# FORM ADV

# UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

Primary Business Name: TOWNSEND HOLDINGS LLC Other-Than-Annual Amendment - All Sections 5/18/2022 2:50:00 PM CRD Number: 160006 Rev. 10/2021

WARNING:	Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4.
Item 1 Iden	tifying Information
registration,	this Item tell us who you are, where you are doing business, and how we can contact you. If you are filing an <i>umbrella</i> the information in Item 1 should be provided for the <i>filing adviser</i> only. General Instruction 5 provides information to assist you <i>umbrella registration</i> .

- A. Your full legal name (if you are a sole proprietor, your last, first, and middle names): TOWNSEND HOLDINGS LLC
- B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A. **TOWNSEND HOLDINGS LLC**

List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.

(2) If you are using this Form ADV to register more than one investment adviser under an umbrella registration, check this box  $\Box$ 

If you check this box, complete a Schedule R for each relying adviser.

D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: **801-72968** 

- (2) If you report to the SEC as an *exempt reporting adviser*, your SEC file number:
  - (3) If you have one or more Central Index Key numbers assigned by the SEC ("CIK Numbers"), all of your CIK numbers:

No Information Filed

E. (1) If you have a number ("CRD Number") assigned by the FINRA's CRD system or by the IARD system, your CRD number: 160006

If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.

(2) If you have additional *CRD* Numbers, your additional *CRD* numbers:

No Information Filed

F. Principal Office and Place of Business

(1) Address (do not use a P.C	D. Box):		
Number and Street 1:		Number and Street 2:	
950 MAIN AVENUE		SUITE 1600	
City:	State:	Country:	ZIP+4/Postal Code:
CLEVELAND	Ohio	United States	44113

If this address is a private residence, check this box: 🗖

List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities,

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	If you are applying	for SEC registration, if ist the largest twenty-fi	you are registered only with t	oplying for registration or with whom you are ro he SEC, or if you are reporting to the SEC as a s of employees as of the end of your most rece	n exempt
	(2) Days of week that	you normally conduct b	ousiness at your principal office	e and place of business:	
	Monday - Friday Normal business ho 8:30 AM - 5:30 PM	ours at this location:			
	(3) Telephone number 216-781-9090				
	(4) Facsimile number a 216-781-1407	t this location, if any:			
			than your <i>principal office and</i> ost recently completed fiscal y	<i>place of business</i> , at which you conduct investr ear?	nent
G.	Mailing address, if differ	ent from your <i>principal</i>	l office and place of business a	address:	
	Number and Street 1:		Number and Stree		
	City:	State:	Country:	ZIP+4/Postal Code:	
	If this address is a priv	ate residence, check th	iis box: 🗖		
н.	If you are a sole proprie Item 1.F.:	etor, state your full resid	dence address, if different fror	n your principal office and place of business ad	dress in
	Number and Street 1:		Number and Stree	t 2:	
	City:	State:	Country:	ZIP+4/Postal Code:	
I.	Do you have one or mor Twitter, Facebook and Li		s on publicly available social m	edia platforms (including, but not limited to,	Yes No
	Section 1.I. of Schedule the web, you may list th address. Do not provide	D. If a website addres be portal without listing the addresses of webs vide the individual elect	s serves as a portal through w addresses for all of the other ites or accounts on publicly av	accounts on publicly available social media pla which to access other information you have pub information. You may need to list more than o vailable social media platforms where you do no of employees or the addresses of employee ac	lished on ne portal ot control
J.	Chief Compliance Office	r			
				er. If you are an <i>exempt reporting adviser</i> , you e one. If not, you must complete Item 1.K. bel	
	Name: AIMEE B. MAY		Other titles, if any: CHIEF COMPLIANCE OF	FICER	
	Telephone number: 216-781-9090		Facsimile number, if an 216-781-1407	у:	
	Number and Street 1: 950 MAIN AVENUE		Number and Street 2: SUITE 1600		
	City: CLEVELAND	State: Ohio	Country: United States	ZIP+4/Postal Code: 44113	
		) address, if Chief Com			

company registered under the Investment Company Act of 1940 that you advise for providing chief compliance officer services to you, provide the *person's* name and IRS Employer Identification Number (if any): Name:

IRS Employer Identification Number:

к.	Additional Regulatory Contact Person: If a person other than the Chief Compliance Officer is authorized to receive information and
	respond to questions about this Form ADV, you may provide that information here.

	respond to questions about	this Form ADV, you	may provide that informatio	n here.		
	Name:		Titles:			
	NATALIE DONOHUE		COMPLIANCE ASSOCI			
	Telephone number: 216-781-9090		Facsimile number, if an 216-781-1407	ny:		
	Number and Street 1: 950 MAIN AVENUE		Number and Street 2: SUITE 1600			
	City: CLEVELAND	State: Ohio	Country: United States	ZIP+4/Postal Code: 44113		
	Electronic mail (e-mail) add NATALIE.DONOHUE@AON.G		son has one:		Vac	No
L.			ecords you are required to k rincipal office and place of b	eep under Section 204 of the Advisers Act, or usiness?	©	0
	If "yes," complete Section 1	.L. of Schedule D.				
					Yes	No
М.	Are you registered with a fo	reign financial regul	latory authority?		0	۲
	-	-	eign financial regulatory aut complete Section 1.M. of Sch	hority, even if you have an affiliate that is regis redule D.		
N	Are you a public reporting c	omnany under Sect	ions 12 or 15(d) of the Secu	rition Evenanda Act of 10242		No
N.	Are you a public reporting c	Simparty under Secti			0	•
0.	Did you have \$1 billion or m If yes, what is the approxim		e last day of your most recer	t fiscal year?	res O	No ©
	6 \$1 billion to less than \$					
	\$10 billion to less than	\$50 billion				
	S \$50 billion or more					
				han the assets you manage on behalf of clients most recent fiscal year end.	. Determ	nine
Ρ.	Provide your Legal Entity Id	<i>entifier</i> if you have o	one:			
	A legal entity identifier is a legal entity identifier.	unique number that	companies use to identify e	ach other in the financial marketplace. You may	not hav	'e a
SEC	TION 1.B. Other Business I	Names				
	t your other business names a ch business name.	and the jurisdictions	s in which you use them. You	must complete a separate Schedule D Section	1.B. for	

Name: THE TOWNSEND GROUP

Jurisdictions

🗹 AL	IL IL	✓ NE	🗹 SC
☑ AK	IN IN	V NV	🗹 SD
✓ AZ	IA IA	☑ NH	🗹 TN

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### IARD - All Sections [User Name: amay123, OrgID: 160006]

AR	KS		TX 🗹	
CA	KX KX		🗹 UT	
🗹 со		I NY	✓ VT	
🗹 СТ	ME ME	✓ NC		
🗹 DE	MD	₽ ND	VA VA	
DC	I MA	Г ОН	VA 🔽	
🗹 FL	MI MI	Г ок	☑ wv	
🗹 GA	MN MN	✓ OR	I wi	
🗖 GU	MS	PA	VY WY	
🗹 HI	🗹 мо	D PR	C Other:	
ID ID	🗹 МТ	RI RI		
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## **SECTION 1.F. Other Offices**

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1: 28-29 DOVER STREET City: LONDON Number and Street 2: 4TH FLOOR Country: United Kingdom

ZIP+4/Postal Code: W1S 4NA

If this address is a private residence, check this box:  $\Box$ 

Telephone Number: +207-495-7784 Facsimile Number, if any: +207-317-0559

State:

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a brokerdealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location? 17

Are other business activities conducted at this office location? (check all that apply)

(1) Broker-dealer (registered or unregistered)

 $\Box$  (2) Bank (including a separately identifiable department or division of a bank)

(3) Insurance broker or agent

 $\Box$  (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(5) Registered municipal advisor

(6) Accountant or accounting firm

(7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:

Number and Street 2:

22, 2:50 PM	IARD - A	All Sections [User Name: a	may123, OrgID: 160006]
TWO EXCHANGE SQUARE		SUITE 2903; 29TH	FLOOR
City: CENTRAL	State:	Country: Hong Kong	ZIP+4/Postal Code:
If this address is a private resident	ce, check this box: $\square$		
Telephone Number: +852-3468-5900	Facsimile N +852-9022	umber, if any: -0620	
-			<i>authority</i> as a branch office location for a broker- BR), please provide the <i>CRD</i> Branch Number here:
How many <i>employees</i> perform inv 8	estment advisory function	s from this office locatior	1?
Are other business activities condu $\Box$ (1) Broker-dealer (registered or		? (check all that apply)	
$\Box$ (2) Bank (including a separately		or division of a bank)	
$\Box$ (3) Insurance broker or agent		·,	
$\Box$ (4) Commodity pool operator or	r commodity trading adviso	or (whether registered or	exempt from registration)
□ (5) Registered municipal adviso			,
$\Box$ (6) Accountant or accounting fir			
$\Box$ (7) Lawyer or law firm			
Describe any other investment-rela	ated business activities co	nducted from this office l	location:
Complete the following information advisory business. You must comp	n for each office, other tha lete a separate Schedule [	n your <i>principal office an</i> D Section 1.F. for each lo	nd place of business, at which you conduct investme cation. If you are applying for SEC registration, if you
Complete the following information advisory business. You must comp are registered only with the SEC, o <i>employees</i> ). Number and Street 1:	n for each office, other tha lete a separate Schedule [	n your <i>principal office an</i> D Section 1.F. for each lo <i>porting adviser</i> , list only Number and Stree	nd place of business, at which you conduct investme cation. If you are applying for SEC registration, if yo the largest twenty-five offices (in terms of numbers
Complete the following information advisory business. You must comp are registered only with the SEC, o employees).	n for each office, other tha lete a separate Schedule [	n your <i>principal office an</i> D Section 1.F. for each lo porting adviser, list only	nd place of business, at which you conduct investme cation. If you are applying for SEC registration, if you the largest twenty-five offices (in terms of numbers
Complete the following information advisory business. You must comp are registered only with the SEC, o <i>employees</i> ). Number and Street 1: 425 MARKET STREET City:	n for each office, other tha lete a separate Schedule I or if you are an <i>exempt rep</i> State: California	n your <i>principal office an</i> O Section 1.F. for each lo <i>porting adviser</i> , list only Number and Stree SUITE 2800 Country:	<i>Id place of business</i> , at which you conduct investme cation. If you are applying for SEC registration, if you the largest twenty-five offices (in terms of numbers t 2: ZIP+4/Postal Code:
Complete the following information advisory business. You must comp are registered only with the SEC, o <i>employees</i> ). Number and Street 1: 425 MARKET STREET City: SAN FRANCISCO	n for each office, other tha lete a separate Schedule I or if you are an <i>exempt rep</i> State: California	n your <i>principal office an</i> D Section 1.F. for each lo <i>porting adviser</i> , list only Number and Stree SUITE 2800 Country: United States	<i>Id place of business</i> , at which you conduct investme cation. If you are applying for SEC registration, if you the largest twenty-five offices (in terms of numbers t 2: ZIP+4/Postal Code:
Complete the following information advisory business. You must comp are registered only with the SEC, o <i>employees</i> ). Number and Street 1: 425 MARKET STREET City: SAN FRANCISCO If this address is a private resident Telephone Number: 415-321-7156 If this office location is also require	n for each office, other tha lete a separate Schedule I or if you are an <i>exempt rep</i> State: California ce, check this box: Facsimile Numb ed to be registered with FI	n your <i>principal office an</i> O Section 1.F. for each lo <i>porting adviser</i> , list only Number and Stree SUITE 2800 Country: United States per, if any:	<i>Id place of business</i> , at which you conduct investme cation. If you are applying for SEC registration, if yo the largest twenty-five offices (in terms of numbers t 2: ZIP+4/Postal Code:
Complete the following information advisory business. You must comp are registered only with the SEC, o <i>employees</i> ). Number and Street 1: 425 MARKET STREET City: SAN FRANCISCO If this address is a private resident Telephone Number: 415-321-7156 If this office location is also require	n for each office, other tha lete a separate Schedule I or if you are an <i>exempt rep</i> State: California ce, check this box: Facsimile Numb ed to be registered with FI le Uniform Branch Office R	n your <i>principal office an</i> O Section 1.F. for each lo <i>porting adviser</i> , list only Number and Stree SUITE 2800 Country: United States Per, if any: NRA or a <i>state securities</i> egistration Form (Form E	Ind place of business, at which you conduct investme cation. If you are applying for SEC registration, if you the largest twenty-five offices (in terms of numbers t 2: ZIP+4/Postal Code: 94105 Stauthority as a branch office location for a broker- BR), please provide the <i>CRD</i> Branch Number here:
Complete the following information advisory business. You must comp are registered only with the SEC, o <i>employees</i> ). Number and Street 1: 425 MARKET STREET City: SAN FRANCISCO If this address is a private resident Telephone Number: 415-321-7156 If this office location is also require dealer or investment adviser on th How many <i>employees</i> perform inv 10 Are other business activities condu	n for each office, other tha lete a separate Schedule I or if you are an <i>exempt rep</i> State: California ce, check this box: Facsimile Numb ed to be registered with FI le Uniform Branch Office R estment advisory functions	n your <i>principal office an</i> O Section 1.F. for each lo <i>porting adviser</i> , list only Number and Stree SUITE 2800 Country: United States Der, if any: NRA or a <i>state securities</i> egistration Form (Form E	Ind place of business, at which you conduct investme cation. If you are applying for SEC registration, if you the largest twenty-five offices (in terms of numbers t 2: ZIP+4/Postal Code: 94105 Stauthority as a branch office location for a broker- BR), please provide the <i>CRD</i> Branch Number here:
Complete the following information advisory business. You must comp are registered only with the SEC, or <i>employees</i> ). Number and Street 1: 425 MARKET STREET City: SAN FRANCISCO If this address is a private resident Telephone Number: 415-321-7156 If this office location is also require dealer or investment adviser on th How many <i>employees</i> perform inv 10 Are other business activities condu [ (1) Broker-dealer (registered or [ (2) Bank (including a separately	n for each office, other tha lete a separate Schedule I or if you are an <i>exempt rep</i> State: California ce, check this box: Facsimile Numb ed to be registered with FI re Uniform Branch Office R estment advisory functions ucted at this office location r unregistered)	n your <i>principal office an</i> O Section 1.F. for each lo <i>porting adviser</i> , list only Number and Stree SUITE 2800 Country: United States er, if any: NRA or a <i>state securities</i> egistration Form (Form E s from this office location ? (check all that apply)	Ind place of business, at which you conduct investme cation. If you are applying for SEC registration, if you the largest twenty-five offices (in terms of numbers t 2: ZIP+4/Postal Code: 94105 Stauthority as a branch office location for a broker- BR), please provide the <i>CRD</i> Branch Number here:
Complete the following information advisory business. You must comp are registered only with the SEC, or <i>employees</i> ). Number and Street 1: 425 MARKET STREET City: SAN FRANCISCO If this address is a private resident Telephone Number: 415-321-7156 If this office location is also require dealer or investment adviser on th How many <i>employees</i> perform inv 10 Are other business activities condu [ (1) Broker-dealer (registered or [ (2) Bank (including a separately [ (3) Insurance broker or agent	n for each office, other tha lete a separate Schedule I or if you are an <i>exempt rep</i> State: California ce, check this box: Facsimile Numb ed to be registered with FI le Uniform Branch Office R estment advisory functions ucted at this office location unregistered) y identifiable department o	n your <i>principal office an</i> D Section 1.F. for each lo <i>porting adviser</i> , list only Number and Stree SUITE 2800 Country: United States er, if any: NRA or a <i>state securities</i> egistration Form (Form E s from this office location ? (check all that apply) or division of a bank)	nd place of business, at which you conduct investme cation. If you are applying for SEC registration, if yo the largest twenty-five offices (in terms of numbers t 2: ZIP+4/Postal Code: 94105 s authority as a branch office location for a broker- 3R), please provide the <i>CRD</i> Branch Number here:
Complete the following information advisory business. You must comp are registered only with the SEC, or <i>employees</i> ). Number and Street 1: 425 MARKET STREET City: SAN FRANCISCO If this address is a private resident Telephone Number: 415-321-7156 If this office location is also require dealer or investment adviser on th How many <i>employees</i> perform inv 10 Are other business activities condu [ (1) Broker-dealer (registered or [ (2) Bank (including a separately	n for each office, other tha lete a separate Schedule I or if you are an <i>exempt rep</i> State: California ce, check this box: Facsimile Numb ed to be registered with FI re Uniform Branch Office R estment advisory functions ucted at this office location unregistered) v identifiable department o	n your <i>principal office an</i> D Section 1.F. for each lo <i>porting adviser</i> , list only Number and Stree SUITE 2800 Country: United States er, if any: NRA or a <i>state securities</i> egistration Form (Form E s from this office location ? (check all that apply) or division of a bank)	nd place of business, at which you conduct investme cation. If you are applying for SEC registration, if yo the largest twenty-five offices (in terms of numbers t 2: ZIP+4/Postal Code: 94105 s authority as a branch office location for a broker- 3R), please provide the <i>CRD</i> Branch Number here:

