



Ranger International Management (TX), L.P.

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This Brochure provides information about the qualifications and business practices of Ranger International Management (TX), L.P. If you have any questions about the contents of this Brochure, please contact us at (214) 871-5200. 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.

Ranger International Management (TX), L.P. registered with the United States Securities and Exchange Commission in July 2010 in accordance with the Investment Advisers Act of 1940. Registration as an investment adviser does not imply any level of skill or training.

Additional information about Ranger International Management (TX), L.P. (CRD # 154002) also is available on the SEC's website at www.adviserinfo.sec.gov. The SEC's web site also provides information about persons who are both affiliated with Ranger International Management (TX), L.P. and registered as investment advisors with the SEC.

Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that the Firm provides to clients as required by SEC Rules. This Brochure is a new document prepared according to the SEC’s new requirements and rules and is materially different in structure and requires certain new information that previous brochures did not require.

In the future, this Item 2 will discuss only specific material changes made to the Brochure and provide clients with a summary of such changes. The Firm will also reference the date of its last annual update of the Brochure.

In the past the Firm has offered or delivered information about its qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, the Firm will ensure you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of its business’ fiscal year. The Firm may further provide other ongoing disclosure information about material changes as necessary.

The Firm will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

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Item 4 – Advisory Business

Ranger International Management (TX), LP (“Ranger” or the “Firm”) is an investment advisor which commenced operations in June 2010 and is registered with the United States Securities and Exchange Commission (the “SEC”) in accordance with the Investment Advisers Act of 1940. Ranger was organized as a Texas limited partnership by Ranger International Group (TX), LLC, a Texas limited liability company which serves as its general partner. Ranger International Group, L.L.C. is controlled by Ranger Capital Group Holdings, L.P., a Texas limited partnership and Andersen Capital International, LLC, an Illinois limited liability company, each of which serves as a managing member.

Ranger is affiliated with Ranger International Management, LP by virtue of common control, and the two firms generally manage portfolios in sub-advisory relationships, whereby Ranger has primary responsibility for activities such as operations, accounting, compliance, legal and client service operational support; and Ranger International Management, LP (the “Sub-Advisor”, and together with Ranger, the “Ranger International Advisors”) is delegated portfolio management responsibility with respect to client portfolios.

As of February 28, 2011, Ranger managed approximately \$15 million of client assets, all of which is managed on a discretionary basis.

Subject to the delegation of investment authority to the Sub-Advisor, Ranger provides continuous investment management services to Ranger International Fund, LP, a Texas limited partnership which serves as a pooled investment vehicle (hereinafter the “Ranger Fund”). The Ranger Fund relies on a registration exemption available pursuant to 3(c)-1 of the Investment Company Act of 1940, and has been established for investment by both legal entities and qualified individuals. The Firm is also actively offering investment advisory services for separate accounts.

Investment supervisory services include: (1) establishing a client’s investment objectives within the International Equity Portfolio, International Plus Equity Portfolio or Global Income and Growth Portfolio investment strategies; (2) buying or selling portfolio securities on behalf of each client; and (3) periodically reporting to clients and investors with current investment holdings, valuations, transactions, capital gains or losses, investment income and performance.

There are three classes of limited partnership interest offered by the Ranger Fund, each of which has differing investment objectives. Included immediately below is a brief description of each class of limited partnership interest and a summary of its investment objectives.

Classes of Limited Partnership Interest in the Ranger Fund.

- **The International Portfolio Class** participates in a portfolio of equity securities of approximately 30 - 35 international companies from both developed and developing market countries. Investment candidates for the International Portfolio exclude U.S. domiciled companies.
- **International Plus Portfolio Class** participates in a portfolio of equity securities of approximately 30 – 35 international companies from both developed and developing market countries. Investment candidates for the International Plus Portfolio include the equity securities of U.S. domiciled companies.
- **Global Income and Growth Portfolio Class** participates in a portfolio of domestic and international yield-generating investment instruments including high yielding equities, convertible and preferred securities, closed-end bond funds, master limited partnerships and real estate investment trusts that are deemed to have good prospects for long term appreciation.

The Firm solicits investors for the Ranger Fund and each class of limited partnership interest therein, within its capacity as general partner of the Ranger Fund.

Item 5 – Fees and Compensation

Private Limited Partnerships

The Firm charges clients advisory fees which are a fixed percentage of assets under management (“Management Fees”). Management Fees are generally charged in accordance with the schedule set forth in this brochure, and in the case of the Ranger Fund, the offering documents of the Ranger Fund.

Ranger reserves the right to negotiate Management Fees with clients which differ from the standard schedule, based on specific circumstances and on a case by case basis. Examples of these circumstances include, without limitation: the relative size of a client account, a client’s affiliation to Ranger, and/or a client’s status as a seed investor. Accordingly, Management Fees incurred by clients may vary substantially. In addition, with respect to Separate Accounts, all other terms of such investment, including terms relating to expenses and redemption terms, may also be negotiable on a case by case basis. As such, client investment in a separate account may provide flexibility with respect to investment terms which are not afforded to investors in the Ranger Fund.

Management Fees are generally referenced at an annual rate, but are generally calculated and charged in advance on a quarterly basis. To the extent that a client redeems its investment, the Firm promptly will refund all fees paid in advance for applicable periods after such redemption date.

