

29 Street LLC

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This Brochure provides information about the qualifications and business practices of 29 Street LLC. If you have any questions about the contents of this brochure, please contact 29 Street LLC's Chief Compliance Officer ("**CCO**") Hamish Burt at (347) 594-5598 or by email at hb@29stllc.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("**SEC**") or by any state securities authority. Additional information about 29 Street LLC is also available on the SEC's website at: www.adviserinfo.sec.gov.

29 Street LLC's registration as an investment adviser does not imply that any of its principals or employees possess a particular level of skill or training in the investment advisory business or any other business.

Item 2: Material Changes

This is the initial Form ADV Part 2A filing for 29 Street LLC and as such, there are no material changes to report.

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Item 4 - Advisory Business

29 Street LLC, a Delaware limited liability company ("**29 Street**" or the "**Firm**"), was founded in September 2014. LG Capital Investors LLC ("**LGCI**") is the sole owner of 29 Street and Mr. Lawrence Guffey is the sole owner of LGCI. 29 Street currently offers discretionary investment advisory services to 64NM Holdings, LP, a Delaware limited partnership ("**64NM**"). 64NM Holdings GP, LLC is a Delaware limited liability company and is the general partner of 64NM (the "**General Partner**"). The services provided to 64NM are in accordance with the investment management agreement (the "**IMA**") with 29 Street.

In addition to providing discretionary investment advisory services to 64NM, the Firm also provides discretionary investment advisory services to a family office, a trust, and Mr. Guffey's individual investment accounts (the "**Proprietary Accounts**"). 29 Street provided these advisory services pursuant to the "Family Office Rule" exclusion from the definition of an investment adviser under Investment Advisers Act of 1940 (the "**Advisers Act**") rule 202(a)(11)(G)-1. Therefore, 29 Street was not previously required to register as an investment adviser with the SEC. 64NM is now proposing to offer limited partner interests to sophisticated third-party investors (the "**Investors**"). The regulatory assets under management ("**RAUM**") in respect of 64NM, when combined with the Proprietary Account assets (which are required to be included in RAUM by Item 5.b (1) of the Instructions to Form ADV), cause 29 Street to exceed the \$25 million threshold for registration with the SEC as an investment adviser.

As of October 1, 2014, 29 Street had RAUM of approximately \$57,213,000, \$34,644,420 in the Proprietary Accounts and \$22,568,580 in 64NM.

Item 5 - Fees and Compensation

Fees and Expenses

29 Street, on a semi-annual basis, will charge a fee equal to 0.50% per year on certain assets under management. Such fee may be waived or altered for specific Investors. In addition, 29 Street will be responsible for paying all expenses incurred by it in the performance of its obligations under the IMA unless 64NM agrees in writing to reimburse the Firm for any specified expense. Please review the IMA for additional information regarding the fees and expenses.

Item 6 - Performance Fees

The General Partner will generally receive an apportioned carried interest distribution (the "**Carried Interest Fee**") from Investors in 64NM. The General Partner, in its own discretion, may waive or reduce the Carried Interest Fee for specific Investors. Compensation based on performance will only be charged in accordance with the provisions of Rule 205-3 under the Advisers Act, whereby each Investor that is charged a performance fee must be a "qualified client."

Item 7 - Types of Clients

64NM is a private fund that meets the exclusion from the definition of an investment company under Section 3(c)(7) of the Investment Company Act of 1940. In addition, 29 Street's other clients include the Proprietary Accounts.

Item 8 - Methods of Analysis, Sources of Information, Investment Strategies, Risk of Loss

Methods of Analysis, Sources of Information and Investment Strategy

Currently, 29 Street provides monitoring services with respect to 64NM's sole investment (the "**Portfolio Company**"). Additionally, where appropriate, 29 Street may also provide additional support:

- when requested by 64NM, to serve on the board of directors or other governing body of the Portfolio Company;
- make recommendations to 64NM with respect to any follow-on investments requested by the Portfolio Company or otherwise made available to the Investors in the Portfolio Company;
- make recommendations to 64NM whenever a corporate action is requested or required with respect to the Portfolio Company, it being understood and agreed that 29 Street shall have no responsibility or authority to actually vote any security on behalf of 64NM; and
- make recommendations with respect to the timing of the sale of 64NM's asset, including, without limitation, develop and assist in the execution of exit strategies to dispose of or otherwise monetize investments in the Portfolio Company.

The Proprietary Accounts are managed depending upon the nature of the beneficiary, but generally are managed to maximize the long-term value of the investments.

Risk of Loss

The following is a summary of certain material risks associated with 29 Street's investment strategies. As a summary, it is inherently incomplete and does not attempt to describe all of the risks associated with those strategies. Investing in securities involves a risk of loss that Investors should be prepared to bear.

Lack of Diversification

Currently the primary investment strategy for 64NM is to hold and monitor a single investment. As such, the investment strategy will not be widely diversified among sectors, industries, geographic areas or types of securities. Further, 64NM will not be diversified among a wide range of issuers. Accordingly, 64NM may be subject to more rapid change in value than would be the case if the vehicle were required to maintain a wide diversification among companies or industry groups.

Dependence on Key Personnel

The success of 64NM depends in substantial part on the skill and expertise of the investment professionals of 29 Street. There can be no assurance that the investment professionals will continue to be employed by the Firm throughout the life of 64NM. The loss of key personnel could have a material adverse effect on an investment vehicle.

Limited Operating History

Both 64NM and 29 Street are new entities and have limited operating history upon which Investors can evaluate their performance.

