

PART 2B OF FORM ADV BROCHURE SUPPLEMENT

**Small Enterprise Assistance Funds
Access Management Holdings Inc.
ACCESS SEAF SAFI
SEAF Caucasus Partners LTD
SEAF Colombia S.A.
SEAF India Investment Advisers Private Limited
SEAF Investment Management Company
SEAF Management LLC
SEAF Management Sichuan LLC
SEAF SME Finance LLC
SEAF Ventures Management LLC
SEAF Ventures Management Ltd
(together “SEAF”)**

ZIA UDDIN AHMED

**1500 K Street NW, Suite 375
Washington, D.C. 20005
Tel: 202.737.8463; Fax: 202.737.5536**

March 31, 2015

This brochure supplement provides information about Zia Uddin Ahmed that supplements the Brochure of SEAF. You should have received a copy of that Brochure. Please contact Natalie Fedors at 202.737.8463 or by email at nfedors@seaf.com if you did not receive the Brochure or if you have any questions about the contents of this Supplement.

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Disclose the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years. If the supervised person has no high school education, no formal education after high school, or no business background, disclose this fact. You may list any professional designations held by the supervised person, but if you do so, you must provide a sufficient explanation of the minimum qualifications required for each designation to allow clients to understand the value of the designation.

Name: Zia Uddin Ahmed

Year of Birth: 1951

Education: Mr. Ahmed earned a B.A. in Economics from the University of Oklahoma in 1975. He earned a Ph.D. in Economics from the University of Virginia in 1982.

Business Background: Zia Ahmed is one of the two founding Managing Directors of SEAF Bangladesh Ventures LLC, which was launched in Bangladesh in 2010. From November 2006 until present, he is also the Chairman of Venture Investment Partners Bangladesh Ltd. Also, from November 2000 until present, Mr. Ahmed serves as Chairman and Principal Consultant for Terra Resources International Investment and Marketing Services. Prior to this, Mr. Ahmed was Senior Consultant and Program Manager of Financial Markets at International Finance Corporation.

Professional Designations: None.

ITEM 3 – DISCIPLINARY INFORMATION

If there are legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person, disclose all material facts regarding those events.

Items 3.A, 3.B, 3.C, and 3.D below list specific legal and disciplinary events presumed to be material for this Item. If the supervised person has been involved in one of these events, you must disclose it under this Item for ten years following the date of the event, unless (1) the event was resolved in the supervised person's favor, or was reversed, suspended or vacated, or (2) you have rebutted the presumption of materiality to determine that the event is not material (see Note below). For purposes of calculating this ten-year period, the "date" of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments or decrees lapsed.

Items 3.A, 3.B, 3.C, and 3.D do not contain an exclusive list of material disciplinary events. If the supervised person has been involved in a legal or disciplinary event that is not listed in Items 3.A, 3.B, 3.C, or 3.D but is material to a client's or prospective client's evaluation of the supervised person's integrity, you must disclose the event. Similarly, even if more than ten years have passed since the date of the event, you must disclose the event if it is so serious that it remains currently material to a *client's* or prospective *client's* evaluation. If you deliver a supplement electronically and if a particular disclosure required below for the *supervised person* is provided through either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system or the IAPD, you may satisfy that particular disclosure obligation by including in that supplement (i) a statement that the *supervised person* has a disciplinary history, the details of which can be found on FINRA's BrokerCheck system or the IAPD, and (ii) a hyperlink to the relevant system with a brief explanation of how the *client* can access the disciplinary history. The BrokerCheck link is www.finra.org/brokercheck; the IAPD link is www.adviserinfo.sec.gov.

Item 3.A	<p>A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any <i>felony</i>; (b) a <i>misdemeanor</i> that <i>involved</i> investments or an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses; 2. is the named subject of a pending criminal <i>proceeding</i> that involves an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; 3. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation; or 4. was the subject of any <i>order</i>, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the <i>supervised person</i> from engaging in any <i>investment-related</i> activity, or from violating any <i>investment-related</i> statute, rule, or <i>order</i>. <p>Not applicable.</p>
Item 3.B	<p>An administrative <i>proceeding</i> before the SEC, any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 1. was <i>found</i> to have caused an <i>investment-related</i> business to lose its

	<p>authorization to do business; or</p> <p>2. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation and was the subject of an <i>order</i> by the agency or authority</p> <p>(a) denying, suspending, or revoking the authorization of the <i>supervised person</i> to act in an <i>investment-related</i> business;</p> <p>(b) barring or suspending the <i>supervised person's</i> association with an <i>investment-related</i> business;</p> <p>(c) otherwise significantly limiting the <i>supervised person's</i> <i>investment-related</i> activities; or</p> <p>(d) imposing a civil money penalty of more than \$2,500 on the <i>Supervised person</i>.</p> <p>Not applicable.</p>
Item 3.C	<p>A self-regulatory organization (SRO) proceeding in which the supervised person</p> <p>1. was <i>found</i> to have caused an <i>investment-related</i> business to lose its authorization to do business; or</p> <p>2. was <i>found</i> to have been <i>involved</i> in a violation of the <i>SRO's</i> rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from <i>investment-related</i> activities; or (iii) fined more than \$2,500.</p> <p>Not applicable.</p>
Item 3.D	<p>Any other <i>proceeding</i> in which a professional attainment, designation, or license of the <i>supervised person</i> was revoked or suspended because of a violation of rules relating to professional conduct. If the <i>supervised person</i> resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a <i>proceeding</i> (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.</p> <p>Note: You may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, you are not required to disclose it. When you review a legal or disciplinary event involving the supervised person to determine whether it is appropriate to rebut the presumption of materiality, you should consider all of the following factors: (1) the proximity of the supervised person to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If you conclude that the materiality presumption has been overcome, you must prepare and maintain a file memorandum of your determination in your records. See SEC rule 204-2(a)(14)(iii) and similar state rules.</p> <p>Not applicable.</p>

