

# TIMESWELL LLC

## FORM ADV PART 2A, APPENDIX 1 WRAP FEE PROGRAM BROCHURE

January 10, 2017

This wrap fee brochure provides information about the qualifications and business practices of Timeswell LLC and its registered investment adviser representatives. If you have any questions about the contents of this brochure, please contact us at +86-10-85900378 or [tianxiaoli@jpm.cn](mailto:tianxiaoli@jpm.cn). 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. Registration does not imply a certain level of skill or training. Additional information about Timeswell LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number known as a CRD number. Timeswell LLC's CRD number is 286512.

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## **ITEM 2 MATERIAL CHANGES**

This version of Part 2A, Appendix 1 of Form ADV (“Firm Brochure”), dated **January 10, 2017**, is the initial wrap fee brochure document for Timeswell LLC. It contains information about our business practices as well as a description of potential conflicts of interest relating to our advisory business which could affect client accounts with us. We are providing this material in accordance with Rule 204-3 of the Investment Advisers Act of 1940, which requires a registered investment adviser to provide a written disclosure statement upon entering into an advisory relationship.

### **Full Brochure Available**

We will provide a new version of the Firm Wrap Fee Brochure as necessary when updates or new information are added, at any time, without charge. Request a complete copy of our Firm Brochure, by contacting us by telephone at **+8610-85900378** or by email at: [tianxiaoli@jpm.cn](mailto:tianxiaoli@jpm.cn).

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## ITEM 4 SERVICES, FEES & COMPENSATION

### A. FIRM DESCRIPTION

Timeswell LLC (“Timeswell” or the “Firm”) was founded in August 2016 as a California limited liability company. Timeswell is an investment advisor registered with the Securities and Exchange Commission (“SEC”). Timeswell is a Robo-Advisor and is the sponsor of the Timeswell Wrap Fee Program.

### B. SERVICES

Timeswell offers individuals and high net worth individuals (“Clients”) unique automated investment advisory services over the internet to allow Clients convenient and personalized access to portfolio management. This Wrap Fee Brochure is meant to help our Clients understand the nature of the advisory services offered by Timeswell, whether the advisory services offered by Timeswell are right for you, and the potential conflicts of interest associated with your participation in the Timeswell Wrap Fee Program. You should review it carefully.

Timeswell manages assets as part of the Timeswell Wrap Fee Program. A wrap fee program is a common alternative to a typical advisory fee structure that provides Clients with discretionary advisory, execution and clearing and custodial services for one all-inclusive bundled fee with no additional account activity charges. In exchange for these “bundled” services, Clients pay an all-inclusive (or “wrap”) fee determined as a percentage of the assets held in the wrap account. As such, Timeswell charges Clients a single bundled fee that covers the investment advisory services it provides, as well as the brokerage and custodial services provided by Apex Clearing Corporation, an unaffiliated broker-dealer (“Apex” or “Broker”). Your fee is bundled with our costs for executing transactions in your account(s). Please see Item 6 for additional information on brokerage consideration.

Prior to providing any discretionary services, Timeswell will provide Clients with an Investment Management Agreement (the “**Agreement**”). Under the Agreement, the Clients provide their current and anticipated financial condition as well as their investment objectives and risk tolerance. Timeswell begins by assessing our Clients’ risk profiles through an online questionnaire via the Timeswell website or mobile application. The Clients are also provided a Customer Brokerage and Custody Agreement (the “Brokerage Agreement” with Apex, which establishes the Client accounts and through which Apex provides the brokerage services.