Standard Fee Schedule for the Ranger Fund

Ranger International Fund, L.P.	
<i>Class of Partnership Interest</i>	<i>Annual Management Fee</i>
International	One Percent (1.00%)
International Plus	One Percent (1.00%)
Global Income and Growth	One Percent (1.00%)

Additional information with respect to fees and other materials terms and conditions is further detailed in the Ranger Fund's private placement memorandum, a copy of which may be obtained by contacting the Firm at (214) 871-5200.

Standard Fee Schedule for Ranger Separately Managed Accounts

<i>Ranger Strategy</i>	<i>Annual Management Fee</i>
International	One Percent (1.00%)
International Plus	One Percent (1.00%)
Global Income and Growth	One Percent (1.00%)

The schedule information presented above may vary in accordance with the fees, terms and conditions in each investment management agreement.

Management Fees Exclusive of Expenses

Management Fees are exclusive of expenses associated with investments in the Separate Accounts and/or the Ranger Fund. Although the Firm is responsible for its general overhead expenses, clients bear the cost attributable to their investment activities and operations, including without limitation, expenses associated with trading and operations. Such expenses may include: (i) expenses incurred in connection with the evaluation, acquisition or disposition of a Portfolio investment, including brokerage fees, due diligence expense, travel costs, taxes, and legal, accounting, consulting, information services and professional fees; (ii) expenses incurred in connection with the carrying or management of investments, including custodial, trustee, record keeping and other administration fees; (iii) fees relating to the administration of a Separate Account or the Ranger Fund, including fees of for a third party administrator; (iv) fees and expenses associated with and/or paid to Portfolio investments and their investment advisors, including management and performance fees; (v) expenses incurred in connection with the Ranger Fund's financial statements and/or tax returns; (vi) attorneys' and accountants' fees and disbursements; (vii) taxes and other governmental charges or fees levied against the Ranger Fund, including registration or filing fees; and (viii) insurance (including in respect of errors or omissions of the Firm, its Affiliates and related entities, and any other persons acting on behalf of the Ranger Fund), regulatory or litigation expenses (and damages), including regulatory expenses of the investment Manager.

For additional information with respect to the factors that the Firm considers in selecting or recommending broker dealers for client transactions and determining the reasonableness of their compensation, please see Item 12 – Brokerage Practices .

Performance Fees

Performance fees are advisory fees which are charged as a percentage of the appreciation of the net asset value of a client's account. Although on a general basis the Firm does not charge performance fees, it may in limit situations and at a client's request consider the application of performance fees as a full or partial alternative to Management Fees.

Compensation to Third Parties

The Firm may enter into agreements with an affiliated or unaffiliated marketing group or individuals that will solicit separately managed accounts or investors for the Ranger Fund managed by the Firm or an affiliate. For their solicitation services, such marketing groups may receive a percentage of the Firm's Management Fee.

The Firm's arrangements with an affiliated or unaffiliated marketing group may result in a potential conflict of interest by creating an incentive for the marketing group to recommend Ranger investment advisory products and services based on compensation received rather than the investor's needs. The Firm has implemented procedures to ensure compensation arrangements with an affiliated or unaffiliated third-party for client or investor referrals will comply with Rule 206(4)-3 under the Adviser's Act.

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

In rare circumstances, the Firm may enter into performance fee arrangements with qualified clients. Performance based fee arrangements may create an incentive for the Firm to invest in securities which may be riskier or more speculative than the securities it would invest in under a different fee arrangement. In addition, performance fee arrangements may create an incentive for the Firm to favor higher fee paying accounts over other accounts in the allocation of investment opportunities.

The Firm generally invests in liquid exchange traded securities which effectively mitigates trade allocation conflicts presented by performance based fee arrangements. In addition, Ranger employs procedures designed and implemented to treat all clients fairly and equally, and to prevent this potential conflict from influencing the allocation of investment opportunities among clients. For example, all client orders for a particular security are aggregated and allocated *pro-rata* electronically prior to making a trade. The Firm's traders review and monitor client orders on real-time and the Operations Manager confirms these orders once they are complete. In addition, all accounts with similar investment guidelines are managed *pari passu*.

Item 7 – Types of Clients

The Firm engages in portfolio management for Investment Companies exempt from registration under the Investment Company Act of 1940. Investors in the Ranger Fund generally include other business entities and high net-worth individuals. Typically, these investors must be “accredited investors”, as defined in the Securities Act of 1933 and/or “qualified purchasers” as defined in the Investment Company Act of 1940, and must satisfy other eligibility requirements.

The Firm seeks to provide investment advisory services to institutional investors such as: registered investment companies, public and private pension plans, insurance companies, collective trusts, foundations, endowments and qualified and accredited individuals or entities.

Such advisory services may be provided directly through Separate Accounts, or indirectly through investment in the Ranger Fund, each of which are deemed clients of the Firm.

Generally, the minimum investment required is one million dollars (\$1,000,000.00) for a class of interest in the Ranger Fund and five million dollars (\$5,000,000.00) for a separately managed account. However, the Firm may accept lesser amounts at its sole discretion.

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

The Firm delegates investment authority to the affiliated Sub-Advisor. The investment strategy of the Advisor, through such delegation to the Sub-Advisor, is to use the principles of value, safety and quality to seek investment candidates globally. The Firm places emphasis on risk control, believing that avoiding large losses allows the inherent appreciation potential of equities to be realized.