ITEM 4 – OTHER BUSINESS ACTIVITIES

<p>Item 4.A</p>	<p>If the <i>supervised person</i> is actively engaged in any <i>investment-related</i> business or occupation, including if the <i>supervised person</i> is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated <i>person</i> of an FCM, CPO, or CTA, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.</p> <ol style="list-style-type: none"> 1. If a relationship between the advisory business and the <i>supervised person’s</i> other financial industry activities creates a material conflict of interest with <i>clients</i>, describe the nature of the conflict and generally how you address it. 2. If the <i>supervised person</i> receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service (“trail”) fees from the sale of mutual funds, disclose this fact. If this compensation is not cash, explain what type of compensation the <i>supervised person</i> receives. Explain that this practice gives the <i>supervised person</i> an incentive to recommend investment products based on the compensation received, rather than on the <i>client’s</i> needs <p>Mr. Ahmed currently serves as the Chairman of Venture Investment Partners Bangladesh Ltd., the President of US Bangladesh Investment Group Inc. and the Chairman of TRIIMS Consultant Ltd. Additionally, Mr. Ahmed receives compensation for his roles as the Chairman and Principal Consultant for Terra Resources International Investment and Marketing Services and the Chief Technical Advisor for VIPB Asset Management Company Ltd.</p> <p>To deal with these potential conflicts, SEAF requires Mr. Ahmed to disclose his outside business activities and acknowledge his receipt and understanding of SEAF’s Code of Ethics (which requires that employees place the interests of SEAF’s Advisory Clients and underlying investors over their own (or those of SEAF) and details the procedures to follow in the event of the receipt of material non-public information). Additionally, investors in SEAF’s Advisory Clients are provided with clear disclosure as to potential conflicts of interest that may arise due to Mr. Ahmed’s relationship with Venture Partners Bangladesh Ltd., US Bangladesh Investment Group Inc., TRIIMS Consultant Ltd., Terra Resources International Investment and Marketing Services or VIPB Asset Management Company Ltd.</p>
<p>Item 4.B</p>	<p>If the <i>supervised person</i> is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of the <i>supervised person’s</i> income or involve a substantial amount of the <i>supervised person’s</i> time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the <i>supervised person’s</i> time and income, you may presume that they are not substantial.</p> <p>Not applicable</p>

ITEM 5 – ADDITIONAL COMPENSATION

If someone who is not a *client* provides an economic benefit to the *supervised person* for providing advisory services, generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the *supervised person's* regular salary. Any bonus that is based, at least in part, on the number or amount of sales, *client* referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

As noted in Item 4.A above, Mr. Ahmed receives compensation for his roles as Chairman and Principal Consultant for Terra Resources International Investment and Marketing Services and Chief Technical Advisor for VIPB Asset Management Company Ltd.

ITEM 6 – SUPERVISION

Explain how you *supervise* the *supervised person*, including how you monitor the advice the *supervised person* provides to *clients*. Provide the name, title and telephone number of the *person* responsible for supervising the *supervised person's* advisory activities on behalf of your firm.

Mr. Ahmed, in his role as Managing Director for SEAF, is responsible for providing investment advice to clients. Mr. Ahmed is supervised by Natalie Fedors, Chief Compliance Officer of SEAF. Mr. Ahmed is also subject to the provisions of SEAF's Compliance Manual and Code of Ethics. Ms. Fedors monitors SEAF's portfolio holdings for consistency with Advisory Client objectives, strategy, and guidelines, including those portfolio holdings over which Mr. Ahmed has direct responsibility. Ms. Fedors is responsible for SEAF's overall compliance program, including compliance with applicable position limits, sector limits and investment guidelines set forth in offering documents provided to investors in the private investment funds and in the agreements of the accounts managed by SEAF. Ms. Fedors can be reached at 202.737.8463 or via email at nfedors@seaf.com.

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SEAF Ventures Management LLC
SEAF Ventures Management Ltd
(together “SEAF”)**

PARTHA CHOUDHURY

**1500 K Street NW, Suite 375
Washington, D.C. 20005
Tel: 202.737.8463; Fax: 202.737.5536**

March 31, 2015

This brochure supplement provides information about Partha Choudhury that supplements the Brochure of SEAF. You should have received a copy of that Brochure. Please contact Natalie Fedors at 202.737.8463 or by email at nfedors@seaf.com if you did not receive the Brochure or if you have any questions about the contents of this Supplement.

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Name: Partha Choudhury

Year of Birth: 1974

Education: Mr. Choudhury has an MBA from the Indian Institute of Management, and has a B.A. in Agriculture from the Banaras Hindu University (BHU), Varanasi India.

Business Background: Mr. Choudhury serves as Managing Director for SEAF India Investment Advisors, managing a sector dedicated private equity fund for the food and agribusiness sector called "SEAF India Agribusiness Fund". Prior to working for SEAF, Partha has worked at Yes Bank in their food and Agri Fund initiative; at Rabo India Finance (a 100 percent subsidiary of Rabobank International) in Rabo India Fund's investment banking and business consulting departments; and in ICICI Bank in their Corporate Finance department.

Professional Designations: None.

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Item 3.A	<p>A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any <i>felony</i>; (b) a <i>misdemeanor</i> that <i>involved</i> investments or an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses; 2. is the named subject of a pending criminal <i>proceeding</i> that involves an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; 3. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation; or 4. was the subject of any <i>order</i>, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the <i>supervised person</i> from engaging in any <i>investment-related</i> activity, or from violating any <i>investment-related</i> statute, rule, or <i>order</i>. <p>Not applicable.</p>
Item 3.B	<p>An administrative <i>proceeding</i> before the SEC, any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 1. was <i>found</i> to have caused an <i>investment-related</i> business to lose its

	<p>authorization to do business; or</p> <p>2. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation and was the subject of an <i>order</i> by the agency or authority</p> <p>(a) denying, suspending, or revoking the authorization of the <i>supervised person</i> to act in an <i>investment-related</i> business;</p> <p>(b) barring or suspending the <i>supervised person's</i> association with an <i>investment-related</i> business;</p> <p>(c) otherwise significantly limiting the <i>supervised person's</i> <i>investment-related</i> activities; or</p> <p>(d) imposing a civil money penalty of more than \$2,500 on the <i>Supervised person</i>.</p> <p>Not applicable.</p>
Item 3.C	<p>A self-regulatory organization (SRO) proceeding in which the supervised person</p> <p>1. was <i>found</i> to have caused an <i>investment-related</i> business to lose its authorization to do business; or</p> <p>2. was <i>found</i> to have been <i>involved</i> in a violation of the <i>SRO's</i> rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from <i>investment-related</i> activities; or (iii) fined more than \$2,500.</p> <p>Not applicable.</p>
Item 3.D	<p>Any other <i>proceeding</i> in which a professional attainment, designation, or license of the <i>supervised person</i> was revoked or suspended because of a violation of rules relating to professional conduct. If the <i>supervised person</i> resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a <i>proceeding</i> (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.</p> <p>Note: You may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, you are not required to disclose it. When you review a legal or disciplinary event involving the supervised person to determine whether it is appropriate to rebut the presumption of materiality, you should consider all of the following factors: (1) the proximity of the supervised person to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If you conclude that the materiality presumption has been overcome, you must prepare and maintain a file memorandum of your determination in your records. See SEC rule 204-2(a)(14)(iii) and similar state rules.</p> <p>Not applicable.</p>