Clients for whom Timeswell is providing discretionary investment management services grant Timeswell a limited power of attorney permitting Timeswell to buy and sell securities on Clients’ behalf, which are custodied with Apex. Apex was selected by BBAE Advisors, LLC (“BBAE” or the “Portfolio Manager”). BBAE is an investment advisor registered with the SEC. Timeswell Clients will have their trades executed through the Portfolio Manager’s preferred broker, Apex, pursuant to the sub-advisor agreement between Timeswell and BBAE (the “Sub-Advisor Agreement”). Authorization pursuant

to the Agreement to manage Clients' assets on a discretionary basis shall remain in full force and effect until revoked by Clients in writing. Pursuant to the Sub-advisor agreement, Timeswell appoints BBAE as a limited agent of the Advisor solely for the purpose of implementing the Advisor's Program as follows:

- a. Reflect Advisor's configuration of Advisor's Program on the Client Portal;
- b. Implement the Questionnaire;
- c. Operate the Asset Allocator Program to (i) implement Advisor's selections, modifications and replacement of Portfolios for Clients' Program Accounts, and (ii) perform the automatic rebalancing for Clients' Program Accounts; and
- d. Carry out the trade order management process via its clearing firm.

The Timeswell platform maintains and monitors Clients' individual account parameters. This review may include types of account, investment objectives, overall financial conditions, personal and business assets, risk tolerances, and other factors unique to Clients' individual situations. Based on our Clients' parameters, the Portfolio Manager will develop customized investment portfolios. Periodic reviews of Clients' investment programs may result in our Clients' programs being revised by the Portfolio Manager, from time to time.

Timeswell offers discretionary services to Clients by providing real-time access to affordable, professional and customized portfolio management (ranging from highly conservative to very aggressive) through its website. Timeswell will develop customized investment programs and guide our Clients' investments by recommending:

A customized portfolio of Exchange Traded Funds ("ETFs") and/or  
A customized portfolio of publicly traded equities ("Stocks");

The Timeswell website and mobile application allows Clients to update their risk profiles online, and this will typically effect a change in their portfolio composition based upon the new risk profile. Timeswell provides Clients with a dedicated login to its website where Clients can view their holdings and their account history. Client portfolios are periodically rebalanced on a discretionary basis to realign the portfolios to the desired weighting across investments.

Timeswell, as a software based advisor, requires Clients to acknowledge their ability and willingness to conduct the relationship with Timeswell on an electronic basis. Under the terms of the Agreement, Clients agree to receive all account information and account documents (including Brochures), and any updates or changes to the same, through access to the Timeswell website, mobile application, and Timeswell's electronic communications. Unless noted otherwise on the Timeswell website or within this Brochure, Timeswell's advisory service, the Portfolio Manager's portfolio management services, Apex's brokerage services, the signature for the Agreement and Brokerage Agreement, and all other documentation related to the advisory and brokerage services are managed electronically.

In its management of Clients' portfolios, Timeswell will seek to ensure that certain conditions are met and maintained, however Clients may not provide specific restrictions in their

account. The software-based advisory services generally include preselected ETFs and/or Stocks for each asset class within the plans recommended to Clients by Timeswell. Timeswell does not allow Clients to select their own ETFs or Stocks because the preselected securities and asset class is considered to be part of the overall investment plan. Clients must promptly notify Timeswell of any change to their financial situations or investment objectives that might require a review or revision of their portfolios. The investment advisor representative will be reasonably available to Clients for consultation on these matters and will act on any changes in financial circumstances deemed to be material or appropriate as soon as practical after the investment advisor representative is notified in writing by Clients.

At any time, Clients may terminate an account or withdraw all or part of an account, or update their investment profits, which may initiate an adjustment in the account holdings. Unless otherwise directed by Clients, Timeswell will sell the securities in their accounts (or a portion of the account in the case of a partial withdrawal or update) at market price at or around the time of termination, withdrawal or update.

### **C. FEES AND COMPENSATION**

The annual account fee is non-negotiable and is 2.0% based on the value of all assets in the account (the "Wrap Fee"). Our firm's fees are billed on a pro-rata annualized basis monthly in arrears based on the value of your account on the last day of the previous month. Fees will be automatically deducted from your managed account. Please note that fees will be adjusted for deposits and withdrawals made during the month. As part of this process, Clients must understand and acknowledge the following:

1. Apex sends statements at least quarterly to you showing all disbursements for your account, including the amount of the advisory fees paid;
2. Clients provide authorization permitting fees to be directly paid by these terms; and
3. Apex calculates the advisory fees and deducts them from the Client accounts.