With respect to the securities research process, the affiliated Sub-Advisor employs a variety of publically available sources of information. These sources include news feeds (e.g. Bloomberg), investment letters and web sites, 13D and 13F filings made by investors with the U. S. Securities and Exchange Commission (SEC), and company audited financial statements, 10-Q and 10-K filings. In addition, the investment team uses third-party research it receives from broker-dealers and other sources. Among other things, the Firm’s investment team also makes use of screens to initially identify prospective companies in which to invest.

Portfolio construction seeks to maximize opportunity for gain while controlling risk. In addition, diversification will be sought through investment in different industries and geographies. Portfolio turnover has generally been relatively low, with an average anticipated holding period for securities of twelve to twenty-four months.

RISK FACTORS

AN INVESTMENT IN THE RANGER FUND OR A SEPARATELY MANAGED ACCOUNT ENTAILS A SIGNIFICANT DEGREE OF RISK, INCLUDING THE POTENTIAL FOR LOSS OF ALL OR PART OF AN INVESTMENT. THEREFORE, ONLY INVESTORS CAPABLE OF EVALUATING AND BEARING THE RISKS SHOULD UNDERTAKE AN INVESTMENT IN THE RANGER FUND OR SEPARATE ACCOUNT. THERE CAN BE NO ASSURANCE THAT SUCH AN INVESTMENT WILL BE ABLE TO ACHIEVE ITS OBJECTIVE, REALIZE A POSITIVE RETURN OR AVOID LOSSES. PROSPECTIVE INVESTORS SHOULD CAREFULLY CONSIDER THE FOLLOWING RISK FACTORS IN CONNECTION WITH OPENING AN INVESTMENT ACCOUNT WITH THE FIRM. PLEASE NOTE THAT THE FOLLOWING LIST IS NOT A COMPLETE LIST OF ALL RISKS INVOLVED IN CONNECTION WITH AN INVESTMENT IN THE RANGER FUND OR A SEPARATE ACCOUNT ADVISED BY THE FIRM. WITH RESPECT TO THE RANGER FUND, ADDITIONAL RISK DISCLOSURES MAY BE FOUND IN ITS PRIVATE PLACEMENT MEMORANDUM.

Security Selection and Market Risk

Security Selection risk is defined as the risk that the Firm may not select and size positions appropriately within the portfolio. An associated market risk arises from the influence of the movements of the overall market or the value of the individual securities in the portfolio. The profitability of a significant portion of the Firm's investment program depends to a great extent upon correctly assessing the future course of the price movements and/or general value of securities and other investments. There can be no assurance that Ranger will be able to accurately predict these price movements or future valuation, nor can assurance be given that the Firm's investment portfolios will generate income or appreciate in value. With respect to Ranger's investment strategies, there is also a degree of market risk. For these reasons, the portfolio may also incur losses.

Concentration Risk

A number of the Firm's investment strategies are not widely diversified and may therefore be subject to more rapid changes in value than would be the case if these strategies maintained wide diversification among companies, securities, and types of securities.

Overall Investment Risk

All securities investments risk the loss of capital. The nature of the securities purchased and traded by the Firm and the investment techniques and strategies employed in order to increase profits may increase this risk. While the Firm will devote its best efforts to the management of investment portfolios, many unforeseeable events, including but not limited to actions by various government agencies, such as the Federal Reserve Board, and domestic and international political events, may cause sharp market fluctuations.

Trading on Non-U.S. Exchanges

The Firm's portfolio will engage in trading on exchanges outside the United States. Trading on such exchanges is not regulated by any United States governmental agency and may involve certain risks not applicable to trading on United States exchanges. For example, some foreign exchanges are "principals' markets" in which performance is the responsibility only of the individual member with whom the trader has entered into a trade and not of an exchange or clearing organization. Moreover, such trading may be subject to whatever regulatory provisions are applicable to transactions effected outside the United States, whether on foreign exchanges or otherwise. Trading on foreign exchanges involves the additional risks of expropriation, burdensome or confiscatory taxation, moratoriums and investment controls, or political or diplomatic events that might adversely affect the Firm's trading activities. The risks of investing in non-U.S. securities may also include: reduced and less reliable information about issuers and markets, less stringent accounting standards, illiquidity of securities and markets and higher brokerage commissions and custody fees. Furthermore, foreign trading is also subject to the risk of changes in the exchange rate between United States dollars and the currencies in which securities traded on such exchanges are settled.

Investments in International Markets, including Emerging Markets

The Firm's portfolios will invest a substantial portion, or the entirety, of its portfolio in investments which are non-U.S. based. The Firm's portfolios will therefore be subject to certain additional risks that are not usually associated with similar investments in the U.S. and other industrialized democracies including: fluctuation in currency exchange rates, the imposition of exchange control regulations, the possibility of expropriation decrees, more limited information about issuers and their operations, different accounting standards, sub-standard regulatory environment and smaller, less liquid markets. Furthermore, political and economic risk may be substantial, especially in Emerging Markets. Emerging Markets in particular have a history of imposing unfriendly controls on foreign investors during times of economic stress. Investment in international markets, and especially emerging market countries, therefore carry a higher degree of risk than investment in securities based in the U.S.

