

**Item 1 – Cover Page**

**Form ADV Part 2A: Brochure**

**HFR Asset Management, LLC**

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Chicago, Illinois 60606  
312-327-0430  
www.hfr.com

January 1, 2015

This Brochure provides information about the qualifications and business practices of HFR Asset Management, LLC (“HFR”). If you have any questions about the contents of this Brochure, please contact Michael Arenibar, Chief Compliance Officer, at 312-327-0430 or [compliance@hfr.com](mailto:compliance@hfr.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. HFR is an investment adviser registered with the SEC and is also registered as a Commodity Pool Operator with the U.S. Commodity Futures Trading Commission.

Registration does not imply any level of skill or training. Additional information about HFR is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). This Brochure was filed with the SEC electronically on the Investment Adviser Registration Depository (IARD) system.

## **Item 2 – Material Changes**

This Brochure dated January 1, 2015 updates the brochure filed August 18, 2014.

This annual amendment contains the following material changes:

- (1) John M. Klimek was appointed President of HFR effective January 1, 2015. Mr. Klimek has over 30 years of legal and business experience in the securities industry and has been a part of the HFR management team since August of 2004 most recently as Managing Member – Legal and Chief Compliance Officer.
- (2) Mr. Nicholas will no longer act as Chairman of HFR but will continue to oversee operations of the HFR companies as head of HFR Group, LLC.
- (3) Michael Arenibar, IACCP® was appointed Chief Compliance Officer effective January 1, 2015. Mr. Arenibar has been with HFR since 2006 most recently as Director, Compliance.

This document should be reviewed in its entirety as some changes may be considered material to some readers and immaterial to others.

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#### **Item 4 – Advisory Business**

##### About the Firm:

HFR is an investment adviser specializing in transparent hedge fund managed accounts and investable hedge fund indices. Joseph G. Nicholas started the HFR business in 1993. In the mid-1990's, Mr. Nicholas introduced a transparent hedge fund investment platform, offering daily position-level reporting and third-party pricing.

HFR registered with the SEC as an investment adviser on April 2001 and registered as a Commodity Pool Operator with the U.S. Commodity Futures Trading Commission on June 2012. HFR is a member of the National Futures Association. HFR's managing member is HFR Group, LLC, a Delaware limited liability company whose managing member is Joseph G. Nicholas.

##### HFR's Advisory Services:

HFR is the investment manager of separately managed transparent single manager and multiple manager hedge funds on the "HFR Platform". The HFR Platform consists of managed accounts domiciled in Bermuda or Ireland. HFR provides daily risk management, ongoing due diligence and standardized reporting for such investment vehicles.

As part of its investment and advisory services, HFR (i) manages portfolios of private pooled vehicles; (ii) selects third party hedge fund managers to trade these managed accounts; and (iii) provides portfolio management advisory services and reporting to such accounts. Generally, investors on the managed account HFR Platform are institutions, financial intermediaries, and high net worth individuals.

HFR's Assets Under Management (net\*) and total number of accounts (December 15, 2014):

	U.S. Dollar Amount	Total Number of Accounts
Discretionary:	(a) \$1,692,115,695	(d) 53
Non-Discretionary:	(b) \$ 0.00	(e) 0
Total:	(c) \$1,692,115,695	(f) 53

\*Total net AUM with leverage

HFR Platform:

HFR acts as investment manager primary to a range of diversified separately managed accounts (each, a “Single Manager Trust” and collectively, the “HFR Platform”), structured as Bermuda Unit Trusts, and Irish Unit Trusts, that cover a broad range of hedge fund strategies including equity hedge, event driven, macro/CTA, and relative value arbitrage. HFR may add or change these strategies over time. A separate independent third-party hedge fund manager (“Trading Manager”) trades on behalf of each Single Manager Trust pursuant to the terms of a trading manager agreement. All Single Manager Trusts operate under an independent custodian, trustee, and administrator. The custodial structure ensures transparency, and mitigates the risk of manager fraud and losses due to style drift. The Single Manager Trusts may serve multiple investors, a single-investor or serve as building blocks for the construction of multiple manager fund of hedge fund portfolios. HFR offers investors opportunity to enhance hedge fund portfolios by providing investors with style verification, monthly (and in some cases weekly) liquidity, daily performance estimates, and exposure information such as leverage, hedge ratios, and concentrations. The HFR Platform offers monthly liquidity with no lock-up, generally upon fifteen (15) business days’ prior written notice to the administrator with up to sixty (60) days’ notice for certain less liquid strategies. Certain Single Manager Trusts provide weekly liquidity, as set forth in the applicable Offering Memorandum of the particular Single Manager Trust.