Pursuant to the Sub-Advisor Agreement, Apex, as the preferred broker and custodian for the Portfolio Manager, will first pay the advisory fees deducted from Client accounts to the Portfolio Manager. The Portfolio Manager will then deduct 35.0% of the Wrap Fee, or 0.7% of the value of all assets in the Client accounts (the "PM Fee") and pay the remainder of the balance to Timeswell. The Portfolio Manager is paid on a pro-rata annualized basis monthly in arrears based on the value of Clients' accounts on the last day of the previous month.

Clients will not have to pay any fees in addition to the Wrap fee, which includes the Portfolio Manager Fee. However, other advisers providing similar services may require clients to pay for their own transaction expenses, including, but not limited to, investment-related expenses (such as brokerage commissions, clearing and settlement charges, custodial fees, interest expenses, expenses relating to consultants, brokers or other professionals or advisors who provide research, advice or due diligence services with regard to investments);

any applicable tax liabilities (including transfer taxes and withholding taxes); and other similar expenses related to their account in addition to advisory fees.

A wrap fee program allows our Clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services may include portfolio management and the fee is not based directly upon transactions in your account. Your fee is bundled with our costs for executing transactions in your account(s). This results in a higher advisory fee to you.

Timeswell does not charge Clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

You may pay product or custodial fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm and Timeswell does not benefit directly or indirectly from any such fees. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore may directly affect the ETF's performance and indirectly affect Clients' portfolio performances or an index benchmark comparison. Expenses of an ETF may include management fees, custodian fees, brokerage commissions and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuers.

Our investment advisory representatives receive a portion of the advisory fee that you pay us, either directly or as a percentage of your overall fee or as their salary from our firm. In cases where our investment advisory representatives are paid a percentage of your overall advisory fee, this may create an incentive to recommend that you participate in a wrap fee program rather than a non-wrap fee program (where you would pay for trade execution costs) or brokerage account where commissions are charged. This is because, in some cases, we may stand to earn more compensation from advisory fees paid to us through a wrap fee program arrangement if your account is not actively traded.

## **ITEM 5 ACCOUNT REQUIREMENTS & TYPES OF CLIENTS**

### **A. ACCOUNT REQUIREMENTS**

Timeswell requires a minimum account size of US \$5,000. All Client accounts are opened and maintained according to the Agreement between Clients and Timeswell.

In order to open a Wrap Fee Program account with Timeswell, Clients must establish a brokerage relationship with Apex, a FINRA member broker-dealer. By entering into the Agreement with Timeswell, Clients authorize and direct Timeswell to place all trades in

their accounts through Apex. As such, Apex will maintain all Client accounts and execute all securities transactions in their accounts without separate commission costs or other fees. Apex's procedures are designed to make every attempt to obtain the best execution possible, although there can be no assurance that it can be obtained. Clients should understand that the appointment of Apex as the sole broker for their accounts under this Wrap Fee Program may result in disadvantages to Clients as a possible result of less favorable executions than may be available through the use of a different broker-dealer.

The Portfolio Manager trades in Client accounts for any number of reasons, including in response to Client actions such as asset allocation changes, deposits or withdrawals. The Portfolio Manager also trades in order to rebalance Client accounts, to change investment options or otherwise to further the investment objectives that Clients specify via the Timeswell website or mobile application. The portfolio is adjusted in real time upon (1) receiving initial Client information from Timeswell, (2) receiving updated information from Clients about their risk tolerances or (3) receipt of risk related adjustments from Timeswell. However, transactions will be subject to processing delays in certain circumstances. Trading for new portfolios and adjustments to existing portfolios will generally occur on the same business day, subject to the Portfolio Manager's and Timeswell's trading policies, except where Clients have not yet funded their accounts.

#### **B. TYPES OF CLIENTS**

Timeswell's Clients include individuals and high net worth individuals.

