

**Part 2A of Form ADV: Firm Brochure**

Item 1 Cover Page

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January 28, 2017

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This brochure provides information about the qualifications and business practices of Nantucket Multi Managers, LLC (the "Adviser" or "We"). If you have any questions about the contents of this brochure, please contact Libby Greenstone, Chief Compliance Officer, at 248-723-9286 or [libby@nantucketfunds.com](mailto:libby@nantucketfunds.com).

Nantucket Multi Managers, LLC is an SEC-registered investment adviser. The Adviser's registration with the Securities and Exchange Commission became effective January 2, 2004. Registration with the Securities and Exchange Commission as an investment adviser does not imply any level of skill or training.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Nantucket Multi Managers, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

This document should be reviewed in its entirety. However, note the following change(s) may be material since the prior ADV-2A update:

Eric M. Strzempek:

Mr. Strzempek is head of operational due diligence. While he is involved in all aspects of due diligence, he is responsible for all operational due diligence matters. Mr. Strzempek became a voting member of the Investment Committee (solely an operational vote with full veto power) on January 1, 2017.

Interests or shares (as applicable) in Nantucket's fund-of-funds (the "Funds" or each a "Fund") are sold only on the basis of delivery of the relevant Confidential Private Placement Memorandum ("COM"). Each Fund is unique in its own terms and conditions as fully detailed in such Confidential Private Placement Memorandum. This brochure should not be relied upon as sufficient and complete when evaluating an investment in any of Adviser's Funds. A prospective investor must independently assess the suitability of a Fund investment and in doing so, should seek advice from their own advisors and should carefully and fully read the relevant Confidential Private Placement Memorandum, especially the "Risk Factors" section before making a decision to invest in any Fund.

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Adviser's Business and Expertise:

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Nantucket Multi Managers, LLC provides investment management services to three privately-offered fund-of-funds (the "Funds" or "Fund-of-Funds") which are exempt from registration as investment companies under the Investment Company Act of 1940, as amended, pursuant to Section 3(c)(1) and Section 3(c)(7).

The following is the history of the Adviser:

January 1, 2000 through December 31, 2000 - Nantucket Multi Managers, LLC and Metamora Multi Managers, LLC served as co-general partners of Nantucket Fund, LP

January 1, 2001 through present - Nantucket Multi Managers, LLC is the sole general partner/managing member/investment manager of the Funds.

The Adviser's ownership structure for owners greater than 25%:

Nantucket Valenti, LP is sole member of the Adviser\*\*

Nantucket Holdings, A LLC is the general partner and Nantucket Holdings B, LLC is a limited partner of Nantucket Valenti, LP\*\*

William Goldsmith is the majority owner of Nantucket Holdings A, LLC and Nantucket Holdings, B LLC

\*\* Note: As of 10-18-2013 Samuel Valenti III has no ownership interest or operational control in any Nantucket related entity.

The following Funds are managed by the Adviser and operate within a master/feeder structure. (Note: The "Master Fund" is the fund that invests directly with underlying managers and the "Feeder Funds" invest substantially all of their assets in the Master Fund.)

Nantucket Fund, LP (Domestic "Master Fund")

Nantucket Institutional Fund (Cayman) SPC (Offshore Feeder Fund that is a Cayman Islands segregated portfolio company)

Nantucket Levered, LLC (Domestic 1-3x Levered Feeder Fund-leverage varies from time to time)

The Adviser's total estimated assets under management in the Funds as of 12-31-2016 were \$283 million. (This represents the combined estimated NAV of the master fund and its two feeder funds).

Hedge fund investing is the Adviser's area of expertise. The Adviser provides investment advice to the Funds relative to investing in other private investment funds, such as other privately-offered limited partnerships and limited liability companies also referred to throughout this brochure as "underlying managers". These underlying managers invest in a variety of public securities, and depending upon the underlying manager, include certain private investments.