ITEM 4 – OTHER BUSINESS ACTIVITIES

Item 4.A	<p>If the <i>supervised person</i> is actively engaged in any <i>investment-related</i> business or occupation, including if the <i>supervised person</i> is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated <i>person</i> of an FCM, CPO, or CTA, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.</p> <ol style="list-style-type: none">1. If a relationship between the advisory business and the <i>supervised person’s</i> other financial industry activities creates a material conflict of interest with <i>clients</i>, describe the nature of the conflict and generally how you address it.2. If the <i>supervised person</i> receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service (“trail”) fees from the sale of mutual funds, disclose this fact. If this compensation is not cash, explain what type of compensation the <i>supervised person</i> receives. Explain that this practice gives the <i>supervised person</i> an incentive to recommend investment products based on the compensation received, rather than on the <i>client’s</i> needs <p>Not applicable</p>
Item 4.B	<p>If the <i>supervised person</i> is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of the <i>supervised person’s</i> income or involve a substantial amount of the <i>supervised person’s</i> time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the <i>supervised person’s</i> time and income, you may presume that they are not substantial.</p> <p>Not applicable</p>

ITEM 5 – ADDITIONAL COMPENSATION

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Mr. Choudhury does not receive economic benefits from any sources other than management fees and performance-based fees generated through investment advisory services provided to SEAF's clients.

ITEM 6 – SUPERVISION

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(together “SEAF”)**

GARY JAMES DODGE

**1500 K Street NW, Suite 375
Washington, D.C. 20005
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March 31, 2015

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Name: Gary James Dodge

Year of Birth: 1966

Education: Mr. Dodge graduated with a B.A. from Harvard College in 1988. He received an M.B.A. from Vanderbilt University in 1994.

Business Background: Mr. Dodge is Managing Director of the SEAF Central and Eastern Europe Growth Fund LLC and serves on SEAF's Global Investment Committee. Prior to this, Mr. Dodge held various fund management positions at SEAF, originally beginning as an Investment Officer with CARESBAC-Polska in 1995. From 1994 to 1995 Mr. Dodge was Business Development Manager at Incom Team, sp. z o.o. in Poland. From 1989 to 1992 he worked as a Systems Engineer at International Business Machines Corporation.

Professional Designations: None.

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Item 3.A	<p>A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 5. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any <i>felony</i>; (b) a <i>misdemeanor</i> that <i>involved</i> investments or an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses; 6. is the named subject of a pending criminal <i>proceeding</i> that involves an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; 7. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation; or 8. was the subject of any <i>order</i>, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the <i>supervised person</i> from engaging in any <i>investment-related</i> activity, or from violating any <i>investment-related</i> statute, rule, or <i>order</i>. <p>Not applicable.</p>
Item 3.B	<p>An administrative <i>proceeding</i> before the SEC, any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 3. was <i>found</i> to have caused an <i>investment-related</i> business to lose its

	<p>authorization to do business; or</p> <p>4. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation and was the subject of an <i>order</i> by the agency or authority</p> <p>(e) denying, suspending, or revoking the authorization of the <i>supervised person</i> to act in an <i>investment-related</i> business;</p> <p>(f) barring or suspending the <i>supervised person's</i> association with an <i>investment-related</i> business;</p> <p>(g) otherwise significantly limiting the <i>supervised person's</i> <i>investment-related</i> activities; or</p> <p>(h) imposing a civil money penalty of more than \$2,500 on the <i>Supervised person</i>.</p> <p>Not applicable.</p>
Item 3.C	<p>A self-regulatory organization (SRO) proceeding in which the supervised person</p> <p>3. was <i>found</i> to have caused an <i>investment-related</i> business to lose its authorization to do business; or</p> <p>4. was <i>found</i> to have been <i>involved</i> in a violation of the <i>SRO's</i> rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from <i>investment-related</i> activities; or (iii) fined more than \$2,500.</p> <p>Not applicable.</p>
Item 3.D	<p>Any other <i>proceeding</i> in which a professional attainment, designation, or license of the <i>supervised person</i> was revoked or suspended because of a violation of rules relating to professional conduct. If the <i>supervised person</i> resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a <i>proceeding</i> (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.</p> <p>Note: You may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, you are not required to disclose it. When you review a legal or disciplinary event involving the supervised person to determine whether it is appropriate to rebut the presumption of materiality, you should consider all of the following factors: (1) the proximity of the supervised person to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If you conclude that the materiality presumption has been overcome, you must prepare and maintain a file memorandum of your determination in your records. See SEC rule 204-2(a)(14)(iii) and similar state rules.</p> <p>Not applicable.</p>

ITEM 4 – OTHER BUSINESS ACTIVITIES

<p>Item 4.A</p>	<p>If the <i>supervised person</i> is actively engaged in any <i>investment-related</i> business or occupation, including if the <i>supervised person</i> is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated <i>person</i> of an FCM, CPO, or CTA, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.</p> <ol style="list-style-type: none"> 3. If a relationship between the advisory business and the <i>supervised person’s</i> other financial industry activities creates a material conflict of interest with <i>clients</i>, describe the nature of the conflict and generally how you address it. 4. If the <i>supervised person</i> receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service (“trail”) fees from the sale of mutual funds, disclose this fact. If this compensation is not cash, explain what type of compensation the <i>supervised person</i> receives. Explain that this practice gives the <i>supervised person</i> an incentive to recommend investment products based on the compensation received, rather than on the <i>client’s</i> needs <p>Mr. Dodge currently serves as Advisor to SECO and receives compensation for this role.</p> <p>To deal with potential conflicts, SEAF requires Mr. Dodge to disclose his outside business activities and acknowledge his receipt and understanding of SEAF’s Code of Ethics (which requires that employees place the interests of SEAF’s Advisory Clients and underlying investors over their own (or those of SEAF) and details the procedures to follow in the event of the receipt of material non-public information). Additionally, investors in SEAF’s Advisory Clients are provided with clear disclosure as to potential conflicts of interest that may arise due to Mr. Dodge’s relationship with SECO.</p>
<p>Item 4.B</p>	<p>If the <i>supervised person</i> is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of the <i>supervised person’s</i> income or involve a substantial amount of the <i>supervised person’s</i> time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the <i>supervised person’s</i> time and income, you may presume that they are not substantial.</p> <p>Not applicable</p>

ITEM 5 – ADDITIONAL COMPENSATION

If someone who is not a *client* provides an economic benefit to the *supervised person* for providing advisory services, generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the *supervised person's* regular salary. Any bonus that is based, at least in part, on the number or amount of sales, *client* referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

As noted in Item 4.A above, Mr. Dodge receives compensation for his roles as Advisor to SECO. Mr. Dodge also receives fees for sitting on the Boards of SEAF portfolio companies BPSC and Symbio. Apart from these fees, he does not receive economic benefits from any sources other than management fees and performance-based fees generated through investment advisory services provided to SEAF's clients.