### **ITEM 6 PORTFOLIO MANAGER SELECTION AND EVALUATION**

Timeswell and its related persons act as sponsor for the Wrap Fee Program and have selected BBAE as the Portfolio Manager. The Portfolio Manager directly manages the portfolios of Clients pursuant to their Client Agreements. This may create a conflict of interest in that other investment advisory firms may charge the same or lower fees than our firm for similar services. Timeswell requires its portfolio managers to meet firm or industry experience levels and complete specialized training unless they possess equivalent portfolio management experience. Timeswell evaluates a variety of information which may include the portfolio manager's investment strategies, past performance returns and financial strength, technology, portfolio customization model and portfolio rebalancing decision model, among other factors. Timeswell will consider replacing a portfolio manager if, based on its independent judgment, the portfolio manager does not meet return expectations.

Timeswell will use industry standards to calculate portfolio manager performance to determine and verify its accuracy and compliance with presentation standards. The performance information is reviewed at least monthly and is reviewed by Timeswell.

### **ITEM 7 CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS**

Timeswell communicates with the Portfolio Manager on a regular basis as needed (daily, weekly, monthly, etc.) to ensure our Clients' most current investment goals and objectives are understood by the Portfolio Manager. In most cases, Timeswell will



communicate such information as part of its regular investment management duties. Nevertheless, Timeswell will also communicate information to the Portfolio Manager when requested by Clients, when market or economic conditions make it prudent to do so, etc.

Timeswell's investment advisers have access to all Client information obtained by Timeswell, in order to be able to communicate with Clients should any questions about their accounts arise. Because BBAE is the portfolio manager for Timeswell Clients, BBAE will also have access to Client information obtained by Timeswell for the particular accounts they manage. Such information includes Client identifying information such as name, address and tax ID; investment profile information such as investment objective and risk tolerance; and administrative information such as disbursement requests, statements, confirmations and other documents prepared by the custodian or Broker.

## **ITEM 8 CLIENT CONTACT WITH PORTFOLIO MANAGERS**

For the programs described in this Brochure, most Client contacts and communications regarding participation in the Wrap Fee Program will occur through contact with Timeswell via email, the Timeswell website, or the Timeswell mobile application. However, Clients may contact Timeswell at any time during normal business hours. Normal business hours are 9 am to 5 pm China Standard Time or 9 am to 5 pm the following day Eastern Standard Time. Timeswell will generally conduct all communications with Clients, except that Clients may be referred to the Portfolio Manager directly for complex and non-routine questions or communications. Timeswell will make reasonable efforts to be available to Clients to discuss management of their accounts, their financial situation and investment objectives. If Timeswell is not available, calls will automatically be forwarded to the Portfolio Manager who will respond to Client communications.

## **ITEM 9 ADDITIONAL INFORMATION**

### **A. DISCIPLINARY INFORMATION**

Timeswell is required to disclose whether there are legal or disciplinary events that are material to our Clients' or prospective Client' evaluation of Timeswell's advisory business or the integrity of its management. None of Timeswell, its principals, or its employees have been involved in any legal or disciplinary proceedings related to past or present investment advisory Clients.

### **B. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

Timeswell is not a registered broker-dealer and does not have an application pending to register as a broker-dealer. Furthermore, none of Timeswell management or supervised persons is a registered representative of a broker-dealer and no such person has an application pending to become a registered representative of a broker-dealer.

Timeswell is not a registered futures commission merchant, commodity pool operator, or commodity trading advisor and does not have an application pending to register as such. Furthermore, none of Timeswell's principals or supervised persons is registered as, or has an application pending to register as, an associated person of any of the foregoing types of firms.

Timeswell is not affiliated with an insurance company or agency which receives commissions or fees. Timeswell does not have any other arrangements with a related person who is a broker- dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser, futures commission merchant, banking or thrift institution, accounting firm, law firm, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships other than those already disclosed herein.

As discussed in Item 4 above, Timeswell uses BBAE as its Portfolio Manager and pays BBAE a Portfolio Management Fee. Timeswell and BBAE are otherwise unaffiliated and are not related persons.

#### **C. CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

Timeswell has adopted a Code of Ethics (the “Code”) for all supervised persons of the Firm. The Code summarizes the Firm’s values, ethical standards and commitment to address potential conflicts of interest that arise from its activities. Policies and procedures have been designed to implement the principles in the Code. Timeswell will provide a copy of its Code of Ethics to Clients or prospective Clients upon request.