HFR may serve as the investment manager to various fund of hedge fund portfolios. Fund of hedge fund portfolios invest in Single Manager Trusts, and may invest directly in security positions.

HFR may provide certain clients and investors different terms based on the nature of the account. Different terms may be negotiated without sending notice, or receiving consent from existing investors. These differences may include higher, lower, or no management fee or incentive allocation, different liquidity terms, or transparency. Additional examples of the different terms can be found in the funds’ Confidential Offering Memorandum.

Customized Advisory Services:

HFR’s investment and advisory services may include hedge fund consulting, portfolio construction, product development, transition management, tactical allocation, trading, risk management, and reporting to financial institutions, family offices, or other highly sophisticated

investors. HFR may create or advise custom fund of hedge funds and manage investible index products.

Additionally, HFR offers bespoke managed account platform programs for institutional investors. Typically, clients determine the investment program with the ability to select and direct key elements of the platform including investment vehicle type and jurisdiction, investment manager, fund managers, liquidity, due diligence requirements, investment guidelines, reporting, financing, leverage, administrator, and counterparties.

HFR offers customized hedge fund strategies and services. These customized services are performed in partnership with the client and are tailored to specific investment policies and guidelines. This may include sourcing and onboarding managers to the HFR Platform to meet client imposed restrictions.

#### Back Office Administration or Technology Services:

Through its affiliate, Fund Solutions, LLC, HFR is able to offer fund administration services and a proprietary risk aggregation system. The risk aggregation system is able to monitor and aggregate risk for a client's new or existing investment portfolio. The system provides instrument and trade processing, risk and performance analysis, and web-based client reporting.

### **Item 5 – Fees and Compensation**

The management fee charged to a Single Manager Trust is generally between 0% and 4.00 % per year, accrued each valuation day, and payable quarterly. A portion of the management fee is retained by HFR, and the balance paid to the Trading Manager of the Single Manager Trust according to the written agreement with the Trading Manager. An administrative fee is charged to each Single Manager Trust by Fund Solutions, LLC, an affiliate of HFR, of 0.25% per year of each Trust's Net Asset Value, accrued monthly and payable quarterly. HFR reserves the right to retain Trading Managers where the fees

charged by the Single Manager Trust will be in excess of those described herein. HFR's annual management fee for fund of hedge funds ranges from 0% to 1.6% of the Net Asset Value of the client's fund interests. HFR may waive or adjust the management fee, incentive fee or fund expenses charged to clients.

The fees payable by a client in respect of Customized Advisory Services or a Customized Portfolio may be negotiated on a case by case basis. Such fees may differ from the management and incentive fees charged by the Single Manager Trusts. All or a portion of the fees payable by investors for these services may, in HFR's discretion, be waived or modified for particular investors. This Brochure is delivered only to qualified purchasers as defined in section 2(a)(51)(A) of the Investment Company Act of 1940.

#### **Item 6 – Performance-based Fees and Side-by-Side Management**

HFR, in its capacity as the investment manager of each Single Manager Trust, will receive an allocation (an "Incentive Allocation") from each Single Manager Trust to its capital account in such Single Manager Trust. This amount will equal a percentage of any net new profits ("Net New Profits"). Net New Profits is, for any Performance Period (as defined below), the amount by which the net asset value of a particular series of units of a Single Manager Trust as of the last day of such period exceeds the "high water mark" for those units. HFR may also receive a performance based fee from funds of hedge funds that it manages.

Generally, a Performance Period is based on a calendar year, commencing on the later of January 1 of the year for which the Performance Period is being determined or the date of the initial subscription for the units. The Incentive Allocation is determined after all fees and expenses, but prior to the accrual of the Incentive Allocation itself. The percentage used in calculating the Incentive Allocation varies, but generally is 20%. HFR pays an amount equal to all or a substantial portion of the Incentive Allocation to the Trading Manager of such Single Manager Trust. The amount paid to a Trading Manager in any given period may be less than the Incentive Allocation made to HFR due to differences in the amount, method of calculation, or timing of the Trading Manager's performance-based fee.

The Incentive Allocation will be calculated on a “high water mark” basis so that any losses from prior periods must be recouped before Net New Profits can again be generated. Any Incentive Allocation previously made will not reduce Net New Profits. If an Incentive Allocation is made, and a net loss is subsequently incurred, the prior Incentive Allocation will be retained by HFR.

Any accrued incentive fee shall also be paid to HFR upon redemption, which shall be deemed to occur at the end of a calendar period for these purposes. HFR may waive or adjust the management fee or the Incentive Allocation charged to any client, and HFR may waive or adjust the proportion of expenses borne by one or more of a particular Single Manager Trust’s series of units with the agreement of all of the affected holders of that series.

