



Double Eagle Family Offices, LLC

ADV Part 2A Firm Brochure

3724 Hulen St.
Fort Worth, Texas 76107

Phone: (817) 928-3260
mbianca@defamilytx.com

March 2024

Item 1 – Cover Page

This Brochure provides information about the qualifications and business practices of Double Eagle Family Office, LLC. If you have any questions about the contents of this Brochure, please contact us using the information listed above. 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.

Double Eagle Family Office, LLC (CRD# 315523) is a registered investment advisor with the SEC. Registration of an investment advisor does not imply any certain level of skill or training.

Additional information about Double Eagle Family Office, LLC is also available on the SEC’s website at www.adviserinfo.sec.gov.



Item 2 – Material Changes

Since the last annual filing of our Form ADV, the following material changes to the firm have occurred:

- August 2023: Megan Bianca was named Chief Compliance Officer.
- January 2024:
 - Family Office Services fees: in addition to fees being based on a percentage of client assets, fees can now be based on a flat fee instead.
 - Minimum account sizes for new clients were increased from \$5,000,000 to \$50,000,000.



Item 3 – Table of Contents

Item 1 – Cover Page	i
Item 2 – Material Changes	ii
Item 3 – Table of Contents	iii
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	6
Item 6 - Performance-Based Fees and Side-By-Side Management	6
Item 7 – Types of Clients & Account Minimums.....	7
Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss.....	7
Item 9 – Disciplinary Information	9
Item 10 – Other Financial Industry Activities and Affiliations	9
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	10
Item 12 – Brokerage Practices	11
Item 13 – Review of Accounts	12
Item 14 – Client Referrals and Other Compensation.....	13
Item 15 – Custody	13
Item 16 – Investment Discretion	13
Item 17 – Voting Client Securities.....	13
Item 18 – Financial Information.....	13



Item 4 – Advisory Business

DESCRIPTION OF THE ADVISORY FIRM

Double Eagle Family Offices, LLC (“DEFO” or “the Firm”) is a registered investment advisor based in Fort Worth, Texas. We are a limited liability company organized under the laws of the State of Texas. DEFO was approved for registration with the SEC in September 2021. Caprock Legacy Trust is the principal owner of the Firm. DEFO maintains a service provider agreement with Double Eagle Natural Resources to provide all operational services to the Firm.

TYPES OF ADVISORY SERVICES

Family Office Services

DEFO provides Family office services to High-Net-Worth clients. These services are designed to help families coordinate their multiple forms of capital using a strategic and collaborative approach.

Our family office services vary by family and occasionally within families but may include the following:

- **Portfolio Management Services** – Includes development of asset allocation, ongoing portfolio management, and review, including selection and evaluation of investment managers. Further, we may provide customized performance reporting at the portfolio level and at the manager or specific investment level. Additional information about our portfolio management services is provided in the portfolio management services section below.
- **Information Management and Coordination** – We organize key information and coordinate such information with the family, the family’s accountant, attorney, insurance agents, and other key advisors.
- **Estate, Gift & Trust Planning** – We provide explanations, summaries, and illustrations of existing and proposed estate planning documents and strategies, including recommendations and education on additional strategies, considerations for making updates periodically, and further coordination with the family’s tax and legal advisor(s) to implement agreed upon strategies or updates.
- **Income Tax Planning** – Includes planning for the minimization of tax liabilities, including asset location, tax loss harvesting and gain minimization planning, charitable asset selection, and coordination with the family’s tax advisor(s).
- **Philanthropic Planning** – Includes defining philanthropic goals, education on philanthropic vehicles and strategies for maximizing the benefits of philanthropy across the family and the organizations they choose to benefit.
- **Education** – Includes both individual and group-based learning sessions around various planning, tax, investment, and other topics with an intention of growing not only the family’s financial capital, but non-financial capital as well. These topics, while commonly focused on younger generations, are generally available across all generations.
- **Consolidated Reporting Services** – Allows the family to customize how their assets are reported by offering a view across multiple accounts or entities in a single statement and/or to segregate assets within accounts. This service may include assets not managed directly by DEFO. This enables the family and their advisors to understand and monitor the total family balance sheet and provide comprehensive and integrated advice from a vantage point inclusive of the family’s entire wealth landscape. This may require an additional fee depending on the nature and complexity of the non-managed assets being reported on. Any additional fees will be mutually agreed to in advance.
- **Asset Protection Planning and Review** – Includes review and discussion of strategies that may avoid or minimize a portion of a family’s balance sheet at risk. These strategies will be evaluated on the benefits they may provide against the degree and likelihood of loss and the complexity and administration they may require to achieve such protections.
- **Liability Risk Management Planning and Review** – Includes advice on a combination of mitigation strategies, including the use of special purpose entities, trusts, and/or various insurance tools. We will review the