ITEM 6 – SUPERVISION

Explain how you *supervise* the *supervised person*, including how you monitor the advice the *supervised person* provides to *clients*. Provide the name, title and telephone number of the *person* responsible for supervising the *supervised person's* advisory activities on behalf of your firm.

Mr. Dodge, in his role as Managing Director, is responsible for providing investment advice to clients. Mr. Dodge is supervised by Natalie Fedors, Chief Compliance Officer of SEAF. Mr. Dodge is also subject to the provisions of SEAF's Compliance Manual and Code of Ethics. Ms. Fedors monitors SEAF's portfolio holdings for consistency with Advisory Client objectives, strategy, and guidelines, including those portfolio holdings over which Mr. Dodge has direct responsibility. Ms. Fedors is responsible for SEAF's overall compliance program, including compliance with applicable position limits, sector limits and investment guidelines set forth in offering documents provided to investors in the private investment funds and in the agreements of the accounts managed by SEAF. Ms. Fedors can be reached at 202.737.8463 or via email at nfedors@seaf.com.

PART 2B OF FORM ADV BROCHURE SUPPLEMENT

**Small Enterprise Assistance Funds
Access Management Holdings Inc.
ACCESS SEAF SAFI
SEAF Caucasus Partners LTD
SEAF Colombia S.A.
SEAF India Investment Advisers Private Limited
SEAF Investment Management Company
SEAF Management LLC
SEAF Management Sichuan LLC
SEAF SME Finance LLC
SEAF Ventures Management LLC
SEAF Ventures Management Ltd
(together “SEAF”)**

**VIPUL HARENDRA MANKAD
1500 K Street NW, Suite 375
Washington, D.C. 20005
Tel: 202.737.8463; Fax: 202.737.5536**

March 31, 2015

This brochure supplement provides information about Vipul Harendra Mankad that supplements the Brochure of SEAF. You should have received a copy of that Brochure. Please contact Natalie Fedors at 202.737.8463 or by email at nfedors@seaf.com if you did not receive the Brochure or if you have any questions about the contents of this Supplement.

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Disclose the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years. If the supervised person has no high school education, no formal education after high school, or no business background, disclose this fact. You may list any professional designations held by the supervised person, but if you do so, you must provide a sufficient explanation of the minimum qualifications required for each designation to allow clients to understand the value of the designation.

Name: Vipul Harendra Mankad

Year of Birth: 1958

Education: Mr. Mankad earned a B.E. in Chemical Engineering from Gujarat University in 1981. He earned an M.B.A. from South Gujarat University in 1983. He earned a D.B.F. from ICFAI India in 1991.

Business Background: Mr. Mankad is Global Investment Officer and serves on SEAF's Global Investment Committee. Prior to joining SEAF, he was President of SIDBI Venture Capital Ltd from 2000 to 2011. Previously he was Senior Vice President at Gujarat Venture Fin. Ltd from 1990 to 2000. From 1983 to 1990 he was Senior Manager at GIIC Ltd.

Professional Designations: None.

ITEM 3 – DISCIPLINARY INFORMATION

If there are legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person, disclose all material facts regarding those events.

Items 3.A, 3.B, 3.C, and 3.D below list specific legal and disciplinary events presumed to be material for this Item. If the supervised person has been involved in one of these events, you must disclose it under this Item for ten years following the date of the event, unless (1) the event was resolved in the supervised person's favor, or was reversed, suspended or vacated, or (2) you have rebutted the presumption of materiality to determine that the event is not material (see Note below). For purposes of calculating this ten-year period, the "date" of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments or decrees lapsed.

Items 3.A, 3.B, 3.C, and 3.D do not contain an exclusive list of material disciplinary events. If the supervised person has been involved in a legal or disciplinary event that is not listed in Items 3.A, 3.B, 3.C, or 3.D but is material to a client's or prospective client's evaluation of the supervised person's integrity, you must disclose the event. Similarly, even if more than ten years have passed since the date of the event, you must disclose the event if it is so serious that it remains currently material to a *client's* or prospective *client's* evaluation. If you deliver a supplement electronically and if a particular disclosure required below for the *supervised person* is provided through either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system or the IAPD, you may satisfy that particular disclosure obligation by including in that supplement (i) a statement that the *supervised person* has a disciplinary history, the details of which can be found on FINRA's BrokerCheck system or the IAPD, and (ii) a hyperlink to the relevant system with a brief explanation of how the *client* can access the disciplinary history. The BrokerCheck link is www.finra.org/brokercheck; the IAPD link is www.adviserinfo.sec.gov.

Item 3.A	<p>A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any <i>felony</i>; (b) a <i>misdemeanor</i> that <i>involved</i> investments or an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses; 2. is the named subject of a pending criminal <i>proceeding</i> that involves an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; 3. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation; or 4. was the subject of any <i>order</i>, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the <i>supervised person</i> from engaging in any <i>investment-related</i> activity, or from violating any <i>investment-related</i> statute, rule, or <i>order</i>. <p>Not applicable.</p>
Item 3.B	<p>An administrative <i>proceeding</i> before the SEC, any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 1. was <i>found</i> to have caused an <i>investment-related</i> business to lose its

	<p>authorization to do business; or</p> <p>2. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation and was the subject of an <i>order</i> by the agency or authority</p> <p>(a) denying, suspending, or revoking the authorization of the <i>supervised person</i> to act in an <i>investment-related</i> business;</p> <p>(b) barring or suspending the <i>supervised person's</i> association with an <i>investment-related</i> business;</p> <p>(c) otherwise significantly limiting the <i>supervised person's</i> <i>investment-related</i> activities; or</p> <p>(d) imposing a civil money penalty of more than \$2,500 on the <i>Supervised person</i>.</p> <p>Not applicable.</p>
Item 3.C	<p>A self-regulatory organization (SRO) proceeding in which the supervised person</p> <p>1. was <i>found</i> to have caused an <i>investment-related</i> business to lose its authorization to do business; or</p> <p>2. was <i>found</i> to have been <i>involved</i> in a violation of the <i>SRO's</i> rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from <i>investment-related</i> activities; or (iii) fined more than \$2,500.</p> <p>Not applicable.</p>
Item 3.D	<p>Any other <i>proceeding</i> in which a professional attainment, designation, or license of the <i>supervised person</i> was revoked or suspended because of a violation of rules relating to professional conduct. If the <i>supervised person</i> resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a <i>proceeding</i> (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.</p> <p>Note: You may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, you are not required to disclose it. When you review a legal or disciplinary event involving the supervised person to determine whether it is appropriate to rebut the presumption of materiality, you should consider all of the following factors: (1) the proximity of the supervised person to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If you conclude that the materiality presumption has been overcome, you must prepare and maintain a file memorandum of your determination in your records. See SEC rule 204-2(a)(14)(iii) and similar state rules.</p> <p>Not applicable.</p>