Lack of Liquidity

Due to the nature of 64NM's investment there may not be a readily available liquidity mechanism at any particular time. As such, Investors should be aware that there may be limited opportunities for redemption during the term of the investment.

Non-U.S. Investment

Investing in non-U.S. companies which are generally denominated in non-U.S. currencies involves certain considerations comprising both risks and opportunities not typically associated with investing in U.S. companies. These considerations include changes in exchange rates and exchange control regulations, political and social instability, expropriation, imposition of foreign taxes, less liquid markets and less available information than is generally the case in the U.S., higher transaction costs, less government supervision of exchanges, brokers and issuers, greater difficulty in enforcing contractual obligations, lack of uniform accounting and auditing standards and greater price volatility.

Item 9 - Disciplinary Information

Neither 29 Street nor any of our management personnel are subject to or have in the past been subject to any criminal or civil action in any domestic or foreign court, and neither 29 Street nor any of our management personnel have been subject to any administrative proceedings before the SEC or any other state, federal or foreign financial regulatory authority.

Item 10 - Other Financial Industry Activities and Affiliations

Currently, neither 29 Street nor any of its management personnel have any relationships or arrangements that pose material conflicts of interest to the business of 29 Street.

In the future 29 Street may perform the same or similar services (including, without limitation, investment management services) for other clients. 29 Street and/or its owners, principals, employees and other clients, as well as their respective affiliates and family members, may purchase, hold and sell shares in business ventures and activities notwithstanding that 29 Street may provide 64NM with recommendations or advice with respect to business ventures and activities hereunder. 29 Street as well as its owners, principals, employees and other clients, as well as their respective affiliates and family members, may engage in business ventures and activities that are not made available to 64NM.

29 Street may provide advice or make recommendations concerning the Portfolio Company or other investment even where 29 Street and/or its owners, principals, employees and other clients, as well as their respective affiliates and family members, has a substantial direct or indirect interest in the transaction in question.

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

Code of Ethics Pursuant to Rule 204A-1 of the Advisers Act

29 Street has adopted a Code of Ethics (the “**Code**”) pursuant to Rule 204A-1 of the Advisers Act describing the high standard of business conduct and fiduciary duty to 64NM, including an “**Employee Investment Policy**” for all employees. 29 Street's Code includes policies and procedures addressing our employees': (i) receipt and provision of

gifts and entertainment; (ii) political contributions; and (iii) outside business activities including, in each case, limitations and reporting requirements. All employees must acknowledge the terms of the Code annually, or as amended. 29 Street will provide a copy of the Code to any client or prospective client upon request.

Participation/Interest in Client Transactions

Mr. Guffey has a significant personal investment in 64NM.

Personal Trading

Under the Code, execution of trades in certain personal securities by employees will require the prior written approval of 29 Street's Chief Compliance Officer ("**CCO**"). Unless such prior written approval is required under the Code, pre-clearance generally will not be necessary in respect of trades in securities that are not included on a conflict register maintained by the CCO or that are not otherwise prohibited under the Code.

Additionally, employees will be required to provide the CCO with periodic reporting relating to their trading activity and personal accounts.

Item 12 - Brokerage Practices

29 Street does not determine the broker or dealer to be used for a purchase or sale of securities for any account that it manages, and the Firm does not determine the commission rates to be paid to a broker or dealer for securities transactions. Therefore, at this time the Firm does not have a "best execution" obligation. In addition, 29 Street does not have any formal or informal "soft dollar" arrangements.

Item 13 - Review of Accounts

Review of Accounts

29 Street continually monitors 64NM's investment holding. Additionally, a review of the investment may be triggered by any significant or unexpected event. For the Proprietary Accounts, account statements will be sent quarterly by the respective Qualified Custodians to the applicable clients.

Client Reports

29 Street shall furnish 64NM and its other clients with any relevant records upon request.

Item 14 - Client Referrals and Other Compensation

29 Street does not currently utilize any third-party marketers or solicitors.

Item 15 - Custody

For purposes of Rule 206(4)-2 under the Advisers Act (the "**Custody Rule**"), 29 Street is considered to have custody over the cash and marketable securities held in the Proprietary Accounts. These assets are held with more than one "**Qualified Custodian**" (as defined in the Custody Rule). The applicable clients will receive quarterly account statements from the respective Qualified Custodians.

The subscription documents and limited partnership agreements entered into with the Investors will be held at a Qualified Custodian. The Firm will use the “audit approach” to the Custody Rule and annually, upon completion of 64NM’s audit, 29 Street shall ensure that the audited financials are delivered to all Investors within 120 days of 64NM’s fiscal year end.

Item 16 - Investment Discretion

29 Street has been appointed to provide discretionary investment management services to 64NM. As such, 29 Street’s obligations in this regard are strictly limited to providing recommendations and ongoing monitoring of the investment. 29 Street also has discretion with respect to the Proprietary Accounts.

Item 17 - Voting Client Securities

29 Street does not expect to participate in any proxy voting with respect to any investment. However, 29 Street may provide recommendations to 64NM whenever a corporate action is requested or required with respect to the Portfolio Company.

Upon request to 29 Street, persons may obtain a copy of the Firm’s proxy voting policies or information on how the Firm voted shares on behalf of 64NM.

Item 18 - Financial Information

29 Street has no financial commitment that impairs the Firm’s ability to meet contractual and fiduciary commitments to 64NM, and has not been the subject of a bankruptcy proceeding.