal Year (and on withdrawal of funds by or distribution of funds to a Limited Partner during a Fiscal Year).
 - The General Partner may waive or reduce the Special Profit Allocation for any Limited Partner.
 - The General Partner does not intend to distribute to the Limited Partners any of the Partnership's cash (other than on withdrawal or expulsion as provided in the Agreement), but intends to reinvest substantially all income and gain allocable to the Limited Partners

On dissolution of the Partnership, after provision for all other debts and liabilities of the Partnership (including those to Partners and reserves), the remaining assets will be distributed to the Partners in cash or in kind or a combination thereof. Such distributions will be made in proportion to and to the extent of their Capital Account balances.

It is important to note that the underlying fund(s) investments charge expenses, management fees and performance fee that are separate and distinct from any fees charged by the Dynamic Opportunity Fund. Any fees or expenses charged by the underlying fund(s) are paid to the underlying fund manager(s) directly and the Dynamic Opportunity Fund does not receive any portion of those fees.

Dynamic Alpha Fund, LP

- 10% per year as a Special Profit Allocation
- 7% per year as a performance fee paid to the Portfolio Manager
- The above percentages are based on the amount by which the Profits (including realized and unrealized gains and losses) of the Partnership otherwise allocable to that Limited Partner in the applicable measurement period exceed that Limited Partner's Unrecouped Losses.
 - "Unrecouped Losses" of a Limited Partner are all Losses allocated to that Limited Partner in a Fiscal Year reduced (but not below zero) by all Profits subsequently allocated to that Limited Partner in that Fiscal Year or in any subsequent Fiscal Year. ("**high water mark**").
 - Allocations are made at the end of each Fiscal Year (and on withdrawal of funds by or distribution of funds to a Limited Partner during a Fiscal Year).
- Lattice, as General Partner, receives the 10% Special Profit Allocation and the Portfolio Manager receives the 7% performance fee.

Lattice may receive a performance fee based upon any gains obtained in the accounts of "qualified clients" pursuant to the terms an investment advisory agreement. Only qualified clients with either \$1,000,000 under management with the Advisor or a net worth of \$2,100,000 will be charged a performance fee. Lattice may waive or reduce the Performance Fee for any Limited Partner in any of the above Funds.

Who is a “Qualified Client”?

The Investment Advisers Act of 1940 (the “Advisers Act”), Rule 205-3(d)(1) defines a “Qualified Client” who is financially sophisticated and meets one or more of the following conditions:

- Client is a natural person who, or a company that, immediately after entering into the contract has at least \$1,000,000 under the management of the Advisor;
- Client is a natural person who, or a company that, immediately prior to entering into the contract has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than \$2,100,000 at the time the contract is entered into.

Item 7 - Types of Clients

Lattice provides investment advisory services to pooled investment vehicles operated as exempt investment pools under the Investment Company Act of 1940, as amended.

As noted above, each investor in the Funds generally must be an “accredited investor” (as defined in Regulation D under the federal Securities Act of 1933) and a “qualified client” (as provided in Rule 205-3(a) under the Investment Adviser’s Act of 1940, as amended). Generally, an individual is an accredited investor if he or she (i) has a net worth in excess of \$1,000,000 excluding the value of the individual’s primary residence and any indebtedness secured by such residence up to its fair market value (indebtedness secured by such residence in excess of the fair market value of such residence, and any increase in the amount of such indebtedness within 60 days before the Interest is purchased, other than an increase as a result of the acquisition of the residence, shall be included as a liability) or (ii) had an individual income in excess of \$200,000 (or joint income with his or her spouse in excess of \$300,000) in each of the preceding two years and has a reasonable expectation of reaching the same level of income in the current year. Generally, qualified clients are persons that have either at least \$1,000,000 under management of the Advisor or have a net worth at the time of investing in excess of \$2,100,000. Each investor must also make representations concerning its sophistication as an investor and its ability to bear the risk of loss of its entire investment.

The minimum initial investment is \$1,000,000, although Lattice may waive this minimum in its discretion.

Item 8 - Methods of Analysis, Sources of Information, Investment Strategies Risk of Loss

A description of the Lattice Funds investment strategies are disclosed in Item 4 of this brochure with more detailed disclosures located in the Funds’ private placement memorandums, as appropriate. Depending upon the type of investment strategy being employed, Lattice may employ.