Representative fees charged to investors in the Funds are as follows, however, an investor must refer to the relevant Confidential Private Placement Memorandum for specific details and applicability:

**Management Fees**

(charged monthly in arrears):

Nantucket Fund, LP = 1.5% per annum of net asset value ("NAV")

Nantucket Institutional Fund (Cayman) SPC = 1.0% per annum of NAV

Nantucket Levered, LLC = 1.5% per annum of NAV

Incentive Allocation: Accrued monthly but not earned or payable until year-end.

All Funds may earn incentive allocation, if and when applicable, in an amount equal to 10% of net new profits annually, provided that any incentive allocation payable to the Adviser will be reduced to the extent that an investor's net annual return on its investment in a Fund would be reduced below a 10% hurdle rate of return subject to a high water mark. For intra-year contributions and withdrawals, the 10% hurdle rate of return is prorated. Incentive Allocation does not apply to investor capital which was invested prior to January 1, 2006 (inception of the incentive allocation). No incentive allocation is charged to the Adviser, its employees or employee immediate family members for their investment(s) in any Fund.

Nantucket Fund, LP and Nantucket Levered, LLC - Fees may be negotiated in certain circumstances at the sole discretion of the Adviser based on various criteria such as size or date of the investment. Fees are waived for the Adviser's own investment in these funds, as well as for employees of Adviser or employee immediate family members.

Nantucket Institutional Fund (Cayman) SPC - All investors in the same share class for this fund are charged the same fees. Different share classes carry different fees. Note: Class E shares which charge no management fee or incentive allocation are available solely to employees, employee family members or the Adviser of this fund. Class F/FR are closed to new investors.

Management Fees/incentive allocation charged by the Adviser are calculated by the Funds' independent administrator and are itemized on investor's monthly statement. These fees are deducted from investor's capital account (in arrears) and are not billed separately.

A Fund investor will pay two levels of fees and allocable expenses 1) management fees and incentive allocation payable to the Adviser and the Fund's operating expenses and 2) fees, incentive allocations and expenses of underlying managers/funds (aka Sub-Managers or Money Managers as specified in the relevant COM) in which the Master Fund invests. Representative Fund operating expenses include, but are not limited to cost of administration, audit, legal, accounting, tax form preparation, compliance costs, record keeping, information technology, certain 3rd party service providers including consulting services, premiums for certain insurance coverage such as cyber and other liability insurance. FOR COMPLETE DETAILS of fees, incentive allocation and expenses borne by the Funds, please refer to the relevant Fund Confidential Private Placement Memorandum and Fund audited financials.

The Adviser or its employees receive no fees or compensation of any kind, directly or indirectly, from any underlying manager with whom the Funds invest.

As mentioned in "Fees and Compensation" Item 5, the Funds pay the Adviser performance-based compensation also referred to as an incentive allocation (or "incentive").

Incentive allocation to the Adviser (when earned) is 10% of net new profits and will be reduced to the extent such payment would reduce an investor's net annual return below a 10% hurdle rate of return in a given year. The hurdle rate will be prorated for intra-year contributions and withdrawals. Any incentive allocation is subject to a high water mark in perpetuity of the investment.

Incentive allocation is based on both realized and unrealized profits and is determined after deducting all other fees and the operating expenses of each Fund (including the management fee). Refer to relevant Private Placement Memorandum for full details regarding incentive allocation.

Examples of Incentive Allocation:

A full year investor with a 15% net (of annual management fee and other expenses) return will ultimately result in a 13.50% net annual return (after incentive) as 1.50% is earned incentive by the Adviser.

A full year investor with a 20% net (of annual management fee and other expenses) return will ultimately result in a 18% net annual return (after incentive) as 2% is earned incentive by the Adviser.

A full year investor with a 10.50% net (of annual management fee and other expenses) return will ultimately result in a 10% net annual return (after incentive) as 0.50% is earned incentive by the Adviser (rather than the full incentive of 1.05% as it would reduce the investor's net annual return below 10%.)