HFR reserves the right to increase, decrease or otherwise modify the fees charged to a Single Manager Trust or fund of hedge funds portfolio after giving sufficient notice to the affected Unit-holders to provide them the opportunity to redeem their units before any increase in such percentage is to be effective.

Fees based on the performance of a portfolio could create an incentive for the Trading Manager to choose riskier or more speculative underlying investments than would otherwise be selected.

## **Item 7 – Types of Clients**

HFR provides investment advisory and investment management services, primarily on a discretionary basis, to hedge fund vehicles structured as exempt investment companies under section 3(c)(7) of the Investment Company Act of 1940.

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

HFR conducts a multi-step evaluation of third party Trading Managers being considered for the HFR Platform. First, it screens the Trading Managers based on : (i) the size and efficiency of assets managed; (ii) performance relative to the Trading Manager’s peer group; (iii) outlook for the strategy employed; (iv) reputation; (v) acceptable compensation plans, including appropriate incentives; (vi) transparency of position information; (vii)



liquidity; (viii) availability for strategy review sessions; and (ix) the degree to which the Trading Manager complements and balances HFR's existing Single Manager Trust. Second, HFR conducts a more extensive due diligence review of each Trading Manager prior to funding and may evaluate, among other things, qualitative and quantitative factors indicative of stability and representative performance for the relevant investment approach. Quantitative factors assessed and reviewed include a Trading Manager's rate of return, standard deviation of return, risk adjusted returns, correlation with various market indices and with other Trading Managers, performance compared to its peer group, worst period of loss, proprietary style analysis, fees, assets under management, business structure, regulatory registrations and examinations, trading procedures, and compliance program. Qualitative factors assessed and reviewed may include a Trading Manager's investment process, sources of investment ideas, talent, research methodology, valuation methodology, risk management techniques, personal investment, method of operation, organization and staff, background, and liquidity.

Investing in securities involves risk of loss that clients should be prepared to bear. The Confidential Offering Memorandum discusses the risk factors that are specific to an investment in each Single Manager Trust.

#### **Item 9 – Disciplinary Information**

HFR has no information to report for this Item.

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

HFR serves as investment manager to separate Single Manager Trusts formed as Bermuda Unit Trusts or Irish Unit Trusts. It is anticipated that HFR may establish funds in different structural forms and in different jurisdictions in the future. Interests in the Single Manager Trusts are sold on a private placement basis, and to qualified purchasers, as explained in the funds Confidential Offering Memorandum. HFR Asset Management, LLC is registered as a non-discretionary investment advisor with the Financial Services Agency-Japan, registered as a Commodity Pool Operator with the U.S. Commodity Futures Trading Commission and is member of the National Futures Association.

HFR's managing member is HFR Group, LLC, a Delaware limited liability company whose managing member is Joseph G. Nicholas.

HFR Group, LLC controls HFR Asset Management U.K., Ltd., a UK private limited company registered with the Financial Conduct Authority, which offers services to European institutional investors and their financial intermediaries who invest in investment vehicles for which HFR acts as the investment manager.

HFR Group, LLC controls HFR Asset Management (Ireland) Limited, an Ireland private limited company authorized by the Central Bank of Ireland.

The managing member of HFR Group, LLC controls Hedge Fund Research, Inc. Hedge Fund Research, Inc. is a research firm specializing in the aggregation, dissemination and analysis of alternative investment information. Hedge Fund Research, Inc. produces a database of hedge fund performance, and also produces and distributes the HFRX Hedge Fund Indices and HFRI Hedge Fund Monthly Performance Indices, industry benchmarks of hedge fund performance. Trading Managers, funded or made available for funding, on the HFR Platform may purchase subscriptions to the Hedge Fund Research, Inc. database or purchase industry reports and newsletters from Hedge Fund Research, Inc.

HFR Group, LLC controls Fund Solutions, LLC, which offers fund administration and investment services including daily risk management, ongoing due diligence, fund administration, and standardized reporting in connection therewith for highly sophisticated investors and their financial intermediaries.

HFR Group, LLC controls Riverside Portfolio Management, LLC ("Riverside"), a registered investment adviser with the U.S. Securities and Exchange Commission. Riverside acts as the investment manager to fund of hedge funds that invest on the HFR Platform. Riverside may also provide advisory services to other fund of hedge funds or investment portfolios investing in the HFR Platform on a discretionary or non-discretionary basis. Riverside is a Delaware limited liability company and is 90% owned by HFR Group, LLC and 10% owned by CMS/Mullin Hedge Fund Strategies.