- Long/Short equity: Invests long to potentially capitalize on equity price appreciation and invests short to hedge and/or produce returns from prices decreasing. Managers generally rely on bottom up analysis and stock picking abilities.
- Emerging Markets Multi-Strategy: Invests in securities traded in developing economies with higher risk/reward profile and invests in both long and short positions in multiple assets classes.
- Global Macro: Flexible, top down investment approach which seeks opportunities regardless of borders or asset class.
- Event Driven: Invests in equity and corporate debt, with focus on event driven arbitrage, turnaround, and special situations.
- Option: writing, including covered options, uncovered options or spreading strategies
- Managed Futures: Take both long and short positions in futures contracts in multiple markets and asset classes using multiple trading disciplines.

Lattice uses the following types of investment analysis:

Fundamental analysis: A method of evaluating a security that entails attempting to measure its intrinsic value

by examining related economic, financial and other qualitative and quantitative factors, and

Technical analysis: A method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity

The main sources of information used by Lattice include:

- Bloomberg
- Financial newspapers and magazines
- Research materials prepared by others
- Corporate rating services
- Annual reports, prospectuses, filings with the SEC
- Company press releases

Risk Factors

Note: All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk. Although Lattice advises assets in a manner consistent with risk tolerances, there can be no guarantee that our efforts will be successful. The investor should be prepared to bear the risk of loss.

Market Risks

Competition. The securities industry and the varied strategies and techniques to be engaged in by the Advisor are extremely competitive and each involves a degree of risk. The Advisor will compete with firms, including many of the larger securities and investment banking firms, which have substantially greater financial resources and research staffs.

Market Volatility. The profitability of the Advisor substantially depends upon it correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. The Advisor cannot guarantee that it will be successful in accurately predicting price and interest rate movements.

Advisor's Investment Activities. The Advisor's investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors which are neither within the control of nor predictable by the Advisor. Such factors include a wide range of economic, political, competitive, technological and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The securities markets may be volatile, which may adversely affect the ability of the Advisor to realize profits.

Material Non-Public Information. By reason of their responsibilities in connection with other activities of the Advisor and/or its affiliates, certain principals or employees of the Advisor and/or its affiliates may acquire confidential or material non-public information or be restricted from initiating transactions in certain securities. The Advisor will not be free to act upon any such information. Due to these restrictions, the Advisor may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.

Accuracy of Public Information. The Advisor selects investments, in part, on the basis of information and data filed by issuers with various government regulators or made directly available to the Advisor by the issuers or through sources other than the issuers. Although the Advisor evaluates all such information and data and sometimes seeks independent corroboration when it's considered appropriate and reasonably available, the Advisor is not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information is not available.

Investments in Undervalued Securities. The Advisor intends to invest in undervalued securities. The identification of investment opportunities in undervalued securities is a difficult task, and there are no assurances that such opportunities will be successfully recognized or acquired. While investments in undervalued securities offer the opportunities for above-average capital appreciation, these investments involve a high degree of financial risk and can result in substantial losses. Returns generated from the Advisor's investments may not adequately compensate for the business and financial risks assumed.

Investment Risks

The Lattice Funds invest substantially all of their available capital (other than capital the General Partner retains in cash or cash equivalents) principally in securities, engages in short sales of securities and trades in options (including covered and uncovered puts and calls and over-the-counter options) and other derivative instruments, private securities and money market instruments. Markets for such instruments fluctuate and the market value of any particular investment may vary substantially. In addition, such securities may be issued by unseasoned companies and may be highly speculative. The Fund's portfolio may not generate any income or appreciate in value.

Portfolio Turnover. The investment strategy of the Lattice Funds may require active trading of the Lattice Funds' portfolio, and as a result, turnover and brokerage commission expenses may significantly exceed those of other investment entities of comparable size.

Small Cap Companies. The Lattice Funds may invest a portion of its assets in the stocks of companies with small market capitalizations. While Lattice believes these investments often provide significant potential for appreciation, those stocks involve higher risks in some respects than do investments in stocks of larger companies. For example, prices of such stocks are often more volatile than prices of large-capitalization stocks. In addition, due to thin trading in some such stocks, an investment in these stocks may be more illiquid than that of larger capitalization stocks.

Lack of Diversification. The Lattice Funds' portfolios may not be widely diversified among sectors, industries, geographic areas or types of securities. Further, the Lattice Funds' portfolios may not necessarily be diversified among a wide range of issuers. Accordingly, the portfolios may be subject to more rapid change in value than would be the case if the Investment Vehicles were required to maintain a wide diversification among companies or industry groups.