Example of High Water Mark Period:

A January 1 investor invested \$1,000,000 and as of December 31, investor's capital account was \$900,000 net of all fees and expenses. Until such time investor's capital account gets to \$1,100,000 (a 10% increase from the \$1,000,000 high water mark) no incentive allocation would be earned by or paid to the Adviser.

The Funds' independent administrator is responsible for the calculation of management fees/incentive allocation, investor capital accounts, performance and net asset value. The Fund's administrator sends investors notification that their monthly investor statements have been posted to the SS&C secure web portal.

The Adviser as of this writing manages no side-by-side accounts, however, reserves the right to do so. Adviser's affiliate, Nantucket Capital Management, LLC ("NCM"), provides hedge fund consulting services to its consulting clients and makes certain hedge fund investment recommendations based on the objectives of its consulting clients. As of this writing, NCM has no consulting clients.

The Adviser clients (according to the SEC's definition of client) are the Funds (Nantucket Fund, LP, Nantucket Institutional Fund (Cayman) SPC and Nantucket Levered, LLC). The Adviser's clients are pooled investment vehicles (fund-of-funds) that are offered to certain qualified investors.

Investments in the Funds are offered exclusively to investors satisfying the applicable accreditation requirements according to certain SEC rules as detailed in the relevant Fund's COM. Specifically, investors must be both accredited investors AND qualified purchasers. Appendix A of each Fund's Subscription Agreement summarizes the definitions of accredited investors and qualified purchasers.

Investors in any of the Funds should have knowledge and experience in financial and business matters in order to determine that such an investment is suitable based on its objectives.

Typically, domestic taxable investors such as individuals, trusts and family LLCs invest in the Nantucket Fund, LP or in Nantucket Levered, LLC. Tax-exempt or tax-deferred investors such as IRAs, foundations, endowments and pension plans typically invest in Nantucket Institutional Fund (Cayman) SPC, which blocks UBTI (unrelated business taxable income).

The following are standard initial investment minimums and liquidity provisions in order to invest in Fund:

Minimum Initial Investment:

Nantucket Fund, LP and Nantucket Institutional Fund (Cayman) SPC - \$1,000,000

Nantucket Levered, LLC - \$500,000

Minimum initial investments may be negotiable at the Adviser's discretion determined on a case-by-case basis.

Liquidity:

All standard Fund redemption terms are quarterly (end of each calendar quarter) on 95-day prior written notification. The Adviser, in its sole discretion, has the right to waive certain withdrawal limitations for investors on a case-by-case basis. However, investor notification of less than 95-day notice will incur a 2% short-notification fee payable to the Master Fund, which Adviser cannot override.

The "Withdrawals" section in the relevant COM should be reviewed in full before investing in any Fund.

Investor interests or shares (as applicable) in a Fund are sold only through delivery of the relevant COM to prospective investors. Each Fund is unique in its own terms and conditions as fully detailed in such COM. This brochure should not be relied upon as sufficient and complete when evaluating an investment in a Fund. A prospective investor must independently assess the suitability of a Fund investment and in doing so, should seek advice from their own advisors and should carefully and fully read the relevant COM especially the "Risk Factors" section, before making a decision to invest in any Fund.

The Adviser conducts extensive due diligence when evaluating prospective underlying managers for investment by the Master Fund. Due diligence is performed by employees of the Adviser who have sophisticated analytical skills, strong people skills and knowledge of various investment strategies. Generally, an MBA, CFA or significant industry experience is necessary to adequately perform such due diligence. The Adviser considers both the investment and non-investment, or operational risks of a prospective underlying manager and utilizes a variety of information in its due diligence efforts. In addition to meeting directly with the underlying manager to gather information, the Adviser also contacts other industry professionals, the underlying manager's professional service providers and references.

The methods of analysis used by the Adviser consist of a broad array of quantitative and qualitative considerations. The prospective underlying manager's expected return, volatility and correlation are examined for a statistical "fit" with the other underlying managers in the Funds. The Adviser must be confident in the underlying manager's people and investment process in order to make an investment on behalf of the Master Fund.