A principal of HFR owns a security investment company.

## **Item 11 – Code of Ethics**

HFR has adopted a Code of Ethics for all employees of the firm. The Code of Ethics includes provisions relating to employee standards of conduct, personal trading, conflicts of interest, political activities, and HFR’s gift and entertainment policy.

HFR’s standard of conduct requires, among other things, that employees place the interests of HFR clients and the unit holders of each trust first, avoid any actual or potential conflicts of interest, and comply with applicable provisions of the federal securities laws and the policies and procedures established by HFR.

HFR restricts the ability of personnel to engage in personal trading activities. Generally, only certain specifically enumerated instruments are allowed for trading including Non-Reportable Securities (as defined in the Investment Advisers Act of 1940), Private Placements, ETFs, and certain Financial Derivatives; i.e., options or futures contracts based on securities or commodities of broad based indices or ETFs. All other securities, derivatives and/or futures products not specifically listed under the Code of Ethics as permitted are prohibited. This stringent personal trading policy is intended to mitigate the potential for conflicts of interest. Exceptions to this policy may be granted if the Chief Compliance Officer determines that the purchase of an instrument restricted by the policy poses no conflict of interest to HFR or its clients.

In the event HFR, its affiliates, or a related person has a financial interest in a fund managed by HFR, an affiliate, or a related person, appropriate disclosures will be made to the prospective investor regarding such financial interest. HFR does not engage in “principal” trading for its own account and does not “agency cross trade” between funds on the HFR Platform. However, HFR may authorize a Trading Manager to engage in regular cross trades between the Single Manager Trust and a Trading Manager’s funds or other managed account(s). Typically, HFR will make this accommodation to allow the Trading Manager to rebalance the Single Manager Trust’s securities portfolio in an effort to maintain *pari passu* exposure with the Trading Manager’s other hedge fund(s). HFR requires prior notice from the Trading Manager before any cross trade. In addition, HFR may require regular cross trades to be independently priced, and to receive evidence of the closing valuation.

A copy of the HFR's Code of Ethics is available to clients or prospective clients upon request.

To send a complaint, write to HFR Asset Management, LLC, Attention: Compliance Department, 10 South Riverside Plaza, Suite 700, Chicago, IL 60606.

## **Item 12 – Brokerage Practices**

HFR acts as investment manager for each Single Manager Trust. Pursuant to a written agreement with the Trading Manager, trading discretion is delegated by HFR to the Trading Manager of each Single Manager Trust. However, HFR retains the right to make trading decisions and to remove the Trading Manager if necessary. HFR (or an affiliate), in its capacity as investment manager for its funds of hedge funds, generally selects the Single Manager Trusts in which each fund of hedge funds invests or reinvests. Certain fund of hedge funds, in addition to investing in Single Manager Trusts, may invest directly in security positions. In such cases, securities transactions are executed by brokers selected by HFR (or an affiliate) in its sole discretion. Subject to HFRAM's right to approve all brokers and dealers used by the Single Manager Trusts, the Trading Managers select broker-dealers used for transactions in securities bought and sold on behalf of the Single Manager Trusts and may negotiate commission rates for such transactions pursuant to the authority granted under the Trading Manager Agreements. HFR makes this accommodation to allow the Trading Manager to trade the SMT's assets in the same manner as the trading manager's other hedge fund(s). HFR maintains an approved prime broker list and a Single Manager Trust may carry a trading account only at one of the firms on this approved list. Each Single Manager Trust is a segregated account and any cash or securities movement is initiated by HFR and authorized by the custodian or trustee. In negotiating commission rates, the Trading Manager may take into account the financial stability and reputation of the broker, the quality of the investment research, special execution capabilities, clearance, settlement, custody, recordkeeping and other services provided by such broker. The Trading Managers are not required to allocate either a stated dollar or stated percentage of their brokerage business to any broker for any minimum time period, and the Trading Managers will review such relationships from time to time. A Single Manager Trust may pay a higher commission to an executing broker than otherwise

may be obtainable from other brokers in return for services only if a good faith determination is made that the commission is reasonable in relation to the services provided. Senior management at HFR may own personal interests in the Single Manager Trusts.

HFR does not enter, or direct Trading Managers to enter, into any directed brokerage agreements under which securities transactions for the Single Manager Trusts are directed to a broker-dealer in consideration for the promotion or sale of units issued by the Single Manager Trust.

