

AKSIA LLC

FIRM BROCHURE

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This brochure provides information about the qualifications and business practices of Aksia LLC (“Aksia”), an investment adviser registered with the United States Securities and Exchange Commission (“SEC”). If you have any questions about the contents of this brochure, please contact Maya Fishman at (212) 710-5771 or maya.fishman@aksia.com. This information has not been approved or verified by the SEC or by any state securities authority.

Additional information about Aksia is also available on the SEC’s website at www.adviserinfo.sec.gov.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Item 2: Material Changes

This is Aksia's "Disclosure Brochure" filed with the SEC in conjunction with the Other-Than-Annual Updating Amendment. This Other-Than-Annual Updating Amendment is being filed to update our new office location. There are no material changes to disclose.

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A. General Description of Advisory Firm.

Aksia LLC (“Aksia”), a Delaware limited liability company, is a research and advisory firm with its principal place of business in New York, New York. Aksia commenced operations as an investment advisor in October 2006 and has been registered with the SEC since March 22, 2007. Aksia has ten principals, including all of the original six founding principals. The firm is 100% owned and controlled by its eleven equity principals. Jim Vos, the managing member of Aksia, has an ownership percentage of between 15% and 20% and Alex Panagiotidis has an ownership percentage of approximately 50%.

B. Description of Advisory Services (including any specializations).

Aksia provides institutional investors with non-discretionary and discretionary advisory services relating to traditional hedge funds, risk parity and hedge fund substitutes, private market funds, and commodity-focused funds. Aksia also provides research services to institutional investors seeking to invest in such private investment funds. For purposes of this brochure, “Clients” shall mean all of Aksia’s clients, including research, discretionary and non-discretionary advisory clients, whereas “Advisory Clients” shall mean Aksia’s discretionary and non-discretionary advisory clients.

Aksia tailors its advisory services to each Advisory Client’s specific guidelines. Aksia does not manage any pooled investment vehicles with commingled investors, with the exception of one client that has two affiliated entities, managed by the same investment staff, invested in a single custom fund.

C. Availability of Tailored Services for Individual Clients.

Aksia views each Advisory Client relationship as unique and therefore seeks to customize its services to address each Advisory Client’s individual investment objectives, guidelines and constraints. As such, Aksia provides advice that is tailored to an Advisory Client’s respective investment policy statement, advisory agreement, investment management agreement, or customized private placement memorandum. For example, some Advisory Clients have liquidity constraints, diversification constraints, mandated sector allocation ranges, and/or prohibitions from investing in certain types of securities. Aksia considers such restrictions prior to making any recommendations or decisions.

D. Wrap Fee Programs.

Not applicable.

E. Client Assets Under Management.

As of December 31, 2015, Aksia had approximately \$46,457,810,263 Advisory Client assets under management/advisement. As of that date, Aksia advised \$43,595,848,122 on a non-discretionary basis and managed \$2,861,962,141 on a discretionary basis. For purposes of calculating Client assets under management/advisement, Aksia has not included its research clients’ invested assets.

Item 5: Fees and Compensation

A. Advisory Fees and Compensation.

Not applicable.

B. Payment of Fees.

Aksia generally charges its non-discretionary Advisory Clients a flat, fixed fee. In some instances, Aksia deducts the investment management fee from discretionary Advisory Client accounts by instructing the Client's custodian. Some Advisory Clients may pay a percentage of assets under management or assets under advisory. Some other Advisory Clients may pay performance-based fees. The Advisory Client may select the method by which it would like to pay Aksia's fee. Aksia bills Advisory Clients for fees and may instruct certain Advisory Clients' custodians to deduct certain Advisory Client accounts on a quarterly basis.

C. Other Fees and Expenses.

In addition to paying investment management or advisory fees, and, potentially, performance-based fees, Client assets that are invested in pooled investment vehicles will bear their pro rata share of the underlying fund's operating and other expenses, including legal expenses, internal and external accounting expenses, audit and tax preparation expenses, and organizational expenses. In addition, during the course of Aksia's due diligence process on underlying private investment funds, Aksia may engage specialized third parties to conduct investigations on key personnel of the funds' managers. Clients may incur a one-time fee associated with an investigation on a new fund; Aksia does not retain any such fees. Aksia may also charge a Client for expenses related to travel outside of standard industry coverage specifically requested by the Client.