Timeswell does not manage any “proprietary” investment accounts; i.e., accounts that are funded with the Firm’s own money and are intended to create profits for the Firm. Accordingly, Timeswell in the ordinary course does not compete with Clients in the market for securities. Similarly, Timeswell does not use its own money to trade as a counterparty with Client accounts.

Timeswell’s employees may at any time buy or sell securities that are also held by Clients. This practice may present a conflict of interest in that employees may have an incentive to place trades in order to benefit from any price movements resulting from Client trades. However, our Code of Ethics requires employees to act in the best interests of Clients.

#### **D. REVIEW OF ACCOUNTS**

Timeswell regularly reviews and evaluates Client accounts for compliance with Clients’ investment objectives, policies and restrictions. The Firm analyzes rates of return and allocation of assets to determine model strategy effectiveness. Such reviews are conducted by Xiaoli Tian, as Managing Director of Timeswell.

In all cases, portfolios are reviewed when significant cash or securities are added to or withdrawn from the account or when Timeswell is advised of a change in circumstances that warrants a change in management of the account. Other events that may trigger a review include asset allocation imbalances or significant model or investment strategy changes. Timeswell utilizes various tools and quality control reports available with its custodians and broker-dealers to identify these triggers.

Timeswell will provide real-time account balances and returns to Clients via their online console, which is also available through their mobile application and is supported by the Portfolio Manager. Apex will also provide Clients at least quarterly statements. Additionally, Clients will receive written statements detailing the portfolio performance no less than

quarterly from Apex. Clients are advised to carefully review and compare reports and statements provided by Apex.

**E. CLIENT REFERRALS AND OTHER COMPENSATION**

Timeswell and its related persons do not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to its Clients. However, we may receive from a broker-dealer or a fund company, without cost and/or at a discount, certain services and/or products, to assist in monitoring and servicing Client accounts. These may include investment-related research, pricing information and market data, software and other technology that provide access to Client account data, compliance and/or practice management-related publications, discounted or free consulting services, discounted or free attendance at conferences, meetings, and other educational or social events, marketing support, computer hardware or software, and other products used by us to assist us in our investment advisory business operations. Timeswell and its related persons currently have no arrangements with unaffiliated third parties in order to market the firm or its investment strategies. We do not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their Clients to Timeswell.

**F. FINANCIAL INFORMATION**

Timeswell does not require nor solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance. Timeswell is not presently aware of any financial condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Timeswell has not been the subject of a bankruptcy petition at any time during the last 10 years.

## **PRIVACY POLICY**

Timeswell does not disclose nonpublic personal information about its Clients or former Clients to third parties other than as described below. Timeswell collects information about its Clients (such as name, address, social security number, assets and income) from the Firm's discussions with Clients, from documents that Clients may deliver to the Firm (such as subscription documents) and in the course of providing services to Clients. In order to service Clients' accounts and effect investment transactions, Timeswell may provide Clients' personal information to the Firm's affiliates and to firms that assist Timeswell in servicing Client accounts and have a need for such information, such as portfolio managers, brokers, distributors, legal counsel, fund administrators, or accountants. Timeswell does not otherwise provide information about Clients to outside firms, organizations, or individuals except as required or permitted by law. Any party that receives this information will use it only for the services required and as allowed by applicable law or regulation, and is not permitted to share or use this information for any other purpose.

**TIMESWELL LLC**

**FORM ADV PART 2B**  
**BROCHURE SUPPLEMENT**

**January 10, 2017**

**XIAOLI TIAN**  
Investment Adviser Representative

This Brochure Supplement provides information about the qualifications of Xiaoli Tian, a Investment Adviser Representative of Timeswell LLC (“Timeswell” or the “Firm”). If you have any questions about the contents of this brochure, please contact us at +8610-85900378 or tianxiaoli@jpm.cn.

Additional information about the Firm’s Investment Adviser Representatives also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number known as a CRD number. Xiaoli Tian’s CRD number is 6744174.