family's assets and liabilities to determine location, titling, and ownership structure. We will review existing or proposed policies, and after receiving your permission, we may facilitate reviews with unaffiliated third-party professionals.

- Estate Tax Liquidity Planning and Review – Includes determination of estate tax liquidity needs and determination of potential liquidity sources including asset liquidations and life insurance. We will review existing or proposed policies and, after receiving your permission, we may facilitate reviews with unaffiliated third-party professionals.

The advice we propose is designed to achieve the client's desired goals, which may require revision to meet changing circumstances. Our recommendations are based on our client's situation from the information provided to the firm. Families may choose to accept or reject our recommendations. We should be notified promptly of any change to a client's situation, goals, objectives, or needs.

Private Fund Advisory Services

DEFO serves as an Advisor to its Private Funds ("Funds"). DEFO is responsible for investing and re-investing the assets of its Funds in securities, financial instruments, and/or other assets in accordance with the investment objectives, policies, and guidelines set forth in its applicable governing documents.

The governing agreements between DEFO and our affiliated private funds do not contain any significant limitations on the types of investments we may make. We, in our sole discretion, employ such investment and trading strategies and methods as we determine to adopt.

Each prospective private fund investor will be required to complete a Subscription Agreement or similar application, pursuant to which the Client shall establish that he/she is qualified for investment in the fund and acknowledges and accepts the various risk factors that are associated with such an investment. Please see Item 8 for more information on the risks associated with this type of investment.

CLIENT-TAILORED SERVICES AND CLIENT-IMPOSED RESTRICTIONS

Family Office Services

For Family Office Services clients who receive Portfolio Management, those clients' financial needs, investment goals, tolerance for risk, and investment objectives are documented in DEFO's Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Private Fund Advisory Services

DEFO advises Private Funds clients where DEFO, or an affiliated entity, serves as a General Partner to the Fund. The Firm does not provide customized investment advisory services to individual limited partners of the underlying Funds. Limited partners generally are not permitted to impose restrictions on investments in certain securities or types of securities.

WRAP FEE PROGRAMS

DEFO does not participate in a Wrap Program.

AMOUNTS UNDER MANAGEMENT

As of December 31, 2023, DEFO had approximately \$536,685,795 of assets under management. Of that, \$108,978,007 were managed on a discretionary basis, and \$427,707,788 were managed on a non-discretionary basis.



Item 5 – Fees and Compensation

FEE SCHEDULE

Family Office Services

DEFO's Family Office Services fees are negotiable and are determined on a case-by-case basis with each client. Family Office Services fees can be billed as a flat fee to be paid quarterly in arrears, based on a percentage of a client's account value as reported by the account custodian(s) on the last day of the previous quarter, also paid quarterly in arrears, or, in some cases, billed hourly. Certain legacy clients may be on different fee schedules than new clients.

Private Fund Advisory Services

DEFO receives a fixed dollar amount management fee or a fee based on a percentage of invested capital of the fund, plus reimbursement of any expenses that might be incurred on behalf of its Funds. DEFO is responsible for paying substantially all their own operating expenses, including personnel costs.