Currency and Exchange Rate Risks

The Firm may invest in securities denominated in currencies other than the U.S. Dollar or in securities which are determined with references to currencies other than the U.S. Dollar. The Firm, however, will value its assets in U.S. Dollars. The Firm will not be hedging currencies applicable to its portfolio and therefore the value of the Firm's assets will fluctuate with U.S. Dollar exchange rates as well as with price changes of their investments in the various local markets and currencies. Thus, an increase in the value of the U.S. Dollar compared to the other currencies in which the Firm may make investments will reduce the effect of increases and magnify the U.S. Dollar equivalent of the effect of decreases in the prices of Firm's securities in their local markets. Conversely, a decrease in the value of the U.S. Dollar will have the opposite effect of magnifying the effect of increases and reducing the effect of decreases in the prices of the Firm's non-U.S. Dollar securities.

Real Estate Investment Trust, Master Limited Partnership, Business Development Company, and Closed End Fund Risks

The Global Income & Growth Portfolio may invest in Real Estate Investment Trusts (a “REIT”), Master Limited Partnerships (an “MLP”), Business Development Companies (a “BDC”), and Closed End Funds (a “CEF”), each of which involves some risks which differ from an investment in the common stock of a corporation. Holders of REIT, MLP, BDC, and CEF securities generally have limited control and voting rights on matters affecting the entity. In addition, there are: (i) certain tax risks associated with an investment in such entities, and (ii) conflicts of interest exist between common equity holders and the general partner of MLPs in which the Global Income and Growth Portfolio may hold investments, including those arising from incentive distribution payments.

General Risks of Securities Linked to the Real Estate Market

The Global Income and Growth Portfolio will not invest in real estate directly, but may invest in securities issued by real estate companies, including REITs. However, investment in securities of companies within the real estate industry may also be subject to the same ownership risks associated with direct ownership of real estate. These risks include:

- declines in the value of real estate
- risks related to general and local economic conditions
- possible lack of availability of mortgage funds
- overbuilding
- extended vacancies of properties
- increased competition
- increases in property taxes and operating expenses
- changes in zoning laws
- losses due to costs resulting from the clean-up of environmental problems
- liability to third parties for damages resulting from environmental problems
- casualty or condemnation losses
- limitations on rents
- changes in neighborhood values and the appeal of properties to tenants
- changes in interest rates

An economic downturn could have a material adverse effect on the real estate markets and therefore on the real estate companies in which the Global Income and Growth Portfolio invests, which in turn could result in the Global Income and Growth Portfolio not achieving its investment objectives.

General Real Estate Risks

The Global Income and Growth Portfolio will not invest in real estate directly, but may invest in securities issued by real estate companies, including REITs. Real property investments, and therefore indirect investment in real property, are subject to varying degrees of risk. The yields available from investments in real estate depend on the amount of income and capital appreciation generated by the related properties. Income and real estate values may also be adversely affected by such factors as: applicable laws (e.g., Americans with Disabilities Act and tax laws), interest rate levels, and the availability of financing. If the properties do not generate sufficient income to meet operating expenses, including, where applicable, debt service, ground lease payments, tenant improvements, third-party leasing commissions and other capital expenditures, the income and ability of the real estate company to make payments of any interest and principal on its debt securities will be adversely affected. In addition, real property may be subject to the quality of credit extended and defaults by borrowers and tenants.

The performance of the economy in each of the regions in which the real estate owned by the portfolio company is located, affects occupancy, market rental rates and expenses, and, consequently, has an impact on the income from such properties and their underlying values. The financial results of major local employers also may have an impact on the cash flow and value of certain properties. In addition, real estate investments are relatively illiquid and, therefore, the ability of real estate companies to vary their portfolios promptly in response to changes in economic or other conditions is limited.

A real estate company may also have joint venture investments in certain of its properties, and consequently, its ability to control decisions relating to such properties may be limited. Real property investments are also subject to risks which are specific to the investment sector or type of property in which the real estate companies are investing.

Acquisition Risk

The abilities of a REIT, MLP or BDC to appreciate and to increase distributions to security holders may be highly dependent on its ability to make acquisitions that result in an increase in adjusted operating surplus. A REIT, MLP or BDC's future growth and ability to provide distributions will be limited in the event it cannot make such acquisitions because it is unable to: identify attractive acquisition candidates, negotiate acceptable purchase contracts, raise financing for such acquisitions on economically acceptable terms, and/or outbid competitors.

Furthermore, even if a REIT, MLP or BDC does consummate acquisitions that they believe will be advantageous, the acquisitions may instead result in a decrease in adjusted operating surplus.

Any acquisition involves risks, including, among other things: mistaken assumptions about revenues and costs, including the assumption of unknown liabilities; limitations on rights to indemnity from the seller; the diversion of management's attention from other business concerns; unforeseen difficulties operating in new product or geographic areas; and customer or key employee losses at the acquired businesses.

Interest Rate Risk

Rising interest rates could adversely impact the financial performance of a REIT, MLP, BDC, or CEF by increasing its costs of capital. This may reduce its ability to execute acquisitions or expansion projects in a cost-effective manner.

Increasing Interest Rates May Negatively Affect the Value of an Investment

REIT, MLP, BDC, and CEF valuations are based on numerous factors, including sector and business fundamentals, management expertise, and expectations of future operating results. However, REIT, MLP, BDC, and CEF yields are also susceptible in the short-term to fluctuations in interest rates and, like treasury bonds, the prices of REIT, MLP, BDC, and CEF securities typically increase when interest rates fall and decline when interest rates rise. The Global Income and Growth Portfolio anticipates investments in REIT, MLP, BDC, and CEF opportunities, and therefore the value of the Global Income and Growth Portfolio may decline if interest rates rise.