D. Prepayment of Fees.

Some Clients pay Aksia's fees in advance. In the event that the contract is terminated before the end of a billing period, such Clients may obtain a prorated rebate for the pre-paid fee attributable to the period between the termination date and the last day of the billing period.

E. Additional Compensation and Conflicts of Interest.

Not applicable.

Item 6: Performance-Based Fees and Side-by-Side Management

Aksia and its investment personnel manage both Advisory Client accounts that are charged performance-based compensation and accounts that are charged an asset-based fee or flat fee. In addition, certain Advisory Client accounts may pay higher asset-based fees or flat fees than other accounts. When Aksia and its investment personnel manage more than one Advisory Client account, a potential exists for one Advisory Client account to be favored over another Advisory Client account. Aksia and its investment personnel may have a greater incentive to favor Advisory Client accounts that pay Aksia performance-based compensation or higher fees.

Aksia has adopted and implemented policies and procedures intended to address conflicts of interest relating to the management of multiple accounts, including accounts with multiple fee arrangements. Aksia reviews advisory decisions for the purpose of ensuring that all accounts with substantially similar investment objectives are treated equitably. The performance of similar Advisory Client accounts is also regularly compared to determine whether there are any unexplained significant discrepancies. Finally, Aksia's procedures also require the objective allocation of limited opportunities to ensure fair and equitable allocation among accounts. In the event there is limited capacity in a private investment vehicle in which multiple Advisory Clients are interested, Aksia will advise the manager which of Aksia's Advisory Clients are interested in the fund, subject to each Advisory Client's consent where applicable, and allow the manager to determine the allocation directly with the Advisory Clients. These areas are monitored by Aksia's compliance department.

Item 7: Types of Clients

Aksia's Clients are U.S. and non-U.S. institutional investors that primarily include public pension plans, corporate pension plans, government-related funds, superannuation funds, endowments, foundations, financial institutions, charitable organizations, and customized trusts/funds, each on behalf of a single Client.

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

A. Methods of Analysis and Investment Strategies.

Aksia provides investment advice and management services on underlying portfolio managers (each, a “Portfolio Manager”) utilizing alternative investment strategies. Aksia’s method of analysis focuses on extensive due diligence from an investment and operational standpoint on such Portfolio Managers presented in consistent, opinionated reports. Aksia endeavors to analyze a Portfolio Manager’s strategy, risk management process, quality of investment professionals, operations and infrastructure, regulatory compliance, and ability to produce attractive long-term, risk-adjusted investment results, among other factors. Alternative investment strategies are comprised of a wide array of hedge fund and private market strategies.

For more specific disclosure pertaining to the investment strategy of a particular Portfolio Manager, please refer to the private placement memorandum of such Portfolio Manager.

B. Material Risks (Including Significant or Unusual Risks) Relating to Investment Strategies.

While Aksia advises multiple Client accounts that each face different risks depending on the investment strategies utilized by the Portfolio Managers managing the Client assets, all such investments risk the loss of capital. Aksia’s extensive due diligence process seeks to address and mitigate such risk; however, there is no guarantee or assurance that Aksia’s investment advice or recommendations will be successful.

In addition, subject to compliance with a Client’s particular investment guidelines and restrictions, Aksia may recommend a Portfolio Manager’s investment program that includes the following potential risks:

Lack of Diversification. Depending on a Client’s investment mandate, the Client’s portfolio may not be diversified among a wide range of types of securities, countries or industry sectors. Accordingly, such Client portfolio may be subject to more rapid change in value than would be the case if Client’s portfolio was more diversified and if each underlying Portfolio Manager was required to maintain a wider diversification among types of securities and other instruments.