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(6) Accountant or accounting firm				
(7) Lawyer or law firm				
Describe any other investment-related busin	ness activities co	onducted from this office	e location:	
Complete the following information for each advisory business. You must complete a sep are registered only with the SEC, or if you a <i>employees</i> ).	arate Schedule	D Section 1.F. for each	location. If you are applying for SEC registra	ation, if you
Number and Street 1: 200 E RANDOLPH		Number and Street	2:	
City:	State:	Country:	ZIP+4/Postal Code:	
CHICAGO	Illinois	United States	60601	
If this address is a private residence, check	this box: 🗖			
Telephone Number: 13123810350	Facsimile Nu	mber, if any:		
If this office location is also required to be re dealer or investment adviser on the Uniform				
How many <i>employees</i> perform investment a 1	dvisory function	s from this office location	on?	
Are other business activities conducted at th	is office location	? (check all that apply)		
$\Box$ (1) Broker-dealer (registered or unregister				
$\Box$ (2) Bank (including a separately identifiable		or division of a bank)		
$\Box$ (3) Insurance broker or agent				
$\Box$ (4) Commodity pool operator or commodi	ity trading advis	or (whether registered	or exempt from registration)	
□ (5) Registered municipal advisor	ity that ing addie			
$\Box$ (6) Accountant or accounting firm				
(c) Lawyer or law firm				
Describe any other investment-related busin	ness activities co	onducted from this office	e location:	
Complete the following information for each advisory business. You must complete a sep are registered only with the SEC, or if you a <i>employees</i> ).	arate Schedule	D Section 1.F. for each	location. If you are applying for SEC registra	ation, if you
Number and Street 1: 20 BAY STREET		Number and St	reet 2:	
City:	State:	Country:	ZIP+4/Postal Code:	
TORONTO		Canada	M5J 2N9	
If this address is a private residence, check	this box: 🗖			
Telephone Number: +14162275684	Facsimile	Number, if any:		

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If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a brokerdealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many employees perform investment advisory functions from this office location?

Are other business activities conducted at this office location? (check all that apply)

(1) Broker-dealer (registered or unregistered)

 $\Box$  (2) Bank (including a separately identifiable department or division of a bank)

□ (3) Insurance broker or agent

🗆 (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(5) Registered municipal advisor

(6) Accountant or accounting firm

(7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

## SECTION 1.I. Website Addresses

List your website addresses, including addresses for accounts on publicly available social media platforms where you control the content (including, but not limited to, Twitter, Facebook and/or LinkedIn). You must complete a separate Schedule D Section 1.I. for each website or account on a publicly available social media platform.

Address of Website/Account on Publicly Available Social Media Platform: HTTP://WWW.TOWNSENDGROUP.COM

Address of Website/Account on Publicly Available Social Media Platform: https://www.linkedin.com/company/the-townsend-group/about/

# SECTION 1.L. Location of Books and Records

Complete the following information for each location at which you keep your books and records, other than your *principal office and place of business*. You must complete a separate Schedule D, Section 1.L. for each location.

Name of entity where books and records are kept: GLOBAL RELAY			
Number and Street 1: 22 CAMBIE STREET		Number and Street 2:	
City: VANCOUVER	State:	Country: Canada	ZIP+4/Postal Code: V68 2M9
If this address is a private residence, check this be	рх: 🗖		
Telephone Number: 866-484-6630	Facsimile number	; if any:	
This is (check one):			
O one of your branch offices or affiliates.			
$oldsymbol{eta}$ a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this	location.		

EMAIL AND INSTANT MESSAGING RETE	NTION/ARCHIVE			
Name of entity where books and records ACCESS RECORDS MANAGEMENT	s are kept:			
Number and Street 1: ONE ANDREWS CIRCLE		Number and Street 2:		
City:	State:	Country:	ZIP+4/Postal Code:	
BRECKSVILLE	Ohio	United States	44141	
If this address is a private residence, ch	eck this box:   🗖			
Telephone Number: 440-838-8611	Facsimile nu	mber, if any:		
This is (check one):				
C one of your branch offices or affiliate	es.			
Image: Second	er.			
O other.				
Briefly describe the books and records k SOME COMPANY RECORDS ARE MAINTA		IRE OFFSITE STORAGE FAC	ILITY.	
Name of entity where books and records TOWNSEND GROUP ASIA LTD.	s are kept:			
Number and Street 1: TWO EXCHANGE SQUARE		Number and Street STE 2903; 29TH FL		
City: CENTRAL	State:	Country: Hong Kong	ZIP+4/Postal Code:	
If this address is a private residence, ch	eck this box:			
Telephone Number: +852-3468-5900	Facsimile 1 +852-902	number, if any: 2-0620		
This is (check one):				
• one of your branch offices or affiliate	s.			
• a third-party unaffiliated recordkeep				
C other.				
Briefly describe the books and records k SOME INFORMATION RELATED TO INVES Name of entity where books and records	STMENT RESEARCH	CONDUCTED IN THIS OFFI	CE.	
TOWNSEND HOLDINGS LLC				
Number and Street 1: 425 MARKET STREET		Number and Street SUITE 2800	2:	
City:	State:	Country:	ZIP+4/Postal Code:	
•		/	,	

If this address is a private residence, check this box:							
Telephone Number: 415-321-7156	Facsimile numb	er, if any:					
This is (check one):							
• one of your branch offices or affiliates.							
O a third-party unaffiliated recordkeeper.							
O other.							
Briefly describe the books and records kept a SOME INFORMATION RELATED TO INVESTME		ND CLIENTS SERVICED OUT OF	THIS OFFICE.				
Name of entity where books and records are TOWNSEND GROUP EUROPE LTD.	kept:						
Number and Street 1: 28-29 DOVER STREET		Number and Street 2: 4TH FLOOR					
City: LONDON		Country: United Kingdom	ZIP+4/Postal Code: W1S 4NA				
If this address is a private residence, check t	this box:						
Telephone Number: +207-495-7784	Facsimile numb +207-317-0559						
This is (check one):							
• one of your branch offices or affiliates.							
O a third-party unaffiliated recordkeeper.							
O other.							
Briefly describe the books and records kept a SOME INFORMATION RELATED TO INVESTME		ONDUCTED IN THIS OFFICE.					
Name of entity where books and records are PROOFPOINT, INC	kept:						
Number and Street 1: 892 ROSS DRIVE		Number and Street 2:					
City: SUNNYVALE	State: California	Country: United States	ZIP+4/Postal Code: 94089				
If this address is a private residence, check t	this box:						
Telephone Number: 408-517-4710	Facsimile numb	er, if any:					
This is (check one):							
O one of your branch offices or affiliates.							

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a third-party unaffiliated recordkeeper.									
O other.									
Briefly describe the books and records kept at this location. EMAIL RETENTION									
Name of entity where books and records are kept: AON CHICAGO OFFICE									
Number and Street 1: 200 EAST RANDOLPH		Number and Street 2:							
City:	State:	Country:	ZIP+4/Postal Code:						
CHICAGO	Illinois	United States	60601						
If this address is a private residence, check th	is box: 🗖								
Telephone Number: 13123810350	Facsimile numb	er, if any:							
This is (check one):									
one of your branch offices or affiliates.									
O a third-party unaffiliated recordkeeper.									
O other.									
Briefly describe the books and records kept at this location. SOME INFORMATION RELATED TO INVESTMENT RESEARCH CONDUCTED IN THIS OFFICE.									
Name of entity where books and records are k AON CANADA OFFICE	ept:								
Number and Street 1: 20 BAY STREET		Number and Street 2:							
City:	State:	Country:	ZIP+4/Postal Code:						
TORONTO		Canada	M5J 2N9						
If this address is a private residence, check th	is box:								
Telephone Number: +14162275684	Facsimile nu	mber, if any:							
This is (check one):									
• one of your branch offices or affiliates.									
O a third-party unaffiliated recordkeeper.									
O other.									
Briefly describe the books and records kept at SOME INFORMATION RELATED TO INVESTMEN		NDUCTED IN THIS OFFICE.							

# SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

ap	pply	ing fo	his Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you r SEC registration or submitting an <i>annual updating amendment</i> to your SEC registration. If you are filing an <i>umbrella</i> e information in Item 2 should be provided for the <i>filing adviser</i> only.
: ]	subr Iten	nittin	r (or remain registered) with the SEC, you must check <b>at least one</b> of the Items 2.A.(1) through 2.A.(12), below. If you a g an <i>annual updating amendment</i> to your SEC registration and you are no longer eligible to register with the SEC, check (13). Part 1A Instruction 2 provides information to help you determine whether you may affirmatively respond to each of ns.
`	You	(the a	adviser):
	V	(1)	are a large advisory firm that either:
			(a) has regulatory assets under management of \$100 million (in U.S. dollars) or more; or
			(b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent <i>annual updating amendment</i> and is registered with the SEC;
		(2)	are a <b>mid-sized advisory firm</b> that has regulatory assets under management of \$25 million (in U.S. dollars) or more bulless than \$100 million (in U.S. dollars) and you are either:
			(a) not required to be registered as an adviser with the <i>state securities authority</i> of the state where you maintain your <i>principal office and place of business</i> ; or
			(b) not subject to examination by the <i>state securities authority</i> of the state where you maintain your <i>principal office and place of business</i> ;
			Click <b>HERE</b> for a list of states in which an investment adviser, if registered, would not be subject to examination by t state securities authority.
		(3)	Reserved
	Γ	(4)	have your principal office and place of business outside the United States;
		(5)	are <b>an investment adviser (or subadviser) to an investment company</b> registered under the Investment Company Act of 1940;
		(6)	are <b>an investment adviser to a company which has elected to be a business development company</b> pursuant to section 54 of the Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under management;
		(7)	are a <b>pension consultant</b> with respect to assets of plans having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a);
		(8)	are a <b>related adviser</b> under rule 203A-2(b) that <i>controls</i> , is <i>controlled</i> by, or is under common <i>control</i> with, an investme adviser that is registered with the SEC, and your <i>principal office and place of business</i> is the same as the registered adviser;
			If you check this box, complete Section 2.A.(8) of Schedule D.
		(9)	are an adviser relying on rule 203A-2(c) because you expect to be eligible for SEC registration within 120 days;
			If you check this box, complete Section 2.A.(9) of Schedule D.
	Γ	(10)	are a multi-state adviser that is required to register in 15 or more states and is relying on rule 203A-2(d);
			If you check this box, complete Section 2.A.(10) of Schedule D.
		(11)	are an Internet adviser relying on rule 203A-2(e);
		(12)	have received an SEC order exempting you from the prohibition against registration with the SEC;
			If you check this box, complete Section 2.A.(12) of Schedule D.
		(13)	are <b>no longer eligible</b> to remain registered with the SEC.
ate	e Se	curit	ies Authority Notice Filings and State Reporting by Exempt Reporting Advisers

https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG\_PK=1652620

check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to direct your *notice filings* or reports to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to

your registration to stop your *notice filings* or reports from going to state(s) that currently receive them, uncheck the box(es) next to those state(s).

Jurisdictions			
🗖 AL	🗖 IL	□ NE	🗖 sc
🗖 ак	🗖 IN	□ NV	🗖 SD
🗖 AZ	🗖 IA	🗖 NH	TN TN
🗖 AR	🗖 кѕ	🗖 NJ	🗖 тх
CA	🗖 кү	□ NM	🗖 UT
🗖 со	🗖 LA	□ NY	🗖 VT
🗖 ст	🗖 ме	□ NC	🗖 VI
DE DE	MD	🗖 ND	🗖 VA
DC DC	🗖 ма	🗖 он	🗖 wa
🗖 FL	🗖 мі	🗖 ок	□ wv
🗖 GA	□ MN	🗖 or	🗖 wi
🗖 GU	□ MS	🗖 РА	🗖 WY
🗖 ні	🗖 мо	🗖 pr	
🗖 ID	🗖 мт	🗖 RI	

If you are amending your registration to stop your notice filings or reports from going to a state that currently receives them and you do not want to pay that state's notice filing or report filing fee for the coming year, your amendment must be filed before the end of the year (December 31).

## SECTION 2.A.(8) Related Adviser

If you are relying on the exemption in rule 203A-2(b) from the prohibition on registration because you *control*, are *controlled* by, or are under common *control* with an investment adviser that is registered with the SEC and your *principal office and place of business* is the same as that of the registered adviser, provide the following information:

Name of Registered Investment Adviser

CRD Number of Registered Investment Adviser

SEC Number of Registered Investment Adviser

#### SECTION 2.A.(9) Investment Adviser Expecting to be Eligible for Commission Registration within 120 Days

If you are relying on rule 203A-2(c), the exemption from the prohibition on registration available to an adviser that expects to be eligible for SEC registration within 120 days, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these representations:

□ I am not registered or required to be registered with the SEC or a *state securities authority* and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective.

□ I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.

### SECTION 2.A.(10) Multi-State Adviser

If you are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.

If you are applying for registration as an investment adviser with the SEC, you must make both of these representations:

I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to

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register as an investment adviser with the *state securities authorities* in those states.

I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the *state securities authorities* of those states.

If you are submitting your annual updating amendment, you must make this representation:

Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the *state securities authorities* in those states.

# SECTION 2.A.(12) SEC Exemptive Order

If you are relying upon an SEC order exempting you from the prohibition on registration, provide the following information:

Application Number: 803-

Date of order:

· <b></b> ,	
	n 3 Form of Organization
If yo	ou are filing an <i>umbrella registration</i> , the information in Item 3 should be provided for the <i>filing adviser</i> only.
Α.	How are you organized?
	C Corporation
	O Sole Proprietorship
	C Limited Liability Partnership (LLP)
	O Partnership
	Limited Liability Company (LLC)
	C Limited Partnership (LP)
	O Other (specify):
В.	If you are changing your response to this Item, see Part 1A Instruction 4. In what month does your fiscal year end each year? DECEMBER
C.	Under the laws of what state or country are you organized?
	State Country
	Delaware United States
	If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.
	If you are chapping your response to this Item, see Part 14 Instruction 4

If you are changing your response to this Item, see Part 1A Instruction 4.

Iter	n 4 Successions		
		Yes	No
A.	Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)?	0	Θ
	If "yes", complete Item 4.B. and Section 4 of Schedule D.		
В.	Date of Succession: (MM/DD/YYYY)		
	If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, che See Part 1A Instruction 4.	eck "No	o."

