

**Item 1 – Cover Page**

Double Eagle Partners, LP  
100 Bayview Circle, Suite 500  
Newport Beach, CA 92660-8903  
March 30, 2016

This is Form ADV, Part 2 A, the “Disclosure Brochure” or “Brochure” for Double Eagle Partners, LLC, as required by the Investment Advisers Act of 1940. This is a very important document between the Limited Partner (you, your) and Double Eagle Partners, LLC (Double Eagle, DEP, us, we, our). This Brochure provides information about our qualifications and business practices.

If you have any questions about the contents of this Brochure, please contact Peter Pellizzon, Chief Compliance Officer at 949-737-7700 or via email at [info@doubleeaglepartners.com](mailto:info@doubleeaglepartners.com).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Regulatory Authority.

We are a registered investment adviser with the Securities and Exchange Commission. Our registration as an Investment Adviser does not imply any level of skill or training. The oral and written communications we provide to you, including this Brochure, is information you use to evaluate us (and other advisers) and which are factors in your decision to hire us.

Additional information about our firm (and our employees) is available to you for free, by using a Securities and Exchange Commission “public disclosure” website. This site is called “Investment Adviser Public Disclosure” and is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

There is a material change in this ADV Part 2A Brochure dated March 30, 2016, and submitted as part of our annual update for the year ending December 31, 2015. Information related to an order entered into by HCM with the National Futures Association (“NFA”) is outlined within Item 9 of this Form ADV.

There was also a material change in Double Eagle’s business, reflected in this ADV Part 2 Brochure effective June 16, 2015, in comparison to the prior brochure utilized from the annual update for the year ending December 31, 2014. The material change in that update was that Double Eagle’s clearing firm and primary custodian, JP Morgan Clearing Corp. (JPMCC), made the decision to exit the custodial and clearing business, so Double Eagle has changed its clearing firm and primary custodian to National Financial Services LLC (NFS), a division of Fidelity Investments. NFS was recommended by JPMCC, after which Double Eagle conducted an analysis of NFS and other alternatives, ultimately deciding that NFS was the optimal choice to meet the firm’s custodial and clearing needs.

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### **Item 4 – Advisory Business**

#### **Overview of our Firm:**

Double Eagle Partners was established in 2003 and is an investment adviser registered with the US Securities and Exchange Commission (SEC), due to common ownership and management with our affiliate, Hollencrest Capital Management (HCM), an SEC registered investment adviser and broker dealer.

#### **Principal Owners / Executive Officers:**

HCM's principal owners include the following individuals:

Gregory Pellizzon, Managing Member, Chief Investment Officer  
Peter Pellizzon, Member and Chief Compliance Officer  
Robert Wolford, Member  
Michael Schulman, Member

#### **Investment Advisory Services Offered / Provided**

Double Eagle Partners, LLC (DEP) was formed to act as the General Partner for hedge funds and other investment funds.

Currently, DEP's sole client is Hollencrest Bayview Partners, L.P. (BVP), which is a privately offered hedge fund (the Fund). DEP is the Investment Adviser and General Partner to the Fund (BVP).

DEP has engaged our affiliate, Hollencrest Capital Management (HCM) to:

- Be the Sub-Adviser for the Fund;
- Be the placement agent for Limited Partnership interests in Bayview (BVP);
- Provide corporate administrative services.

In addition, DEP has entered into an agreement with US Bancorp Fund Services, LLC to provide administrative and reporting services for the Fund and LP investors in the Fund. Please see the Fund's Private Placement Memorandum for a complete description of the Fund.

Please see the Form ADV, Part 2 A and Part 2 B Brochure Supplements for additional information on Hollencrest Capital Management (HCM) (available via Investment Adviser Public Disclosure on the cover page of this Brochure).

Hollencrest Securities, LLC is a broker/dealer and member of FINRA; and a registered investment adviser, dba Hollencrest Capital Management (HCM) with the Securities and Exchange Commission.

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HCM's services include recommending the Fund (BVP) to clients while taking into account the client's needs, including total return objectives, risk tolerance, and other assets and obligations of the client. Admission as an investor in the Fund (BVP) is not open to the general public and must meet the definition of an Accredited Investor.

The Fund (BVP) is not intended as a complete investment program and is designed only for persons who are able to bear the economic risk of their investments and are sophisticated persons in connection with financial and business matters.