ITEM 4 – OTHER BUSINESS ACTIVITIES

Item 4.A	<p>If the <i>supervised person</i> is actively engaged in any <i>investment-related</i> business or occupation, including if the <i>supervised person</i> is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated <i>person</i> of an FCM, CPO, or CTA, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.</p> <ol style="list-style-type: none">1. If a relationship between the advisory business and the <i>supervised person’s</i> other financial industry activities creates a material conflict of interest with <i>clients</i>, describe the nature of the conflict and generally how you address it.2. If the <i>supervised person</i> receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service (“trail”) fees from the sale of mutual funds, disclose this fact. If this compensation is not cash, explain what type of compensation the <i>supervised person</i> receives. Explain that this practice gives the <i>supervised person</i> an incentive to recommend investment products based on the compensation received, rather than on the <i>client’s</i> needs <p>Not applicable</p>
Item 4.B	<p>If the <i>supervised person</i> is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of the <i>supervised person’s</i> income or involve a substantial amount of the <i>supervised person’s</i> time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the <i>supervised person’s</i> time and income, you may presume that they are not substantial.</p> <p>Not applicable</p>

ITEM 5 – ADDITIONAL COMPENSATION

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Mr. Mankad does not receive economic benefits from any sources other than management fees and performance-based fees generated through investment advisory services provided to SEAF's clients.

ITEM 6 – SUPERVISION

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PART 2B OF FORM ADV BROCHURE SUPPLEMENT

**Small Enterprise Assistance Funds
Access Management Holdings Inc.
ACCESS SEAF SAFI
SEAF Caucasus Partners LTD
SEAF Colombia S.A.
SEAF India Investment Advisers Private Limited
SEAF Investment Management Company
SEAF Management LLC
SEAF Management Sichuan LLC
SEAF SME Finance LLC
SEAF Ventures Management LLC
SEAF Ventures Management Ltd
(together “SEAF”)**

HEMENDRA MATHUR

**1500 K Street NW, Suite 375
Washington, D.C. 20005
Tel: 202.737.8463; Fax: 202.737.5536**

March 31, 2015

This brochure supplement provides information about Hemendra Mathur that supplements the Brochure of SEAF. You should have received a copy of that Brochure. Please contact Natalie Fedors at 202.737.8463 or by email at nfedors@seaf.com if you did not receive the Brochure or if you have any questions about the contents of this Supplement.

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Name: Hemendra Mathur

Year of Birth: 1972

Education: Mr. Mathur studied management at the Indian Institute of Management, Ahmedabad, and holds a Bachelor's degree in Engineering (Agricultural) from Rajasthan Agricultural University.

Business Background: Hemendra Mathur is Managing Director for SEAF India Investment Advisors, managing a sector dedicated private equity fund for food and agribusiness sector called "SEAF India Agribusiness Fund". Prior to working for SEAF, Hemendra worked with Yes Bank, Rabo India Finance (a 100 percent subsidiary of Rabobank International), KSA Technopak, and ORG MARG (now part of The Nielsen Company).

Professional Designations: None.

ITEM 3 – DISCIPLINARY INFORMATION

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Items 3.A, 3.B, 3.C, and 3.D do not contain an exclusive list of material disciplinary events. If the supervised person has been involved in a legal or disciplinary event that is not listed in Items 3.A, 3.B, 3.C, or 3.D but is material to a client's or prospective client's evaluation of the supervised person's integrity, you must disclose the event. Similarly, even if more than ten years have passed since the date of the event, you must disclose the event if it is so serious that it remains currently material to a *client's* or prospective *client's* evaluation. If you deliver a supplement electronically and if a particular disclosure required below for the *supervised person* is provided through either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system or the IAPD, you may satisfy that particular disclosure obligation by including in that supplement (i) a statement that the *supervised person* has a disciplinary history, the details of which can be found on FINRA's BrokerCheck system or the IAPD, and (ii) a hyperlink to the relevant system with a brief explanation of how the *client* can access the disciplinary history. The BrokerCheck link is www.finra.org/brokercheck; the IAPD link is www.adviserinfo.sec.gov.

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Item 3.B	<p>An administrative <i>proceeding</i> before the SEC, any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 5. was <i>found</i> to have caused an <i>investment-related</i> business to lose its

	<p>authorization to do business; or</p> <p>6. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation and was the subject of an <i>order</i> by the agency or authority</p> <p>(i) denying, suspending, or revoking the authorization of the <i>supervised person</i> to act in an <i>investment-related</i> business;</p> <p>(j) barring or suspending the <i>supervised person's</i> association with an <i>investment-related</i> business;</p> <p>(k) otherwise significantly limiting the <i>supervised person's</i> <i>investment-related</i> activities; or</p> <p>(l) imposing a civil money penalty of more than \$2,500 on the <i>Supervised person</i>.</p> <p>Not applicable.</p>
Item 3.C	<p>A self-regulatory organization (SRO) proceeding in which the supervised person</p> <p>5. was <i>found</i> to have caused an <i>investment-related</i> business to lose its authorization to do business; or</p> <p>6. was <i>found</i> to have been <i>involved</i> in a violation of the <i>SRO's</i> rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from <i>investment-related</i> activities; or (iii) fined more than \$2,500.</p> <p>Not applicable.</p>
Item 3.D	<p>Any other <i>proceeding</i> in which a professional attainment, designation, or license of the <i>supervised person</i> was revoked or suspended because of a violation of rules relating to professional conduct. If the <i>supervised person</i> resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a <i>proceeding</i> (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.</p> <p>Note: You may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, you are not required to disclose it. When you review a legal or disciplinary event involving the supervised person to determine whether it is appropriate to rebut the presumption of materiality, you should consider all of the following factors: (1) the proximity of the supervised person to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If you conclude that the materiality presumption has been overcome, you must prepare and maintain a file memorandum of your determination in your records. See SEC rule 204-2(a)(14)(iii) and similar state rules.</p> <p>Not applicable.</p>

ITEM 4 – OTHER BUSINESS ACTIVITIES

Item 4.A	<p>If the <i>supervised person</i> is actively engaged in any <i>investment-related</i> business or occupation, including if the <i>supervised person</i> is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated <i>person</i> of an FCM, CPO, or CTA, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.</p> <p>5. If a relationship between the advisory business and the <i>supervised person’s</i> other financial industry activities creates a material conflict of interest with <i>clients</i>, describe the nature of the conflict and generally how you address it.</p> <p>6. If the <i>supervised person</i> receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service (“trail”) fees from the sale of mutual funds, disclose this fact. If this compensation is not cash, explain what type of compensation the <i>supervised person</i> receives. Explain that this practice gives the <i>supervised person</i> an incentive to recommend investment products based on the compensation received, rather than on the <i>client’s</i> needs</p> <p>Not applicable</p>
Item 4.B	<p>If the <i>supervised person</i> is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of the <i>supervised person’s</i> income or involve a substantial amount of the <i>supervised person’s</i> time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the <i>supervised person’s</i> time and income, you may presume that they are not substantial.</p> <p>Not applicable</p>

ITEM 5 – ADDITIONAL COMPENSATION

If someone who is not a *client* provides an economic benefit to the *supervised person* for providing advisory services, generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the *supervised person's* regular salary. Any bonus that is based, at least in part, on the number or amount of sales, *client* referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

Mr. Mathur does not receive economic benefits from any sources other than management fees and performance-based fees generated through investment advisory services provided to SEAF's clients.