# **SECTION 4 Successions**

No Information Filed

## Item 5 Information About Your Advisory Business - Employees, Clients, and Compensation

Responses to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A Instruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.

## Employees

If you are organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (2), (3), (4), and (5).

- A. Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.
   119
- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
   81
  - (2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?
  - (3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?
    - 4
  - (4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?
     0
  - (5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?
  - (6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?6

In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.

#### Clients

In your responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

- C. (1) To approximately how many *clients* for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?
   37
  - (2) Approximately what percentage of your *clients* are non-*United States persons*?
     32%
- D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.
   The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, do not answer (1)(d) or (3)(d) below.

Indicate the approximate number of your *clients* and amount of your total regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of *client*. If you have fewer than 5 *clients* in a particular category (other than (d), (e), and (f)) you may check Item 5.D.(2) rather than respond to Item 5.D.(1).

The aggregate amount of regulatory assets under management reported in Item 5.D.(3) should equal the total amount of regulatory assets under management reported in Item 5.F.(2)(c) below.

If a *client* fits into more than one category, select one category that most accurately represents the *client* to avoid double counting *clients* and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

Type of <i>Client</i>	(1) Number of <i>Client(s)</i>	(2) Fewer than 5 <i>Clients</i>	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)	0		\$ 0
(b) High net worth individuals	0		\$ 0
(c) Banking or thrift institutions	0		\$ 0
(d) Investment companies	0		\$ 0
(e) Business development companies	0	1 [	\$ 0
(f) Pooled investment vehicles (other than investment companies and business development companies)	37		\$ 8,452,548,152
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	19		\$ 7,860,360,449
(h) Charitable organizations	1		\$ 142,328,490
(i) State or municipal <i>government entities</i> (including government pension plans)	4		\$ 1,803,635,666
(j) Other investment advisers	0		\$ 0
(k) Insurance companies	0		\$ 0
(I) Sovereign wealth funds and foreign official institutions	5		\$ 3,343,166,840
(m) Corporations or other businesses not listed above	0		\$ 0
(n) Other:	0		\$ 0

## **Compensation Arrangements**

- E. You are compensated for your investment advisory services by (check all that apply):
  - ☑ (1) A percentage of assets under your management
  - ☑ (2) Hourly charges
  - (3) Subscription fees (for a newsletter or periodical)
  - ☑ (4) Fixed fees (other than subscription fees)
  - (5) Commissions
  - ☑ (6) Performance-based fees
  - (7) Other (specify): RETAINER WITH INCREMENTAL CHARGES BASED ON SERVICES REQUESTED.

Regulatory Assets Under Management										
				Yes	No					
F.	(1) Do you provide continuous an	d regular supervisory or management servi	ces to securities portfolios?	$\odot$	0					
	(2) If yes, what is the amount of your regulatory assets under management and total number of accounts?									
		U.S. Dollar Amount	Total Number of Accounts							
	Discretionary:	(a) \$16,953,384,467	(d) 54							
	Non-Discretionary:	(b) \$4,648,655,130	(e) 12							
	Total:	(c) \$ 21,602,039,597	(f) 66							

*Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item.* 

(3) What is the approximate amount of your total regulatory assets under management (reported in Item 5.F.(2)(c) above) attributable to *clients* who are non-*United States persons*?
 \$ 8,097,629,852

Ite	em 5 Information About Your Advisory Business - Advisory Activities							
Ad	Advisory Activities							
G.	G. What type(s) of advisory services do you provide? Check all that apply.							
	$\Box$ (1) Einancial planning services							

(1) Financial planning services

(2) Portfolio management for individuals and/or small businesses

2

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- (3) Portfolio management for investment companies (as well as "business development companies" that have made an election pursuant to section 54 of the Investment Company Act of 1940)
  - (4) Portfolio management for pooled investment vehicles (other than investment companies)
  - V (5) Portfolio management for businesses (other than small businesses) or institutional clients (other than registered investment companies and other pooled investment vehicles)
  - Г (6) Pension consulting services
  - 2 (7) Selection of other advisers (including *private fund* managers)
- $\Box$ (8) Publication of periodicals or newsletters
- (9) Security ratings or pricing services
- (10) Market timing services
- (11) Educational seminars/workshops
- (12) Other(specify):

Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 814 number of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Schedule D.

- н. If you provide financial planning services, to how many *clients* did you provide these services during your last fiscal year?
  - 0 0
  - 1 10  $\circ$
  - 11 25  $\circ$
  - 26 50  $\circ$
  - 51 100  $\mathbf{O}$
  - 101 250  $\mathbf{O}$
  - 251 500  $\mathbf{O}$
  - More than 500  $\mathbf{O}$

If more than 500, how many? (round to the nearest 500)

In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

#### Yes No

 $\odot$  $\circ$ 

Ι. (1) Do you participate in a wrap fee program?

(2) If you participate in a wrap fee program, what is the amount of your regulatory assets under management attributable to acting as:

- (a) sponsor to a wrap fee program
  - \$
- (b) portfolio manager for a wrap fee program?
  - \$
- (c) sponsor to and portfolio manager for the same wrap fee program?
  - \$

If you report an amount in Item 5.I.(2)(c), do not report that amount in Item 5.I.(2)(a) or Item 5.I.(2)(b).

If you are a portfolio manager for a wrap fee program, list the names of the programs, their sponsors and related information in Section 5.I.(2) of Schedule D.

If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2).

- Yes No
- J. (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect œ C to limited types of investments?

(2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to  $\odot$  $\odot$ compute your regulatory assets under management?

Κ. Separately Managed Account Clients

		Yes	No
	(1) Do you have regulatory assets under management attributable to <i>clients</i> other than those listed in Item 5.D.(3)(d)-(f) (separately managed account <i>clients</i> )?	۲	0
	If yes, complete Section 5.K.(1) of Schedule D.		
	(2) Do you engage in borrowing transactions on behalf of any of the separately managed account <i>clients</i> that you advise? If yes, complete Section 5.K.(2) of Schedule D.	0	۲
	(3) Do you engage in derivative transactions on behalf of any of the separately managed account <i>clients</i> that you advise? If yes, complete Section 5.K.(2) of Schedule D.	0	o
	(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management?	۲	0
	If yes, complete Section 5.K.(3) of Schedule D for each custodian.		
L.	Marketing Activities	Yes	No
	(1) Do any of your <i>advertisements</i> include:		
	(a) Performance results?	0	0
	(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	0	0
	(c) <i>Testimonials</i> (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	0
	(d) <i>Endorsements</i> (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	0
	(e) Third-party ratings?	0	0
	(2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of <i>testimonials</i> , <i>endorsements</i> , or <i>third-party ratings</i> ?	0	0
	(3) Do any of your advertisements include hypothetical performance ?	0	0
	(4) Do any of your advertisements include predecessor performance ?	0	0

SECTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies

No Information Filed

SECTION 5.I.(2) Wrap Fee Programs

No Information Filed

# SECTION 5.K.(1) Separately Managed Accounts

After subtracting the amounts reported in Item 5.D.(3)(d)-(f) from your total regulatory assets under management, indicate the approximate percentage of this remaining amount attributable to each of the following categories of assets. If the remaining amount is at least \$10 billion in regulatory assets under management, complete Question (a). If the remaining amount is less than \$10 billion in regulatory assets under management, complete Question (b).

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Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

End of year refers to the date used to calculate your regulatory assets under management for purposes of your annual updating amendment. Mid-year is the date six months before the end of year date. Each column should add up to 100% and numbers should be rounded to the nearest percent.

Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.

Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.

#### (a) Asset Type Mid-year End of year (i) Exchange-Traded Equity Securities 0 % 0 % Non Exchange-Traded Equity Securities 0 % 0 % (ii) U.S. Government/Agency Bonds 0 % 0 % (iii) (iv) U.S. State and Local Bonds 0 % 0 % 0% Sovereign Bonds 0 % (v) 0 % 0 % (vi) Investment Grade Corporate Bonds (vii) Non-Investment Grade Corporate Bonds 0 % 0 % (viii) Derivatives 0 % 0 % 0 % 0 % (ix) Securities Issued by Registered Investment Companies or Business Development Companies Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or 100 % 100 % (x) **Business Development Companies**) (xi) Cash and Cash Equivalents 0 % 0 % 0 % (xii) Other 0 %

Generally describe any assets included in "Other"

Asse	et Type	End of year
(i)	Exchange-Traded Equity Securities	%
(ii)	Non Exchange-Traded Equity Securities	%
(iii)	U.S. Government/Agency Bonds	%
(iv)	U.S. State and Local Bonds	%
(v)	Sovereign Bonds	%
(vi)	Investment Grade Corporate Bonds	%
(vii)	Non-Investment Grade Corporate Bonds	%
(viii)	Derivatives	%
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	%
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	%
(xi)	Cash and Cash Equivalents	%
(xii)	Other	%

#### SECTION 5.K.(2) Separately Managed Accounts - Use of Borrowingsand Derivatives

 $\overline{\mathbf{V}}$  No information is required to be reported in this Section 5.K.(2) per the instructions of this Section 5.K.(2)

If your regulatory assets under management attributable to separately managed accounts are at least \$10 billion, you should complete Question (a). If your regulatory assets under management attributable to separately managed accounts are at least \$500 million but less than \$10 billion, you should complete Question (b).

(a) In the table below, provide the following information regarding the separately managed accounts you advise. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise. End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

In column 3, provide aggregate *gross notional value* of derivatives divided by the aggregate regulatory assets under management of the accounts included in column 1 with respect to each category of derivatives specified in 3(a) through (f).

You may, but are not required to, complete the table with respect to any separately managed account with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

(i) Mid-Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings	s (3) Derivative Exposures					
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative		(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$	\$	%	%	%	%	%	%
10-149%	\$	\$	%	%	%	%	%	%
150% or more	\$	\$	%	%	%	%	%	%

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(ii) End of Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings		(	(3) Derivativ	ve Exposure	s	
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative		(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$	\$	%	%	%	%	%	%
10-149%	\$	\$	%	%	%	%	%	%
150% or more	\$	\$	%	%	%	%	%	%

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which borrowings and derivatives are used in the management of the separately managed accounts that you advise.

(b) In the table below, provide the following information regarding the separately managed accounts you advise as of the date used to calculate your regulatory assets under management for purposes of your annual updating amendment. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any borrowings and (b) the gross notional value of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

You may, but are not required to, complete the table with respect to any separately managed accounts with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings
Less than 10%	\$	\$
10-149%	\$	\$
150% or more	\$	\$

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which borrowings and derivatives are used in the management of the separately managed accounts that you advise.

## SECTION 5.K.(3) Custodians for Separately Managed Accounts

Complete a separate Schedule D Section 5.K.(3) for each custodian that holds ten percent or more of your aggregate separately managed account regulatory assets under management.

(a) Legal name of custodian:

NORTHERN TRUST COMPANY

(b) Primary business name of custodian: NORTHERN TRUST COMPANY

(d) Is the custodian a related person of your firm?

(c) The location(s) of the custodian's office(s) responsible for *custody* of the assets :

City:	State:	Country:
CHICAGO	Illinois	United States

Yes No

 $\odot$ 

- (e) If the custodian is a broker-dealer, provide its SEC registration number (if any)
- (f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity *identifier* (if any)

(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? \$ 5,218,072,491

(a) Legal name of custodian: BANK OF NEW YORK MELLON

5/18/2	22, 2	2:50 PM	IARD - All Section	ns [User Name: amay123, OrgID: 160006]	
	(b)	Primary business name of cus	stodian:		
		BANK OF NEW YORK MELLON			
	(c)	The location(s) of the custodia	an's office(s) responsible for <i>custod</i>	ly of the assets :	
		City:	State:	Country:	
		EVERETT	Massachusetts	United States	
				Yes No	
	(d)	Is the custodian a related per	son of your firm?	0 0	
	(e)	If the custodian is a broker-do	ealer, provide its SEC registration n	umber (if any)	
	(f)	If the custodian is not a broke <i>identifier</i> (if any)	er-dealer, or is a broker-dealer but	does not have an SEC registration number, provide its legal entity	
	(g)	What amount of your regulate	ory assets under management attri	butable to separately managed accounts is held at the custodian?	
		\$ 3,123,662,178			
	<u> </u>				
	(a)	Legal name of custodian: JP MORGAN CHASE			
	(h)	Primary business name of cus	todian		
	(0)	JP MORGAN CHASE			
	(c)		an's office(s) responsible for custod	ly of the assets :	
		City:	State:	Country:	
		NEW YORK	New York	United States	
				Yes No	
	(d)	Is the custodian a related per	<i>son</i> of your firm?	0 0	
	(e)	If the custodian is a broker-de	ealer, provide its SEC registration n	umber (if any)	
		-			
	(f)	If the custodian is not a broke <i>identifier</i> (if any)	er-dealer, or is a broker-dealer but	does not have an SEC registration number, provide its legal entity	
	(g)	What amount of your regulate	ory assets under management attri	butable to separately managed accounts is held at the custodian?	
		\$ 3,977,509,700			

Iten	n 6 O	ther Business Activities		
In tl	nis Ite	em, we request information about your firm's other business activities.		
A.		<ul> <li>are actively engaged in business as a (check all that apply):</li> <li>(1) broker-dealer (registered or unregistered)</li> <li>(2) registered representative of a broker-dealer</li> <li>(3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>(4) futures commission merchant</li> <li>(5) real estate broker, dealer, or agent</li> <li>(6) insurance broker or agent</li> <li>(7) bank (including a separately identifiable department or division of a bank)</li> <li>(8) trust company</li> <li>(9) registered municipal advisor</li> <li>(10) registered security-based swap dealer</li> <li>(11) major security-based swap participant</li> <li>(12) accountant or accounting firm</li> <li>(13) lawyer or law firm</li> <li>(14) other financial product salesperson (specify):</li> </ul>	ion	
			'es	No
В.	(1)	Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?	o	$\odot$
	(2)	If yes, is this other business your primary business?	0	$\circ$
		If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.	ıt	
		Y	'es	No
	(3)	Do you sell products or provide services other than investment advice to your advisory <i>clients</i> ?	C	$\odot$
		If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a differen name, provide that name.	ıt	

# SECTION 6.A. Names of Your Other Businesses

No Information Filed

# SECTION 6.B.(2) Description of Primary Business

Describe your primary business (not your investment advisory business):

If you engage in that business under a different name, provide that name:

# SECTION 6.B.(3) Description of Other Products and Services

Describe other products or services you sell to your *client*. You may omit products and services that you listed in Section 6.B.(2) above.

If you engage in that business under a different name, provide that name:

#### Item 7 Financial Industry Affiliations

In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your *clients*.

A. This part of Item 7 requires you to provide information about you and your *related persons*, including foreign affiliates. Your *related persons* are all of your *advisory affiliates* and any *person* that is under common *control* with you.

You have a *related person* that is a (check all that apply):

- 🗹 (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)
- (2) other investment adviser (including financial planners)
- (3) registered municipal advisor
- □ (4) registered security-based swap dealer
- □ (5) major security-based swap participant
- 🗹 (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (7) futures commission merchant
- (8) banking or thrift institution
- (9) trust company
- $\Box$  (10) accountant or accounting firm
- 🔲 (11) lawyer or law firm
- □ (12) insurance company or agency
- ☑ (13) pension consultant
- (14) real estate broker or dealer
- (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- 🗹 (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).

Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.

For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.

You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.

You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

#### SECTION 7.A. Financial Industry Affiliations

Complete a separate Schedule D Section 7.A. for each related person listed in Item 7.A.