HCM is also responsible for managing the assets in the Fund (BVP) with the use of closed-end funds, fixed income, and other investment assets. In this investment management capacity, HCM is acting on DEP's behalf to advise the Fund (BVP). HCM accesses a range of different information sources, including Bloomberg, William O'Neil, and other comparable resources. Proprietary screens and analysis methodologies are applied to the information gathered to arrive at a selection of holdings deemed suitable for investment. HCM then employs various trading strategies designed to generate the greatest value possible with the selected holdings. HCM may not show preferential treatment of the Fund (BVP) over its other discretionary clients, either in selection of recommended securities, or in the employment of trading strategies.

We may use a number of securities within a Client's account, including but not limited to:

- Mutual funds;
- Closed-end funds;
- Exchange Traded Funds (ETFs);
- Individual equity securities;
- Individual Fixed Income securities;
- Bridge lending;
- Futures;
- Real Estate Loans, Mortgages;
- Alternative investments (hedge funds or real estate trusts)

### **General Information on Advisory Services**

**Services to Family and Friends of HCM:** Family members or friends of HCM principals and employees may receive the same or similar advisory services as Limited Partners for fees that are zero or negotiated at a rate lower than available to our Clients. These lower advisory fees charged to family or friends are not available to Clients. In addition, HCM employees may invest in our affiliated limited partnership (Bayview Partners, LP) without having to qualify as a Qualified Client due to their employment with us (or be charged the performance fee by the investment adviser / GP).

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### Assets Under Management (as of December 31, 2014):

Type	AUM in US Dollars
Discretionary	\$26,250,894.67
Non-Discretionary	\$ 0.00

The discretionary Assets Under Management is the aggregation of the ending capital values of all of the entities who owned a part of the Fund as of 12/31/14.

## **Item 5 – Fees and Compensation**

### **Fee Schedule for Services Provided to the Bayview Fund**

#### Asset Based Fee

DEP receives asset-based fees from the Fund (BVP) in an amount equal to 1.00% of the Fund's assets on an annual basis. These fees are assessed monthly, in arrears, and will be adjusted pro rata for any subscriptions or withdrawals made during the month.

#### Performance Fee

DEP receives 20% of the Fund's net profit each year, net of the asset based fee.

#### Expense Reimbursement

DEP will also be reimbursed for any expenses relating to the Fund (BVP)'s formation and operation.

#### Payments to Hollencrest Capital Management

From these fees DEP pays HCM for its management and placement services. HCM's compensation (for sub-advisory portfolio management services, administrative services and placement agent services) through the written management agreement (and other agreements) with Double Eagle Partners allows for HCM to receive a portion of the base (percentage of assets). The performance fee compensation is paid to Double Eagle Partners (DEP) by the Bayview Partners Fund (BVP). The actual advisory fees payable to Double Eagle Partners by Bayview Partner Fund (BVP) is described in the private offering memorandum.

#### Additional Fees Payable by the Fund (BVP)

Services provided by DEP or HCM to the Fund (BVP) do not include service charges (commissions) or other transaction costs which are borne solely by the Fund (BVP) and the LP investors. See General Information on fees, below, and Item 12, Brokerage Practices, below).

### **General Information on Advisory Fees**

#### **Portfolio Valuation for Fee Calculation and Performance Purposes:**

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We use a combination of individual security prices to value the Fund (BVP). We primarily use the prices as provided by the Fund (BVP)'s qualified custodian. If we discover issues or errors in the pricing file delivered to us by our custodian, we may utilize a third party source to value the security and override the original price in our portfolio accounting system (sometimes there are file or price errors).

**Additional Expenses:** The portfolio management services provided by HCM include those individual securities we believe are the most suitable to meet the Fund (BVP)'s investment objectives (and include mutual funds, exchange traded funds, closed-end funds). In addition to transaction costs borne by the Fund (BVP), these securities also charge additional fees and expenses to their shareholders. These are in the form of:

- Advisory / management fees;
- Distribution fees (in the case of mutual funds);
- Administrative and operational expenses (in the case of exchange traded or closed-end funds);
- Among others.

**Additional Compensation (see also Item 14, below):** Hollencrest Securities, LLC is a registered broker/dealer with FINRA and investment adviser with the SEC and is licensed to receive additional compensation from brokerage and advisory clients when providing brokerage or advisory services to the Fund (BVP). This additional compensation is primarily paid to our broker dealer and may include:

- 12b-1 fees paid by mutual funds to broker dealers
- Other forms of typical and customary compensation

As a result, DEP and the Fund (BVP) understand that HCM does not reduce the compensation from DEP to offset the commissions or other forms of payment HCM receives due to HCM's broker/dealer registration on securities we purchase for the Fund (BVP).