ITEM 6 – SUPERVISION

Explain how you *supervise* the *supervised person*, including how you monitor the advice the *supervised person* provides to *clients*. Provide the name, title and telephone number of the *person* responsible for supervising the *supervised person's* advisory activities on behalf of your firm.

Mr. Mathur, in his role as Managing Director for SEAF, is responsible for providing investment advice to clients. Mr. Mathur is supervised by Natalie Fedors, Chief Compliance Officer of SEAF. Mr. Mathur is also subject to the provisions of SEAF's Compliance Manual and Code of Ethics. Ms. Fedors monitors SEAF's portfolio holdings for consistency with Advisory Client objectives, strategy, and guidelines, including those portfolio holdings over which Mr. Mathur has direct responsibility. Ms. Fedors is responsible for SEAF's overall compliance program, including compliance with applicable position limits, sector limits and investment guidelines set forth in offering documents provided to investors in the private investment funds and in the agreements of the accounts managed by SEAF. Ms. Fedors can be reached at 202.737.8463 or via email at nfedors@seaf.com.

PART 2B OF FORM ADV BROCHURE SUPPLEMENT

**Small Enterprise Assistance Funds
Access Management Holdings Inc.
ACCESS SEAF SAFI
SEAF Caucasus Partners LTD
SEAF Colombia S.A.
SEAF India Investment Advisers Private Limited
SEAF Investment Management Company
SEAF Management LLC
SEAF Management Sichuan LLC
SEAF SME Finance LLC
SEAF Ventures Management LLC
SEAF Ventures Management Ltd
(together “SEAF”)**

**RICHARD ANTHONY RUSSELL
1500 K Street NW, Suite 375
Washington, D.C. 20005
Tel: 202.737.8463; Fax: 202.737.5536**

March 31, 2015

This brochure supplement provides information about Richard Anthony Russell that supplements the Brochure of SEAF. You should have received a copy of that Brochure. Please contact Natalie Fedors at 202.737.8463 or by email at nfedors@seaf.com if you did not receive the Brochure or if you have any questions about the contents of this Supplement.

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Disclose the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years. If the supervised person has no high school education, no formal education after high school, or no business background, disclose this fact. You may list any professional designations held by the supervised person, but if you do so, you must provide a sufficient explanation of the minimum qualifications required for each designation to allow clients to understand the value of the designation.

Name: Richard Anthony Russell

Year of Birth: 1965

Education: Mr. Russell received a Bachelor of Commerce from the University of Alberta in 1988.

Business Background: Mr. Russell is Chief Operating Officer of SEAF and serves on SEAF's Global Investment Committee. From 2010 to 2013 he worked as Corporate Finance Consultant to Discovery Capital. From 2002 to 2009 he was Senior Consultant at Global Foods. Previously he was FX Broker with Refco Canada from 2000 to 2002. Earlier in his career he was Assistant Director at ING Barings from 1994 to 1999.

Professional Designations: None.

ITEM 3 – DISCIPLINARY INFORMATION

If there are legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person, disclose all material facts regarding those events.

Items 3.A, 3.B, 3.C, and 3.D below list specific legal and disciplinary events presumed to be material for this Item. If the supervised person has been involved in one of these events, you must disclose it under this Item for ten years following the date of the event, unless (1) the event was resolved in the supervised person's favor, or was reversed, suspended or vacated, or (2) you have rebutted the presumption of materiality to determine that the event is not material (see Note below). For purposes of calculating this ten-year period, the "date" of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments or decrees lapsed.

Items 3.A, 3.B, 3.C, and 3.D do not contain an exclusive list of material disciplinary events. If the supervised person has been involved in a legal or disciplinary event that is not listed in Items 3.A, 3.B, 3.C, or 3.D but is material to a client's or prospective client's evaluation of the supervised person's integrity, you must disclose the event. Similarly, even if more than ten years have passed since the date of the event, you must disclose the event if it is so serious that it remains currently material to a *client's* or prospective *client's* evaluation. If you deliver a supplement electronically and if a particular disclosure required below for the *supervised person* is provided through either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system or the IAPD, you may satisfy that particular disclosure obligation by including in that supplement (i) a statement that the *supervised person* has a disciplinary history, the details of which can be found on FINRA's BrokerCheck system or the IAPD, and (ii) a hyperlink to the relevant system with a brief explanation of how the *client* can access the disciplinary history. The BrokerCheck link is www.finra.org/brokercheck; the IAPD link is www.adviserinfo.sec.gov.

Item 3.A	<p>A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the <i>supervised person</i></p> <ul style="list-style-type: none"> 13. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any <i>felony</i>; (b) a <i>misdemeanor</i> that <i>involved</i> investments or an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses; 14. is the named subject of a pending criminal <i>proceeding</i> that involves an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; 15. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation; or 16. was the subject of any <i>order</i>, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the <i>supervised person</i> from engaging in any <i>investment-related</i> activity, or from violating any <i>investment-related</i> statute, rule, or <i>order</i>. <p>Not applicable.</p>
Item 3.B	<p>An administrative <i>proceeding</i> before the SEC, any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> in which the <i>supervised person</i></p> <ul style="list-style-type: none"> 7. was <i>found</i> to have caused an <i>investment-related</i> business to lose its