Short-Sales. Lattice may sell securities short. Short sales can, in certain circumstances, substantially increase the impact of adverse price movements on the Lattice Funds' portfolios. A short sale involves the risk of a theoretically unlimited increase in the market price of the particular investment sold short, which could result in an inability to cover the short position and a theoretically unlimited loss. There can be no assurance that securities necessary to cover a short position will be available for purchase.

Options and Other Derivative Instruments. Lattice may invest, from time to time, in options and other derivative instruments, including, but not limited to, the buying and selling of puts and calls on some of the securities held by Lattice. The prices of many derivative instruments, including many options and swaps, are highly volatile. The values of options and swap agreements depend primarily upon the price of the securities, indexes, commodities, currencies or other instruments underlying them. Price movements of options contracts and payments pursuant to swap agreements are also influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Options on highly volatile securities, currencies or other assets may be more expensive than options on other investments.

Hedging Transactions. Investments in financial instruments such as forward contracts, options, commodities and interest rate swaps, caps and floors, other derivatives, and other investment techniques are commonly utilized by investment funds to hedge against fluctuations in the relative values of its portfolio positions as

a result of changes in currency exchange rates, interest rates and/or the equity markets or sectors thereof. Any hedging against a decline in the value of portfolio positions does not eliminate fluctuations in the values of portfolio positions or prevent losses if the values of such positions decline, but establishes other positions designed to gain from those same developments, thus moderating the decline in the portfolio positions' value. Such hedging transactions also limit the opportunity for gain if the value of the portfolio positions should increase. The Advisor is not obligated to establish hedges for portfolio positions and may not do so.

Leverage. The Lattice Funds may use leverage by engaging in short sales, entering into swaps, reverse repurchase agreements, lending portfolio securities, entering into futures contracts or forward currency contracts, investing in inverse floaters, entering into short sales, the use of portfolio leverage or margin engaging in forward commitment transactions, which may magnify the strategy's gains, losses and volatility. In addition, the use of leverage requires the pledging of assets as collateral. Margin calls or changes in margin requirements can cause the Lattice Funds to be required to pledge additional collateral or liquidate the Lattice Funds' holdings, which could require the Lattice Funds to securities at substantial losses that would not otherwise be realized. Because many derivatives have a leverage component, adverse changes in the value or level of the underlying asset, reference rate or index can result in a loss substantially greater than the amount invested in the derivative itself. Certain derivatives have the potential for unlimited loss, regardless of the size of the initial investment.

Market or Interest Rate Risk. The price of most fixed income securities move in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed income securities falls. If the Advisor holds a fixed income security to maturity, the change in its price before maturity may have little impact on the Advisor's performance; however, if the Advisor has to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to the Advisor.

Fixed Income Call Option Risk. Many bonds, including agency, corporate and municipal bonds, and all mortgage-backed securities, contain a provision that allows the issuer to "call" all or part of the issue before the bond's maturity date. The issuer usually retains this right to refinance the bond in the future if market interest rates decline below the coupon rate. There are three disadvantages to the call provision. First, the cash flow pattern of a callable bond is not known with certainty. Second, because the issuer will call the bonds when interest rates have dropped, the Advisor is exposed to reinvestment rate risk – the Advisor will have to reinvest the proceeds received when the bond is called at lower interest rates. Finally, the capital appreciation potential of a bond will be reduced because the price of a callable bond may not rise much above the price at which the issuer may call the bond.

Inflation Risk. Inflation risk results from the variation in the value of cash flows from a security due to inflation, as measured in terms of purchasing power. For example, if the Advisor purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation-linked bonds, adjustable bonds or floating rate bonds, the Advisor is exposed to inflation risk because the interest rate the issuer promises to make is fixed for the life of the security.

Investments in Non-U.S. Investments. From time to time, the Advisor may invest and trade a portion of its assets in non-U.S. securities and other assets (through ADRs and otherwise), which will give rise to risks relating to political, social and economic developments abroad, as well as risks resulting from the differences between the regulations to which U.S. and foreign issuers and markets are subject. Such risks may include:

- Political or social instability, the seizure by foreign governments of company assets, acts of war or terrorism, withholding taxes on dividends and interest, high or confiscatory tax levels, and limitations on the use or transfer of portfolio assets.
- Enforcing legal rights in some foreign countries is difficult, costly and slow, and there are sometimes special problems enforcing claims against foreign governments.
- Foreign securities and other assets often trade in currencies other than the U.S. dollar, and the Advisor may directly hold foreign currencies and purchase and sell foreign

currencies through forward exchange contracts. Changes in currency exchange rates will affect the Advisor's net asset value, the value of dividends and interest earned, and gains and losses realized on the sale of investments. An increase in the strength of the U.S. dollar relative to these other currencies may cause the value of the Advisor's investments to decline. Some foreign currencies are particularly volatile. Foreign governments may intervene in the currency markets, causing a decline in value or liquidity of the Advisor's foreign currency holdings. If the Advisor enters into forward foreign currency exchange contracts for hedging purposes, it may lose the benefits of advantageous changes in exchange rates. On the other hand, if the Advisor enters forward contracts for the purpose of increasing return, it may sustain losses.