The Adviser relies on information provided by the underlying managers and their professional service providers in good faith including but not limited to exposure reports, performance reports and audits. Certain information is verified by the Adviser or an independent third party, however, certain other information is unverified either directly by the Adviser or an independent third party. The Adviser performs a background check on the prospective underlying manager (both the firm and founder or senior individual).

The Adviser believes that strategy diversification is important, but it is not necessary to allocate to all hedge fund strategies to achieve sufficient diversification. The Adviser gravitates toward strategies where process and skill are believed to create repeatable results over full market cycles. The Adviser seeks the benefits of strategy/manager diversification and reduced correlation. The Adviser prefers managers registered with the SEC, CFTC or FCA who follow industry best practices such as using high quality service providers (i.e. third party administrators, auditors, etc) with independent asset/pricing verification. A wide dispersion of performance results occur within each hedge fund strategy, therefore, Adviser believes that underlying manager skill is the determining factor for superior results. As of the date of this brochure, there are five broad investment strategy "buckets" the Adviser allocates to, which are subject to change at the Adviser's discretion: 1) Credit/Distressed 2) Event/Arbitrage 3) Multi-Strategy 4) Long/Short Equity and 5) Global Macro. Specific strategy and manager allocation is published quarterly in the Adviser's investor letter.

While the Adviser believes investment and non-investment risks are mitigated through a multi strategy, multi-manager approach, there are still investment risks that need to be understood when considering an investment in the Funds. The "Risk Factors" section of the relevant COM should be reviewed thoroughly before investing. The risks include, but are not limited to, loss of capital, general investment and market risks, operational risks, custodial risks, information technology and cyber security risks, tax risks, strategy risks, manager risks, fund structure risks and limitations on withdrawals/liquidity, both at the underlying manager level and the Fund level. While the Adviser has the ability to suspend withdrawals/redemptions under certain extraordinary circumstances, the Adviser has never suspended or limited investor withdrawals/redemptions of any Fund at any time. Reference liquidity information found in Item 7 of this brochure and Withdrawals section of the relevant COM.



The Adviser has no material legal or disciplinary events to disclose.

There is one regulatory event from 2003 to disclose relative to a management person of the Adviser, which is noted below.

Nantucket Multi Managers had an affiliated broker-dealer, Nantucket Securities Company, LLC (a member of FINRA and SIPC), during the time period from July 5, 2001 through December 31, 2007. Nantucket Securities Company, LLC voluntarily withdrew its FINRA membership on December 31, 2007 due to the appearance of a conflict.

During the period from June 6, 2003 through December 5, 2003, William Goldsmith's ownership in Nantucket Securities Company, LLC was temporarily suspended for six months barring him from membership or association in any capacity with any exchange member or member organization. This disciplinary action was imposed upon Mr. Goldsmith by the New York Stock Exchange as he was found to have engaged in an outside business activity ("OBA") without the prior written consent of his employer which was his involvement in the Metamora Fund, LP, the predecessor of the Nantucket Fund, LP. Mr. Goldsmith maintains that he notified his immediate supervisor of his OBA, received verbal consent and was told that written consent was in process, but according to NYSE findings that was not sufficient. No investors were harmed and no financial penalty was imposed on Mr. Goldsmith. He consented to this temporary disciplinary action without admitting or denying guilt and was re-affiliated with Nantucket Securities Company on December 6, 2003.

During the time of Mr. Goldsmith's temporary suspension from a member firm as described above, it is important to note that the Adviser's business of managing the Funds was not impacted.

The Adviser has common ownership with the following affiliated entities:

Nantucket Capital Management, LLC ("NCM")

SEC Registered Investment Adviser since February, 2000

NCM provides hedge fund consulting services to certain high net worth families regarding direct hedge fund investing. As of this writing, NCM has no clients.

Nantucket PEF, LLC ("NPEF")

NPEF is the managing member of a private equity fund-of-funds. This private equity fund-of-funds was wound down effective 12/31/2016. NPEF or other Nantucket entity perform administrative functions for other entities and are compensated for such services.