	<p>authorization to do business; or</p> <p>8. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation and was the subject of an <i>order</i> by the agency or authority</p> <p>(m) denying, suspending, or revoking the authorization of the <i>supervised person</i> to act in an <i>investment-related</i> business;</p> <p>(n) barring or suspending the <i>supervised person's</i> association with an <i>investment-related</i> business;</p> <p>(o) otherwise significantly limiting the <i>supervised person's</i> <i>investment-related</i> activities; or</p> <p>(p) imposing a civil money penalty of more than \$2,500 on the <i>Supervised person</i>.</p> <p>Not applicable.</p>
Item 3.C	<p>A self-regulatory organization (SRO) proceeding in which the supervised person</p> <p>7. was <i>found</i> to have caused an <i>investment-related</i> business to lose its authorization to do business; or</p> <p>8. was <i>found</i> to have been <i>involved</i> in a violation of the <i>SRO's</i> rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from <i>investment-related</i> activities; or (iii) fined more than \$2,500.</p> <p>Not applicable.</p>
Item 3.D	<p>Any other <i>proceeding</i> in which a professional attainment, designation, or license of the <i>supervised person</i> was revoked or suspended because of a violation of rules relating to professional conduct. If the <i>supervised person</i> resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a <i>proceeding</i> (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.</p> <p>Note: You may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, you are not required to disclose it. When you review a legal or disciplinary event involving the supervised person to determine whether it is appropriate to rebut the presumption of materiality, you should consider all of the following factors: (1) the proximity of the supervised person to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If you conclude that the materiality presumption has been overcome, you must prepare and maintain a file memorandum of your determination in your records. See SEC rule 204-2(a)(14)(iii) and similar state rules.</p> <p>Not applicable.</p>

ITEM 4 – OTHER BUSINESS ACTIVITIES

Item 4.A	<p>If the <i>supervised person</i> is actively engaged in any <i>investment-related</i> business or occupation, including if the <i>supervised person</i> is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated <i>person</i> of an FCM, CPO, or CTA, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.</p> <p>7. If a relationship between the advisory business and the <i>supervised person’s</i> other financial industry activities creates a material conflict of interest with <i>clients</i>, describe the nature of the conflict and generally how you address it.</p> <p>8. If the <i>supervised person</i> receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service (“trail”) fees from the sale of mutual funds, disclose this fact. If this compensation is not cash, explain what type of compensation the <i>supervised person</i> receives. Explain that this practice gives the <i>supervised person</i> an incentive to recommend investment products based on the compensation received, rather than on the <i>client’s</i> needs</p> <p>Not applicable</p>
Item 4.B	<p>If the <i>supervised person</i> is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of the <i>supervised person’s</i> income or involve a substantial amount of the <i>supervised person’s</i> time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the <i>supervised person’s</i> time and income, you may presume that they are not substantial.</p> <p>Not applicable</p>

ITEM 5 – ADDITIONAL COMPENSATION

If someone who is not a *client* provides an economic benefit to the *supervised person* for providing advisory services, generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the *supervised person's* regular salary. Any bonus that is based, at least in part, on the number or amount of sales, *client* referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

Mr. Russell does not receive economic benefits from any sources other than management fees and performance-based fees generated through investment advisory services provided to SEAF's clients.

ITEM 6 – SUPERVISION

Explain how you *supervise* the *supervised person*, including how you monitor the advice the *supervised person* provides to *clients*. Provide the name, title and telephone number of the *person* responsible for supervising the *supervised person's* advisory activities on behalf of your firm.

Mr. Russell, in his role as Chief Operating Officer, is responsible for providing investment advice to clients. Mr. Russell is supervised by Natalie Fedors, Chief Compliance Officer of SEAF. Mr. Russell is also subject to the provisions of SEAF's Compliance Manual and Code of Ethics. Ms. Fedors monitors SEAF's portfolio holdings for consistency with Advisory Client objectives, strategy, and guidelines, including those portfolio holdings over which Mr. Russell has direct responsibility. Ms. Fedors is responsible for SEAF's overall compliance program, including compliance with applicable position limits, sector limits and investment guidelines set forth in offering documents provided to investors in the private investment funds and in the agreements of the accounts managed by SEAF. Ms. Fedors can be reached at 202.737.8463 or via email at nfedors@seaf.com.

PART 2B OF FORMADV BROCHURE SUPPLEMENT

**Small Enterprise Assistance Funds
Access Management Holdings Inc.
ACCESS SEAF SAFI
SEAF Caucasus Partners LTD
SEAF Colombia S.A.
SEAF India Investment Advisers Private Limited
SEAF Investment Management Company
SEAF Management LLC
SEAF Management Sichuan LLC
SEAF SME Finance LLC
SEAF Ventures Management LLC
SEAF Ventures Management Ltd
(together “SEAF”)**

HUBERTUS JAN VAN DER VAART

**1500 K Street NW, Suite 375
Washington, D.C. 20005
Tel: 202.737.8463; Fax: 202.737.5536**

March 31, 2015

This brochure supplement provides information about Hubertus Jan van der Vaart that supplements the Brochure of SEAF. You should have received a copy of that Brochure. Please contact Natalie Fedors at 202.737.8463 or by email at nfedors@seaf.com if you did not receive the Brochure or if you have any questions about the contents of this Supplement.

ITEM 2 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Disclose the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years. If the supervised person has no high school education, no formal education after high school, or no business background, disclose this fact. You may list any professional designations held by the supervised person, but if you do so, you must provide a sufficient explanation of the minimum qualifications required for each designation to allow clients to understand the value of the designation.

Name: Hubertus (Bert) Jan van der Vaart

Year of Birth: 1955

Education: Hubertus Jan van der Vaart earned a B.A. from the University of North Carolina in 1977. He received a B.A. in Politics and Economics from Oxford University in 1979, and then an M.Phil in Economics from Oxford University in 1980. He earned a J.D. from Yale Law School in 1983, where he also studied Finance at Yale School of Management.

Business Background: Mr. van der Vaart is Executive Chairman and CEO of SEAF and serves on SEAF's Global Investment Committee. Mr. van der Vaart co-founded Small Enterprise Assistance Funds (SEAF) in 1989, when it was known as the CARE Small Business Assistance Corporation (CARESBAC). From September 2007 to February 2012, Mr. van der Vaart served as a Principal at Discovery Global Citizens Fund ("DGCF") in South Norwalk, Connecticut. Prior to that, from August 1994 until May 1997, Mr. van der Vaart worked as Director-General, Executive Vice President and General Counsel for CARESBAC – Polska. From July 1991 to July 1994, Mr. van der Vaart was a Managing Partner at Gibson, Dunn & Crutcher – Brussels.

Professional Designations: None.

ITEM 3 – DISCIPLINARY INFORMATION

If there are legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person, disclose all material facts regarding those events.

Items 3.A, 3.B, 3.C, and 3.D below list specific legal and disciplinary events presumed to be material for this Item. If the supervised person has been involved in one of these events, you must disclose it under this Item for ten years following the date of the event, unless (1) the event was resolved in the supervised person's favor, or was reversed, suspended or vacated, or (2) you have rebutted the presumption of materiality to determine that the event is not material (see Note below). For purposes of calculating this ten-year period, the "date" of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments or decrees lapsed.