PAYMENT OF FEES

Family Office Services

DEFO's family office services fees are invoiced to clients and can be paid by check or wire transfer.

Private Fund Advisory Services

The quarterly management fees are billed to each limited partner in the Funds quarterly in advance.

ADDITIONAL FEES

In addition to personnel costs, as mentioned above under "Advisory Fees and Compensation," DEFO and its Funds will incur brokerage and other transaction costs in connection with a trade (expenses relating to short sales, clearing and settlement charges, custodial fees, bank service fees, and interest expenses); investment-related travel expenses; occupancy expenses; legal expenses; professional fees (including, without limitation, expenses of consultants and experts); accounting expenses (including the cost of accounting software packages); auditing and tax preparation expenses; costs of printing and mailing reports and notices; taxes; regulatory expenses (including filing fees); and extraordinary expenses. **See Item 12 below.**

PREPAYMENT OF FEES

DEFO does not expect Clients to prepay fees.

EXTERNAL COMPENSATION FOR THE SALE OF SECURITIES

DEFO does not receive any external compensation from the sale of securities.

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

As the general partner to affiliated private funds/offering, DEFO may receive performance-based compensation from the funds. Such performance-based compensation is generally calculated based on a share of all net realized income and gains and losses of the funds.

Investors and prospective investors in any of the funds should note that performance-based compensation, in some contexts, can create an incentive for DEFO to recommend investments that may be riskier or more speculative than those that would be recommended under a different fee arrangement.

Side-by-side management refers to multiple client relationships where an advisor manages more than one client relationship or portfolio on a simultaneous basis. Various conflicts of interest arise by such side-by-side management. For example, in theory, DEFO could have incentive to favor a fund paying performance-based compensation over one that does not pay performance-based compensation, or a fund paying higher aggregate performance-based compensation over one paying less. This conflict is mitigated by disclosures, procedures, and DEFO's fiduciary obligation to place the best interest of the Client first.



Item 7 – Types of Clients & Account Minimums

Family Office Services

We generally offer investment advisory services to individuals, family offices, trusts, estates, charitable organizations, corporations, and other business entities.

DEFO generally requires a minimum account size of \$50,000,000 for advisory accounts. However, from time to time, at DEFO's sole discretion, the Firm may accept smaller accounts based on various criteria, such as anticipated future assets, related accounts, and other factors.

Private Fund Advisory Services

DEFO currently provides investment advice to its affiliated Private Fund clients. The Firm may, in the future, provide investment advice to other clients, including, but not limited to, other pooled investment vehicles.

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

METHODS OF ANALYSIS

Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Our principal investment objective is to provide investors with superior, risk-adjusted, absolute rates of return over the long term while also maintaining a commitment to capital preservation. We pursue our objectives mainly by investing in securities that we believe are priced at a significant discount to their intrinsic value.

DEFO utilizes research-intensive fundamental analysis to select investments, with a focus on asset values, underlying earnings power of assets, and return on invested capital. Our investment decisions are based on proprietary valuation techniques, including discounted cash flow modeling, balance sheet, and credit analysis, and conversations and visits with management, competitors, and industry contacts, along with other research methods.

INVESTMENT STRATEGY

Family Office Services

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to DEFO. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Private Fund Advisory Services

The investment strategy for each affiliated Fund Client is based upon the objectives of the Fund and will differ by Fund accordingly.

RISKS OF INVESTMENTS AND STRATEGIES UTILIZED

Investing in securities involves risk of loss that Clients should be prepared to bear. DEFO's investment approach constantly keeps the risk of loss in mind. Investors may face the following investment risks:

General Market Developments. The success of our activities is affected by general economic and market conditions, such as changes in interest rates, availability of credit, inflation rates, economic uncertainty, changes in laws (including laws relating to taxation of investments), trade barriers, currency exchange controls, and national and international political circumstances (including wars, terrorist acts or security operations). These factors may affect the level and volatility of securities prices and the liquidity of investments. Volatility and/or illiquidity could impair DEFO's profitability or result in losses. DEFO could incur material losses even if we react quickly to difficult market conditions, and there can be no assurance that it will not suffer material losses and other adverse effects from broad and rapid changes in market conditions in the future. Investors should realize that markets for the financial instruments in which we invest can correlate strongly with each other at times or in ways that are difficult for us to predict. Even a well-analyzed approach may not protect DEFO from incurring significant losses under certain market conditions.