In addition to the risks of equity securities and securities linked to the real estate market, preferred stocks and high yield equities also are more sensitive to changes in interest rates than common stocks. When interest rates rise, the value of preferred stocks and high yield equities may fall.

Risks of Investment in Lower-Rated Securities

Lower-rated securities may be considered speculative with respect to the issuers continuing ability to make principal and interest payments. Analysis of the creditworthiness of issuers of lower-rated securities may be more complex than for issuers of higher quality debt securities, and the Global Income and Growth Portfolio's ability to achieve its investment objectives may, to the extent it invests in lower-rated securities, be more dependent upon such creditworthiness analysis than would be the case if it were investing in higher quality securities. The Global Income and Growth Portfolio may invest in high yield securities that are rated CCC or higher by S&P, or CAA or higher by Moody's, or unrated securities that are determined by the Firm to be of comparable quality. An issuer of these securities has a currently identifiable vulnerability to default and the issuer may be in default or there may be present elements of danger with respect to principal or interest.

Lower-rated securities may be more susceptible to real or perceived adverse economic and competitive industry conditions than higher grade securities. The prices of lower-rated securities may be less sensitive to interest-rate changes than more highly rated investments, but more sensitive to adverse economic downturns or individual corporate developments. Yields on lower-rated securities will fluctuate. If the issuer of lower-rated securities defaults, the Global Income and Growth Portfolio may incur additional expenses to seek recovery.

The secondary markets in which lower-rated securities are traded may be less liquid than the market for higher grade securities. Less liquidity in the secondary trading markets could adversely affect the price at which the Global Income and Growth Portfolio could sell a particular lower-rated security when necessary to meet liquidity needs or in response to a specific economic event, such as a deterioration in the creditworthiness of the issuer, and could adversely affect and cause large fluctuations in the net asset value of the Global Income and Growth Portfolio. Adverse publicity and investor perceptions may decrease the values and liquidity of high yield securities.

It is reasonable to expect that any adverse economic conditions could disrupt the market for lower-rated securities, have an adverse impact on the value of such securities, and adversely affect the ability of the issuers of such securities to repay principal and pay interest thereon. New regulation and proposed new regulations may adversely impact the market for lower-rated securities.

Portfolio Turnover

The investment portfolios managed by the Firm will not be restricted in effecting transactions by any specific limitations with regard to their portfolio turnover rate. While recent portfolio turnover has been relatively low, unusual market activities or other unforeseen events may result in substantial portfolio turnover at any point in the future.

Potential Conflicts of Interest

Trade Allocation

The Firm manages and expects to continue to manage other client accounts. Generally, the Firm has discretionary authority over the investment Portfolios for which it manages on behalf of clients. As a general matter, the Firm believes that aggregation of orders for multiple clients is consistent with its duty to seek best execution for its clients. However, in any case in which the Firm believes that aggregation is not consistent with its duty to seek best execution for its clients, it will not affect the transaction on an aggregated basis.

Typically, the Firm allocates orders for securities on a *pro-rata* basis in accordance with each account's investment guidelines as determined exclusively by the Firm's Portfolio Manager or his designee. The Firm also allocates orders for initial public offerings on a *pro-rata* basis to the accounts of non-restricted investors or in accordance with *de minimis* exceptions. Differences in allocation proportions may occur due to tax considerations, avoidance of odd lots or *de minimis* numbers of shares, and investment strategies of the accounts. In order to verify compliance with these policies and procedures, the Firm conducts periodic reviews of the order allocation process.

Personal Trading

Personal trading by employees of the Firm may create potential conflicts of interest with respect to the portfolio's the Firm manages on behalf of its investors. "Front running" client accounts is a common example of such a conflict. For additional information with respect to the policies and procedures the firm has implemented to mitigate conflicts associated with personal trading, please see Item 11 – Code of Ethics or by contacting the Firm at (214) 871-5200.

Soft Dollar Credits

The Firm has employed a soft dollar policy that falls within the safe harbor established by Section 28(e) of the Securities Exchange Act of 1934 ("1934 Act"). However, the Firm's use of soft dollar credits to pay for research and brokerage products or services might otherwise be borne by the Firm. Accordingly, the authority to use soft dollar credits may give the Firm an incentive to select brokers or dealers for securities transactions, or to negotiate commission rates or other execution terms, in a manner that takes into account the soft dollar benefits received by the Firm rather than giving exclusive consideration to the interests of the Firm's clients. For additional information regarding the Firm's use of soft dollars and broker selection, please see Item 12 – Brokerage Practices.

Investing in securities involves risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Firm or the integrity of its management. The Firm has no legal or disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

The Firm is affiliated with the Sub-Advisor by virtue of common control through Ranger Capital Group Holdings, L.P. and Andersen Capital International, LLC, and the two firms generally manage portfolios in sub-advisory relationships, whereby Ranger has primary responsibility for primary responsible for activities such as operations, accounting, compliance, legal and client service operational support; and Ranger International Management, LP (the "Sub-Advisor", and together with Ranger, the "Ranger International Advisors") is delegated portfolio management responsibility with respect to client portfolios.