- 1. Legal Name of *Related Person*: TOWNSEND ALPHA MANAGER I, LLC
- 2. Primary Business Name of *Related Person*: TOWNSEND ALPHA MANAGER I, LLC
- 3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
  - or Other
- 4. Related Person's

3/22,	2:50	PM IARD - All Sections [User Name: amay123, OrgID: 160006]		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)			
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
		□ futures commission merchant		
		banking or thrift institution		
	(i)	□ trust company		
	(j)	<ul> <li>accountant or accounting firm</li> </ul>		
		lawyer or law firm		
	(l) (m)			
	(m)			
		real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	_	NI.
6.	Dov	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?		
0.	D0 y	ou control of are you controlled by the related person?	2	C
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	,	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to		_
0.		clients?		0
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	)	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> your <i>clients'</i> assets:	y	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:		
		Yes	s	N
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	5	С
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	,	•
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	d	
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	5	С
12.	Do y	ou and the <i>related person</i> share the same physical location?	,	С
1.	-	l Name of <i>Related Person</i> : TRUST COMPANY		
2.		ary Business Name of <i>Related Person</i> : TRUST COMPANY		

3.	Rela	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	er de la constante de la const		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)			
	(c)	registered municipal advisor		
	• •	registered security-based swap dealer		
	(e) (f)	<ul> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>		
		futures commission merchant		
		banking or thrift institution		
	(i)	T trust company		
	(j)	accountant or accounting firm		
		awyer or law firm		
	(I)	insurance company or agency		
	(m) (n)	<ul> <li>pension consultant</li> <li>real estate broker or dealer</li> </ul>		
	(II) (0)	_		
	(p)			
			Yes	No
6.	Do y	rou control or are you controlled by the related person?	$\circ$	$\odot$
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	۲	o
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	o	o
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i>	stodv	of
	(-)	your clients' assets:		-
		Number and Street 1:Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$	Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		
10	. (a)	Is the related person registered with a foreign financial regulatory authority ?	0	o
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>reperson</i> is registered.	lated	
		No Information Filed		
11	. Do y	ou and the related person share any supervised persons?	0	$\circ$
			~	
12	. Do y	ou and the <i>related person</i> share the same physical location?	0	$\odot$
			-	

1.	5	Il Name of <i>Related Person</i> : GERMAN INVESTMENTS I LLC		
2.		ary Business Name of <i>Related Person</i> : GERMAN INVESTMENTS I LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or Othe	er de la companya de		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
5.		ted Person is: (check all that apply)		
	(a)			
	(b) (c)	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> </ul>		
	(c) (d)	registered multicipal advisor     registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	Tust company		
	(j)	accountant or accounting firm		
	(k)	awyer or law firm		
	(I)	insurance company or agency		
	(m)			
	(n) (o)	<ul> <li>real estate broker or dealer</li> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>		
	(0) (p)	sponsor of syndicator of infliced partnersings (of equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(P)		s N	ю
6.	Do y	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?		_
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	¢	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	6	•
		clients?		
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	2
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> your <i>clients'</i> assets:	y of	:
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
		Ye	s N	ю
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	2
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	6	•
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	d	
s://cr	d.finra	a.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG_PK=1652620	29	)/1:

11.	. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	C		;
12.	. Do you and the <i>related person</i> share the same physical location?	G	0	;
	Legal Name of <i>Related Person</i> : AON ADVANTAGE FUNDS LLC Primary Business Name of <i>Related Person</i> :			
	AON ADVANTAGE FUNDS LLC			
3.	<i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 120405 or Other			
4.	Related Person's			
	(a) CRD Number (if any):			
	310335 (b) CIK Number(s) (if any):			
	No Information Filed			
5.	Related Person is: (check all that apply)         (a)       broker-dealer, municipal securities dealer, or government securities broker or dealer         (b)       other investment adviser (including financial planners)         (c)       registered municipal advisor         (d)       registered security-based swap dealer         (e)       major security-based swap participant         (f)       commodity pool operator or commodity trading advisor (whether registered or exempt from registration)         (g)       futures commission merchant         (h)       banking or thrift institution         (i)       trust company         (j)       accountant or accounting firm         (k)       lawyer or law firm         (l)       insurance company or agency         (m)       pension consultant         (n)       real estate broker or dealer         (o)       sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles         (p)       sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Ye	s N	0
6.	Do you control or are you controlled by the related person?	C		
7.	Are you and the <i>related person</i> under common <i>control</i> ?	c		5
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provi clients?	de to C	•	ð
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that maintained at the <i>related person</i> ?	C are		,
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible your <i>clients'</i> assets:	for <i>custod</i>	y of	
	Number and Street 1: Number and Street 2:			
	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:			
		Ye	s N	o

<ul> <li>9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?</li> <li>(b) If the answer is yes, under what exemption?</li> <li>10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?</li> <li>(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory aut person</i> is registered. No Information Filed</li> <li>11. Do you and the <i>related person</i> share any <i>supervised persons</i>?</li> <li>12. Do you and the <i>related person</i> share the same physical location?</li> <li>14. Legal Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li>2. Primary Business Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li>3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) <ul> <li>or</li> <li>Other</li> </ul> </li> <li>4. <i>Related Person's</i> <ul> <li>(a) <i>CRD</i> Number (if any):</li> <li>(b) <i>CRD</i> Number (if any):</li> </ul> </li> </ul>	C thority with which the related
<ul> <li>10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? <ul> <li>(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory aut person</i> is registered. <ul> <li>No Information Filed</li> </ul> </li> <li>11. Do you and the <i>related person</i> share any <i>supervised persons</i>?</li> <li>12. Do you and the <i>related person</i> share the same physical location?</li> </ul> </li> <li>14. Legal Name of <i>Related Person</i>: <ul> <li>AON INVESTMENTS CANADA INC.</li> </ul> </li> <li>2. Primary Business Name of <i>Related Person</i>: <ul> <li>AON INVESTMENTS CANADA INC.</li> </ul> </li> <li>3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) <ul> <li>or</li> <li>Other</li> </ul> </li> <li>4. <i>Related Person's</i> <ul> <li>(a) <i>CRD</i> Number (if any):</li> </ul> </li> </ul>	thority with which the related
<ul> <li>(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory aut person is registered. No Information Filed</li> <li>11. Do you and the related person share any supervised persons?</li> <li>12. Do you and the related person share the same physical location?</li> <li>1. Legal Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li>2. Primary Business Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li>3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other</li> <li>4. <i>Related Person's</i> (a) <i>CRD</i> Number (if any):</li> </ul>	thority with which the related
<ul> <li>(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory aut person is registered. No Information Filed</li> <li>11. Do you and the related person share any supervised persons?</li> <li>12. Do you and the related person share the same physical location?</li> <li>1. Legal Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li>2. Primary Business Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li>3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other</li> <li>4. <i>Related Person's</i> (a) <i>CRD</i> Number (if any):</li> </ul>	thority with which the related
No Information Filed         11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?         12. Do you and the <i>related person</i> share the same physical location?         1. Legal Name of <i>Related Person</i> : AON INVESTMENTS CANADA INC.         2. Primary Business Name of <i>Related Person</i> : AON INVESTMENTS CANADA INC.         3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other         4. <i>Related Person's</i> (a) <i>CRD</i> Number (if any):	
<ol> <li>Do you and the <i>related person</i> share the same physical location?</li> <li>Legal Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li>Primary Business Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li><i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other</li> <li><i>Related Person's</i> (a) <i>CRD</i> Number (if any):</li> </ol>	
<ol> <li>Legal Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li>Primary Business Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li><i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)         <ul> <li>or</li> <li>Other</li> </ul> </li> <li><i>Related Person's</i> <ul> <li>(a) <i>CRD</i> Number (if any):</li> </ul> </li> </ol>	
<ol> <li>Legal Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li>Primary Business Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li><i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)         <ul> <li>or</li> <li>Other</li> </ul> </li> <li><i>Related Person's</i> <ul> <li>(a) <i>CRD</i> Number (if any):</li> </ul> </li> </ol>	0
<ul> <li>AON INVESTMENTS CANADA INC.</li> <li>Primary Business Name of <i>Related Person</i>: AON INVESTMENTS CANADA INC.</li> <li><i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other</li> <li><i>Related Person's</i> (a) <i>CRD</i> Number (if any):</li> </ul>	
<ul> <li>AON INVESTMENTS CANADA INC.</li> <li>3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) <ul> <li>or</li> <li>Other</li> </ul> </li> <li>4. <i>Related Person's</i> <ul> <li>(a) <i>CRD</i> Number (if any):</li> </ul> </li> </ul>	
<ul> <li>AON INVESTMENTS CANADA INC.</li> <li>3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other</li> <li>4. <i>Related Person's</i> (a) <i>CRD</i> Number (if any):</li> </ul>	
- or Other 4. <i>Related Person's</i> (a) <i>CRD</i> Number (if any):	
Other 4. <i>Related Person's</i> (a) <i>CRD</i> Number (if any):	
<ul> <li>4. Related Person's</li> <li>(a) CRD Number (if any):</li> </ul>	
(a) CRD Number (if any):	
(a) CRD Number (if any):	
(b) CIK Number(s) (if any): No Information Filed	
5. <i>Related Person</i> is: (check all that apply)	
(a) D broker-dealer, municipal securities dealer, or government securities broker or dealer	
(b) 🗹 other investment adviser (including financial planners)	
(c) 🗖 registered municipal advisor	
(d)  registered security-based swap dealer	
(e) major security-based swap participant	
(f) (f) commodity pool operator or commodity trading advisor (whether registered or exempt from	registration)
(g) futures commission merchant	
(h) banking or thrift institution	
(i)  Tust company (j)  accountant or accounting firm	
<ul> <li>(j) □ accountant or accounting firm</li> <li>(k) □ lawyer or law firm</li> </ul>	
(I) $\Box$ insurance company or agency	
(n)	
(n) $\Box$ real estate broker or dealer	
(o) $\Box$ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment v	ehicles
(p) 🔲 sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	
	Yes
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	o
7. Are you and the <i>related person</i> under common <i>control</i> ?	c
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory s <i>clients</i> ?	services you provide to O
<ul> <li>(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2</li> </ul>	

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		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?	
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custod your clients' assets:	<i>ly</i> of
		Number and Street 1: Number and Street 2:	
		City: State: Country: ZIP+4/Postal Code:	
		If this address is a private residence, check this box:	es No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0
	(b)	If the answer is yes, under what exemption? FOREIGN ENTITY	
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relate	
		person is registered.	
		Name of Country/English Name of Foreign Financial Regulatory Authority	
		Canada - Alberta Securities Commission	
		Canada - British Columbia Securities Commission	
		Canada - Manitoba Securities Commission	
		Canada - New Brunswick Securities Commission	
		Canada - Newfoundland and Labrador, Financial Services Regulation Division	
		Canada - Nova Scotia Securities Commission	
		Canada - Ontario Securities Commission	
		Canada - Quebec, Financial Markets Authority	
		Canada - Saskatchewan Financial Services Commission	
		Canada - Yukon Territories, Registrar of Securities         you and the related person share any supervised persons?         you and the related person share the same physical location?	
		you and the <i>related person</i> share any <i>supervised persons</i> ?	
12.	Do y	you and the <i>related person</i> share the same physical location?	
12.	Do y Lega	you and the <i>related person</i> share any <i>supervised persons</i> ?	
12.	Do y Lega TOW Prim	you and the <i>related person</i> share any <i>supervised persons</i> ? you and the <i>related person</i> share the same physical location?	
12. 1. 2.	Do y Lega TOW Prim TOW	you and the <i>related person</i> share any <i>supervised persons</i> ? you and the <i>related person</i> share the same physical location? al Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED hary Business Name of <i>Related Person</i> :	
12. 1. 2.	Do y Lega TOW Prim TOW <i>Rela</i>	you and the <i>related person</i> share any <i>supervised persons</i> ? you and the <i>related person</i> share the same physical location? al Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED hary Business Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED	
12. 1. 2.	Do y Lega TOW Prim TOW <i>Rela</i> - or	you and the <i>related person</i> share any <i>supervised persons</i> ? you and the <i>related person</i> share the same physical location? al Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED hary Business Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	
12. 1. 2.	Do y Lega TOW Prim TOW <i>Rela</i>	you and the <i>related person</i> share any <i>supervised persons</i> ? you and the <i>related person</i> share the same physical location? al Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED hary Business Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	
12. 1. 2. 3.	Do y Lega TOW Prim TOW <i>Rela</i> or Othe	you and the related person share any supervised persons? you and the related person share the same physical location? al Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED hary Business Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er	
12. 1. 2. 3.	Do y Lega TOW Prim TOW <i>Rela</i> or Othe <i>Rela</i> (a)	you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: VNSEND GROUP EUROPE LIMITED hary Business Name of Related Person: VNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ated Person's CRD Number (if any):	
12. 1. 2. 3.	Do y Lega TOW Prim TOW <i>Rela</i> or Othe <i>Rela</i> (a)	you and the related person share any supervised persons? you and the related person share the same physical location? al Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED hary Business Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er	
12. 1. 2. 3.	Do y Lega TOW Prim TOW <i>Rela</i> or Othe (a) (b)	you and the <i>related person</i> share any <i>supervised persons</i> ? you and the <i>related person</i> share the same physical location? al Name of <i>Related person</i> : VNSEND GROUP EUROPE LIMITED hary Business Name of <i>Related Person</i> : VNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ated Person's <i>CRD</i> Number (if any): CIK Number(s) (if any): No Information Filed	
12. 1. 2. 3.	Do y Lega TOW Prim TOW <i>Rela</i> (a) (b) <i>Rela</i>	you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: VNSEND GROUP EUROPE LIMITED hary Business Name of Related Person: VNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ated Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed ated Person is: (check all that apply)	
12. 1. 2. 3.	Do y Lega TOW Prim TOW <i>Rela</i> (a) (b) <i>Rela</i> (a)	you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: VNSEND GROUP EUROPE LIMITED hary Business Name of Related Person: VNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ated Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed ated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer	
12. 1. 2. 3.	Do y Lega TOW Prim TOW <i>Rela</i> (a) (b) <i>Rela</i> (a) (b)	you and the related person share any supervised persons? you and the related person share the same physical location? you and the related person share the same physical location? al Name of Related Person: NNSEND GROUP EUROPE LIMITED nary Business Name of Related Person: NNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ated Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed ated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)	
12. 1. 2. 3.	Do y Lega TOW Prim TOW <i>Rela</i> (a) (b) <i>Rela</i> (a)	you and the related person share any supervised persons? you and the related person share any supervised persons? you and the related person share the same physical location? all Name of Related Person: NNSEND GROUP EUROPE LIMITED nary Business Name of Related Person: NNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ated Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed ated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor	
12. 1. 2. 3.	Do y Lega TOW Prim TOW <i>Rela</i> (a) (b) (c)	you and the related person share any supervised persons? you and the related person share any supervised persons? you and the related person share the same physical location? all Name of Related Person: NNSEND GROUP EUROPE LIMITED hary Business Name of Related Person: NNSEND GROUP EUROPE LIMITED ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ated Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed ated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor	