Nature of Investments. Our investments inherently involve a high degree of financial risk. Markets in which we invest are subject to a high degree of volatility. There can be no assurance that our investment objective will be realized or that the Funds will receive any return of capital. Moreover, the Fund agreements do not contain any significant limitations on the types of investments we may make. We, in our sole discretion, employ such investment and trading strategies and methods as we determine to adopt.

Equity Risks. We invest in equity securities. The value of these securities generally varies with the performance of the issuer and movements in the broader equity markets. As a result, DEFO may suffer losses if we invest in equity securities of issuers whose performance diverges from our (or market) expectations or if equity markets generally move in a single direction and we have not adequately hedged against such a general move. DEFO also may be exposed to risks that issuers will not fulfill contractual obligations, such as, in the case of convertible securities or private placements, delivering marketable common stock upon conversions of convertible securities, and registering restricted securities for public resale.

Some of the small and mid-cap issuers of equity securities in which we invest may be more vulnerable than larger capitalization issuers to adverse business or market developments, may have limited markets or financial resources, and may lack experienced management. In addition, some equity securities may be illiquid. Due to perceived or actual illiquidity or investor concerns regarding leveraged capitalization, certain equity securities often trade at significant discounts to otherwise comparable investments or are not readily tradeable. Such securities generally do not produce current income for our client and may also be speculative. In addition, actual and perceived accounting irregularities may cause dramatic price declines in the equity securities of companies reporting such irregularities or that are rumored to be subject to accounting irregularities.

Limited Diversification. We typically invest the Fund's assets in a limited number of issuers and generally have no formal guidelines relating to diversification of the assets of the Funds. At any given time, it is therefore possible that the Firm may select investments that are concentrated in a particular market or industry, or in a limited number or type of securities. This limited diversity could expose our client to losses disproportionate to market movements in general if there are disproportionately greater adverse price movements in those investments.

Investing in Small- and Medium-Sized Companies. Investing in securities and other instruments of small- and medium-sized companies involves substantial risks. While the Firm believes such securities can provide significant potential for appreciation, the securities of small- or medium-capitalization companies involve higher risks in some respects than do investments in securities of larger companies. These risks include the fact that prices of small-capitalization and medium-capitalization securities may be more volatile than prices of large-capitalization securities; that small- and medium-capitalization companies typically have analyst coverage by fewer research firms than do large-capitalization companies and, therefore, such companies' securities are more likely to trade at prices that reflect incomplete or inaccurate information; the fact that, during some periods, securities of small- and medium-capitalization companies, by asset class, have underperformed the securities of large companies; and the risk of bankruptcy or insolvency of many small companies (with the attendant losses to investors) is higher than for larger, "blue-chip" companies. In addition, due to thin trading in some small-capitalization stocks, an investment in those stocks may be illiquid.

Illiquid Portfolio Securities. DEFO may invest a portion of its assets in securities of private companies and privately issued securities of public companies. DEFO may not be able to readily dispose of such non-publicly traded securities and, in some cases, may be contractually prohibited from disposing of such investments for a specified time period.