Additional compensation the Fund (BVP) will pay (imposed by custodians, brokers, third party investment advisers, and other third parties) include (and are not limited to) the following):

- Advisory fees and administrative fees charged by Mutual Funds (MF), Exchange Traded Funds (ETFs)
- Custodial Fees
- Odd-Lot differentials
- Transfer taxes
- Wire transfer and electronic fund processing fees
- Other fees and expenses that may be applicable and incurred



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Other Items in this Brochure provide additional information and disclosure related to “other costs” the Fund (BVP) may incur. Please see Item 12 below.

**Official record of the Fund (BVP) Account(s):** For performance and cost basis information (including capital gains or loss information), the “official” record-keeper of the Fund account data and information is the Fund’s third party qualified custodian – US Bancorp. As a result, the official record-keeper is the Fund’s custodian. If you have questions, please contact the General partner to discuss the record-keeper.

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

DEP is compensated on an asset based and performance based fee basis. (See Item 5 and the Private Offering Memorandum for additional detail).

HCM does not receive a portion of the performance-based fee which may be earned by DEP for services provided to Bayview Partners (the Fund - BVP).

### **Item 7 – Types of Clients**

DEP provides portfolio management services to the Fund (BVP), only (a private investment partnership); individuals or entities invest in the Fund (BVP) as Limited Partner Investors.

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

#### **Method of Analysis:**

As the adviser to the Fund (BVP) (under a sub-advisory agreement), the following disclosures are from HCM's Form ADV Part 2 A:

- HCM does not have a particular approach to security selection or analysis for the Fund (BVP).
- We utilize data from a number of sources (as identified below). We then utilize our proprietary screens and methodologies to gather data.
- The output of this analysis is the securities, asset classes, industries and asset allocation weights that we use to guide our investment decisions.
- We then implement this information (those deemed suitable) for investment or recommendation to our Fund (BVP).

#### **Sources of Information:**

Information we use to provide advice includes the following:

- Bloomberg
- BCA Research
- Lombard
- Investors Business Daily
- Yardeni
- William O'Neil
- Other similar services and resources

#### **Investment Strategies:**

We then employ various trading strategies to generate the greatest value possible with the securities we recommend. Strategies include the following:

- Short term purchases (held under 1 year)
- Long term purchases (held over 1 year)
- Trading (securities that may be acquired and liquidated within approximately 30 days (or longer))
- Short sales
- Margin
- Bridge Loans
- Real Estate related transactions

- Loans
- Mortgages
- Option writing or strategies
- Hedging through the use of Futures on oil, gold, the S&P 500 index, the US Dollar, and other Futures contracts

### **Risk of Loss:**

DEP (and HCM) remind LP investors that investing in securities has associated “investment and market” risk. This means that you may lose a portion or all of the assets you invest in Fund (BVP). Neither DEP nor HCM, directly or indirectly, suggest or imply any level of performance, or that your specific investment objectives will be achieved.

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

We are required for DEP and our senior executives to disclose any disciplinary events or information that are material to your evaluation of DEP, if any. As of the date of this Brochure we do not have any of the following events to disclose that would be material to your evaluation of DEP and the services we provide to Limited partners and Prospective Clients:

- Criminal or civil events
- Administrative proceeding before the SEC or any other federal regulatory agency or financial regulatory authority
- Self-regulatory authority FINRA

We do, however, have the following disclosure.

On December 21, 2015, the National Futures Association (“NFA”) issued a Complaint against Hollencrest and Peter Pellizzon (“Pellizzon”). The Complaint alleged that Hollencrest violated NFA Compliance Rule 2-2(f) based on communications by a former Hollencrest employee, Nita Charlton-Gomes (“Charlton-Gomes”). Charlton-Gomes sent NFA’s registration department a copy of a fabricated e-mail she claimed she received from an NFA employee who did not in fact exist. This fabricated e-mail showed NFA’s approval of another Hollencrest employee’s registration. Charlton-Gomes then repeatedly lied regarding the fabricated e-mail, which caused the NFA and Hollencrest to incur significant costs to investigate and resolve the matter. The Complaint alleged that Hollencrest and Pellizzon did not adequately supervise the firm’s investigation of the circumstances surrounding Charlton-Gomes’ submission of information to the NFA, in violation of NFA Compliance Rule 2-g (a).