	(g)	futures commission merchant		
		banking or thrift institution		
		T trust company		
		<ul> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> </ul>		
		<ul> <li>lawyer or law firm</li> <li>insurance company or agency</li> </ul>		
	(n) (m)			
		real estate broker or dealer		
	• •	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	$\odot$	0
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	c
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	o	۲
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	o
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	stody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	⊙	0
	(b)	If the answer is yes, under what exemption? FOREIGN ENTITY		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	o	0
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>reperson</i> is registered.	lated	
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		United Kingdom - Financial Conduct Authority		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	o	~
				0
1.	-	I Name of <i>Related Person</i> : ATEGIC MANAGER III, LLC		
2.		ary Business Name of <i>Related Person</i> : ATEGIC MANAGER III, LLC		
3.	Rela	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	r		
4.	Rela	ted Person's		
		CRD Number (if any):		
	(1.)			I
	(b)	CIK Number(s) (if any): No Information Filed		
11				1

or

5.		ted Person is: (check all that apply)		
	(a)			
	(b)			
	(c)	registered municipal advisor		
	(d)			
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	T trust company		
	(j)	accountant or accounting firm		
	(k)	🗖 lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(1)		Yes	No
6.	Do v	you control or are you controlled by the related person?	$\odot$	_
	,		e	0
7	Aro	you and the <i>related person</i> under common <i>control</i> ?		-
7.	Ale		$\circ$	⊙
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	$\circ$	$\odot$
	(6)	clients?		
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	0	0
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are		
		maintained at the related person?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i>	tody	of
	(C)	your clients' assets:	louy	01
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
	. ,		O	0
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rel	ated	
		person is registered.		
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	$\odot$	0
12.	Do y	you and the related person share the same physical location?	$\odot$	0
			~	~
1.	Lega	al Name of <i>Related Person</i> :		
	AON	SOLUTIONS IRELAND LIMITED		
2.	Prim	ary Business Name of Related Person:		
	AON	SOLUTIONS IRELAND LIMITED		
3.	Rela	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
11				

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	Othe				
1	Dolo	ted Person's			
4.		CRD Number (if any):			
	(u)				
	(b)	CIK Number(s) (if any):			
		No Information Filed			
5.		ted Person is: (check all that apply)			
	(a)				
		<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> </ul>			
		<ul> <li>registered municipal advisor</li> <li>registered security-based swap dealer</li> </ul>			
		major security-based swap participant			
		commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			
		□ futures commission merchant			
	(h)	banking or thrift institution			
	(i)	T trust company			
	(j)	accountant or accounting firm			
		lawyer or law firm			
		insurance company or agency			
	(m)				
	. ,	real estate broker or dealer			
	• •	<ul> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> <li>sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</li> </ul>			
	(P)	sponsor, general partier, managing member (or equivalent) or pooled investment venicles	Yes	: N/	
6.	Do v	you control or are you controlled by the related person?	0	o	
	- /		0	e	1
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	C	
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to	$\circ$	$\odot$	
		clients?			
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are	0	C	)
		maintained at the <i>related person</i> ?			
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cus	stody	of	
		your <i>clients</i> ' assets:	-		
		Number and Street 1: Number and Street 2:			
		City: State: Country: ZIP+4/Postal Code:			
		If this address is a private residence, check this box: $\Box$	Yes	N	
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		_	
5.		If the answer is yes, under what exemption?	$\odot$	С	
	(b)	FOREIGN ENTITY			
10	(a)	Is the related person registered with a foreign financial regulatory authority ?			
10.	(a) (b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rel	• Iated	C	ł
	(b)	person is registered.	aleu		
		Name of Country/English Name of Foreign Financial Regulatory Authority			7
		Ireland - Central Bank of Ireland			1
11.	Do v	rou and the <i>related person</i> share any <i>supervised persons</i> ?	~	0	1
	- 1		0	$\odot$	
12.	Do v	you and the related person share the same physical location?	0	$\overline{\mathbf{O}}$	
	,		0	e	1
1					- I.

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1.		Il Name of <i>Related Person</i> : MANAGER, LLC			
2.		Primary Business Name of <i>Related Person</i> : TTG MANAGER, LLC			
3.	Rela -	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	or Othe	ır			
4.	Rela	ted Person's			
	(a)	CRD Number (if any):			
	(b)	CIK Number(s) (if any):			
		No Information Filed			
5.		ted Person is: (check all that apply) I broker-dealer, municipal securities dealer, or government securities broker or dealer			
	(a) (b)				
	(c)	registered municipal advisor			
	• •	registered security-based swap dealer			
	• •	major security-based swap participant			
	(f) (g)	<ul> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> </ul>			
	(b)				
		T trust company			
		accountant or accounting firm			
		awyer or law firm			
	.,	Insurance company or agency			
	(m) (n)	<ul> <li>pension consultant</li> <li>real estate broker or dealer</li> </ul>			
	• •	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles			
		Y	Yes	No	
6.	Do y	rou control or are you controlled by the related person?	Θ	0	
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	o	
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	o	
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	o	
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custo</i> your <i>clients'</i> assets:	ody	of	
		Number and Street 1: Number and Street 2:			
		City:State:Country:ZIP+4/Postal Code:If this address is a private residence, check this box:			
0	(-)		Yes	No	
9.	(a)		0	0	
	(b)	If the answer is yes, under what exemption?			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\odot$	
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relat person</i> is registered.	ted		
		No Information Filed			

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11. Do you and the related person share any supervised persons?

12. Do you and the *related person* share the same physical location?

6	0
×.	

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1.	Legal Name of <i>Related Person:</i> PENN SQUARE MANAGER II, LLC		
2.	Primary Business Name of <i>Related Person</i> : PENN SQUARE MANAGER II, LLC		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's (a) CRD Number (if any):		
	(b) CIK Number(s) (if any):		
	No Information Filed		
5.	Related Person is: (check all that apply)         (a)       broker-dealer, municipal securities dealer, or government securities broker or dealer         (b)       other investment adviser (including financial planners)         (c)       registered municipal advisor         (d)       registered security-based swap dealer         (e)       major security-based swap participant         (f)       ✓         (g)       futures commodity pool operator or commodity trading advisor (whether registered or exempt from registration)         (g)       futures commission merchant         (h)       banking or thrift institution         (i)       trust company         (j)       accountant or accounting firm         (k)       lawyer or law firm         (l)       insurance company or agency         (m)       pension consultant         (n)       real estate broker or dealer         (o)       sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles         (p)       ✓         (o)       sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	Ν
6.	Do you control or are you controlled by the related percent	0	C
7.	Are you and the <i>related person</i> under common <i>control</i> ?	0	6
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	6
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	Ċ
	<ul> <li>(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custo</i> your <i>clients</i>' assets:</li> <li>Number and Street 1:</li> </ul>	эdy	of
	City:     State:     Country:     ZIP+4/Postal Code:       If this address is a private residence, check this box:		
0		Yes	N
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\mathbf{O}$	- C

0 0 https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG\_PK=1652620

Yes No

Yes No

 $\odot$   $\circ$ 

 $\mathbf{O}$  $\odot$ 

 $\mathbf{O}$  $\odot$ 

 $\mathbf{O}$ 0

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	(b)	If the answer is yes, under what exemption?	
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	6
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related	
		person is registered. No Information Filed	
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	C
12.	Do y	ou and the <i>related person</i> share the same physical location?	c
1.	-	I Name of <i>Related Person</i> : G REAL ESTATE PARTNERS I, LLC	
2.		ary Business Name of <i>Related Person</i> : GG REAL ESTATE PARTNERS I, LLC	
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	
	- or Othe	r	
4.		ted Person's CRD Number (if any):	
	(b)	CIK Number(s) (if any): No Information Filed	
5.	(a) (b) (c) (d) (f) (g) (h) (i) (j) (k) (l) (n) (n) (o)	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> <li>registered security-based swap dealer</li> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> <li>banking or thrift institution</li> <li>trust company</li> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> <li>insurance company or agency</li> <li>pension consultant</li> <li>real estate broker or dealer</li> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> <li>sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</li> </ul>	- N
6.	Do y	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	c C
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	œ
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	C

(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of

8/22,	2:50 F	PM	IARD - All Se	ections [User Name: amay1	23, OrgID: 160006]		
		your <i>clients</i> ' assets: Number and Street	1:	Number and Street 2:			
		City:	State:		ZIP+4/Postal Code:		
		If this address is a p	private residence, check this box: $\square$	]			
0		TC is a state of a second			Ň	ſes	No
9.			is an investment adviser, is it exen	npt from registration?		$\circ$	O
	(b)	If the answer is yes,	under what exemption?				
10.	(a)	Is the related person	registered with a foreign financial	regulatory authority ?		0	$\odot$
	(b)			sh of each <i>foreign financia</i>	al regulatory authority with which the relat	ted	
		person is registered.		No Information Filed			
11.	Do y	ou and the <i>related pe</i>	erson share any supervised persons			o	0
						e	Č
12.	Do y	rou and the <i>related pe</i>	erson share the same physical locat	ion?		0	0
1.		I Name of <i>Related Per</i>					
	SA S	SPECIAL SITUATIONS	GENERAL PARTNER, LLC				
2.	Prim	ary Business Name of	f Related Person:				
	SA S	PECIAL SITUATIONS	GENERAL PARTNER, LLC				
3.	Relat -	ted Person's SEC File	Number (if any) (e.g., 801-, 8-, 86	6-, 802-)			
	or						
	Othe	er					
4.		<i>ted Person's</i> <i>CRD</i> Number (if any)	):				
	(b)	CIK Number(s) (if ar					
	(0)			No Information Filed			
5.		<i>ted Person</i> is: (check					
	(a)		nunicipal securities dealer, or gover		or dealer		
	(b) (c)	registered muni	nt adviser (including financial plann icinal advisor	ers)			
		-	rity-based swap dealer				
	. ,		based swap participant				
	(f)	commodity pool	l operator or commodity trading ad	visor (whether registered	or exempt from registration)		
	(g)	futures commiss	sion merchant				
	• •	banking or thrift	t institution				
		trust company	_				
		accountant or a					
		lawyer or law fir					
	(l) (m)	<ul> <li>insurance comp</li> <li>pension consulta</li> </ul>					
	(m) (n)	•					
			licator of limited partnerships (or eq	quivalent), excluding pool	led investment vehicles		
	• •	. ,	I partner, managing member (or eq				
					٢	Yes	No
6.	Do y	ou <i>control</i> or are you	controlled by the related person?			Θ	$\circ$
7	۸	upu pad the webster	arean under commente de la				
7.	Are y	you and the <i>related pe</i>	erson under common control?			0	$\odot$

8/22,	2:50	PM IARD - All Sections [User Name: amay123, OrgID: 160006]					
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	©			
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	o	С			
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	stody	of			
		Number and Street 1: Number and Street 2:					
		City: State: Country: ZIP+4/Postal Code:					
		If this address is a private residence, check this box: $\square$					
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?					
	(b)	If the answer is yes, under what exemption?	· ·				
	( )						
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	c			
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relation person is registered.	ated				
		No Information Filed					
(c) 9. (a) (b) 10. (a) (b) 11. Do 12. Do 1. Leg LAK 2. Prin LAK 3. <i>Rela</i> or Oth 4. <i>Rela</i> (a) (b) (c) (d) (c) (d) (e) (f) (g) (h)	Do y	a you and the related percent chare any supervised percent?					
			Yes No OO				
12.	Do y	you and the <i>related person</i> share the same physical location?	$\odot$	С			
2. 3. 4.	Prim LAKI - or Othe <i>Rela</i> (a)	E TAHOE II GP, LLC hary Business Name of <i>Related Person</i> : E TAHOE II GP, LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ated Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed					
5.	(a)	<ul> <li>ated Person is: (check all that apply)</li> <li>broker-dealer, municipal securities dealer, or government securities broker or dealer</li> <li>other investment adviser (including financial planners)</li> </ul>					
	(c)	registered municipal advisor					
	(d)	registered security-based swap dealer					
	• •	major security-based swap participant					
	• •	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)					
		futures commission merchant					
	(n) (i)	<ul> <li>banking or thrift institution</li> <li>trust company</li> </ul>					
	(i) (j)	<ul> <li>accountant or accounting firm</li> </ul>					
		lawyer or law firm					
	(N) (I)	insurance company or agency					
	(n) (m)						
	(n)	real estate broker or dealer					
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles					

sponsor, general partner, managing member (or equivalent) of pooled investment vehicles control or are you controlled by the related person? and the related person under common control? es the related person act as a qualified custodian for your clients in connection with advisory services you provide to ents? you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you ercome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the ated person and thus are not required to obtain a surprise examination for your clients' funds or securities that are initianed at the related person? you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cus ur clients' assets: umber and Street 1:		
and the <i>related person</i> under common <i>control</i> ? es the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>ents</i> ? you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you ercome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>ated person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are anintained at the <i>related person</i> ? you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>cus</i> ur <i>clients</i> ' assets: umber and Street 1: Number and Street 2: ty: State: Country: ZIP+4/Postal Code: this address is a private residence, check this box: the <i>related person</i> is an investment adviser, is it exempt from registration?	© C C C	
and the <i>related person</i> under common <i>control</i> ? es the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>ents</i> ? you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you ercome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>ated person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are anintained at the <i>related person</i> ? you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>cus</i> ur <i>clients</i> ' assets: umber and Street 1: Number and Street 2: ty: State: Country: ZIP+4/Postal Code: this address is a private residence, check this box: the <i>related person</i> is an investment adviser, is it exempt from registration?	C C C	0 0 0
es the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>ents</i> ? you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you ercome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>ated person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are aintained at the <i>related person</i> ? you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>cus</i> ur <i>clients</i> ' assets: umber and Street 1: Number and Street 2: ty: State: Country: ZIP+4/Postal Code: this address is a private residence, check this box: the <i>related person</i> is an investment adviser, is it exempt from registration?	o o	c
ents?         you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you         ercome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the         ated person and thus are not required to obtain a surprise examination for your clients' funds or securities that are         aintained at the related person?         you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cus         ur clients' assets:         umber and Street 1:       Number and Street 2:         ty:       State:       Country:       ZIP+4/Postal Code:         this address is a private residence, check this box:       Image: Country is an investment adviser, is it exempt from registration?	C tody	
ercome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the ated person and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are anintained at the <i>related person</i> ? you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> ur <i>clients</i> ' assets: umber and Street 1: Number and Street 2: ty: State: Country: ZIP+4/Postal Code: this address is a private residence, check this box: the <i>related person</i> is an investment adviser, is it exempt from registration?	tody	C of
unclients' assets:       Number and Street 2:         umber and Street 1:       Number and Street 2:         ty:       State:       Country:       ZIP+4/Postal Code:         this address is a private residence, check this box:       Image: Country:       Image: Country:       Country:         the related person is an investment adviser, is it exempt from registration?       Image: Country:       Image: Country:       Image: Country:		of
ty: State: Country: ZIP+4/Postal Code: this address is a private residence, check this box: the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	
this address is a private residence, check this box:	Yes	
the related person is an investment adviser, is it exempt from registration?	Yes	
	Yes	
	_	
	0	0
the answer is yes, under what exemption?		
the related person registered with a foreign financial regulatory authority ?	0	$\odot$
		~
-		
	_	_
	$\odot$	0
and the <i>related person</i> share the same physical location?	O	0
AKE GENERAL PARTNER, LLC		
AKE GENERAL PARTNER, LLC		
<i>Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
Person's		
D Number (if any):		
<pre>&lt; Number(s) (if any):</pre>		
	the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relators is</i> registered. No Information Filed and the <i>related person</i> share any <i>supervised persons</i> ? and the <i>related person</i> share the same physical location? AKE GENERAL PARTNER, LLC Business Name of <i>Related Person</i> : AKE GENERAL PARTNER, LLC <i>Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) <i>Person's</i> <i>ID</i> Number (if any): K Number(s) (if any):	the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related rson</i> is registered. No Information Filed and the <i>related person</i> share any <i>supervised persons</i> ? and the <i>related person</i> share the same physical location? ame of <i>Related Person</i> : AKE GENERAL PARTNER, LLC Business Name of <i>Related Person</i> : AKE GENERAL PARTNER, LLC <i>Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) <i>Person's</i> <i>LD</i> Number (if any): K Number(s) (if any):