Illiquid Investments. Portfolio Managers may invest in companies the securities of which are not at the time of investment, and may never be, publicly traded. These investments may be difficult to value and sell, or otherwise liquidate, and the risk of investing in such companies is generally much greater than the risk of investing in publicly traded companies. Companies whose securities are not publicly traded are not subject to the same disclosure and reporting requirements that are generally applicable to companies with publicly traded securities, nor is the trading of such non-publicly traded securities regulated by any government agency. Accordingly, the protections accorded by such regulation are not available in making such investments. To the extent that there is no liquid trading market for particular investments, a Portfolio Manager may be unable to liquidate such investments or may be unable to do so at a profit. In addition, in certain circumstances governmental or regulatory approvals may be required for a Portfolio Manager’s funds to dispose of an investment, or the Portfolio Manager may be prohibited by contract or for legal or regulatory reasons from selling an illiquid investment for a period of time.

Short Selling. Short selling transactions expose a Portfolio Manager to the risk of loss in an amount greater than the initial investment, and such losses can increase rapidly and without effective limit. There is the risk that the securities borrowed by such Portfolio Manager in connection with a short sale would need to be returned to the securities lender on short notice. If such request for return of securities occurs at a time when other short sellers of the subject security are receiving similar requests, a “short squeeze”

can occur, wherein the Portfolio Manager may be compelled, at the most disadvantageous time, to replace the borrowed securities previously sold short with purchases on the open market, possibly at prices significantly in excess of the proceeds received earlier.

C. Risks Associated With Types of Securities that are Primarily Recommended (Including Significant, or Unusual Risks).

The securities recommended by Aksia are investments in investment vehicles managed by Portfolio Managers and such securities are not registered under the Securities Act of 1933, as amended. Accordingly, the securities recommended by Aksia are restricted as to their transferability. Such investments may also have exposure to esoteric securities, which may carry additional risks such as:

Illiquid Instruments. Certain instruments may have no readily available market or third-party pricing. Reduced liquidity may have an adverse impact on market price and the Portfolio Manager's ability to sell particular securities when necessary to meet liquidity needs or in response to a specific economic event, such as the deterioration of creditworthiness of an issuer. Reduced liquidity in the secondary market for certain securities may also make it more difficult for the Portfolio Manager to obtain market quotations based on actual trades for the purpose of valuing a fund's portfolio.

Non-U.S. Securities. Foreign securities, foreign currencies, and securities issued by U.S. entities with substantial foreign operations can involve additional risks relating to political, economic, or regulatory conditions in foreign countries. These risks include fluctuations in foreign currencies; withholding or other taxes; trading, settlement, custodial, and other operational risks; and the less stringent investor protection and disclosure standards of some foreign markets. All of these factors can make foreign investments, especially those in emerging markets, more volatile and potentially less liquid than U.S. investments. In addition, foreign markets can perform differently from the U.S. market.

Emerging Markets. The risks of foreign investments typically are greater in less developed countries, sometimes referred to as emerging markets. For example, political and economic structures in these countries may be less established and may change rapidly. These countries also are more likely to experience high levels of inflation, deflation, or currency devaluation, which can harm their economies and securities markets and increase volatility. Restrictions on currency trading that may be imposed by emerging market countries will have an adverse effect on the value of the securities of companies that trade or operate in such countries.

Equity Securities. The value of equity securities fluctuates in response to issuer, political, market, and economic developments. Fluctuations can be dramatic over the short as well as long term, and different parts of the market and different types of equity securities can react differently to these developments. For example, large cap stocks can react differently from small cap stocks, and "growth" stocks can react differently from "value" stocks. Issuer, political, or economic developments can affect a single issuer, issuers within an industry or economic sector or geographic region, or the market as a whole. Changes in the financial condition of a single issuer can impact the market as a whole. Terrorism and related geopolitical risks have led, and may in the future lead, to increased short-term market volatility and may have adverse long-term effects on world economies and markets generally.

Commodity Futures and Options. Commodity futures markets are highly volatile and are influenced by factors such as changing supply and demand relationships, governmental programs and policies, national and international political and economic events and changes in interest rates. In addition, because of the low margin deposits normally required in commodity futures trading, a high degree of leverage may be typical of a pooled investment vehicle engaging in commodity futures trading. As a result, a relatively small price movement in a commodity futures contract may result in substantial losses to such a pooled

investment vehicle. Commodity options, like commodity futures contracts, are speculative, and their use involves risk. Specific market movements of the cash commodity or futures contract underlying an option cannot be predicted, and no assurance can be given that a liquid offset market will exist for any particular futures option at any particular time.