Non-U.S. Investments. We may invest in financial instruments of non-U.S. corporations and governments. Investing in the financial instruments of companies (and, from time to time, governments) outside of the United States involves certain considerations not usually associated with investing in financial instruments of U.S. companies or the U.S. government, including political and economic considerations, such as greater risks of expropriation, nationalization, confiscatory taxation, imposition of withholding or other taxes on interest, dividends, capital gains or other income, limitations on the removal of assets and general social, political and economic instability; the



relatively small size of the securities markets in such countries and the low volume of trading, resulting in potential lack of liquidity and in price volatility; the evolving and unsophisticated laws and regulations applicable to the securities and financial services industries of certain countries; fluctuations in the rate of exchange between currencies and costs associated with currency conversion; and certain government policies that may restrict our client's investment opportunities. In addition, accounting and financial reporting standards that prevail outside of the U.S. generally are not as high as U.S. standards, and consequently, less information is typically available concerning companies located outside of the U.S. than for those located in the U.S. As a result, we may be unable to structure transactions to achieve the intended results or to mitigate all risks associated with such markets. It may also be difficult to enforce our client's rights in such markets.

Management Risk. The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

Cybersecurity Risk. DEFO and its service providers may be subject to operational and information security risks resulting from cyberattacks. Cyberattacks include, among other behaviors, stealing or corrupting data maintained online or digitally, denial of service attacks on websites, the unauthorized release of confidential information, or various other forms of cybersecurity breaches. Cybersecurity attacks affecting DEFO and its service providers may adversely impact Clients. For instance, cyberattacks may interfere with the processing of transactions, cause the release of private information about Clients, impede trading, subject DEFO to regulatory fines or financial losses, and cause reputational damage. Similar types of cybersecurity risks are also present for issuers of securities in which Clients may invest in, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions. Cybersecurity incidents that could ultimately cause them to incur losses, including, for example, financial losses, cost and reputational damages, and loss from damage or interruption of systems. Although DEFO has established its systems to reduce the risk of these incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that DEFO does not directly control the cybersecurity measures and policies employed by third-party service providers.

The foregoing risk factors do not purport to be a complete description of all of the risks associated with our investment program. Prospective clients and investors should read this brochure, our governing documents, and any applicable offering materials in their entirety before making any investment decisions.

Item 9 – Disciplinary Information

DEFO and its management have not been involved in any criminal or civil actions, administrative or self-regulatory enforcement proceedings, nor any legal or disciplinary events that are material to a Client's or prospective Client's evaluation of DEFO or the integrity of its management.

Item 10 – Other Financial Industry Activities and Affiliations

REGISTRATION AS A BROKER-DEALER OR BROKER-DEALER REPRESENTATIVE

Neither DEFO nor its management persons are registered as a broker-dealer or broker-dealer representative.

REGISTRATION AS A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR, OR A COMMODITY TRADING ADVISOR

Neither DEFO nor its management persons are registered as futures commission merchant, commodity pool operator, or a commodity trading advisor.

RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND POSSIBLE CONFLICTS OF INTEREST

DEFO may receive external compensation from affiliations as the general partner of private funds/offerings or other pooled investment vehicles. DEFO may recommend these funds as investments for certain qualifying clients. This represents a conflict of interest because it gives an incentive to recommend investment in these funds, as the general partners will receive additional fees. This conflict is mitigated by disclosures, procedures, and DEFO's



fiduciary obligation to place the best interest of the Client first. Moreover, clients are under no obligation to invest in such partnerships.

SELECTION OF OTHER ADVISORS OR MANAGERS

DEFO does not utilize nor select other advisors.

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

CODE OF ETHICS

The affiliated persons (affiliated persons include employees and/or independent contractors) of DEFO have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of DEFO-affiliated persons and address conflicts that may arise. The Code defines acceptable behavior for affiliated persons of DEFO. The Code reflects DEFO and its supervised persons’ responsibility to act in the best interest of their Client.

One area that the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

DEFO’s policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer, or director of DEFO may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

DEFO’s Code is based on the guiding principle that the interests of the Client are our top priority. DEFO’s officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client’s interests over the interests of either affiliated persons or the company.