- Non-U.S. securities, commodities and other markets may be less liquid, more volatile and less closely supervised by the government than in the United States. Foreign countries often lack uniform accounting, auditing and financial reporting standards, and there may be less public information about the operations of issuers in such markets.

Lack of Liquidity. The Lattice Funds may invest in thinly traded and relatively illiquid securities or those securities may not be traded at the time the Lattice Funds invest or may cease to be traded after the Lattice Funds invest. The Lattice Funds also may acquire significant positions in some securities. In such cases and in the event of extreme market activity, the Lattice Funds may not be able to liquidate its investments promptly if necessary. In addition, the Lattice Funds' sales of thinly traded securities could depress the market value of those securities and thereby reduce the Lattice Funds' profitability or increase its losses. Such circumstances or events could affect the Lattice Funds' gain or loss materially and adversely. In addition, the China Fund may invest in PIPE (private investments in public equity) financings, which may involve purchase of unregistered equity securities which are not publicly tradable when purchased and may never become publicly tradable.

Limited Operating History. Although Lattice has significant investment management experience, the Lattice Funds are recently-formed entities and have limited operating history upon which investors can evaluate their likely performance. Accordingly, an investment in the Lattice Funds entails a significant degree of risk.

Risk of Default or Bankruptcy of Third Parties. The Advisor may engage in transactions in securities, commodities, other financial instruments and other assets that involve counterparties. Under certain conditions, the Advisor could suffer losses if a counterparty to a transaction were to default or if the market for certain securities, commodities, other financial instruments and/or other assets were to become illiquid.

Regulatory Risks

Strategy Restrictions. Certain institutions may be restricted from directly utilizing investment strategies of the type in which the Advisor may engage. Such institutions, including entities subject to ERISA, should consult their own advisors, counsel and accountants to determine what restrictions may apply and whether an investment in the Advisor is appropriate.

Trading Limitations. For all securities, instruments and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the Advisor to loss. Also, such a suspension could render it impossible for the Advisor to liquidate positions and thereby expose the Advisor to potential losses.

Conflicts of Interest. In the administration of Client accounts, portfolios and financial reporting, the Advisor faces inherent conflicts of interest, which are described in this brochure. Generally, the Advisor mitigates these conflicts through its Code of Ethics, which provides that the Client's interest is always held above that of the Advisor and its associated persons.

Supervision of Trading Operations. The Advisor, with assistance from its brokerage and clearing firms, intends to supervise and monitor trading activity in the portfolio accounts to ensure compliance with firm and Client objectives. Despite the Advisor's efforts, however, there is a risk that unauthorized or otherwise inappropriate trading activity may occur in portfolio accounts.

Depending on the nature of the investment management service selected by a Client and the securities used to implement the investment strategy, Clients will be exposed to risks that are specific to the securities in their particular investment portfolio.

Reliance on Management and Key Personnel. Investors have no right or power to take part in the management of Lattice. Accordingly, no investor should invest in the Lattice Funds unless such investor is willing to entrust all aspects of management to Lattice. The investment performance of the Lattice Funds depends largely on the skill of key personnel of Lattice, including, in particular, its sub advisors. If key personnel were to leave Lattice, it might not be able to find equally desirable replacements and the performance of the Lattice Funds could, as a result, be adversely affected.

Security Specific Risks

Note: Investment strategies that we offer invest in a variety of securities and employ a number of investment techniques that involve certain risks. Long and short positions in futures, forward contracts, options on futures, exchange-traded options, over the counter options, and swaps may be used to hedge, to obtain exposure, to facilitate trading, to provide liquidity for cash flows, to manage interest rate risk, or for other purposes that facilitate meeting the objectives of the strategy. Investing in securities and certain derivatives involves risk of loss that you should be prepared to endure.