Derivatives. Swaps, and certain options and other custom derivative or synthetic instruments are subject to the risk of nonperformance by the counterparty to such instrument, including risks relating to the financial soundness and creditworthiness of the counterparty. In addition, investments in derivative instruments require a high degree of leverage, meaning the overall contract value (and, accordingly, the potential for profits or losses in that value) is much greater than the modest deposit used to buy the position in the derivative contract. Derivative securities can also be highly volatile. The prices of derivative instruments and the investments underlying the derivative instruments may fluctuate rapidly and over wide ranges and may reflect unforeseeable events or changes in conditions, none of which can be controlled by the Client or the Portfolio Manager. Further, transactions in derivative instruments are not undertaken on recognized exchanges, and will expose the Client's account to greater risks than regulated exchange transactions that provide greater liquidity and more accurate valuation of securities.

Distressed Securities. Investments in unrated or low grade debt securities of distressed companies are subject to greater risk of loss of principal and interest than higher-rated debt securities. Also, securities of distressed companies are generally more likely to become worthless than the securities of more financially stable companies. In addition, evaluating credit risk for foreign debt securities involves greater uncertainty because credit rating agencies throughout the world have different standards, making comparison across countries difficult.

Fixed-Income and Debt Securities. Investment in fixed-income and debt securities such as bonds, notes and asset-backed securities, subject a Client's portfolio to the risk that the value of these securities overall will decline because of rising interest rates. Similarly, portfolios that hold such securities are subject to the risk that the portfolio's income will decline because of falling interest rates. Investments in these types of securities will also be subject to the credit risk created when a debt issuer fails to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that debt to decline. Lastly, investments in debt securities will also subject the investments to the risk that the securities may fluctuate more in price, and are less liquid than higher-rated securities because issuers of such lower-rated debt securities are not as strong financially, and are more likely to encounter financial difficulties and be more vulnerable to adverse changes in the economy.

Asset-Backed Securities. Asset-backed securities are subject to interest rate risk and, to a lesser degree, prepayment risk. Asset-backed securities are subject to additional risks in that, unlike mortgage-backed securities, asset-backed securities generally do not have the benefit of a security interest in the related collateral. Each type of asset-backed security also entails unique risks depending on the type of assets involved and the legal structure used. In addition, asset-backed securities experience credit risk. There is also the possibility that recoveries on repossessed collateral may not be available to support payments on these securities because of the inability to perfect a security interest in such collateral.

REITs. REITs in which a Portfolio Manager may invest are affected by underlying real estate values, which may have an exaggerated effect to the extent that REITs in which the Portfolio Manager invests concentrate investments in particular geographic regions or property types. Investments in REITs are also subject to the risk of interest rate volatility. Further, rising interest rates will cause investors in REITs to demand a higher annual yield from future distributions, which will in turn decrease market prices for equity securities issued by REITs. REITs are subject to risks inherent in operating and financing a limited number of projects because they are dependent upon specialized management skills, and have limited

diversification. REITS depend generally on their ability to generate cash flow to make distributions to investors.

Risk Arbitrage Securities. A merger, other restructuring, tender, or exchange offer proposed at the time the Portfolio Manager invests in risk arbitrage securities may not be completed on the terms or within the time frame contemplated, resulting in losses.

Security Futures and Options. In connection with the use of futures contracts and options, there may be an imperfect correlation between the change in market value of a security and the prices of the futures contracts and options in the Client's account. In addition, the Portfolio Manager's investments in security futures and options may encounter a lack of a liquid secondary market for a futures contract and the resulting inability to close a futures position prior to its maturity date.

Item 9: Disciplinary Information

Not applicable.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-Dealer Registration Status.

Not applicable.

B. Commodities-Related Registration.

Aksia is registered with the U.S. Commodity Futures Trading Commission as a Commodity Pool Operator and a Commodity Trading Advisor.