The Code applies to “access” persons. “Access” persons are affiliated persons who have access to non-public information regarding any Clients’ purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

DEFO will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

RECOMMENDATIONS INVOLVING MATERIAL FINANCIAL INTERESTS

DEFO anticipates, in appropriate circumstances and consistent with Client’s investment objectives, that DEFO may recommend the purchase of partnership interests in which our affiliates, directly or indirectly, have a material financial interest. DEFO’s employees, directors, and partners often invest in these same partnerships. Because of the nature of these partnerships, investment by employees, partners, and directors do not influence pricing. Should a conflict arise, it will be mitigated by disclosures, procedures, and DEFO’s fiduciary obligation to place the best interest of the Client first. Moreover, clients are under no obligation to invest in such partnerships.

ADVISORY FIRM PURCHASE OF SAME SECURITIES RECOMMENDED TO CLIENTS AND CONFLICTS OF INTEREST

DEFO or its related persons may invest in securities or other investment products, which it recommends to or buys and sells on behalf of its Funds.



CLIENT SECURITIES RECOMMENDATIONS OR TRADES AND CONCURRENT ADVISORY FIRM SECURITIES TRANSACTIONS AND CONFLICTS OF INTEREST

DEFO or its related persons may recommend or invest in securities or other investment products at or about the same time that it recommends to or buys and sells on behalf of its Funds.

DEFO's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal transactions of its affiliated persons, to ensure compliance with the Firm's Code of Ethics.

Important Note – Affiliations

DEFO offers only **non-discretionary** investment advice for its Family Office Services by invitation exclusively to a select group of sophisticated ultra-high net worth individuals, trusts, and family offices. Private funds and/or affiliated entities mentioned here may create a potential conflict of interest to DEFO and underlying clients. All private funds are audited annually. Affiliations change frequently and a list of affiliations are available to clients upon request.

DEFO is owned by Caprock Legacy Trust, and two Access Persons of DEFO act as Trustees of the Caprock Legacy Trust. Additionally, two clients of DEFO are beneficiaries of the Caprock Legacy Trust. Access Persons of DEFO are employees of Double Eagle Natural Resources. Double Eagle Natural Resources has a contractual agreement with DEFO to manage the operations of DEFO.

Clients may invest in, maintain an investment in, or be solicited to invest in one or more publicly traded entities and/or private placements affiliated with our firm (Related Ventures). Clients should note that the recommendation of investments in these Related Ventures creates a conflict of interest because our firm, our affiliates, and our financial professionals may have an incentive to recommend affiliated Related Ventures over other investments that have no relationship with us, for the purposes of generating additional revenue for our firm, our affiliates, and for themselves. To address this conflict, we do not charge clients who have invested in the Related Ventures advisory fees on the portion of the client's assets invested in any affiliated Related Venture. Clients should note that we will receive fees from the Related Ventures for investment management and/or other services we and our financial professionals provide to or for the benefit of the Related Ventures. Additionally, financial professionals are required to uphold their fiduciary duty of acting in our client's best interests and, in connection therewith, will prepare and maintain records supporting any resulting recommendation of an affiliated Related Venture. Clients of our firm are under no obligation, contractually or otherwise, to invest in these offerings and are free to invest in the pooled investment vehicle(s) of their choice.

Item 12 – Brokerage Practices

Family Office Services

DEFO recommends that you establish brokerage accounts with either Fidelity Family Offices or Schwab Institutional (the "Custodians") to maintain custody of assets and to effect trades. Factors that the Firm considers in recommending Custodians to Clients include their respective financial strength, reputation, execution, pricing, research, and service. The Brokers enable the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by the Brokers may be higher or lower than those charged by other financial institutions.

The Custodians provide DEFO with access to its institutional trading and custody services, which are typically not available to retail investors. The Custodians' services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For the Firm's Client accounts maintained in custody, the Custodians charge account holders' transaction-related fees for securities trades. The Custodians provide DEFO assistance in managing and administering Clients' accounts. These include access to client account data, facilitate trade execution, provide research, recordkeeping, and Client reporting.