In addition, the Firm and each of the following investment advisers are affiliated by virtue of common control and ownership by Ranger Capital Group Holdings, L.P. Each Ranger adviser mentioned below maintains independent investment teams and processes, and focus on different investment strategies.

- Ranger Investment Management, L.P. manages investment portfolios which consist of the U.S. exchange traded equity securities of small and/or mid capitalization growth oriented companies.
- Ranger Advisors, L.P. manages multi-strategy fund-of-hedge funds.
- Ranger Alternative Management, L.P. serves as a sub advisor to and has day-to-day portfolio management responsibilities with respect to a short only actively managed exchange traded fund. Portfolio investments generally include short sales of domestically traded mid- and large-cap U.S. exchange-traded equity securities.
- Ranger Fund Management, L.P. manages fund of funds portfolios whose primary objective is to invest a variety of strategies advised by Ranger affiliated investment advisers.

All Ranger investment advisers are registered with the U.S. Securities and Exchange Commission in accordance with the Investment Advisers Act of 1940. Registration as an investment adviser does not imply any level of skill or training.

Item 11 – Code of Ethics, Participation/Interest in Client Transactions & Personal Trading

As a fiduciary, the Firm has an affirmative duty to act in the best interests of its investors and to make full and fair disclosure of all material facts, particularly where the Firm's interests may conflict with those of its investors. The Firm's Code of Conduct and Code of Ethics (the "Codes") serve as behavior benchmarks from which the Firm's compliance program is built.

Briefly, the Codes requires each Ranger employee to act with integrity, competence, diligence, respect, and in an ethical manner when dealing with current and prospective clients, the Firm, other employees, colleagues in the investment profession, and other participants in the global capital markets. The Firm expects employees to place the interests of clients and the Firm above their own personal interest and to avoid any actual or potential conflicts of interest.

Among other things, the Firm's Code of Ethics requires that all employees comply with applicable provisions of the federal securities laws and promptly report any potential violations of the Firm's compliance policies and procedures to the Chief Compliance Officer.

Personal Trading Policy

The Firm has implemented a personal trading policy which prohibits employees from purchasing individual securities which the Firm may invest in for the benefit of its clients. Employees may continue to hold investments initiated prior to the adoption of the policy or their employment with the firm, and may sell such securities only after all anticipated clients' purchases or sales of such securities are completed, if any. In addition, the Firm requires that all employees receive pre-clearance from the Chief Compliance Officer by submitting a written request prior to the sale

of individual securities transactions. Employees may invest in pooled investment vehicles, ETFs, Closed End Mutual Funds and SEC non-restricted securities such as open-end mutual funds, certain U.S. government securities and cash equivalents. Pre-clearance and reporting requirements vary for these investments. The Firm's personal trading policy requires employees to provide the Chief Compliance Officer with a detailed summary of certain holdings (both initially upon commencement of employment and annually thereafter) over which such employees have a direct or indirect beneficial interest.

Employees of Firm affiliate, Ranger International Management, LP, are permitted to purchase or sell individual securities for their own accounts. However, the Firm requires such employees to comply with certain pre-clearance procedures and other personal security transaction policies set forth in the Ranger International Management, LP's compliance manual. Employees are prohibited from front running client accounts and/or acting upon inside information, as described in the compliance manual. Under no circumstance may an employee, or family member living in the employee's household, benefit at the expense of investors or the Firm. Nonetheless, because certain affiliated employees are permitted to invest in the same securities as those held in the accounts the Firm advises, there is a possibility that such employees might benefit from market activity by a client in a security held by the employee. Employee trading is continually monitored to reasonably prevent conflicts of interest involving the Firm, affiliates and investors. In addition to personal trading activities, other policies and procedures found in the Code of Ethics provide guidelines the Firm and/or employees follow with respect to:

- Insider Trading
- Outside Business Activities
- Political Contributions
- Gifts and Entertainment

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

Item 12 – Brokerage Practices

Generally, the Firm provides compliance and operational oversight with respect to the affiliated Sub-Advisor. References to the Firm in this Section 12 shall be deemed to reference both the Firm and the Sub-Advisor.

The Firm has complete investment and brokerage discretion over its client accounts.

Broker Selection and Transactions

The Firm selects brokers for its securities transactions based on a number of factors, including, but not limited to: the ability to effect prompt and reliable executions at favorable prices (including the applicable dealer spread or commission, if any); the operational efficiency with which transactions are effected, taking into account the size of an order and the difficulty of execution; the financial strength, integrity and stability of the broker; the broker's risk in positioning a block of securities; the quality, comprehensiveness and frequency of available research products or other services considered by the Firm to be of value; and the

competitiveness of commission rates in comparison with other brokers satisfying the Firm's other selection criteria.

With respect to research and brokerage products or services provided by brokers dealers, the Firm seeks to maintain a soft dollar policy that falls within the safe harbor established by Section 28(e) of the Securities Exchange Act of 1934 ("1934 Act"). Research services, as that term is used in Section 28(e)(3), may include both services generated internally by a broker's own research staff and services obtained by the broker from a third party research firm. The research services obtained may include a broad variety of financial and related information and services, including written or oral research and information relating to the economy, industries or industry segments, a specific company or group of companies, software or written financial data, electronic or other quotations or market information systems, financial or economic programs or seminars, or other similar services or information believed to assist the Firm and its advisory functions and services. The Firm believes that its ability to obtain such products and services is an integral factor in the level of the advisory fees charged to clients.