C. Material Relationships or Arrangements with Industry Participants.

Aksia LLC and four of its wholly owned subsidiaries, Aksia Japan Co., Ltd., Aksia Europe Limited, Aksia Hong Kong Limited, and Aksia GP Ltd., located in Tokyo, London, Hong Kong, and the Cayman Islands, respectively, provide investment advisory services to Clients on private investment funds. Aksia Japan Co., Ltd. provides such Services to Clients located in Japan and is registered with the Japanese Financial Services Agency. Aksia Europe Limited provides such Services to Clients located in Europe and the Middle East and is authorized by the U.K. Financial Conduct Authority. Aksia Hong Kong limited provides such Services to Clients located in mainland China and is registered with the Hong Kong Securities and Futures Commission. Aksia GP Ltd. serves solely as the general partner of two private investment funds whose sole investor is a U.S. government entity and is registered as an exempted company in the Cayman Islands. Aksia GP Ltd. delegates all investment management authority to Aksia LLC. Lastly, Aksia Information Technology PC, located in Athens, Greece, provides information technology, research, advisory and other support services to Aksia LLC.

D. Material Conflicts of Interest Relating to Other Investment Advisers.

Not applicable.

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

A. Code of Ethics.

Aksia has adopted a Code of Ethics (the “Code”) that obligates Aksia and its supervised persons to put the interests of Aksia’s Clients before their own interests and to act honestly and fairly in all respects in their dealings with Clients. All of Aksia’s personnel are also required to comply with applicable federal securities laws. Clients or prospective clients may obtain a copy of the Code by contacting Maya Fishman at (212) 710-5771 or maya.fishman@aksia.com.

In the course of its business activities, Aksia may come into possession of confidential or material nonpublic information about issuers. Aksia is prohibited from improperly disclosing or using such information for its own benefit or for the benefit of any other person, regardless of whether such other person is a Client. Aksia maintains and enforces written policies and procedures that prohibit the communication of such information to persons who do not have a legitimate need to know such information and to assure that Aksia is meeting its obligations to Clients and remains in compliance with applicable law. In certain circumstances, Aksia may possess certain confidential or material, nonpublic information that, if disclosed, may be material to a decision to buy, sell or hold a security, however, Aksia will be prohibited from communicating such information to the Client or using such information for the Client’s benefit. In such circumstances, Aksia will have no responsibility or liability to the Client for not disclosing such information to the Client (or the fact that Aksia possesses such information), or not using such information for the Client’s benefit, as a result of following Aksia’s policies and procedures designed to provide reasonable assurances that it is complying with applicable law.

B. Client Transactions in Securities where Adviser has a Material Financial Interest.

While Aksia does not invest for its own account and as such does not invest in any securities that Aksia or a related person recommends to Clients, there are certain circumstances where Aksia may recommend, purchase or sell for its Advisory Clients funds managed by Portfolio Managers that are affiliated with Clients of Aksia. This can create the perception that Aksia is recommending a Portfolio Manager because of its affiliation with a Client of Aksia. Aksia addresses this potential conflict of interest via policies and procedures reasonably designed to ensure that its activities are carried out in compliance with applicable regulatory requirements and with the best interests of Clients in mind. Such policies and procedures include a screening of such potential investment through Aksia’s extensive due diligence process comprised of multiple layers of review by multiple individuals.

C. Investing in Securities Recommended to Clients.

Aksia’s Code prohibits Aksia or its supervised persons from executing personal securities transactions of any kind in any securities on a restricted securities list maintained by the compliance department. All of Aksia’s supervised persons are required to enable the compliance department to monitor their personal accounts upon becoming an employee. In addition, supervised persons must provide quarterly attestations of their complete disclosure of their personal accounts.

D. Conflicts of Interest Created by Contemporaneous Trading.

Not applicable.

Item 12: Brokerage Practices

Aksia makes or recommends direct investments in private investment funds for its Clients, which does not require the use of a broker-dealer. In certain limited circumstances, however, Aksia may receive a distribution in kind and need to dispose of such investment. In such circumstance, Aksia would consider a number of factors in selecting a broker-dealer to execute such transaction and determine the reasonableness of the broker-dealer's compensation. Such factors include reputation, financial strength and stability, net price, and efficiency of execution. Aksia is not obligated to solicit competitive bids and does not have an obligation to seek the lowest available commission cost. Aksia would not receive research or other products or services other than execution from a broker-dealer in connection with an Advisory Client securities transaction, and as such would not use "soft dollars."