The Custodians also make available to the Firm other services intended to help the Firm manage and further develop its business enterprise. These services may include consulting, publications, and conferences on practice management, information technology, business succession, regulatory compliance, and marketing.

In choosing a broker-dealer or negotiating commission rates, we are not obligated to seek competitive bids or the lowest commission cost for you, but we determine that the commission rate charged is reasonable based on the quality of custodial services available to our clients. As a fiduciary, DEFO endeavors to act in your best interest.

The commissions paid by the Firm's Clients comply with the Firm's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to affect the same transaction where the Firm determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. DEFO seeks competitive rates but may not necessarily obtain the lowest possible commission rates for Client transactions.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers and custodians with whom we have an institutional advisory arrangement. Also, we do not receive other benefits from a broker-dealer in exchange for client referrals.

Trade Aggregation

While individual Client advice is provided to each account, Client trades can be executed as a block trade. This process is directed solely by third-party managers.

Private Fund Advisory Services

DEFO does not engage in securities transactions through broker-dealers as part of the investment program of the Funds.

Item 13 – Review of Accounts

Family Office Services

Frequency and Nature of Periodic Review and Who Makes Those Reviews

Account reviews are performed at least annually by the Chief Compliance Officer of DEFO. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include but are not limited to a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Factors That Will Trigger a Non-Periodic Review of Client Accounts

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content and Frequency of Regular Reports

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Client's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. DEFO may also send periodic or other event-inspired reports based on market or portfolio activity. Reports will generally be provided in electronic format.

Private Fund Advisory Services

As manager of the Funds, DEFO is responsible for day-to-day oversight of the Funds' operations and assets. Through our affiliate operating company, the Firm administers all accounts and transactions on behalf of the Funds under the direction of our management team.



Investors in each of the Funds receive the following with respect to the Fund in which they have invested:

- annual audited financial statements;
- annual tax information for the completion of such an investor's individual tax return.

Item 14 – Client Referrals and Other Compensation

ECONOMIC BENEFITS FROM OTHERS

DEFO does not receive any economic benefits from external sources.

COMPENSATION TO NON-ADVISORY PERSONNEL FOR CLIENT REFERRALS

DEFO does not compensate for Client referrals.

Item 15 – Custody

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by DEFO.

DEFO has custody of funds and/or securities in certain Client accounts. These accounts are examined on a surprise basis at least annually by an outside public accounting firm unless otherwise exempted.

DEFO has custody over assets invested in DEFO's affiliated private funds/offerings (see Item 10 above). The private offerings are audited annually by a Public Company Accounting Oversight Board ("PCAOB") registered and inspected accounting firm. The audit reports are distributed to investors of these offerings upon completion.

DEFO is not affiliated with the custodian. The custodian does not supervise DEFO, its employees, or its activities.

Item 16 – Investment Discretion

Family Office Services

DEFO manages all Family Office portfolio accounts on a non-discretionary basis.

Private Fund Advisory Services

Subject to the limitations set forth in the Governing Documents, DEFO has sole discretion regarding the acquisition and disposition of assets on behalf of the Funds, the size or amount of each asset to be bought or sold, and the price at which the Funds' assets are acquired or disposed. In addition, DEFO has the authority to deduct fees and expenses from amounts otherwise distributable to the investors' accounts.

Item 17 – Voting Client Securities

Family Office Services

DEFO does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

Private Fund Advisory Services

None of the Funds invest in voting securities. As such, DEFO does not exercise any voting authority rights on behalf of the Funds. Rule 206(4)-6 under the Advisers Act requires registered investment advisors to adopt and implement policies and procedures related to voting of client securities to the extent that it exercises such authority. In the event that any Fund acquires voting securities in the future, DEFO will comply with the obligations of Rule 206(4)-6.

Item 18 – Financial Information

DEFO does not require nor solicit prepayment of more than \$1,200 (SEC) in fees per Client six months or more in advance. There is no financial condition that is reasonably likely to impair DEFO's ability to meet its contractual obligations to its clients.