Liquidity. Liquidity is the ability to readily convert an investment into cash. Securities where there is a ready market that is traded through an exchange are generally more liquid. Securities traded over the counter or that do not have a ready market or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation. The Lattice Funds may invest in thinly traded and relatively illiquid securities or those securities may not be traded at the time the Lattice Funds invest or may cease to be traded after the Lattice Funds invest. The Lattice Funds also may acquire significant positions in some securities. In such cases and in the event of extreme market activity, the Lattice Funds may not be able to liquidate its investments promptly if necessary. In addition, the Lattice Funds' sales of thinly traded securities could depress the market value of those securities and thereby reduce the Lattice Funds' profitability or increase its losses. Such circumstances or events could affect the Lattice Funds' gain or loss materially and adversely. Liquidity risk also exists when a particular derivative instrument is difficult to purchase or sell. If a derivative transaction is particularly large or if the relevant market is illiquid (as is the case with many privately negotiated derivatives), it may not be possible to initiate a transaction or liquidate a position at an advantageous time or price. The secondary market for certain municipal bonds tends to be less well developed or liquid than many other securities markets, which may adversely affect the strategy's ability to sell such municipal bonds at attractive prices. Trading limits (such as "daily price fluctuation limits" or "speculative position limits") on futures trading imposed by regulators and exchanges could prevent the prompt liquidation of unfavorable futures positions and result in substantial losses. In addition, the ability to execute futures contract trades at favorable prices if trading volume in such contracts is low may be limited. It is also possible that an exchange or a regulator may suspend trading in a particular contract, order immediate liquidation and settlement of a particular contract or order that trading in a particular contract be conducted for liquidation only. Therefore, in some cases, the execution of trades to invest or divest cash flows may be postponed which could adversely affect the withdrawal of assets and/or performance.

Currency. Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Lack of Registration. Lattice Funds or LP interests have neither been registered under the Securities Act nor under the securities or "blue sky" laws of any state and, therefore, are subject to transfer restrictions.

Withdrawal of Capital. The ability to withdraw funds from the Lattice Funds or LP interests is usually restricted in accordance with the withdrawal provisions contained in an Offering Memorandum. In addition, substantial withdrawals by investors within a short period of time could require a fund to liquidate securities positions and other investments more rapidly than would otherwise be desirable, possibly reducing the value of the fund's assets and/or disrupting the fund's investment strategy.

Item 9 - Disciplinary Information

There are no legal, regulatory or disciplinary events involving Lattice or any of its employees required to be disclosed. Lattice and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD# **141860**.

Item 10 - Other Financial Industry Activities and Affiliations

Lattice is not registered and does not have an application pending as a securities broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor.

Fariba Ronnasi, CIO and CCO of Lattice and is also President and CCO of Elite Wealth Management, Inc. ("Elite") an affiliated SEC-registered investment advisor. Lattice Capital Management and Elite Wealth Management share office space and certain employees, which may at times create conflicts of interest and limit investment activities. Clients of Elite may receive recommendations to allocate a portion of their assets to the investment management services provided by Lattice. This may cause a conflict of interest in recommending Lattice. Clients of Elite are under no obligation to accept a recommendation to engage the services of Lattice.

Ali Dadgar (the spouse of Ms. Ronnasi), Managing Member of the General Partner of Lattice, also serves as President and Chief Executive Officer of Elite Accounting and Financial Service, Inc. ("Elite Accounting"), an accounting firm with emphasis on investment and tax strategies for high net worth individuals, family offices and small to medium sized businesses. Mr. Dadgar is the owner of Elite Accounting. Mr. Dadgar also serves as Partner of Elite Accounting and Financial Services Seattle ("Elite Accounting Seattle"), also an accounting firm with emphasis on tax strategies for high net worth individuals, family offices and small to medium size businesses. Mr. Dadgar is 50% owner of Elite Accounting Seattle. Lattice may engage Elite Accounting and/or Elite Accounting Seattle for various accounting and bookkeeping services. The common ownership may cause a conflict of interest in recommending Elite Accounting and/or Elite Accounting Seattle.

These and other persons associated with the General Partner or an Investment Manager have fiduciary duties both to the Partnership and to the Clients of the other investment firms with which they are associated. Their multiple roles may create conflicts of interest in selecting, negotiating and administering investments for the Partnerships and the other firms' Clients. These persons may give different or conflicting advice to the Partnerships and the Clients of the other firms, depending on each Client's investment considerations. They may be subject to compliance policies and trading restrictions imposed by those other firms that may have the effect of restricting their investment activities and the investment activities of the Partnership. The General Partner or an Investment Manager may not be able to buy or sell certain Securities at certain times, or take other action that might benefit the Partnership, because of confidential information they acquire or other trading limitations or compliance obligations they incur in connection with their other activities and those of their Affiliates. The General Partner and the Investment Managers may have conflicts of interest over the amount of time they devote to the Partnership and the amount of time they and their Affiliates and principals devote to the other firms with which they are associated and their other accounts.