Generally, the Firm will attempt to place portfolio transactions with broker dealers who, in its opinion, provide the best combination of price and execution (including brokerage commissions). However, the Firm may pay a broker dealer a commission for effecting a transaction in excess of the amount of commission charged by another broker or dealer as long as the Firm makes a good faith determination that the amount of commission is reasonable in relation to the value of the brokerage and research services provided by the broker-dealer.

The Firm maintains an internal allocation procedure to identify those brokers who provided it with research and execution services that the Firm considers useful to its investment decision-making process. The amount of commission the Firm allocates to any broker will be based, in part, on the cost of such research to the broker, and the amount allocated is generally higher than that which the Firm would pay for the research were it to pay for it in cash using its own funds.

Clients should consider that there is a potential conflict of interest between their interests in obtaining best execution and the Firm's receipt of and payment for research through brokerage allocations as described above. To the extent the Firm obtains brokerage and research services that it otherwise would acquire at its own expense, the Firm may have incentive to place a greater volume of transactions or pay higher commissions than would otherwise be the case.

The soft dollar research the Firm obtains normally benefits many accounts rather than just the one(s) for which the order is being executed, and not all research may be used by the Firm in connection with the account(s) which paid commissions to the broker providing the research. For example, the Firm may use the commissions paid by its clients who invest in international securities to obtain U.S. securities research services. In this situation, the U.S. securities research may benefit only a select group of the Firm's clients which is different from the group whose commissions generated the soft dollar credits.

Best Execution Reviews

On at least a quarterly basis, the Firm holds a best execution review meeting to determine the value each broker dealer brought to the Firm over the previous three (3) month period. In attendance at the meeting are members of the Firm's investment team, and its compliance team members. At the meeting the participants address issues such as, the quality of execution, quality of research, responsiveness of the broker, access to analysts and access to company management. The meeting participants also discuss each active broker dealer on the approved list to determine whether the commissions earned are commensurate with the value received from each broker dealer. At this time, trading costs associated with commission levels are measured and reviewed. Following the review, the Portfolio Manager and compliance team members document the changes made to the approved list of broker dealers.

Each quarter, as part of the best execution review, and also any instance in which the Firm modifies its soft dollar products and services, the Portfolio Manager and the compliance team members will discuss general soft dollar activities and possible changes to the list of all soft dollar services. Examples of soft dollar issues the meeting participants address during the best execution review may include:

- Changes to the current level of service
- Prospective products and services being considered
- Services that are not being fully utilized, are obsolete, or redundant and should be eliminated
- Whether the commissions targeted for the current quarter or year are in line with the budgeted amounts

The compliance team members document and maintain information the meeting participants discuss during the best execution review.

Order Aggregation

Generally, the Firm aggregates and allocates all client orders on a *pro-rata* prior to making a trade. The Portfolio Managers review and monitor client orders. Upon completion, the Operations Manager confirms client orders. The Firm manages all accounts with similar investment guidelines *pari passu*. Ranger aggregates trade orders to seek best execution. However, in any case in which the Firm believes that aggregation is not consistent with its duty to seek best execution for its clients, it will not affect the transaction on an aggregated basis.

Directed Brokerage

An investor may instruct the Firm to effect securities transactions from the investor's account through a specific broker/dealer. The Firm considers such an instruction to be a "directed brokerage arrangement." In such circumstances, the investor is responsible for negotiating the terms and arrangements for the account with that broker dealer. The Firm will not seek better execution services or prices from other broker dealers or be able to aggregate the investor's

transactions for execution through other broker dealers, with orders for other accounts the Firm advises. As a result, a directed trade may be placed following aggregated trading activity for a particular security. In addition, the Firm may not obtain best execution on behalf of the investor, who may pay materially disparate commissions, greater spreads or other transaction costs, or receive less favorable net prices on transactions for the account than would otherwise be the case.

Soft Dollar Reviews

In addition to quarterly best execution reviews, the Firm will conduct an annual evaluation of its soft dollar products and services to, (1) ensure the products and services continue to provide the value to the investment manager which was originally established upon initial evaluation; and, (2) prepare an annual soft dollar budget which it believes is in the best interest of the Firm's clients. The Chief Compliance Officer and Chief Financial Officer must approve the annual soft dollar budget. The President provides resolution to any differences of opinion between the Chief Compliance Officer and Chief Financial Officer.

Every month, a member of the accounting department reviews and verifies all invoices for soft dollar products and services and then submits them to the Portfolio Manager for verification. The invoices are stamped and dated, and then forwarded to the soft dollar broker for payment. The soft dollar broker submits a monthly summary of all payments made for research, as well as a detailed listing of commissions generated with the executing soft dollar brokers. A member of the accounting department reviews all research payments and the Portfolio Manager reviews commissions to ensure payments between the commission list submitted by the soft dollar broker and a commission report generated by the portfolio management system have been properly reconciled. The soft dollar broker resolves any issues, and any unresolved disputes will be promptly brought to the attention of the Chief Compliance Officer and Chief Financial Officer.