**A. General Requirements**

Generally, Timeswell requires employees to hold a college or advanced degree or have relevant working experience in the securities industry.

**B. Investment Adviser Representative Information**

Timeswell currently has two (2) investment adviser representatives. This Brochure Supplement provides information about **Xiaoli Tian**.

**ITEM 2 EDUCATION AND BUSINESS EXPERIENCE**

CRD Number: 6744174

Year of Birth: 1982

**EDUCATION:**

University of China- Communication (2006)

**RELATED BUSINESS EXPERIENCE:**

**Investment Advisor Representative**

TIMESWELL LLC

(August 2016 - Present)

**Vice President**

JINPING Media Limited Company

(June 2014 – Present)

**Head of PR**

Meiwei Media Limited Company

(August 2012 – June 2014)

**Programmer**

Hua Fu Hong Kong Group Limited

(June 2009 – July 2012)

**Journalist**

SICHUAN TV

(September 2006 – June 2009)

**ITEM 3 DISCIPLINARY INFORMATION**

Xiaoli Tian does not have any legal or disciplinary events material to Clients' or prospective Clients' evaluation.

**ITEM 4 OTHER BUSINESS ACTIVITIES**

Xiaoli Tian Vice President of Beijing Jinping Media Limited Company media company based in China.

**ITEM 5 ADDITIONAL COMPENSATION**

Xiaoli Tian does not receive any other economic benefit from any third party for providing advisory services.

## **ITEM 6      SUPERVISION**

Xiaoli Tian is the Managing Member and the sole Investment Adviser Representatives of Timeswell. Timeswell provides investment advisory services in accordance with its policies and procedures manual. Xiaoli Tian serves as Timeswell's Chief Compliance Officer and is primarily responsible for implementation of the Firm's policies and procedures.

**TIMESWELL LLC**

**FORM ADV PART 2B**  
**BROCHURE SUPPLEMENT**

**January 10, 2017**

**JIANG ZHU**  
Investment Adviser Representative

This Brochure Supplement provides information about the qualifications of Jiang Zhu, a Investment Adviser Representative of Timeswell LLC (“Timeswell” or the “Firm”). If you have any questions about the contents of this brochure, please contact us at +8610-85900378 or tianxiaoli@jpm.cn.



**A. General Requirements**

Generally, Timeswell requires employees to hold a college or advanced degree or have relevant working experience in the securities industry.

**B. Investment Adviser Representative Information**

Timeswell currently has two (2) investment adviser representatives. This Brochure Supplement provides information about **Jiang Zhu**.

**ITEM 2 EDUCATION AND BUSINESS EXPERIENCE**

Year of Birth: 1971

EDUCATION:

University of Southampton Solent - Commerce (1995)

RELATED BUSINESS EXPERIENCE:

**Investment Advisor Representative**

TIMESWELL LLC

(August 2016 - Present)

**CEO**

JINPING Media Limited Company

(June 2014 – Present)

**CEO**

Meiwei Media Limited Company

(August 2012 – June 2014)

**Product Manager**

Beijing IQIYI Science & Technology Co., Ltd

(February 2010 – July 2012)

**Product Manager**

Ninetowns Internet Technology Group Co., Ltd

(September 2006 – January 2010)

**ITEM 3 DISCIPLINARY INFORMATION**

Jiang Zhu does not have any legal or disciplinary events material to Clients' or prospective Clients' evaluation.

**ITEM 4 OTHER BUSINESS ACTIVITIES**

Jiang Zhu, CEO of Beijing Jinping Media Limited Company media company based in China.

**ITEM 5 ADDITIONAL COMPENSATION**

Jiang Zhu does not receive any other economic benefit from any third party for providing advisory services.

## **ITEM 6      SUPERVISION**

Jiang Zhu is one of two Investment Adviser Representatives of Timeswell. Timeswell provides investment advisory services in accordance with its policies and procedures manual. Xiaoli Tian serves as Timeswell's Chief Compliance Officer and is primarily responsible for implementation of the Firm's policies and procedures.