Common ownership of Nantucket Multi Managers, NCM and NPEF is as follows: William Goldsmith through various entities, Libby Greenstone and Andrew Hopper (a previous employee of Adviser) are equity owners of all Nantucket companies. William Goldsmith is the majority equity owner of each.

Strategic Partner: An unrelated, third party investor purchased a minority, non-management preferred interest in the Nantucket Companies' revenue stream, including the Adviser. This third party investor has no involvement in the day-to-day management of any Nantucket company, however, does maintain a substantial investment in Adviser's Funds.

John Lowenberg, Sr. is a Voting Member of Adviser's Investment Committee. (Refer to Continuation Pg 1)

William Goldsmith is a Director of the Nantucket Institutional Fund (Cayman) SPC, and while he is not paid for the directorship position, he indirectly benefits from the success of Nantucket Multi Managers, LLC and the Funds.

Outside Directors of Nantucket Institutional Fund (Cayman) SPC:

Dr. David J. Brophy, Chairman (Professor, University of Michigan Ross School of Business)

Don M. Seymour (DMS Governance Ltd, Cayman Islands)

Other investment-related activities by employees of the Adviser (which may be paid or unpaid):

William Goldsmith

Chairman of Investment Committee and Trustee / Cranbrook School

Chairman of Investment Committee and Trustee / Beaumont Health

Member of Investment Committee / Ultra High Net Worth Family

Member of Cranbrook School's Capital Markets Task Force and Finance Committee

Advisory Committee Member, Commonfund Capital, Inc / Advisory Committee Member of a venture fund

Co-investor in non-proprietary, unrelated investments with other investors (through a partnership or other such entity), some of whom are investors in Adviser's Funds. From time to time these investments are with underlying managers of Adviser's master fund and if so, Adviser takes reasonable steps so the non-proprietary investing entity is not favored over Adviser's Funds.

Investment committee member or advisor to unaffiliated institutions and high-net worth family entities which from time to time may invest with one or more underlying managers in which the Adviser's master fund invests.

(See continuation pages located at the end of this brochure for other employee information )

The Adviser's affiliate, Nantucket Capital Management, LLC ("NCM") makes certain hedge fund investment recommendations to its consulting clients based upon the clients' specific investment objectives which may include Adviser's Funds or underlying managers of Adviser's Funds. However, as of this writing, NCM has no clients.

The Adviser or its employees have no financial ownership or interest nor do they receive any compensation (directly or indirectly) in/from any underlying manager in the Funds or hedge fund recommended by NCM to its consulting clients.

The Adviser or its employees occasionally participate in activities as guests of underlying managers such as a dinner, sporting event or other activity (or underlying managers may be guests of Advisor).

The Adviser, its employees, access persons or any affiliated entity may or do provide administrative, investment advisory, consulting or management services (paid or unpaid) to unaffiliated individuals or entities such as foundations, endowments, pension or profit sharing plans, charitable organizations, corporations or any other entity in which an Adviser's employee or Fund investor may participate.

Principals, employees or related family members of 1) one or more underlying managers of the Funds or 2) the Adviser's legal counsel are currently or have been investors in one or more of the Adviser's Funds.

The Adviser maintains a minimum investment in each of the domestic Funds, as required in the governing documents. Certain employees of the Adviser, their family related members or entities also invest in Adviser's Funds or directly with underlying managers of the Funds.