HFR does not have any soft dollar arrangements with broker-dealers. However, the Trading Managers may have soft dollar arrangements with broker-dealers. A direct “soft dollar” arrangement is an arrangement under which products and/or services, other than execution of transactions, are obtained from or through a broker-dealer in exchange for the transactions being effected through such broker-dealer. Each Trading Manager may enter into “soft dollar” arrangements with broker-dealers through which the relevant Single Manager Trust conducts its trading activities. The investment information and soft dollar benefits received from brokers may be used by the Trading Manager in servicing other accounts, and not all such information and soft dollar benefits may be used by the Trading Manager for the benefit of the Single Manager Trust. The Trading Manager may derive substantial direct or indirect benefit to the extent the Trading Manager uses “soft dollars” to pay for expenses which the Trading Manager would otherwise have been required to pay.

Generally, any soft dollar arrangements are within the “safe harbor” provided by Section 28(e) of the Securities Exchange Act of 1934, as amended, or in compliance with the laws or rules of the regulatory authority having jurisdiction over the Trading Manager and/or brokerage firm. As set forth in each applicable Trading Manager Agreement, certain Trading Managers may be allowed to receive certain products or services from brokerage firms which are outside the “safe harbor” of Section 28(e). Typically, HFR will make this accommodation to allow the Trading Manager to trade the Trust’s assets in the same manner as the Trading Manager’s other hedge fund(s).

### **Item 13 – Review of Accounts**

Client accounts are reviewed daily by an analyst to ensure compliance with a predefined set of investment guidelines and to monitor conformance to investment strategies and exposures.

Unaudited reports are available to clients by HFR on a daily basis through its Dashboard portal or by contacting an HFR representative. Unaudited monthly statements of the net asset value of client's fund interests are provided by the fund administrator, MUFG Fund Services (Bermuda) Limited or MUFG Fund Services (Ireland) Limited (the, "Administrators"). Certain investors that have investments in funds operating under CFTC Regulation 4.7 receive quarterly account statements from HFR. Additionally, annual audited financial reports are provided to investors and clients by HFR.

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

HFR may have direct or indirect referral arrangements whereby HFR pays a portion of its fees to a third party in exchange for services and client introductions. While the specific terms of each arrangement may differ, referral arrangements do not increase the referred client's fees beyond that which HFR would otherwise charge the referred client for its investment management services. The cost of these referral fees are paid entirely by HFR and are not borne by the referred client.

### **Item 15 – Custody**

HFR does not have custody of any client assets and does not have the ability to withdraw assets from client accounts. The HFR Platform has been designed so that an independent trustee is the legal owner and custodian of client assets.

## **Item 16 – Investment Discretion**

Pursuant to a written agreement with the third party Trading Manager of each Single Manager Trust, trading discretion for such trust is delegated by HFR to the Trading Manager, although HFR retains the right to make trading decisions and to remove the Trading Manager.

Each Single Manager Trust maintains a different portfolio of assets, managed according to the specific hedge fund trading strategy and investment objectives for the particular Single Manager Trust.

## **Item 17 – Voting Client Securities**

As a general matter, HFR does not vote any proxies with respect to equity securities. Although it has discretionary authority with respect to each Single Manager Trust, HFR generally delegates the trading authority, including the responsibility of voting proxies, to the Trading Manager of each Single Manager Trust.

Each Trading Manager that is registered as an investment adviser under the Investment Advisers Act of 1940, as amended, is required to comply with Rule 206(4)-6 which addresses an adviser's fiduciary responsibilities in connection with proxies. Such responsibilities include the following:

1. adopting written policies and procedures reasonably designed to ensure that it votes in the best interests of its clients;
2. disclosing those policies and procedures to its clients;
3. notifying its clients on how the adviser may obtain information on how the adviser voted proxies
4. maintaining certain books and records in connection with the voting of proxies

Generally, Trading Managers will vote proxies in a manner that maximizes shareholder value or in a manner that is otherwise in the best interest of its clients. Upon request, HFR will use its best efforts to obtain proxy votes with respect to a third party Trading Manager.

## **Item 18 – Financial Information**

HFR 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.

## **Item 19 – Requirements for State-Registered Advisers**

Not Applicable

## **Class Action Lawsuit Policy**

From time to time, the Adviser in its capacity as investment manager to a Single Manager Trust or fund of hedge fund receives notice that such Single Manager Trust or fund of hedge fund may be eligible to participate in a securities class action claim to recover losses incurred as a result of fraud or other malfeasance (“Class Action Claim”). The determination whether to participate in the Class Action Claim will be made by management of the Adviser in consultation with the Legal Department taking into consideration a number of factors including whether, at the time of the Class Action Claim, the applicable Single Manager Trust or fund of hedge fund is then in existence and the availability of appropriate documentation to support a claim.