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On or about March 16, 2016, Hollencrest agreed to a finding by the Business Conduct Committee of the NFA ("Committee"), without admitting or denying that Hollencrest violated NFA Compliance Rule 2-4 by failing to observe high standards of commercial honor and just and equitable principles of trade in the conduct of its commodity futures business and swaps business. Hollencrest further agreed to the order of the Committee to pay compensation of a \$125,000 fine for the NFA's investigative costs and to resolve the NFA's charges. Separately, on March 24, 2016, based on the conduct of Charlton-Gomes described herein, Nita Charlton-Gomes was found by the Financial Industry Regulatory Authority ("FINRA") to have violated FINRA Rule 2010. Charlton-Gomes consented to a lifetime bar from association with any FINRA member broker-dealer in all capacities.

Pellizzon was not found to have violated any NFA or FINRA rules, and no penalties were assessed against him.

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

Our principal executives (see Item 4) are also employees with HCM and Hollencrest Insurance Services. This additional activity creates a material conflict of interest in the providing of investment advice (and other services to the Fund (BVP)). We manage these conflicts of interests through various means, including but not limited to the following:

1. Disclosure (this Form ADV, Part 2 A) of the outside business activity
2. Certain contractual provisions related to Investment Advice
3. Internal controls, including Policies and Procedures for all aspects of our various services
4. The designation of a Chief Compliance Officer (CCO) as required by SEC rules applicable to registered investment advisers
5. Compliance Program Administration (by the CCO and designated managers and supervisors)
6. Compliance monitoring and exception reporting to the CCO and the Managing Members
7. Periodic compliance training for all employees (at least annually)
8. A Code of Ethics which includes prohibitions on insider trading, reporting of all brokerage accounts and securities holdings, restrictions on gifts, entertainment and gratuities, among other provisions (and our monitoring off all personal trading and outside business activities for registered employees and non-registered employees).
9. An annual “review and assessment” of our investment adviser compliance program assessing the adequacy of the program and its implementation
10. Other processes and procedures as may be applicable and relevant to the objective of managing potential conflicts of interest and other compliance requirements

### Item 11 – Code of Ethics

#### **Personal and Proprietary Trading**

DEP has adopted Hollencrest Securities' Code of Ethics and personal securities trading policies and procedures. DEP and HCM follow our own advice. However, we recognize:

First, we are a fiduciary to you, DEP and the Fund (BVP), not only due to Regulations and Rules under the Advisers Act which govern our relationship with you, but because it is also good business.

Second, our fiduciary obligations mean that when providing Investment Advisory services to you, we place your interests first and disclose actual and potential conflicts of interests.

Third, following our own advice (as investors, including beneficial ownership accounts, i.e., family and other similar accounts) presents a potential conflict of interest with our personal interests and those of each Fund LP investor to whom we provide advisory services.

As a result, the following statements apply to this potential conflict of interest (and the steps we take to protect your interests):

- We have developed and implemented controls to address this potential conflict of interest. We also allow our employees and their family members to purchase or sell securities, including products that Hollencrest has selected to purchase or sell for you. These controls are intended to allow our firm, executives or employees to have a financial interest in securities we recommend (buy, sell, or recommend) to you. Our controls include:
  - The maintenance of a restricted security list – we require any person employed by Hollencrest to obtain pre-clearance and prior approval to purchase or sell any security while a security is on the list.
    1. The Portfolio Management team may also be consulted before granting permission to an Employee to conduct trades in securities on the restricted security list.
    2. There is no restriction regarding Employee transactions in open-end mutual funds and ETFs.
  - A Code of Ethics which defines the desire and requirement for ethical behavior by all employees, affirms our goal of meeting our fiduciary obligations to Clients and, and defines our restrictions on insider trading (trading while in possession of material, non-public information). Additional sections of the Code include the following:

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- a. Personal securities trading and restrictions – requiring all new employees to disclose members of their households, all beneficially owned securities, including securities in certificate form (not held by a custodian), all brokerage accounts and all outside business activities. This initial disclosure is also required to be updated and affirmed by each employee on a quarterly basis.
  - i. Our Personal Trading process:
    - 1. Prohibits employees from participation in new issue securities (Initial Public Offerings, or IPO).
    - 2. Prohibits employees from investing in private placement or private offering securities unless pre-cleared and approved by our CCO or CIO prior to investment.
    - 3. Requires pre-clearance (approval) of all reportable transactions prior to purchase or sale.
    - 4. Requires a report, on a quarterly basis, of all reportable transactions (or none, if no transactions are conducted).
- b. Gifts and Entertainment – disclosure of gifts and entertainment provided to Clients, Prospective Clients, Vendors, etc., including the refusal of gifts or entertainment deemed to be excessive or to which an expectation of a favor or a compromise of our objective assessment as a fiduciary.
- c. Client Confidentiality – requiring all employees to safeguard material, non-public information on all of our Clients.
- d. Disclosure of all outside business activities of all employees, including service as a director or employee of outside entities, including public stock companies, charity organizations, etc.
- e. Disclosure of all political contributions made by employees.
- f. Compliance procedures related to the Code (including forms and submission requirements), such as quarterly reports of all “reportable securities transactions” among others.
- g. Violations and sanctions that are imposed on employees by the CCO (and Firm) for violations of the Code and its requirements.
- h. Allows employees to purchase, sell, or own the same securities recommended to our Clients.
- i. Allows employees to own securities that are not suitable for our Advisory Clients.
- j. Prohibits employees from giving preference to employee or affiliated trades over our Clients.
- k. Requires, when Client and personal (employee) trades are aggregated (blocked) together, that the shares purchased over time to fill the block are “average priced” so all block participants receive the same average price.
  - i. If partial fills are completed, Client orders (non-employee, non-related) are completely filled before employee trades.

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- l. Requires employees to act with integrity, competence, diligence, respect and in an ethical manner with the public, colleagues, Clients, Prospective Clients, HCM and affiliates, vendors / suppliers, and other industry professionals.
- m. Prohibits the use of an individual's employment at HCM (or affiliates) to enrich themselves or any party.
- n. Upon identification of compliance related issues or conflicts of interest (actual or potential) to contact our Chief Compliance Officer.
- o. Conduct personal trading in compliance with our Code and its requirements.
- p. Promote the integrity of HCM and the profession by complying with these standards as developed and implemented by HCM.

You may request a copy of the Hollencrest's Code of Ethics by contacting Peter Pellizzon, Chief Compliance Officer at 949-737-7700 or via email at [peterp@hollencrest.com](mailto:peterp@hollencrest.com).

### **Item 12 – Brokerage Practices**

#### **Transactions for Bayview Partners Hedge Fund**

HCM acts as sub-adviser to Bayview Partners (BVP). The Investment Advisory Agreement between DEP and HCM authorizes HCM to determine the securities to be bought and sold, the amounts of the securities bought and sold, and the timing of purchases and sales made for the Fund (BVP). The buy and sell transactions for typical equity and fixed income securities are placed (for BVP) at National Financial Services LLC (NFS), an SEC and FINRA registered broker dealer. Please see the Confidential and Private Offering Memorandum for Bayview Partners Fund (BVP) for additional details.

The custodian of Bayview Partners Fund (BVP) is NFS, an SEC and FINRA registered broker dealer.

#### **Recommendation of a broker – Futures transactions:**

The open and close transactions for futures contracts are placed through our co-independent introducing broker, our strategic partner Gain Capital, and are cleared through our Futures Commodities Merchant, Rosenthal Collins Group, Inc., a member of the National Futures Association (NFA).



### **Soft Dollars**

DEP does *not* participate in the generation or use of Soft Dollar credits (the use of Client Commissions for research products or services). Hollencrest Securities LLC pays for all research products or services we use in providing our advisory services to the Fund (BVP).

### **Trade Errors - General definition of a Trade Error for Advisory Clients**

Trade errors may include the purchase or sale of securities that:

- Are not legally authorized for an account
- Are prohibited by investment policy or style
- Are prohibited by the contract
- Include an incorrect security or transaction (buy versus sell, etc.)
- Block trades that are incorrectly allocated
- Other situations wherein a trade or an attribute of a trade needs to be corrected

### **Selection of a Broker and Trading Practices**

When placing transactions for the Fund (BVP), we utilize the following criteria to determine through whom we will execute transactions. Our experience and analysis, based upon these evaluation criteria, supports our decision to utilize, primarily, the brokerage services of NFS. We consider the following factors when making purchase and sale decisions:

- Broker's financial strength, integrity, and stability
- Market access
- Transaction confirmation and statement practices
- Reasonableness of commission charges or spreads; ability to negotiate commissions
- Actual execution
- Ability to promptly and reliably effect transactions
- Consistency of process (minimal trade errors)
- Nature of the security or instruments we are buying or selling
- Timing of the transaction
- Execution, clearance and settlement capabilities

### **Principal Transactions**

DEP does not engage in Principal Trading for the Fund (BVP).