Mixed-Use Soft Dollar Products and Services

In some instances, the Firm may use brokerage and research products or services for functions that are not entirely brokerage or research related (i.e. not related to the investment decision-making process). Where a research product or service has a mixed-use, the Firm will make a reasonable allocation according to its use and will pay for the non-research portion in cash using its own funds. Mixed-use allocation decisions are generally based on a reasonable combination of factors such as:

- The percentage of time the Firm uses the product for research in relation to non-research applications;
- The relative value of the product for each use as the Chief Compliance Officer and Chief Financial Officer determine to be reasonable and appropriate; and,
- The availability and value of comparable products and services.

The Chief Compliance Officer supervises the evaluation of all mixed-use soft dollar items upon initial receipt of the product or service, and then again on an annual basis. Evaluation results,

along with guidance from the Chief Financial Officer, assist the Chief Compliance Officer in the establishment of a final mixed-use allocation decision.

Item 13 – Review of Accounts

Each account will be reviewed and valued on a daily basis or more frequently if triggered by market or economic conditions. At this time, there is one account requiring review. Members of the investment staff will review each account in a manner consistent with the investment goals of each account. The Firm's Chief Financial Officer will review the accounts' valuation, including net asset value calculations, securities positions and pricing information, interest accrual calculations, and cash balance reports generated by the Firm's accounting system, custodian, prime broker and brokerage firms on a monthly basis. The Firm's independent public accountants perform an annual audit of the books and records of the Ranger Fund.

The Firm typically remits quarterly and annual reports to its clients, which set forth various financial data and information. The Firm's operations staff, supervised by the Chief Financial Officer, reviews the accounts' valuation, including net asset value calculations, securities positions and pricing information, interest accrual calculations, and cash balance reports generated by the Firm's accounting system, custodian, prime broker and/or brokerage firms. Investors in the Ranger Fund receive an audited annual financial report and the information necessary to complete annual federal income tax returns.

Item 14 – Client Referrals and Other Compensation

The Firm may enter into agreements with an affiliated or unaffiliated marketing group or individuals that will solicit separately managed accounts or investors for the Ranger Fund. For their solicitation services, such marketing groups or individuals may receive a percentage of the Firm's Management Fee.

The Firm's arrangements with an affiliated or unaffiliated marketing group or individuals may result in a potential conflict of interest by creating an incentive for the marketing group to recommend Ranger investment advisory products and services based on compensation received rather than the investor's needs. The Firm has implemented procedures to ensure compensation arrangements with an affiliated or unaffiliated third-party for client or investor referrals will comply with Rule 206(4)-3 under the Adviser's Act.

Item 15 – Custody

The Firm does not take direct possession of investor funds or securities. However, the Firm serves as a General Partner and/or attorney-in-fact with full discretion over the portfolios of pooled investment vehicles it advises, which indirectly gives the Firm authority to take possession of client funds and securities. As a result, the Firm is deemed to have custody of such funds and securities pursuant to Rule 206(4)-2 of the Investment Advisors Act of 1940.

Accordingly, the Firm implements certain policies and procedures to safeguard investor assets. In addition, the Firm must comply with additional bookkeeping, auditing and disclosure requirements, which includes providing investors in the Ranger Fund with audited financial statements on an annual basis.

The Firm strongly encourages all investors to closely monitor the account statements, audited financial statements and any other important investment related materials they receive from the Firm. Any potential discrepancies should be promptly brought to the Firm's attention by contacting (214) 871-5200.

Item 16 – Investment Discretion

The Firm has delegated discretion over client accounts to the affiliated Sub-Advisor, which generally has complete discretion over the selection and amount of securities to be bought or sold for investor accounts without obtaining their consent or approval (within the parameters established by the private placement memorandum of the Range Fund or investment management agreements applicable to Separate Accounts). Discretionary authority will only be authorized upon full disclosure to the client and by that client specifically authorizing said authority through the execution of a private placement memorandum or investment management agreement. Trades the Sub-Advisor executes on behalf of the discretionary accounts will be in accordance with that client's investment objectives and goals.

Item 17 – Voting Client Securities

As delegated to the Sub-Advisor, the Firm has the right to vote proxies for investment partnerships and other accounts it advises. The Firm seeks to vote such proxies in the interest of maximizing shareholder value. To that end, the Firm takes great care to vote proxies in a way that it believes is consistent with its fiduciary duty. It is the Firm's policy to review each proxy statement on an individual basis and give consideration to both the short and long term implications of the proposal to be voted. The Firm's Portfolio Managers are responsible for identifying the proxies upon which the Firm will vote, voting the proxies in the best interest of clients, and submitting the proxies promptly and properly.

The Firm's proxy voting policy and procedures are available for review by investors in the Ranger Fund or separate accounts advised by the Firm. In addition, the Firm maintains a record of all of the proxy votes cast on behalf of the Ranger Fund and separate accounts it advises; such records may be reviewed at the Firm's offices or upon written request.

Class Action Law Suits

From time to time, the Firm may receive notices regarding class action lawsuits involving securities that are or were held by the Ranger Fund. As a matter of policy, the Firm refrains from serving as the lead plaintiff in class action matters and also refrains from submitting proofs of claim where the Firm believes that either the recovery amounts are likely to be negligible or the Firm cannot be assured of confidential treatment of the data submitted in connection with the

proof of claim. As a result, the Firm, in most cases, does not participate in class action law suits.

Item 18 – Financial Information

Ranger International Management (TX), L.P. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients. In addition, the Firm has never been the subject of a bankruptcy petition.