If the Adviser (or its delegate) determines that a Single Manager Trust or fund of hedge fund should participate in a Class Action Claim the following shall be applicable with respect to any proceeds received as a result of a Single Manager Trust or fund of hedge fund’s participation in the Class Action Claim:

(i) if the Single Manager Trust or fund of hedge fund is operating when such proceeds are distributed, such proceeds will be added to the assets of the Single Manager Trust or fund of hedge fund; and

(ii) If the Single Manager Trust is not operating when such proceeds are distributed or final NAVs have been struck, such proceeds will be retained by the Adviser, unless the Adviser (in its sole discretion) determines that the circumstances of the case warrant a special distribution of such proceeds to former investors.



## **Error Correction Disclosure**

Errors for transactions executed on behalf of the Single Manager Trusts for which HFR acts as investment manager or for other HFR clients may occasionally occur. Errors can result from a variety of situations and include (1) selling or buying the wrong asset (2) selling or buying the incorrect amount (3) selling or buying for the wrong account or (4) selling or buying an asset or amount of an asset that results in the violation of a client or regulatory restriction. Errors may result in a loss or a gain. Errors do not include intentional acts, errors related to the investment selection decision, or errors that are detected and corrected prior to settlement.

To the extent an error is caused by the counterparty or broker, HFR will attempt to recover any losses due to such error from such party, and to the extent that the entire loss is not recovered from the counterparty or broker, HFR will not make up the deficiency. To the extent that HFR determines that it is responsible for an error, HFR will seek to resolve the error on a fair and equitable basis with the client and other related parties. This may include payment by HFR to the client. A client will be notified of any material errors that occur in its account.

## **Block Trading Policy**

HFR does not engage in block trading. HFR delegates trading authority to Trading Managers and these trading managers may use block trading if they believe the purchase or sale of a security is in the best interest of the Single Manager Trust. Trading Managers are required to ensure that (i) the Single Manager Trust receives substantially similar treatment as the Trading Manager's other accounts including commission rates and cost of margin, (ii) investment opportunities are allocated equitably between the Single Manager Trust and the Trading Manager's other accounts in order to ensure that the Single Manager Trust and the Trading Manager's other fund have equal access to the same quality and quantity of investment opportunities, and (iii) trades are allocated on a basis that is fair and equitable, with neither the Single Manager Trust nor the Trading Manager's other accounts receiving preferential treatment over the other or being disadvantaged by the aggregation, placement or allocation of trades. Each Single Manager Trust is governed by the principle of fair allocation of investment opportunities.

## **Privacy Policy**

HFR has implemented the following privacy policies and procedures to safeguard nonpublic confidential information.

### **Information HFR May Collect**

HFR must collect certain personally identifiable financial information about its investors to ensure that it offers the highest quality financial services and products, and to perform certain functions including anti-money laundering requirements. The personally identifiable financial information which HFR gathers during the normal course of doing business with investors may include:

1. information provided on the account application, and other forms, which may include name, address, tax payer identification numbers, date of birth, and other identifying documents about a client;
2. information on subscriptions or other forms; and
3. information about clients' transactions, statements, confirmations, and account balances with HFR, its affiliates, or others.

### **Information HFR May Disclose**

HFR does not disclose any nonpublic personal information about its clients or former clients or investors to anyone, except as permitted by law or as disclosed herein. HFR may disclose all of the information it collects to certain third parties such as attorneys, accountants, auditors, trustees, administrators and persons or entities who need to know in order to assist HFR in fulfilling its obligations to its investors. Generally, HFR enters into contractual agreements with third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which HFR discloses the information. HFR may disclose any of the information it collects to its affiliates in connection with the servicing of accounts or to inform clients or investors of financial products or services that might be of interest.

### **Confidentiality and Security**

HFR restricts access to nonpublic personal information about its clients or investors to those employees who need to know in order to provide financial products or services to its clients. HFR maintains physical, electronic, and procedural safeguards that comply with federal standards to guard its clients' nonpublic personal information.

### **Opt-Out Provisions**

You may limit our affiliates in the HFR group of companies from marketing their products or services to you based on the information that we collect and share with them. Your choice to limit marketing offers from our affiliates will apply until you tell us to change your choice. If you have already made a choice to limit marketing offers from our affiliates, you do not need to act again until you receive the renewal notice.

To limit marketing offers, contact us by mail at the address below.

HFR provides notice of its Privacy Policy annually to its clients. A copy of HFR's Privacy Notice is available at [www.hfr.com](http://www.hfr.com). Clients or prospective clients can request a copy by writing to HFR Asset Management, LLC, Attention: Compliance Department, 10 South Riverside Plaza, Suite 700, Chicago, IL 60606.