#### Code of Ethics and Personal Trading

The Adviser maintains a detailed Code of Ethics. A copy of our Code of Ethics is available upon request; highlights are as follows: 1) We strive to serve our investors with the highest level of personal and professional service and operate with the highest degree of integrity and standards of business conduct. 2) Our goal is to preserve, protect and grow the assets of our investors. 3) Investor information is privileged and confidential and is shared only as detailed in our Privacy Policy. 4) We strive to fully educate our investors and/or their advisers so they can make the best possible decision regarding a Nantucket fund investment. 5) We are committed to disclose all potential, material conflicts of interest to investors or prospective investors. 6) We strive for industry best practices, consistent performance reporting and continuously educate employees on compliance. 7) Gifts and entertainment policy is in place to avoid unethical or inappropriate conflicts of interest. 8) The Adviser maintains a policy for "Personal Securities Transactions and Outside Business Activity". All employees/access persons must follow this policy which includes certain pre-clearance procedures. 9) No material, non-public information can be communicated to others and no employee/access person shall knowingly buy or sell securities for any account where his/her decision is influenced by material non-public information. 10) No employee/access person shall act upon or benefit from information available to them regarding any Nantucket business or entity to the detriment of any Nantucket entity or investor 11) No employee/access person shall initiate/spread false rumors regarding a public security 12) The Adviser's policies and procedures are available upon request to our investors/their advisers. 13) The Adviser encourages all employees/access persons to report any violation of the Adviser's Code of Ethics to the CCO without negative impact to the reporting person.

The Adviser has discretion to open brokerage accounts to accommodate investments in securities including investments with an underlying manager through a publicly traded security or to accommodate in-kind securities distributions (received in lieu of cash withdrawals from underlying managers) on behalf of the Master Fund. Adviser will select a broker-dealer based on different criteria depending upon the nature of the investment, which is considered on a case-by-case basis.

The Adviser is not involved in any soft-dollar practices.

The Adviser does not make broker-dealer recommendations to underlying managers in the Funds.

Adviser reviews the Funds (which are Adviser's "clients") as follows:

William Goldsmith and Investment Committee Members continuously review the Master Fund portfolio (not less than monthly) through various types of quantitative and qualitative analysis. William Goldsmith and Eric Strzempek conduct manager due diligence on both existing and prospective managers. The Adviser's Investment Committee meets monthly (or more often if necessary). Terminating or hiring an underlying manager or making a material allocation change requires a majority vote by the Investment Committee.

Adviser's Investment Committee Members are as follows:

William Goldsmith: Head of Investment Due Diligence, Portfolio and Risk Management (Voting Member)  
Edward Hunia: Macro Strategist (Voting Member)  
John Lowenberg, Sr: Investment Committee Member (Voting Member)  
Eric Strzempek: Head of Operational Due Diligence / Risk Analytics (Voting Member-solely relating to operational due diligence vote with full veto power).  
Libby Greenstone: Chief Compliance Officer / Operational Due Diligence Support (Non-Voting Member)

The Funds NAVs and capital accounts - underlying manager capital accounts are recorded and reviewed monthly by the Adviser's independent administrator, SS&C. The independent administrator generates monthly internal Fund performance reports for the Adviser which include (underlying manager) balances, market value, cost basis, gains/losses. Gina Maniaci, Adviser's CFO, provides certain monthly oversight and checks in addition to the independent administrator generated information.

PricewaterhouseCoopers conducts independent annual audits for all of the Funds.

Investor Capital Accounts - are calculated on a monthly basis by the Funds' independent administrator, which includes each investor's capital account balance, purchases or withdrawals, gains/losses and breakdown of all fees paid and period performance. Gina Maniaci provides certain monthly oversight in addition to the independent administrator. Monthly statements are generated by the independent administrator and posted to their web portal.

Generally, investors in the Funds receive (or have access to) the following written reports:

- Monthly from the Adviser: period and YTD preliminary performance of the Nantucket Funds and the underlying managers of the Master Fund. This information is generally available on or about the 5th business day of the month.
- Monthly from the Administrator: monthly investor statements which include capital invested/withdrawn, gains/losses, fees, incentive allocation (if earned) period and YTD performance. Administrator notifies investors via email when statements are posted to their web portal.
- Quarterly from the the administrator: quarterly investor letter (authored by the Adviser)
- Semi-Annually from the Adviser: conference call material distributed to conference call participants.
- Annually from the Administrator: K-1s are posted to the administrators web portal (Nantucket Fund, LP and Nantucket Levered, LLC).
- Annually (by June 30) from the administrator: audited financials for the fund in which an investor is invested.