Items 3.A, 3.B, 3.C, and 3.D do not contain an exclusive list of material disciplinary events. If the supervised person has been involved in a legal or disciplinary event that is not listed in Items 3.A, 3.B, 3.C, or 3.D but is material to a client's or prospective client's evaluation of the supervised person's integrity, you must disclose the event. Similarly, even if more than ten years have passed since the date of the event, you must disclose the event if it is so serious that it remains currently material to a *client's* or prospective *client's* evaluation. If you deliver a supplement electronically and if a particular disclosure required below for the *supervised person* is provided through either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system or the IAPD, you may satisfy that particular disclosure obligation by including in that supplement (i) a statement that the *supervised person* has a disciplinary history, the details of which can be found on FINRA's BrokerCheck system or the IAPD, and (ii) a hyperlink to the relevant system with a brief explanation of how the *client* can access the disciplinary history. The BrokerCheck link is www.finra.org/brokercheck; the IAPD link is www.adviserinfo.sec.gov.

Item 3.A	<p>A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any <i>felony</i>; (b) a <i>misdemeanor</i> that <i>involved</i> investments or an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses; 2. is the named subject of a pending criminal <i>proceeding</i> that involves an <i>investment-related</i> business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; 3. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation; or 4. was the subject of any <i>order</i>, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the <i>supervised person</i> from engaging in any <i>investment-related</i> activity, or from violating any <i>investment-related</i> statute, rule, or <i>order</i>. <p>Not applicable.</p>
Item 3.B	<p>An administrative <i>proceeding</i> before the SEC, any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> in which the <i>supervised person</i></p> <ol style="list-style-type: none"> 1. was <i>found</i> to have caused an <i>investment-related</i> business to lose its

	<p>authorization to do business; or</p> <p>2. was <i>found</i> to have been <i>involved</i> in a violation of an <i>investment-related</i> statute or regulation and was the subject of an <i>order</i> by the agency or authority</p> <p>(a) denying, suspending, or revoking the authorization of the <i>supervised person</i> to act in an <i>investment-related</i> business;</p> <p>(b) barring or suspending the <i>supervised person's</i> association with an <i>investment-related</i> business;</p> <p>(c) otherwise significantly limiting the <i>supervised person's</i> <i>investment-related</i> activities; or</p> <p>(d) imposing a civil money penalty of more than \$2,500 on the <i>Supervised person</i>.</p> <p>Not applicable.</p>
Item 3.C	<p>A self-regulatory organization (SRO) proceeding in which the supervised person</p> <p>1. was <i>found</i> to have caused an <i>investment-related</i> business to lose its authorization to do business; or</p> <p>2. was <i>found</i> to have been <i>involved</i> in a violation of the <i>SRO's</i> rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from <i>investment-related</i> activities; or (iii) fined more than \$2,500.</p> <p>Not applicable.</p>
Item 3.D	<p>Any other <i>proceeding</i> in which a professional attainment, designation, or license of the <i>supervised person</i> was revoked or suspended because of a violation of rules relating to professional conduct. If the <i>supervised person</i> resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a <i>proceeding</i> (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.</p> <p>Note: You may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, you are not required to disclose it. When you review a legal or disciplinary event involving the supervised person to determine whether it is appropriate to rebut the presumption of materiality, you should consider all of the following factors: (1) the proximity of the supervised person to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If you conclude that the materiality presumption has been overcome, you must prepare and maintain a file memorandum of your determination in your records. See SEC rule 204-2(a)(14)(iii) and similar state rules.</p> <p>Not applicable.</p>

ITEM 4 – OTHER BUSINESS ACTIVITIES

<p>Item 4.A</p>	<p>If the <i>supervised person</i> is actively engaged in any <i>investment-related</i> business or occupation, including if the <i>supervised person</i> is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated <i>person</i> of an FCM, CPO, or CTA, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.</p> <ol style="list-style-type: none"> 1. If a relationship between the advisory business and the <i>supervised person</i>’s other financial industry activities creates a material conflict of interest with <i>clients</i>, describe the nature of the conflict and generally how you address it. 2. If the <i>supervised person</i> receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service (“trail”) fees from the sale of mutual funds, disclose this fact. If this compensation is not cash, explain what type of compensation the <i>supervised person</i> receives. Explain that this practice gives the <i>supervised person</i> an incentive to recommend investment products based on the compensation received, rather than on the <i>client</i>’s needs <p>Mr. van der Vaart currently serves as a Senior Advisor for GlobalTurk Capital, a pre- and post-investment management and advisory services firm. Mr. van der Vaart also serves as an advisor to TriLinc Global, a private investment company. Mr. van der Vaart serves as Advisor for Prince Maktoum Establishment for SMEs. The organization promotes the establishment of SMEs in Dubai by U.A.E. nationals.</p> <p>To deal with these potential conflicts, SEAF requires Mr. van der Vaart to disclose his outside business activities and acknowledge his receipt and understanding of SEAF’s Code of Ethics (which requires that employees place the interests of SEAF’s Advisory Clients and underlying investors over their own (or those of SEAF) and details the procedures to follow in the event of the receipt of material non-public information). Additionally, investors in SEAF’s Advisory Clients are provided with clear disclosure as to potential conflicts of interest.</p>
<p>Item 4.B</p>	<p>If the <i>supervised person</i> is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of the <i>supervised person</i>’s income or involve a substantial amount of the <i>supervised person</i>’s time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the <i>supervised person</i>’s time and income, you may presume that they are not substantial.</p> <p>Not applicable</p>

ITEM 5 – ADDITIONAL COMPENSATION

If someone who is not a *client* provides an economic benefit to the *supervised person* for providing advisory services, generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the *supervised person's* regular salary. Any bonus that is based, at least in part, on the number or amount of sales, *client* referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

Mr. van der Vaart receives fees for sitting on the Board of SEAF portfolio company BPSC. Apart from these fees, he does not receive economic benefits from any sources other than management fees and performance-based fees generated through investment advisory services provided to SEAF's clients.

ITEM 6 – SUPERVISION

Explain how you *supervise* the *supervised person*, including how you monitor the advice the *supervised person* provides to *clients*. Provide the name, title and telephone number of the *person* responsible for supervising the *supervised person's* advisory activities on behalf of your firm.

Mr. van der Vaart, in his roles as Executive Chairman and CEO of SEAF, is responsible for providing investment advice to clients. Mr. van der Vaart is supervised by Natalie Fedors, Chief Compliance Officer of SEAF. Mr. van der Vaart is also subject to the provisions of SEAF's Compliance Manual and Code of Ethics. Ms. Fedors monitors SEAF's portfolio holdings for consistency with Advisory Client objectives, strategy, and guidelines, including those portfolio holdings over which Mr. van der Vaart has direct responsibility. Ms. Fedors is responsible for SEAF's overall compliance program, including compliance with applicable position limits, sector limits and investment guidelines set forth in offering documents provided to investors in the private investment funds and in the agreements of the accounts managed by SEAF. Ms. Fedors can be reached at 202.737.8463 or via email at nfedors@seaf.com.