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5/18/22,	2:50	ΡM
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. ,				
	(3)	accountant or accounting firm		
	(k) (l)	<ul> <li>lawyer or law firm</li> <li>insurance company or agency</li> </ul>		
	(i) (m)			
		real estate broker or dealer		
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	$\odot$	0
-	A = 0	way and the related nerven under common control		
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	Θ
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	o
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	tody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$	Vac	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
5.	. ,	If the answer is yes, under what exemption?	0	0
	(5)			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel person</i> is registered.	ated	
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	$\odot$	0
12	Dov	you and the <i>related person</i> share the same physical location?	_	_
12.	D0 y		O	o
1.	-	al Name of Related Person:		
	TOW	INSEND STRATEGIC VENTURES GP, LLC		
2.	Drim	ary Business Name of <i>Related Person</i> :		
Ζ.		INSEND STRATEGIC VENTURES GP, LLC		
3.	Rela -	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.		ted Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(5)	No Information Filed		
				1
5.	Rela	ted Person is: (check all that apply)		
	(a)			
	• •	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		

		<ul> <li>(e) □ major security-</li> <li>(f) ▼ commodity pool</li> <li>(g) □ futures commis</li> <li>(h) □ banking or thrift</li> <li>(i) □ trust company</li> <li>(j) □ accountant or a</li> </ul>	ft institution accounting firm		
		<ul> <li>(k) lawyer or law fi</li> <li>(l) insurance comp</li> </ul>			
		(m) D pension consult			
		(n) real estate brok			
			dicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
		(p) 🗹 sponsor, genera	al partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
	6.	Do you <i>control</i> or are you	controlled by the related person?	•	
				e	<u> </u>
	7.	Are you and the <i>related p</i>	person under common control?	0	Θ
8	8.	(a) Does the <i>related per</i> <i>clients</i> ?	rson act as a qualified custodian for your clients in connection with advisory services you provide to	0	0
		overcome the presu	g or registered with the SEC and you have answered "yes," to question 8.(a) above, have you imption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are elated person?	0	o
		<ul><li>(c) If you have answere your <i>clients</i>' assets:</li></ul>	ed "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cust</i>	ody (	of
		Number and Street City:	State: _ Country: ZIP+4/Postal Code:		
		If this address is a	private residence, check this box:	Yes	No
	9.	(a) If the related persor	n is an investment adviser, is it exempt from registration?	0	
		(b) If the answer is yes,	, under what exemption?	č	Č
	10.	(a) Is the related person	n registered with a foreign financial regulatory authority ?	0	$\odot$
		(b) If the answer is yes, <i>person</i> is registered	, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela</i> .	ted	
	11.		No Information Filed		
		Do you and the related pe	No Information Filed erson share any supervised persons?	$\odot$	$^{\circ}$
	12.			•	0 0
	1. 2.	Do you and the <i>related per</i> Legal Name of <i>Related Per</i> CIF-H GP, LLC Primary Business Name o	erson share any supervised persons? erson share the same physical location? erson:	0	0
	1. 2.	Do you and the <i>related pe</i> Legal Name of <i>Related Pe</i> CIF-H GP, LLC Primary Business Name o CIF-H GP, LLC	erson share any supervised persons? erson share the same physical location? erson: of Related Person:	•	0
	1. 2.	Do you and the <i>related pe</i> Legal Name of <i>Related Pe</i> CIF-H GP, LLC Primary Business Name o CIF-H GP, LLC	erson share any supervised persons? erson share the same physical location? erson:	•	0
	1. 2.	Do you and the <i>related pe</i> Legal Name of <i>Related Pe</i> CIF-H GP, LLC Primary Business Name o CIF-H GP, LLC	erson share any supervised persons? erson share the same physical location? erson: of Related Person:	•	0
	1. 2. 3.	Do you and the <i>related per</i> Legal Name of <i>Related Per</i> CIF-H GP, LLC Primary Business Name of CIF-H GP, LLC <i>Related Person's</i> SEC File - or	erson share any supervised persons? erson share the same physical location? erson: of <i>Related Person</i> : e Number (if any) (e.g., 801-, 8-, 866-, 802-)	•	0

### IARD - All Sections [User Name: amay123, OrgID: 160006]

No Information Filed

5.	Rela	ated Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	T trust company		
	(j)	accountant or accounting firm		
	(k)			
		insurance company or agency		
	(m)	•		
	(n)			
	(0)			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	<b>W</b>	
c	Dai	in control or are you controlled by the related nerver?	Yes	NO
6.	Doy	you control or are you controlled by the related person?	$\odot$	0
_				
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	Θ
	(-)	Describe related nerves act as a qualified sustadian for your gliants in connection with advisory convisor you provide to		
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	Θ
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	~	~
	(-)	overcome the presumption that you are not operationally independent (pursuant to rule $206(4)-2(d)(5)$ ) from the	0	0
		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are		
		maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cus	tody	of
		your <i>clients</i> ' assets:		
		Number and Street 1:     Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
			۷۵۵	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
	• •		0	0
	(D)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority ?		-
10.	. ,		0	Θ
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel</i> . <i>person</i> is registered.	atea	
		No Information Filed		
11.	Do v	you and the <i>related person</i> share any <i>supervised persons</i> ?	~	~
	/	,	$\odot$	0
12.	Do v	you and the <i>related person</i> share the same physical location?	~	~
	/	,	$\odot$	0
1.	Lega	al Name of Related Person:		
	том	VNSEND GREAT LAKES AND PLAINS GP, LLC		
2.		nary Business Name of <i>Related Person</i> :		
	ION	VNSEND GREAT LAKES AND PLAINS GP, LLC		
<b>_</b>	Dala	atad Parcan's SEC File Number (if any) (a.g. 201 2 266 202)		
3.	кеіа -	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		

	or Othe	er		
4.		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	The trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(m)			
	(n) (o)	<ul> <li>real estate broker or dealer</li> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>		
	(0) (p)	<ul> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> <li>sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</li> </ul>		
	(P)		Yes	No
6.	Do v	ou control or are you controlled by the related person?	_	-
0.	20,		$\odot$	0
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	$\odot$
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	0
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	stody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$		
~	(-)		Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	$\circ$
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>resperson</i> is registered.	lated	
		No Information Filed		
		No Information Fried		
11.	Do y	rou and the <i>related person</i> share any <i>supervised persons</i> ?	o	o

1. Legal Name of Related Person:

	AON	SECURITIES LLC		
2.		ary Business Name of Related Person:		
	AON	SECURITIES LLC		
	Dala			
3.		<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 106546		
	or			
	Othe	r		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(1)			1
	(b)	CIK Number(s) (if any): No Information Filed		
		No Information Flied		
5.	Rela	ted Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)			
	(d)			
	(e)			
	• •	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(3)	futures commission merchant     banking or thrift institution		
		<ul> <li>banking or thrift institution</li> <li>trust company</li> </ul>		
		<ul> <li>accountant or accounting firm</li> </ul>		
		lawyer or law firm		
	• •	insurance company or agency		
	(m)			
	(n)	real estate broker or dealer		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	_		es	No
6.	Do y	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	0	⊙
	A.r.o. 1	ion and the related person under common control?	_	_
7.	Arey	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	~	
	(u)	clients?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	0	$\circ$
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the		
		related person and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are		
		maintained at the <i>related person</i> ?	dura	.e
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custod</i> your <i>clients'</i> assets:	uy c	"
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$		
	(-)		es	No
9.	(a)		0	⊙
	(b)	If the answer is yes, under what exemption?		
10	(2)	Is the related person registered with a foreign financial regulatory authority ?		
10.	(a) (b)			•
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relate person</i> is registered.	eu	
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?		

12. Do you and the *related person* share the same physical location?

# 00

1.	-	I Name of <i>Related Person</i> : INVESTMENTS USA INC.		
2.	Prim	ary Business Name of Related Person:		
	AON	INVESTMENTS USA INC.		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	801	- 17219		
	or			
	Othe	r		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
		105596		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.		ted Person is: (check all that apply)		
	(a)			
	• •	other investment adviser (including financial planners) registered municipal adviser		
	(c) (d)	<ul> <li>registered municipal advisor</li> <li>registered security-based swap dealer</li> </ul>		
	• •	<ul> <li>registered security-based swap dealer</li> <li>major security-based swap participant</li> </ul>		
	(e) (f)	<ul> <li>Image: security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>		
		futures commission merchant		
	(),	banking or thrift institution		
	(i)	trust company		
	(j)	<ul> <li>accountant or accounting firm</li> </ul>		
		□ lawyer or law firm		
	(K) (I)	insurance company or agency		
	(i) (m)			
	(n)	real estate broker or dealer		
	(0)	<ul> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>		
		sponsor of syndicator of inflice partnerships (of equivalent), excluding pooled investment vehicles		
	(P)		Yes	No
6.	Do y	ou control or are you controlled by the related person?	$\circ$	$\odot$
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	$\circ$
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	~	_
0.	(u)	clients?	0	O
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	0	0
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	~	~
		related person and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are		
		maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	stody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	$\odot$
·//c	rd finr	a.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG_PK=1652620		47/1

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	(b) If the answer is yes, under what exemption?		
10.	. (a) Is the related person registered with a foreign financial regulatory authority ?	0	0
	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel</i>		e
	person is registered.		
1 1	No Information Filed		
11.	. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	⊙	С
12.	. Do you and the <i>related person</i> share the same physical location?	0	C
1.	Legal Name of <i>Related Person</i> : LAKE TAHOE III GP, LLC		
2.	Primary Business Name of <i>Related Person</i> :		
2.	LAKE TAHOE III GP, LLC		
3.	<i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) -		
	or Other		
4.	Related Person's		
	(a) CRD Number (if any):		
	(b) CIK Number(s) (if any): No Information Filed		
5.	Related Person is: (check all that apply)		
	(a) 🔲 broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b) C other investment adviser (including financial planners)		
	(c)  registered municipal advisor		
	(d) registered security-based swap dealer		
	(e) major security-based swap participant		
	(f) C commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	<ul> <li>(g)</li></ul>		
	(i) Turust company		
	(j) accountant or accounting firm		
	(k) $\Box$ lawyer or law firm		
	(I) $\square$ insurance company or agency		
	(m) 🔲 pension consultant		
	(n) 🗖 real estate broker or dealer		
	(o) $\Box$ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p) 🗹 sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6.	Do you control or are you controlled by the related person?	Yes	
0.		۲	C
7.	Are you and the <i>related person</i> under common <i>control</i> ?	0	0
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	C
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	C
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cus	tody	of

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		your <i>clients</i> ' assets: Number and Street 1: City: St	Number and Street 2: tate: Country: ZIP+4/Postal Code:				
		If this address is a private	residence, check this box: $\Box$				
9.	(a)	If the <i>related person</i> is an i	investment adviser, is it exempt from registration?	Yes No			
		If the answer is yes, under		00			
10.			tered with a foreign financial regulatory authority ? e name and country, in English of each foreign financial regulatory authority with which t				
	(0)	person is registered.					
	_		No Information Filed				
11.	Do y	ou and the <i>related person</i> sl	share any <i>supervised persons</i> ?	$\odot$ $\circ$			
12.	Do y	ou and the <i>related person</i> sl	hare the same physical location?	• O			
1.		I Name of <i>Related Person</i> : GG REAL ESTATE PARTNERS	ΙΙ, ШС				
2.		ary Business Name of <i>Relate</i> SG REAL ESTATE PARTNERS					
3.	Relat -	ted Person's SEC File Numbe	er (if any) (e.g., 801-, 8-, 866-, 802-)				
	or						
	Othe	r					
4.		ted Person's CRD Number (if any):					
	(b)	CIK Number(s) (if any):	No Information Filed				
5.	<i>Relat</i> (a)	ted Person is: (check all that	it apply) pal securities dealer, or government securities broker or dealer				
	(b)		iser (including financial planners)				
	• •	registered security-bas					
	. ,	<ul> <li>major security-based s</li> <li>commodity pool operation</li> </ul>	swap participant ator or commodity trading advisor (whether registered or exempt from registration)				
	• •	futures commission me					
	• •	banking or thrift institu	ution				
	• •	trust company					
		<ul> <li>accountant or account</li> <li>lawyer or law firm</li> </ul>	ing firm				
		insurance company or	agency				
	(m)						
	(n) (o)		dealer of limited partnerships (or equivalent), excluding pooled investment vehicles				
	• •	. ,	her, managing member (or equivalent) of pooled investment vehicles				
				Yes No			
6.	Do y	ou <i>control</i> or are you <i>contro</i>	olled by the related person?	• •			
7.	Are \	/ou and the <i>related person</i> ι	under common <i>control</i> ?	0.0			
				00			

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8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	o	0		
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	C		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cust</i> your <i>clients'</i> assets:	ody	of		
		Number and Street 1:     Number and Street 2:       City:     State:     Country:     ZIP+4/Postal Code:       If this address is a private residence, check this box:				
9.	(2)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes			
5.		If the answer is yes, under what exemption?	0	С		
	(2)					
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	$^{\circ}$	c		
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela person</i> is registered.	ted			
		No Information Filed				
11.	Do y	you and the related person share any supervised persons?	$\odot$	с		
12.	Do y	you and the related person share the same physical location?	Θ	С		
1. 2. 3.	AON Prim AON <i>Rela</i> or Othe <i>Rela</i>	<i>ted Person's</i> <i>CRD</i> Number (if any): CIK Number(s) (if any):				
		No Information Filed				
5.	(a) (b) (c) (d) (e) (f)	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> <li>registered security-based swap dealer</li> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> </ul>				
	(m)	pension consultant				
	• •	real estate broker or dealer				
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles				

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	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles			
			Ye	s M	١o
6.	Do y	a control or are you controlled by the related person?	С	) (	•
7.	Are	u and the <i>related person</i> under common <i>control</i> ?	c	,	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you prov <i>lients</i> ?	ide to C		•
	(b)	f you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>elated person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that naintained at the <i>related person</i> ?	e ``	, ,	0
	(c)	f you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible your <i>clients</i> ' assets:	e for <i>custod</i>	y o	f
		Number and Street 1: Number and Street 2:			
		City: State: Country: ZIP+4/Postal Code:			
		If this address is a private residence, check this box: 🗖			
			Ye	s M	٥N
9.	(a)	f the <i>related person</i> is an investment adviser, is it exempt from registration?	C		0
	(b)	f the answer is yes, under what exemption? OREIGN ENTITY			
10.	(a)	s the related person registered with a foreign financial regulatory authority ?	G		0
	(b)	f the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which	~		
		person is registered.			_
		Name of Country/English Name of <i>Foreign Financial Regulatory Authority</i>			_
		United Kingdom - Financial Conduct Authority			
11.	Doy	and the <i>related person</i> share any <i>supervised persons</i> ?	С		0
12.	Do y	and the <i>related person</i> share the same physical location?	С	) (	•
1. 2.	TOW	Name of <i>Related Person</i> : SEND RE GLOBAL GP LIMITED y Business Name of <i>Related Person</i> : SEND RE GLOBAL GP LIMITED			
3.	Rela	<i>d Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	- or Othe				
4.		d Person's			
	(a)	CRD Number (if any):			
	(b)	CIK Number(s) (if any): No Information Filed			
5.	Rela	d Person is: (check all that apply)			
	(a)				
	(b)				
	(c)	registered municipal advisor			
	(d)				
	• •	amajor security-based swap participant			
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			