**Item 1- Cover Page**

**Form ADV Part 2B:**

**Brochure Supplement**

**John M. Klimek**

**HFR Asset Management, LLC**

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Chicago, Illinois 60606

Phone: 312-327-0430

January 1, 2015

This Brochure Supplement provides information about *John M. Klimek* that supplements the HFR Asset Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Michael Arenibar, Chief Compliance Officer at 312-327-0430 if you did not receive HFR Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

## **Item 2- Educational Background and Business Experience**

John M. Klimek (Born 1959): President.

### Education Background:

University of Illinois, Urbana-Champaign, J.D., 1984

University of Illinois, Urbana-Champaign, B.S., Accounting, 1981

### Business Background:

HFR Asset Management, LLC (2015 – Present): President; (July 2004 – 2015): Managing Director, Legal; (2007-2015): Chief Compliance Officer

Riverside Portfolio Management, LLC (2009 – Present): Managing Director, Legal and Chief Compliance Officer

HFR Asset Management (Ireland) Limited (2010 - Present): Director

Merrick and Klimek, PC (1999 – 2004): Principal

Fishman and Merrick, PC (1984 – 1999): Principal

### Professional Licenses:

Bar and Court Admissions – Illinois Supreme Court (1984)

Certified Public Accountant – Illinois (1981)

## **Item 3- Disciplinary Information**

There is no disciplinary history to report.

## **Item 4- Other Business Activities**

Mr. Klimek is the President of HFR Asset Management, LLC and Managing Director, Legal and Chief Compliance Officer for Riverside Portfolio Management, LLC.

HFR Asset Management, LLC is a registered investment adviser with the U.S. Securities and Exchange Commission and Kanto Local Finance Bureau and offers transparent hedge fund investing on a managed account platform.

Riverside Portfolio Management, LLC is a registered investment adviser with the U.S. Securities and Exchange Commission and manages custom funds of hedge funds investing in managed accounts on the HFR Platform.

Mr. Klimek receives salary and bonus from the companies noted above.

He also serves as an outside member of the Board of Directors for Reliv International, Inc. (NASDAQ:RELV) and CTI Industries Corporation (NASDAQ:CTIB).

### **Item 5- Additional Compensation**

Mr. Klimek receives compensation for his board member services to Reliv International, Inc. and CTI Industries Corporation.

### **Item 6 - Supervision**

HFR has adopted a compliance program and Code of Ethics that governs all employees. Each company officer and employee affirms in writing that he or she has received, read, and understands the Code of Ethics and Compliance Manual. HFR's Chief Compliance Officer is responsible for supervising the compliance program, which includes investigating any potential violations of the Code of Ethics.

John M. Klimek does not report to a supervisor. You can contact Michael Arenibar, Chief Compliance Officer, at 312-628-0328 with any compliance matters.

**Item 1- Cover Page**

**Barry A. Higgins**

**HFR Asset Management, LLC**

10 South Riverside Plaza, Suite 700

Chicago, Illinois 60606

Phone: 312-327-0430

January 1, 2015

This Brochure Supplement provides information about *Barry A. Higgins* that supplements the HFR Asset Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Michael Arenibar Chief Compliance Officer at 312-327-0430 if you did not receive HFR Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

## **Item 2- Educational Background and Business Experience**

Barry Higgins (Born 1975): Managing Director, HFR Platform

### Education Background:

DePaul University, Chicago, IL, MBA Finance May 2002

Northeast Louisiana University (now the University of Louisiana at Monroe), Monroe, LA, BA – Economics 1997

### Business Background:

HFR Asset Management, LLC (2013 - Present): Managing Director, HFR Platform;

(2010-2012): Director, HFR Platform

Alternative Consulting, Inc. (2009 - 2010): Founder and President

Ranger Advisors (2004 - 2008): Partner and Investment Committee Member

## **Item 3- Disciplinary Information**

There is no disciplinary history to report.

## **Item 4- Other Business Activities**

There are no outside business activities to report.

## **Item 5- Additional Compensation**

There is no additional compensation to report.

## **Item 6 - Supervision**

HFR has adopted a compliance program and Code of Ethics that governs all employees. Each company officer and employee affirms in writing that he or she has received, read, and understands the Code of Ethics and Compliance Manual. HFR's Chief Compliance Officer is responsible for supervising the compliance program, which includes investigating any potential violations of the Code of Ethics.

Barry A. Higgins reports to John M. Klimek, President of HFR Asset Management, LLC who can be contacted at 312-327-0430. Alternatively, you may contact Michael Arenibar Chief Compliance Officer, at 312-628-0328.