Item 11 - Code of Ethics, Participation/Interest in Client Transactions, Personal Trading

A. Code of Ethics

Lattice recognizes and believes that (i) high ethical standards are essential for its success and to maintain the confidence of its Clients; (ii) its long-term business interests are best served by adherence to the principle that the interests of Clients come first; and (iii) it has a fiduciary duty to its Clients to act solely for their benefit. Lattice has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Lattice (our "Supervised Persons"). Lattice's Supervised Persons must put the Clients' interests before their own personal interests and must act honestly and fairly in all respects in dealings with Clients. Supervised Persons must also comply with all federal and state securities laws.

B. Personal Trading with Material Interest

From time-to-time the interests of the Supervised Persons of Lattice may coincide with those of a Client. Individual investments may be bought, held or sold by a Supervised Persons of Lattice that is also recommended to or held by a fund. If potential insider information is inadvertently provided or learned by a Supervised Persons, it is the policy of Lattice to strictly prohibit its use.

As stated above and outlined in the Personal Trading section below, Lattice has a Code of Ethics designed to prevent violations of securities rules and will provide a copy to Clients upon their request.

C. Personal Trading in Same Securities as Clients

Lattice has adopted a Code of Ethics governing personal trading by its Supervised Persons. Among other requirements, the Code of Ethics requires its Supervised Persons who have access to Client portfolio information or Lattice's non-public securities recommendations to report their personal securities transactions and holdings to Lattice, and Lattice is required to review such reports. Supervised Persons are required to pre-clear their personal trades and the CCO shall conduct a quarterly review of such trades.

Lattice permits the Advisor and its Supervised Persons to buy, sell and hold the same securities that are also recommended to Client(s)/Fund(s). It is acknowledged and understood that Lattice performs or may perform investment management services for various Funds or accounts with varying investment goals and risk profiles. As such, the investment advice may differ between Clients/Fund(s). Lattice has no obligation to recommend for purchase or sale a security that Lattice or its Supervised Persons may purchase sell or hold. When a decision is made to liquidate a security from all applicable accounts, priority would always be given to the Funds' orders before those of a Supervised Person of Lattice. As stated above, Lattice has procedures in place for dealing with insider trading, employee related accounts, "front running" and other issues that may present a potential conflict when such purchase, sales or recommendations are made. In general, these policies and procedures are intended to eliminate, to the extent possible, the adverse effect on Clients of any potential conflicts of interest.

Additionally, all Supervised Persons must complete an Initial Holdings Report and Annual Holdings Report confirming the existence and location of any Covered Accounts, as defined by the Code of Ethics.

D. Personal Trading at Same Time as Client

While Lattice allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Lattice, or any Supervised Person of Lattice, transact in any security to the detriment of any Client.**

Item 12 - Brokerage Practices

A. Brokerage Discretion

Lattice, as General Partner to the Funds, has the authority to determine the use of a particular custodian and/or broker-dealer. Lattice has complete discretion over the selection of the broker to be used and the commission rates to be paid.

B. Order Aggregation

Lattice may purchase and/or sell the same security for many various accounts under its management. When possible, Lattice may also aggregate the same transaction in the same securities for Funds for which Lattice has brokerage discretion. Funds in aggregated transactions each receive the same price per unit, although a particular Fund may pay differing brokerage commissions depending upon the nature of the directed brokerage arrangement, if any.

If more than one price is paid for securities in an aggregated transaction, Funds in the aggregated transaction will receive the average price paid for the block of securities in the same aggregated transaction for the day. If Lattice is unable to fill an aggregated transaction completely, but receives a partial fill of the aggregated transaction, Lattice will allocate the filled portion of the transaction to Funds based on a pro-rata allocation.

C. Best Execution

The criteria for the recommendation or selection of a broker/dealer includes reasonableness of commissions, and other costs of trading, ability to facilitate trades computer trading support, clearance, settlement, reputation, financial strength and stability, efficiency of execution and error resolution, special execution capabilities, block trading and block positioning capabilities, willingness to execute related or unrelated difficult transactions in the future, order of call, computer trading systems, the availability of stocks to borrow for short trades, custody, recordkeeping and similar services, and other matters involved in the receipt of brokerage services generally. These factors will be reviewed, at least annually, to ensure best execution for accounts under the Advisor's management.