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	(g)	futures commission merchant		
	(h)	-		
	(i)	trust company		
	(j)	accountant or accounting firm		
		awyer or law firm		
		insurance company or agency		
	(m)			
	(n)			
	(0)			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	_		Yes	No
6.	Do y	you control or are you controlled by the related person?	$\odot$	0
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	$\odot$
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to		-
0.	(u)	clients?	0	Θ
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	0	o
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	~	~
		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are		
		maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cu	stody	of
		your <i>clients'</i> assets:		
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$	Vac	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	. NO
	(b)	If the answer is yes, under what exemption?	~	~
	(-)			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\circ$
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the re		
	(-)	person is registered.		
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	$\odot$	0
12.	Do y	you and the related person share the same physical location?	$\odot$	0
				_
1.	ا مم ا	al Name of <i>Related Person</i> :		
1.	5	I SECURITIES INVESTMENT MANAGEMENT INC.		
2.	Prim	hary Business Name of <i>Related Person</i> :		
		SECURITIES INVESTMENT MANAGEMENT INC.		
3.	Rela	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe	2r		
	<b>_</b> .			
4.		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(0)	No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
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	(a)	🗖 broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	Tust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(0)			
	(p)	$\square$ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	$\circ$	$\odot$
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	$\circ$
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	0	$\odot$
		clients?		
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	$\mathbf{O}$	$\mathbf{O}$
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the		
		related person and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are		
		maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cust</i> your <i>clients'</i> assets:	oay	OF
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$		
			Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	$\odot$
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	$\odot$	0
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relative	ated	
		person is registered.		
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		Canada - British Columbia Securities Commission		
		Canada - Manitoba Securities Commission		
		Canada - Ontario Securities Commission		
		Canada - Quebec, Financial Markets Authority		
11	Dov	ou and the <i>related person</i> share any <i>supervised persons</i> ?		
	D0 y		0	$\odot$
12	Dov	ay and the related percent chare the same physical location?	_	_
12.	D0 y	ou and the <i>related person</i> share the same physical location?	0	$\odot$
1.	Lega	I Name of <i>Related Person</i> :		
	-	MANAGER, LLC		
2.	Prim	ary Business Name of Related Person:		
		MANAGER, LLC		
3.	Rela	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		

	or Othe	er		
	Dala			
4.		ated Person's CRD Number (if any):		
	(-)			
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	ated Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)			
	(h) (i)	_		
	(i) (j)	<ul> <li>trust company</li> <li>accountant or accounting firm</li> </ul>		
	(I)	insurance company or agency		
	(m)			
	(n)	real estate broker or dealer		
	(0)	$\Box$ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	$\odot$	С
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\circ$	$\odot$
0	(2)	Describe related person active a qualified sustadian for your clients in connection with advisory convises you provide to	_	
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	$\odot$
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	0	0
	. ,	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	· ·	<u> </u>
		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are		
		maintained at the related person?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i>	tody	of
		your <i>clients</i> ' assets: Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	$\circ$
	(b)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority ?		-
10.	. ,		0	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel person</i> is registered.	atea	
		No Information Filed		
11.	Doy	you and the related person share any supervised persons?	$\odot$	0
			~	~
12.	Doy	you and the <i>related person</i> share the same physical location?	$\odot$	$\circ$

	том	/NSEND ALPHA MANAGER II, LLC		
2.		ary Business Name of <i>Related Person</i> : /NSEND ALPHA MANAGER II, LLC		
3.	Rela	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or Othe			
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.		ted Person is: (check all that apply)		
	(a) (b)			
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	<ul> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> </ul>		
	(g) (h)			
	(i)	T trust company		
	(j)	accountant or accounting firm		
		awyer or law firm		
	(l) (m)	<ul> <li>insurance company or agency</li> <li>pension consultant</li> </ul>		
		real estate broker or dealer		
	• •	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	_		ſes	No
6.	Do y	you control or are you controlled by the related person?	0	0
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	o
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custo</i> your <i>clients'</i> assets:	ody (	of
		Number and Street 1:     Number and Street 2:       Citrue     Country		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:	(es	No
9.	(a)	If the related person is an investment advisor is it available from registration?		0
	(b)	If the answer is yes, under what exemption?	Ĩ	$\sim$
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relate person is registered.	ted	-
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?		

12. Do you and the *related person* share the same physical location?

			~	~	
1.	-	lame of <i>Related Person</i> : SEND REF GP, LLC			
2.		y Business Name of <i>Related Person</i> : SEND REF GP, LLC			
3.	<i>Related</i> -	<i>Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	or Other				
4.		l Person's RD Number (if any):			
	(b) C	IK Number(s) (if any):			
		No Information Filed			
5.	<ul> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(d)</li> <li>(d)</li> <li>(e)</li> <li>(f)</li> <li>(g)</li> </ul>	other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant			
	(h) [ (i) [ (j) [ (k) [ (h) [ (h) [ (n) [ (n) [ (o) [ (p) ]	trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles	Yes	Na	
6.	Do you	control or are you controlled by the related person?	o ⊙	0	
7.	Are you	and the <i>related person</i> under common <i>control</i> ?	o	0	
8.	.,	oes the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>lients</i> ?	0	0	
	o' re	you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you vercome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the elated person and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	0	
	y	you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cu</i> spur <i>clients'</i> assets: Number and Street 1: Number and Street 2:	stody	of	
	C	City: State: Country: ZIP+4/Postal Code: f this address is a private residence, check this box:			
9.	(a) <sup>Tf</sup>	the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes		
э.	(a) If	מיכ דכומנכם פרוסטורוס מח ווועכסטווכות מעאוסכו, וס וג פאפוווףג ווטווו רפעוסגומנוטוו?	$\circ$	О	

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	(b)	If the answer is yes, under what exemption?	
10.	(a)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	G
		If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	-
		No Information Filed	
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	C
12.	Do y	ou and the <i>related person</i> share the same physical location?	Ċ
	-	l Name of <i>Related Person</i> : T LAKE II GENERAL PARTNER, LLC	
		ary Business Name of <i>Related Person</i> : T LAKE II GENERAL PARTNER, LLC	
3.	Rela	red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	
	- or Othe	r	
		red Person's CRD Number (if any):	
	(b)	CIK Number(s) (if any): No Information Filed	
	<ul> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(d)</li> <li>(e)</li> <li>(f)</li> <li>(g)</li> <li>(h)</li> <li>(i)</li> <li>(j)</li> <li>(k)</li> <li>(l)</li> <li>(m)</li> <li>(n)</li> <li>(o)</li> </ul>	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> <li>registered security-based swap dealer</li> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> <li>banking or thrift institution</li> <li>trust company</li> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> <li>insurance company or agency</li> <li>pension consultant</li> <li>real estate broker or dealer</li> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> <li>sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</li> </ul>	- N
6.	Do y	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	s N C
7.	Are y	rou and the <i>related person</i> under common <i>control</i> ?	C
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	G
	(b)		C

(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of

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		your <i>clients</i> ' assets	:					
		Number and Street	t 1:	Numbe	r and Street 2	2:		
		City:	State:	Country	/:	ZIP+4/Postal Code:		
		If this address is a	private residence, check t	his box:			Vor	s No
9.	(a)	If the <i>related perso</i>	n is an investment adviser	r. is it exempt from	registration?	>		
5.			s, under what exemption?	,	i egisti ationi		o	0
	(0)	If the answer is yes						
10.	(a)	Is the related perso	on registered with a foreigr	n financial regulato	ry authority ?	?	0	$\odot$
	(b)	If the answer is yes	s, list the name and countr	ry, in English of ead	ch <i>foreign fina</i>	ancial regulatory authority with which th	ne <i>related</i>	- <u>-</u>
		person is registered	i.					
					mation Filed			
11.	Do y	ou and the <i>related p</i>	person share any supervise	ed persons?			$\odot$	0
12.	Do y	ou and the <i>related p</i>	<i>person</i> share the same phy	vsical location?			©	0
1.		I Name of <i>Related Pe</i> NSEND LAKE CONST						
2.	Prima	ary Business Name o	of Related Person:					
	TOW	NSEND LAKE CONST	TANCE GP, LTD.					
3.	Relat	ted Person's SEC File	e Number (if any) (e.g., 80	)1-, 8-, 866-, 802-	)			
	-			, , , , , , , , , , , , , , , , , , , ,	,			
	or							
	Othe	r						
4	Dolot	ted Person's						
4.		CRD Number (if any	w).					
	(u)		, , . , , .					
	(b)	CIK Number(s) (if a	any):					
				No Inforr	nation Filed			
5.	Relat	ted Person is: (check	< all that apply)					
	(a)	broker-dealer,	municipal securities dealer	r, or government s	ecurities brok	ker or dealer		
	(b)	other investme	ent adviser (including finar	ncial planners)				
	(c)	registered mur	nicipal advisor					
	(d)	registered secu	urity-based swap dealer					
	(e)	major security	-based swap participant					
	(f)	commodity poo	ol operator or commodity t	trading advisor (wl	nether registe	ered or exempt from registration)		
	(g)	futures commis	ssion merchant					
	(h)	banking or thri	ift institution					
	(i)	trust company						
	(j)	accountant or	accounting firm					
	(k)	lawyer or law f	irm					
	(I)	insurance com	pany or agency					
	(m)	pension consul	ltant					
	(n)	real estate bro	ker or dealer					
	• •		•			pooled investment vehicles		
	(p)	Sponsor, gener	al partner, managing mem	nber (or equivalent	) of pooled inv	ivestment vehicles		
c	D-	ou cont1	u controlled hubble states	l porcor 2			Yes	5 No
6.	Do y	ou <i>control</i> or are you	u <i>controlled</i> by the <i>related</i>	person?			$\odot$	0
-		and the state of		(D				
7.	Are y	ou and the <i>related</i> p	<i>person</i> under common <i>con</i>	itrol?			0	$\odot$

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8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	C
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	o	С
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	tody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	
	(b)	If the answer is yes, under what exemption?	· ·	· `
	(-)			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\overline{\mathbf{O}}$
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relationship register ad	ated	~
		person is registered. No Information Filed		
11.	Do \	you and the <i>related person</i> share any <i>supervised persons</i> ?	~	_
	20,		$\odot$	С
12.	Do y	you and the <i>related person</i> share the same physical location?	$oldsymbol{\circ}$	С
<ol> <li>2.</li> <li>3.</li> <li>4.</li> </ol>	PGO <i>Rela</i> or Othe <i>Rela</i> (a)	hary Business Name of <i>Related Person</i> : DF MANAGER I, LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ated Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed		
-	Dolo			
5.	(a)	Ited Person is: (check all that apply) Interpretation broker-dealer, municipal securities dealer, or government securities broker or dealer		
	. ,	<ul> <li>other investment adviser (including financial planners)</li> </ul>		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
		banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
		lawyer or law firm		
	(I) (m)	insurance company or agency		
	(m) (n)	<ul> <li>pension consultant</li> <li>real estate broker or dealer</li> </ul>		
	(n) (o)	<ul> <li>real estate broker or dealer</li> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>		
	(0)			

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	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	Ν
6.	Do y	ou control or are you controlled by the related person?	$\odot$	C
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	G
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	c
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cust</i> your <i>clients'</i> assets:	ody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$	Yes	N
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	
	(b)	If the answer is yes, under what exemption?	Č	Č
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	$^{\circ}$	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela</i>	ited	
		person is registered. No Information Filed		
11	Do γ	ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	C
			~	~
1.		I Name of <i>Related Person</i> :		
	LAKE	E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
2.		ary Business Name of <i>Related Person</i> : E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
3.	Rela	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or Othe	r .		
	othe			
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
		No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)	, , , , ,		
	(b)			
		registered municipal advisor		
	(d)			
	(e) (f)			
	(f) (g)	<ul> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> </ul>		
	(g) (h)			
		trust company		

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum = \&viewChanges = N\&FLNG_PK = 1652620$ 

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					i.
		<ul> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> </ul>			
	(k) (l)	<ul> <li>lawyer or law firm</li> <li>insurance company or agency</li> </ul>			
	(m)				
	(n)	real estate broker or dealer			
	(0)	$\square$ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles			
	_		Yes	No	
6.	Do y	you control or are you controlled by the related person?	$\odot$	0	
7.	Δre	you and the <i>related person</i> under common <i>control</i> ?	~	~	
	7110		0	$\odot$	
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	0	$\odot$	
	(b)	<i>clients</i> ? If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	~	~	
	(6)	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	o	o	
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i>	tody	of	
		your <i>clients</i> ' assets:			
		Number and Street 1:     Number and Street 2:			
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:			
			Yes	No	
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	0	
	(b)	If the answer is yes, under what exemption?	č	č	
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\odot$	
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rel	ated		
		person is registered. No Information Filed			
11.	Do y	you and the related person share any supervised persons?	0	$\odot$	
			<sup>C</sup>	e	
12.	Do y	you and the related person share the same physical location?	$\circ$	$\odot$	
					İ
1.		al Name of <i>Related Person</i> :			
	THE	KEY WEST SAXON GROUP, LLC			
2.	Prim	hary Business Name of <i>Related Person</i> :			
2.		KEY WEST SAXON GROUP, LLC			
3.	Rela -	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	or				
	Othe				
4.	Rela	ted Person's			
		CRD Number (if any):			
	(h)	CIV Number(c) (if any)			1
	(b)	CIK Number(s) (if any): No Information Filed			
					I
5.		ted Person is: (check all that apply)			
	(a)				
	• •	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> </ul>			
	(-)				

		(d) (e) (f)			
			<ul><li>futures commission merchant</li><li>banking or thrift institution</li></ul>		
		• •	trust company		
			<ul> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> </ul>		
			insurance company or agency		
		(m)	·		
		(n)			
		(o) (p)	<ul> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> <li>sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</li> </ul>		
		(P)		Yes	No
	6.	Do y	rou control or are you controlled by the related person?	0	o
	7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	0
	8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	Θ
		(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
		(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custa</i> your <i>clients'</i> assets:	ody	of
			Number and Street 1:     Number and Street 2:       City:     State:     Country:     ZIP+4/Postal Code:		
			If this address is a private residence, check this box: $\Box$		
				Yes	No
	9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	0
		(b)	If the answer is yes, under what exemption?		
	10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\odot$
		(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela person</i> is registered.	ted	~
			No Information Filed		
	11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	Θ	o
	12.	Do y	rou and the related person share the same physical location?	0	0
	1.		Il Name of <i>Related Person</i> : TOWNSEND GROUP LLC		
	2.		ary Business Name of <i>Related Person</i> :		
	3.		TOWNSEND GROUP LLC		
		Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
Ш		<i>Rela</i> - or Othe	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	4.	- or Othe <i>Rela</i>	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ted Person's		
	4.	- or Othe <i>Rela</i>	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er		

### IARD - All Sections [User Name: amay123, OrgID: 160006]

No Information Filed

5.	Rela	ited Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	$\square$ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	🗖 futures commission merchant		
	(h)	banking or thrift institution		
	(i)	T trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(0)	$\square$ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	$\odot$	o
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	$\odot$
			~	e
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	0
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i>	stody	of
	(0)	your clients' assets:	nouy	01
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:		
			Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	$\odot$
	(b)	If the answer is yes, under what exemption?	~	~
	(2)			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	~	~
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel</i>	O Jatod	$\odot$
	(0)	person is registered.	aleu	
		No Information Filed		
11.	Do \	you and the related person share any supervised persons?	~	~
	50,		$\odot$	О
12.	Do y	you and the <i>related person</i> share the same physical location?	o	0
1.		al Name of <i>Related Person</i> : /NSEND OPPORTUNITY ZONE FUND GP, LLC		
<b>_</b> _	Destant	name Rusinger Name of Related Persons		
2.		nary Business Name of <i>Related Person</i> : /NSEND OPPORTUNITY ZONE FUND GP, LLC		
	101			
3.	Rola	nted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			

	or Othe	er		
4.		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	• •	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	trust company		
	(j)	<ul> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> </ul>		
	(k)			
	(l) (m)			
	(m)	real estate broker or dealer		
	. ,	<ul> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>		
	(e) (p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(P)		Yes	No
6.	Do y	you control or are you controlled by the related person?	$\odot$	0
			e	· ·
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	$\odot$
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	$\odot$
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	stody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$		
0	(-)	If the related person is an investment edulate is it assess from a sisterily 2	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	$\odot$
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\odot$
	(1.)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the real	lated	
	(b)			
	(D)	person is registered. No Information Filed		
		person is registered.	©	0
11.	Do y	person is registered. No Information Filed	•	0

	LAKE TAHOE IV GP, LLC					
2.	Primary Business Name of <i>Related Person</i> : LAKE TAHOE IV GP, LLC					
3.	<i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)					
	-					
	or Other					
4.	Related Person's (a) CRD Number (if any):					
	(b) CIK Number(s) (if any): No Information Filed					
5.	Related Person is: (check all that apply)         (a)       broker-dealer, municipal securities dealer, or government securities broker or dealer         (b)       other investment adviser (including financial planners)         (c)       registered municipal advisor         (d)       registered security-based swap dealer         (e)       major security-based swap participant         (f)       commodity pool operator or commodity trading advisor (whether registered or exempt from registration)         (g)       futures commission merchant         (h)       banking or thrift institution         (ii)       trust company         (j)       accountant or accounting firm         (k)       lawyer or law firm         (l)       insurance company or agency         (m)       pension consultant         (n)       real estate broker or dealer         (o)       sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles					
	<ul> <li>(o) L sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> <li>(p)</li></ul>					
		Yes	No			
6.	Do you control or are you controlled by the related person?	$\odot$	0			
7.	Are you and the <i>related person</i> under common <i>control</i> ?	0	o			
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide <i>clients</i> ?	to O	o			
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?		o			
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for your <i>clients'</i> assets:	custody o	of			
	Number and Street 1:Number and Street 2:City:State:Country:ZIP+4/Postal Code:If this address is a private residence, check this box:	Yes	No			
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	_	0			
	(b) If the answer is yes, under what exemption?	~~				
10.	(a) Is the related person registered with a foreign financial regulatory authority ?	0	o			
	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>person</i> is registered.	e related				
	No Information Filed					
11.	Do you and the <i>related person</i> share any <i>supervised persons</i> ?					