Item 13: Review of Accounts

A. Frequency and Nature of Review.

Each Advisory Client account is reviewed on a monthly basis by the heads of each sector research team together with the advisory team responsible for the Advisory Client account. Matters reviewed include specific positions held, adherence to each Advisory Client's investment guidelines, and the performance of each Advisory Client account. In addition, Aksia's sector research teams generally meet on a bi-weekly basis to discuss market trends, manager performance, recently completed due diligence, and any changes to their outlooks.

Aksia's Chief Compliance Officer or her delegate reviews Advisory Client portfolios on a quarterly basis to determine whether such portfolios adhere to their stated guidelines and constraints, as applicable.

B. Factors Prompting a Non-Periodic Review of Accounts.

Significant market events affecting underlying funds in Advisory Client accounts, changes in the investment objectives or guidelines of a particular Advisory Client, or specific arrangements with particular Advisory Clients may trigger reviews of Advisory Client accounts on other than a periodic basis, including weekly or bi-weekly.

C. Content and Frequency of Regular Account Reports.

For Advisory Client accounts who subscribe to Aksia's operations and accounting services, Advisory Clients (or the investor in each customized vehicle) receive written reports pursuant to the terms of each Advisory Client's agreement, but in any event at least monthly.

Aksia's Clients also have ongoing access to research, analytics, portfolio tools, and reporting through Aksia's password protected website. Frequency of reports depends on certain triggering events which may occur intra-month, monthly, quarterly and annually.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Received from Non-Clients for Providing Services to Clients.

Aksia does not receive any economic benefit from any entity or person who is not a Client for providing investment advice or advisory services to a Client.

B. Compensation to Non-Supervised Persons for Client Referrals.

Aksia may make payments to a third-party solicitor for Client referrals outside of the U.S., provided that, to the extent required, such solicitor has entered into a written agreement with Aksia pursuant to which the solicitor will provide each prospective client with a copy of Aksia's Form ADV Part 2, and a disclosure document setting forth the terms of the solicitation arrangement, including the nature of the relationship between the solicitor and Aksia and any fees to be paid to the solicitor. Where applicable, payments for Client solicitations will be structured to comply fully with the requirements of Rule 206(4)-3 under the Advisers Act and related SEC staff interpretations.

Item 15: Custody

Not applicable.

Item 16: Investment Discretion

Aksia provides investment advisory services on a discretionary basis to some of its Advisory Clients. Please see Item 4 for a description of limitations such Advisory Clients may place on Aksia's discretionary authority.

Prior to assuming full or limited discretion in managing a discretionary Client's assets, Aksia enters into an investment management agreement or other agreement that sets forth the scope of Aksia's discretion. Any limitations on such discretion are individually agreed to between the Advisory Client and Aksia and memorialized in the respective agreement with Aksia. Such limitations may include: diversification constraints, mandated sector allocation ranges, prohibitions from investing in certain types of securities, liquidity constraints, and limits on Aksia's ability to purchase or sell securities without the Advisory Client's prior written consent.

A. Policies and Procedures Relating to Authority to Vote Client Securities.

To the extent Aksia has been delegated proxy voting authority on behalf of an Advisory Client, Aksia complies with its proxy voting policies and procedures that are designed to ensure that in cases where Aksia votes proxies with respect to Advisory Client securities, such proxies are voted in the best interests of such Advisory Client.

An Advisory Client that wishes to direct its vote in a particular solicitation shall give reasonable prior written notice to Aksia indicating such intention and provide written instructions directing Aksia's vote in regard to the particular solicitation. Where such prior written notice is received, Aksia will vote proxies in accordance with such written instructions received from the Advisory Client, provided that such instructions are provided to Aksia in a timely manner.

If a material conflict of interest between Aksia and a Client exists, Aksia will determine whether voting in accordance with the guidelines set forth in the proxy voting policies and procedures is in the best interests of the Client or take some other appropriate action.

Clients may obtain a copy of Aksia's proxy voting policies and procedures and information about how Aksia voted an Advisory Client's proxies by contacting Maya Fishman at (212) 710-5771 or maya.fishman@aksia.com.

Item 18: Financial Information

Not applicable.

Item 19: Requirements for State-Registered Advisers

Not applicable.