

Part 2A of Form ADV: Firm *Brochure*

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Item 2 Material Changes

Item 4 Advisory Business

Item 5 Fees and Compensation

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

Item 7 Types of *Clients*

A large, empty rectangular box with a thin black border, occupying the majority of the page below the header. It is intended for the user to write their response to the question 'Types of Clients'.

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

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Item 16 Investment Discretion

Item 17 Voting *Client* Securities

Item 19 Requirements for State-Registered Advisers