Referral / Solicitation Agreements:

The Adviser pays referral or selling fees as negotiated between the Adviser and the referring or selling party. Referral or solicitation agreements are entered into by the Adviser and the referral / selling party which are generally trust companies, banks or broker-dealers. A disclosure letter fully compliant with relevant SEC rules is sent by the Adviser to the investor (when applicable) on or before the date of sale to be acknowledged and signed by the investor that a fee sharing arrangement is in place. Referral / selling fees paid to referral or selling party consist of a portion of the Adviser's management and/or incentive allocation earned, are not borne by any of Adviser's Funds, and in no way negatively impacts the performance of the referred investor. However, additional fees, IF any, charged by a referring/soliciting party should be taken into consideration when making an investment in a Fund. (Additional fees charged by a trust company, bank or broker-dealer would generally not be disclosed to the Adviser).

Unaffiliated Investment Adviser Referrals:

The Adviser from time to time will reduce the management fee charged to an investor referred by an unaffiliated investment adviser (only applicable for Nantucket Fund, LP or Nantucket Levered, LLC investment). The reduced management fee is negotiated (between the Adviser and referring unaffiliated investment adviser). The unaffiliated investment adviser may charge its client an additional fee which is generally not disclosed to the Adviser. Fees (if any) charged by the unaffiliated investment adviser should be taken into consideration when making an investment in a Fund.

Other Compensation:

The Adviser or its employees participate in activities such as an occasional dinner, sporting event or other such activity as guests of underlying managers of the Funds. While this activity is infrequent, it could be deemed to be a conflict of interest. The Adviser addresses this potential conflict by maintaining policies and procedures for entertainment and gifts.

The Adviser is deemed to have custody of client assets (cash and securities) in its discretionary capacity as the general partner, managing member or investment manager of the Funds.

There are certain safeguards the Adviser and the qualified custodians have in place for movement of capital. Details are available to investors upon request.

Investors in the Funds receive monthly notification from the Funds' independent administrator that investor statements have been generated and posted to the administrator's secure web portal. We encourage investors to review and compare these statements to their own records.

The Adviser has full discretion to invest the Master Fund's capital among a select group of underlying managers through a pooled vehicle or managed account, each with individual investment approaches and styles, in order to achieve the Funds' investment objectives. The Adviser also has discretion to directly implement investment positions on behalf of the Master Fund portfolio. This broad investment authority is outlined in each Fund's COM.



The Adviser has authority to vote on all matters with respect to the Funds' investments. However, the Adviser has no authority to vote proxies with respect to the securities held in the underlying managers' portfolios. The underlying managers generally have the authority to vote proxies with respect to the individual securities held in their respective portfolios.

The Adviser has no financial commitment that impairs its ability to meet contractual and fiduciary obligations to its clients and has not been the subject of a bankruptcy proceeding.

This section is not applicable to the Adviser.

(Continuation from Item 10, Page 10) - Other investment-related activities:

John Lowenberg, Sr.

Principal of Anvil Management Company LLC  
Chair Emeritus Denison University Endowment Investment Committee  
Trustee and Chairman of Investment Committee Environmental Learning Center Foundation  
Trustee, Finance and Investment Committees St. Edwards School  
Advisory Boards of New China Holdings I and II  
Advisory Boards of DAG Management LLC I, II, III and IV  
Co-Chair Investment Committee Redstick Golf Club, Vero Beach, FL

Note: John Lowenberg, Sr. is an access person in his capacity as a Voting Member of Adviser's Investment Committee. John is not an employee of the Adviser, however, does receive compensation from Adviser for serving on Adviser's Investment Committee.

Edward Hunia

Consultant to high net worth families and/or their foundations  
Member of Investment Committee/Beaumont Health and The Skillman Foundation

Andrew C. Hopper was a prior employee of the Adviser, however, still remains an equity owner. Andrew Hopper is employed by an unaffiliated family office and is part of their investment management team. Andrew is NOT involved in the day-to-day activities of Adviser.

Firm Brochure NMM 01-28-2017