### **Trade Errors**

For those errors that DEP created, DEP will make sure to make the Fund (BVP) is made whole from any losses arising from the error. Gains are addressed based upon the following:

- If the transaction was suitable for the Fund (BVP), the gain remains with the fund;
- If the transaction was not suitable (for any number of reasons) for the Fund (BVP), the gain will be removed from the Account and the appropriate trade that should have been executed on behalf of the Fund (BVP) will be implemented on an “as-of” basis.

### **Item 13 – Review of Accounts**

#### **Reviews, Reviewers, and Reports**

The Fund (BVP) is reviewed on a continual basis by monitoring securities (holdings) held by our Portfolio Managers.

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

#### **Client Referrals:**

Neither DEP or HCM have entered into cash referral arrangements where DEP or HCM pay third parties for the introduction of prospective, Limited Partner Investors to the Fund.

Hollencrest Securities, LLC, as a broker/dealer is the placement agent for DEP and Hollencrest's Bayview Fund Partners (BVP).

#### **Other Compensation:**

As described under Items 4 and 5 in this Part 2 A Brochure and the Part 2 B Brochure Supplement(s), attached, DEP (through the executives) and HCM (through their executives and employees) are involved in other business activities (other than providing investment advice). These activities include the following:

- Hollencrest Securities LLC, is also a securities broker/dealer and is a member of FINRA
- Hollencrest Securities LLC, is also an introducing Broker (along with strategic partner and co-introducing broker Gain Capital) to Rosenthal Collins Group – a member of the NFA and our Futures Commodities Merchant
- Owners and employees of Hollencrest Insurance Services (an insurance agency / broker)

### **Item 15 – Custody**

DEP as the General Partner and Adviser to Hollencrest Bayview Fund Partners (BVP) has custody of the Fund (BVP)'s Assets. To comply with regulatory requirements, we subject the Fund (BVP) to an annual financial audit by a certified public accountant each calendar year. The results of the financial audit are then presented to each (then current) Limited Partner investor of the Fund.

### **Item 16 – Investment Discretion**

#### **Investment Discretion**

HCM, through our agreement with DEP (adviser and GP to the Fund (BVP)) has investment discretionary authority over the Fund (BVP). The Investment Advisory Agreement between DEP and HCM authorizes HCM to determine the securities to be bought and sold, the amounts of the securities bought and sold, and the timing of purchases and sales made for the Fund. Generally, we are not restricted to the securities, types of securities or the types of investments that can be invested in the Fund.

### **Item 17 – Voting Client Securities (i.e., Proxy Voting)**

DEP has delegated proxy voting responsibility to HCM for the Fund (BVP). HCM maintains records of ballots received and the votes cast. We vote all ballots received. Of course, DEP is not responsible for:

- Voting proxies of foreign issuers if the cost of voting is, in our opinion higher than the value of voting the proxies (based on the number of shares / ballots)
- If there is a conflict of interest between the issuer, HCM and / or the Fund (BVP) (in these cases, we will abstain from the vote due to the conflict);
- Any situation or characteristic that affects Hollencrest's ability to responsibly vote the proxy

For ERISA Clients: You are required to provide DEP with copies of the relevant sections of your Plan and Trust Documents related to services provided by named fiduciaries (like DEP), which govern our services to you, including proxy voting (and any amendments that may occur from time to time).

Note: HCM will not vote or take action on corporate actions (re-organization of the company, among other matters) or other communications to shareholders / investors.

#### **Proxy Voting Procedures:**

Due to the nature of our business, we do not receive a large volume of proxy related materials (we do not have large positions of individual equity securities in our Fund). In voting proxies, it is our overall policy to vote with management on routine matters:

- Officers or directors;

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- Designation of a certified public accountant;
- Issuance of additional shares or classes of shares;
- Other matters deemed routine

Our decisions are driven by what is in the best interest of the Fund (BVP), which holds an investment in the particular security or fund (mutual or ETF) that issues the proxy materials.

If you have questions related to proxy voting by HCM, or would like a copy of our Proxy Voting Policies / Procedures, please contact, Peter Pellizzon, at [peterp@hollencrest.com](mailto:peterp@hollencrest.com) or 949-737-7700.

### **Item 18 – Financial Information**

DEP does not have any financial information or issues to disclose to Clients or Prospective clients which would reasonably impair our ability to meet contractual commitments to you, our Clients.

Neither HCM nor any management person has been the subject of a bankruptcy proceeding.