D. Soft Dollar Arrangements

Lattice has not entered into any soft dollar arrangements.

Item 13 - Review of Accounts

Liccar & Co. has been retained as the administrator for the Funds (for each a "Fund Administrator"), providing daily accounting and monthly statement services. As agreed upon in the Master Services Agreement between Lattice and Liccar & Co., investor statements will be prepared and delivered by the Fund Administrator on a monthly basis. The monthly investor statements include the partners; Beginning Equity, Capital Additions, Capital Redemptions, Profit/Loss, Ending Equity and Rate of Return.

The Fund and investor accounts are generally reviewed on a daily basis by the Portfolio Manager. Spicer Jeffries & Co. has been retained as an independent auditor for the Funds, providing an annual year-end audit and investor K1s.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Lattice

Lattice is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. Lattice does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party.

B. Client Referrals from Solicitors

From time to time, Lattice may enter into written agreements with certain individuals and entities who will act as solicitors of accounts for Lattice. Each solicitor must enter into a written agreement with Lattice and will receive a portion of the total fee paid to Lattice for managing the account[s]. Any marketing fee or commission in connection with any investor referral activities, including ongoing payments, will be borne solely by Lattice and not by the Fund(s) or the referred investor. Any third parties receiving compensation for Client referrals will be properly registered with an appropriate securities regulator or exempt from such registration. An additional disclosure statement, listing compensation to be paid to solicitors, is provided to the Client prior to or at the signing of Lattice's investment advisory agreement.

Item 15 - Custody

As an SEC-registered investment advisor that is notice filed in the state of Washington that acts in a General Partner capacity to the Funds, Due to its powers as General Partner, Lattice is deemed to have custody of the Funds' assets.

Advisors with custody of Client funds and securities must maintain them with "Qualified Custodians". "Qualified Custodians" include banks and savings associations and registered broker-dealers.

Lattice currently uses Jefferies, Inc. ("**Jefferies**") as its prime broker for DAF and DOF. Jefferies clears through Jefferies LLC ("**Jefferies**"). Under this arrangement, Jefferies provides among other things, clearing, custodial and record keeping services.

Annually, upon completion of the Funds' annual audit, Lattice will distribute the audited financials along with copies of its Privacy Notice and ADV Part 2 to investors.

CCO shall use best efforts to ensure that Lattice's audited financials are delivered to all limited partners (or members or other beneficial owners) within 120 days of the fiscal year end.

Item 16 - Investment Discretion

Lattice has exclusive and absolute discretion and authority in managing and controlling the investments and affairs of the Funds, subject only to specific and express limitations provided by the law notwithstanding the Agreement. Lattice has the unrestricted right, in its discretion, to select the Securities in which the Funds invest and to determine the amount of funds to be used for each purpose.

Lattice may exercise this discretion and authority conditionally or unconditionally in varying or similar circumstances, within the constraints of its fiduciary duty to act in the best interest of the Fund(s). For example, Lattice may provide certain Limited Partners more frequent or more detailed reports of an investor's portfolio holdings or performance, special fee and allocation arrangements and special withdrawal rights that it does not provide to other Limited Partners.

Item 17 - Voting Client Securities

Lattice's policy with respect to proxy voting is to vote all proxies on behalf of the beneficial investors in the Fund(s). Proxies will generally be voted according to Jefferies' recommendations but in all cases will be in the Fund(s) best interest. Lattice will seek to avoid any conflicts of interest by retaining documentation necessary to demonstrate the proxy votes are cast in the Fund(s) best interest and otherwise upholding Lattice's fiduciary duty to the Fund(s) as Clients of the Advisor.

Clients may obtain details regarding Lattice's proxy voting history and policies by contacting Fariba Ronnasi, Lattice's CCO, at +1 425 828 4300 or by email at info@latticecm.com.

Item 18 - Financial Information

Lattice does not require or solicit pre-payment of any type of Client fees six months or more in advance.

Lattice has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to Clients, and has not been the subject of a bankruptcy proceeding.

