

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

The image shows a large rectangular frame representing the cover page of a firm brochure. In the upper right corner, there is a redacted area consisting of a yellow rectangle and a blue-outlined rectangle containing a white rectangle. In the center of the page, there is another redacted area consisting of a yellow rectangle and a green rectangle stacked vertically.

Item 2 Material Changes

Item 4 Advisory Business



Item 5 Fees and Compensation

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

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

Item 10 Other Financial Industry Activities and Affiliations

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

Item 12 Brokerage Practices

Item 13 Review of Accounts

Item 14 Client Referrals and Other Compensation

Item 16 Investment Discretion

Item 17 Voting Client Securities