**Item 1- Cover Page**

**Tom Sass**

**HFR Asset Management, LLC**

10 South Riverside Plaza, Suite 700

Chicago, Illinois 60606

Phone: 312-327-0430

January 1, 2015

This Brochure Supplement provides information about *Tom Sass* that supplements the HFR Asset Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Michael Arenibar, Chief Compliance Officer at 312-327-0430 if you did not receive HFR Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

## **Item 2- Educational Background and Business Experience**

Tom Sass (Born 1962): Managing Director, HFR Platform

### Education Background:

Tufts University, Fletcher School, PhD - Intl Relations Intl Business, Negotiation, and Security Studies  
2012

Harvard University, Kennedy School of Government, Masters of Public Administration, 1998

Yale University, Yale College, B.A. - American Studies, 1984

Armed Forces Staff College, Joint Military Professional Education Phase II, 2000

Defense Language Institute, Italian, 1992

### Business Background:

HFR Asset Management, LLC (2013 – Present), Managing Director, HFR Platform;  
(2012): Director, HFR Platform

U.S. Naval War College (2007 - 2012), Donovan Special Operations Chair and Military Operations  
Professor

SEAL Delivery Vehicle Team ONE, (2005 – 2007), Commanding Officer

Flag Aide to Commander Naval Forces Europe and Allied Forces South, (2001-2003)

Executive Officer, Naval Special Warfare Unit TWO, (2000 – 2001)

Operations Officer, Joint Staff, Special Operations Division, (1998 – 2000)

Junior Officer Assignments, (1988 – 1997)

Cargill Inc. (1985 – 1987), Merchant, Commodity Marketing Division

## **Item 3- Disciplinary Information**

There is no disciplinary history to report.

## **Item 4- Other Business Activities**

There are no outside business activities to report.

## **Item 5- Additional Compensation**

There is no additional compensation to report.

## **Item 6 - Supervision**

HFR has adopted a compliance program and Code of Ethics that governs all employees. Each company officer and employee affirms in writing that he or she has received, read, and understands the Code of Ethics and Compliance Manual. HFR's Chief Compliance Officer is responsible for supervising the compliance program, which includes investigating any potential violations of the Code of Ethics.

Tom Sass reports to Barry Higgins, Managing Director, HFR Platform, Mr. Higgins can be contacted at 312-327-0430. Alternatively, you may contact Michael Arenibar Chief Compliance Officer, at 312-327-0430.

**Item 1- Cover Page**

**Seth Weinstein, CFA**

**HFR Asset Management, LLC**

10 South Riverside Plaza, Suite 700

Chicago, Illinois 60606

Phone: 312-327-0430

January 1, 2015

This Brochure Supplement provides information about *Seth Weinstein* that supplements the HFR Asset Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Michael Arenibar, Managing Chief Compliance Officer at 312-327-0430 if you did not receive HFR Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

## **Item 2- Educational Background and Business Experience**

Seth Weinstein, CFA (Born 1973): Director, HFR Platform – HFR Asset Management, LLC

### Education Background:

Fordham University Graduate School of Business, MBA Finance and Marketing, 2004

University of Michigan, BA Political Science, 1995

### Business Background:

HFR Asset Management, LLC (2013 – Present): Director, HFR Platform– HFR Asset Management, LLC;

(2012): Director, Business Development

Man Investments (2008 – 2011): Vice President, Institutional Relationship Management

Fischer Francis Trees & Watts, LLC (2004 – 2008): Client Portfolio Manager, Client Service and Business Development

UBS Global Asset Management (1999 – 2004): Client Service Associate, Client Relationship Management

; (1997 – 1999): Portfolio Assistant, Index Equities

Bankers Trust Company (1996 – 1997): Investment Assistant, Global Securities Services

### Minimum Qualifications for Professional Designation

The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed- income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. For more information, visit the CFA Institute's web site, [www.cfainstitute.org](http://www.cfainstitute.org).

## **Item 3- Disciplinary Information**

There is no disciplinary history to report.

## **Item 4- Other Business Activities**

There are no outside business activities to report.

## **Item 5- Additional Compensation**

There is no additional compensation to report.

### **Item 6 - Supervision**

HFR has adopted a compliance program and Code of Ethics that governs all employees. Each company officer and employee affirms in writing that he or she has received, read, and understands the Code of Ethics and Compliance Manual. HFR's Chief Compliance Officer is responsible for supervising the compliance program, which includes investigating any potential violations of the Code of Ethics.

Seth Weinstein reports to Tom Sass. Mr. Sass can be contacted at 312-327-0430. Alternatively, you may contact Michael Arenibar Chief Compliance Officer, at 312-327-0430.