FORM ADV PART 2B

FARIBA RONNASI
LATTICE CAPITAL
MANAGEMENT, LLC
1014 MARKET STREET
KIRKLAND, WA 98033

PHONE: 425-828-4300

FAX: 425-828-9700

www.latticecm.com

fariba.ronnasi@latticecm.com

This Form ADV2B (“Brochure Supplement”) provides information about *Fariba Ronnasi* that supplements the *Lattice Capital Management* Disclosure Brochure. You should have received a copy of that brochure. Please contact *Fariba Ronnasi, Chief Compliance Officer* if you did not receive the *Lattice Capital Management* brochure or if you have any questions about the contents of this supplement. Additional information about *Fariba Ronnasi* is available on the SEC’s website at www.adviserinfo.sec.gov by searching by her name or her CRD# 4135998

Effective Date: February 2019

Fariba Ronnasi

Year of Birth: 1968

Educational Background:

- 1992, Bachelor of Arts in Finance, Seattle University
- 1994, Masters of Finance, Seattle University

Business Experience:

- President and CCO, Elite Wealth Management, LLC (2004 - present);
- Chief Investment Officer and CCO, Lattice Capital Management (2006 – present);
- Vice President & Managing Director, Columbia Financial Center (2001-2004)

Disciplinary Information:

Ms. Ronnasi has no legal or disciplinary events required to be disclosed.

Other Business Activities:

Elite Wealth Management

Fariba Ronnasi, CIO and CCO is also President and CCO of Elite Wealth Management, Inc. an affiliated SEC-registered investment advisor. Lattice Capital Management and Elite Wealth Management share office space and certain employees which may at times create conflicts of interest and limit investment activities. Ms. Ronnasi's multiple roles may create conflicts of interest in selecting, negotiating and administering investments for the Lattice Funds and Elite's Clients.

Additional Compensation:

As President of Elite Wealth Management, Mrs. Ronnasi apportions her time between the Lattice and Elite as necessary, and being related firms provides for economies of scale and efficient resource management, Ms. Ronnasi's business activities at Elite represent a substantial amount (greater than 10%) of her time and compensation.

Supervision:

As Lattice's Chief Investment Officer and Chief Compliance Officer, Ms. Ronnasi maintains the ultimate responsibility for the company's operations and supervisory procedures and operational controls.

Fariba Ronnasi's contact information:

PHONE: (425) 828-4300

EMAIL: fariba.ronnasi@latticecm.com

FORM ADV PART 2B

**LATTICE CAPITAL
MANAGEMENT
1014 MARKET STREET
KIRKLAND, WA 98033**

PHONE: (425) 828-4300

FAX: (425) 828-9700

www.latticecm.com

kevin.lennil@latticecm.com

This ADV 2B (“Brochure Supplement”) provides information about Kevin Lennil that supplements the *Lattice Capital Management* Disclosure Brochure. You should have received a copy of that brochure. Please contact *Fariba Ronnasi, Chief Compliance Officer* if you did not receive the *Lattice Capital Management* brochure or if you have any questions about the contents of this supplement. Additional information about *Kevin Lennil* is available on the SEC’s website at www.adviserinfo.sec.gov.

Effective Date: February 2019

Kevin Lennil

Date of Birth: 11/12/1985

Educational Background:

- University of Washington, (2004 - 2008)

Business Experience:

- Portfolio Manager, Lattice Capital Management (2013 – present)
- Portfolio Manager, Elite Wealth Management, LLC (2014 - present)
- Managing Partner, Exagroup LLC (2009 – 2013)
- Owner, Lennil Enterprise (2007-2008)

Disciplinary Information:

Mr. Lennil has no legal or disciplinary events to disclose.

Other Business Activities:

Elite Wealth Management

Mr. Lennil is also Investment Manager of Elite Wealth Management (“Elite”) an affiliated SEC registered investment advisor. Elite and Lattice share office space and certain employees subject to Elite’s compliance program (“Supervised Persons”) which may at times create conflicts of interest and limit investment activities. Mr. Lennil is a registered principal with the Commodity Futures Trading Commission.

Additional Compensation:

As Portfolio Manager of Lattice, Mr. Lennil apportions his time between the related firms as necessary, and being related firms provides for economies of scale and efficient resource management, Mr. Lennil’s business activities represent a substantial amount (greater than 10%) of his time and compensation. Mr. Lennil receives compensation as a solicitor for Elite.

Supervision:

Mr. Lennil is supervised by Fariba Ronnasi, CCO of Lattice. Ms. Ronnasi maintains the ultimate responsibility for the company’s operations and supervisory structure. Lattice maintains appropriate policies, procedures and operational controls

Kevin Lennil’s contact information:

PHONE: (425) 828-4300

EMAIL: Kevin.lennil@latticecm.com

Privacy Policy

July 22, 2016

Our Commitment to You

Lattice Capital Management, LLC ("Lattice" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Lattice (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Lattice does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect

Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Lattice does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Lattice or the Client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients Lattice does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (425) 828-4300.