12. Do you and the *related person* share the same physical location?

## $\odot$ $\circ$

					_	
1.	-	l Name of <i>Related Person</i> : NSEND GROUP ASIA LTD.				
2.	Primary Business Name of <i>Related Person</i> : TOWNSEND GROUP ASIA LTD.					
3.	Relai -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)				
	or Othe	r				
4.		ted Person's CRD Number (if any):				
	(b)	CIK Number(s) (if any): No Information Filed				
5.	<ul> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(d)</li> <li>(e)</li> <li>(f)</li> <li>(g)</li> <li>(h)</li> <li>(i)</li> <li>(j)</li> <li>(k)</li> </ul>	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> <li>registered security-based swap dealer</li> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> <li>banking or thrift institution</li> <li>trust company</li> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> <li>insurance company or agency</li> </ul>	Yes			
6.	Do y	ou control or are you controlled by the related person?	⊙	0		
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	$\odot$		
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	$\odot$		
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cu</i> your <i>clients'</i> assets:	stody	of		
		Number and Street 1:     Number and Street 2:       City:     State:     Country:     ZIP+4/Postal Code:       If this address is a private residence, check this box:				
			Yes	No	>	
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\odot$	О		

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	(b)	If the answer is yes, under what exemption? FOREIGN ENTITY		
10	. (a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relation	ated	~
		person is registered. No Information Filed		
11	Do γ	you and the related person share any supervised persons?	~	~
11	,		$\odot$	0
12	. Do y	you and the <i>related person</i> share the same physical location?	©	0
1.		al Name of <i>Related Person</i> : CORE PLUS INVESTMENTS , LLC		
2.		ary Business Name of <i>Related Person</i> : CORE PLUS INVESTMENTS , LLC		
3.	Rela -	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe			
4.		<i>ted Person's</i> <i>CRD</i> Number (if any):		
	(b)	CIK Number(s) (if any):		
	(-)	No Information Filed		
5.	<i>Rela</i> (a) (b)			
		registered municipal advisor		
	(d)	_		
	(e) (f)	<ul> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>		
	(g)	□ futures commission merchant		
	(h)	banking or thrift institution		
	(i)	T trust company		
	(j) (k)	<ul> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> </ul>		
	(K) (I)	insurance company or agency		
	(m)			
	(n)	real estate broker or dealer		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Var	No
6.	Do γ	you control or are you controlled by the related person?	-	-
	_		$\odot$	0
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	۲
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?		•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are	0	0

maintained at the *related person*?

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	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> your <i>clients'</i> assets:	y	o
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:  Yee	~	
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
	(b)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority ?		
		If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related</i>	) d	
	(2)	person is registered.		
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	)	
1 7	Davi	and the related nerves the same physical leastion?		
12.	Doy	ou and the <i>related person</i> share the same physical location?	)	
	-	l Name of <i>Related Person</i> : IV KOREA FEEDER GENERAL PARTNER, LLC		
	OL			
2.	Prim	ary Business Name of Related Person:		
	GPE	IV KOREA FEEDER GENERAL PARTNER, LLC		
	D . / .			
3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	r		
		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(0)	No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
		registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	• •	banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(l) (m)	insurance company or agency		
	(m) (n)	<ul> <li>pension consultant</li> <li>real estate broker or dealer</li> </ul>		
	(II) (0)	<ul> <li>real estate broker of dealer</li> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>		
	(0) (p)	<ul> <li>sponsor of syndrator of infinited partners lips (of equivalent), excluding pooled investment vehicles</li> <li>sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</li> </ul>		
	(r-7	Yes	s	
6.	Do y	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	)	
7	A = 0	you and the <i>related person</i> under common <i>control</i> ?		
7.	Are	You and the related person under common control?		

8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	$\odot$
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cust</i> your <i>clients'</i> assets:	tody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	$\circ$
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	~	~
	• •	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela</i>	ated.	Θ
	(2)	person is registered.		
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	0
			~	~
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	0
			~	Č
1.		I Name of <i>Related Person</i> :		
	TG V	OLTESSO GP S.A.R.L.		
	<b>.</b> .			
2.		ary Business Name of <i>Related Person</i> :		
	IGV	OLTESSO GP S.A.R.L.		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe	r		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)			
	(u) (b)			
		registered municipal advisor		
		registered security-based swap dealer		
	• •	major security-based swap participant		
	(c) (f)	<ul> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>		
	.,	□ futures commission merchant		
	(3)	banking or thrift institution		
	(i)	trust company		
	.,	<ul> <li>accountant or accounting firm</li> </ul>		
	,	lawyer or law firm		
		insurance company or agency		
	(m)			
		real estate broker or dealer		
11				

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	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	_		s	No
6.	Do	you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	)	0
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	,	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	5	0
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	,	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custod</i> your <i>clients'</i> assets:	ly c	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$	~	No
9.	(a)	If the related person is an investment educer is it events from resistantion?		_
			2	Θ
	(D)	If the answer is yes, under what exemption?		
10	. (a)	Is the related person registered with a foreign financial regulatory authority ?		$\odot$
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related	d	•
	. ,	person is registered.		
		No Information Filed		
11	. Do	you and the <i>related person</i> share any <i>supervised persons</i> ?	5	o
12	. Do	you and the <i>related person</i> share the same physical location?	5	С
1.	Lea	al Name of <i>Related Person</i> :		
	-	N SOLUTIONS UK LIMITED		
2.		nary Business Name of <i>Related Person</i> :		
	IOA	N SOLUTIONS UK LIMITED		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Oth	er		
4.		ated Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.		ated Person is: (check all that apply)		
	• • •	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)			
	(c) (d)	<ul> <li>registered municipal advisor</li> <li>registered security-based swap dealer</li> </ul>		
	(u) (e)	<ul> <li>Tegistered security-based swap dealer</li> <li>major security-based swap participant</li> </ul>		
	(C) (f)	<ul> <li>Image security based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>		
	(g)	<ul> <li>☐ futures commission merchant</li> </ul>		
	(h)	banking or thrift institution		
ttpo-//c	ard fin	-	7	'0/1 <i>i</i>

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=\&viewChanges=N\&FLNG_PK=1652620$ 

	(j) (k) (l)	<ul> <li>trust company</li> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> <li>insurance company or agency</li> </ul>		
	(m) (n) (o) (p)	real estate broker or dealer	Yes	No
6.	Do y	ou control or are you controlled by the related person?	0	©
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	o	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	o	$\odot$
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients</i> ' assets: Number and Street 1: Number and Street 2:	stody	of
		City:State:Country:ZIP+4/Postal Code:If this address is a private residence, check this box:		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes ⓒ	No C
	(b)	If the answer is yes, under what exemption? FOREIGN ENTITY		
10.	(a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel person</i> is registered.	<b>⊙</b> lated	0
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		United Kingdom - Financial Conduct Authority		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	Θ
1.		I Name of <i>Related Person</i> : NSEND ALPHA MANAGER III, L.P.		
2.		ary Business Name of <i>Related Person:</i> NSEND ALPHA MANAGER III, L.P.		
3.	Relai -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	ır		
4.	<i>Rela</i> i (a)	ted Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		

5.	Rela	ted Person is: (check all that apply)		
	(a)	$\square$ broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	T trust company		
	(j)	accountant or accounting firm		
	(k)	🔲 lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)			
	(0)			
		sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(1)		Yes	No
6.	Do v	you control or are you controlled by the related person?		
0.	50,		$\odot$	О
	•			
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\circ$	$\odot$
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	$\circ$	$\odot$
		clients?		
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	$\circ$	$\mathbf{C}$
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the		
		related person and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are		
		maintained at the <i>related person</i> ?		_
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i>	stody	of
		your <i>clients</i> ' assets:		
		Number and Street 1:     Number and Street 2:       Situ     Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
			Yes	No
	$(\mathbf{a})$	If the valated person is an investment advisor is it evenue from registration?	res	NO
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	О
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	$\circ$	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the real	lated	
		person is registered.		
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	$\odot$	0
			~	~
12.	Do v	you and the related person share the same physical location?	~	~
	20,		O	O
1	Leas	al Name of Related Person:		
		HEWITT INC.		
2.	Prim	ary Business Name of <i>Related Person</i> :		
Ζ.		HEWITT INC.		
	7.011			
3.	Rola	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
٦.	-	cca + crosses = 5 cc + inc +		
	or			
	Othe	er		
	Stife	··		

	2:50		IARD - All Sections [User Name: amay123, OrgID: 160006]		
4.	Rela	ted Person'	's		
	(a)	CRD Numb	ber (if any):		
	(b)	CIK Numb	per(s) (if any):		
			No Information Filed		
-	Dele	tad Davaaa			
5.	(a)		is: (check all that apply) er-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)		r investment adviser (including financial planners)		
	(c)		tered municipal advisor		
	(d)		tered security-based swap dealer		
	(e)	_	r security-based swap participant		
	(f)	-	nodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	🗖 future	es commission merchant		
	(h)		ing or thrift institution		
	(i)	🗖 trust	company		
	(j)	🗖 accou	untant or accounting firm		
	(k)	🗖 lawye	er or law firm		
	(I)	🗖 insura	ance company or agency		
	(m)	🔽 pensi	ion consultant		
	(n)	🗖 real e	estate broker or dealer		
	(0)	spons	sor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(0)				
	(b) (p)	spons	sor, general partner, managing member (or equivalent) of pooled investment vehicles		
~	(p)	•		Yes	; No
6.	(p)	•	sor, general partner, managing member (or equivalent) of pooled investment vehicles or are you <i>controlled</i> by the <i>related person</i> ?		s Na ©
6. 7.	(p) Do y	ou control o		0	
	(p) Do y	you <i>control</i> o	or are you <i>controlled</i> by the <i>related person</i> ?	0 ©	O
7.	(p) Do y Are	you <i>control</i> of you and the Does the <i>r</i> <i>clients</i> ? If you are overcome <i>related pe</i>	or are you <i>controlled</i> by the <i>related person</i> ? e <i>related person</i> under common <i>control</i> ? <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>erson</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are	0 © 0	© 0
7.	(p) Do y Are (a)	you and the Does the r clients? If you are overcome related pe maintainee If you hav	or are you <i>controlled</i> by the <i>related person</i> ? e <i>related person</i> under common <i>control</i> ? <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>erson</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are ad at the <i>related person</i> ? <i>re</i> answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>c</i>	0 0 0	0 0 0
7.	(p) Do y Are (a) (b)	you and the Does the r clients? If you are overcome related pe maintained If you hav your client	or are you <i>controlled</i> by the <i>related person</i> ? <i>e related person</i> under common <i>control</i> ? <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>erson</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are ad at the <i>related person</i> ? <i>re</i> answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>c</i> <i>ts'</i> assets:	0 0 0	0 0 0
7.	(p) Do y Are (a) (b)	you and the Does the r clients? If you are overcome related pe maintained If you hav your client	or are you <i>controlled</i> by the <i>related person</i> ? <i>e related person</i> under common <i>control</i> ? <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>erson</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are and at the <i>related person</i> ? <i>re</i> answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>c</i> <i>ts</i> ' assets: and Street 1: Number and Street 2:	0 0 0	0 0 0
7.	(p) Do y Are (a) (b)	you and the Does the r clients? If you are overcome related pe maintained If you hav your client Number a City:	or are you <i>controlled</i> by the <i>related person</i> ? <i>e related person</i> under common <i>control</i> ? <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>erson</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are ad at the <i>related person</i> ? <i>re</i> answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>c</i> <i>ts'</i> assets:	0 0 0	0 0 0
7.	(p) Do y Are (a) (b)	you and the Does the r clients? If you are overcome related pe maintained If you hav your client Number a City:	or are you <i>controlled</i> by the <i>related person</i> ? e <i>related person</i> under common <i>control</i> ? related person act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the erson and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are ed at the <i>related person</i> ? re answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>c</i> ts' assets: and Street 1: State: Lumber and Street 2: State: Lumber and Street 2: Lumber and Street 2: State: Lumber and Street 2: Lumber and Street 3: Lumber	C C C Uustody	© © © ¢of
7.	(p) Do ) Are (a) (b) (c)	you and the Does the r clients? If you are overcome related pe maintaine If you hav your client Number a City: If this add	or are you <i>controlled</i> by the <i>related person</i> ? e <i>related person</i> under common <i>control</i> ? related person act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the erson and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are ed at the <i>related person</i> ? re answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>c</i> ts' assets: and Street 1: State: Lumber and Street 2: State: Lumber and Street 2: Lumber and Street 2: State: Lumber and Street 2: Lumber and Street 3: Lumber	C C C U ustody	0 0 0
7.	<ul> <li>(p)</li> <li>Do y</li> <li>Are</li> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(a)</li> </ul>	you and the Does the r clients? If you are overcome related pe maintained If you hav your client Number a City: If this add	or are you <i>controlled</i> by the <i>related person</i> ? e <i>related person</i> under common <i>control</i> ? related person act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the erson and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are id at the <i>related person</i> ? re answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>c</i> ts' assets: and Street 1: Number and Street 2: State: Country: ZIP+4/Postal Code: dress is a private residence, check this box: ted person is an investment adviser, is it exempt from registration? wer is yes, under what exemption?	C C C C Uustody Yess	© © © ✓ of
7. 8. 9.	<ul> <li>(p)</li> <li>Do y</li> <li>Are</li> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(a)</li> <li>(b)</li> </ul>	you and the poes the r clients? If you are overcome related pe maintainee If you hav your client Number a City: If this add If the relat If the answ FOREIGN	or are you <i>controlled</i> by the <i>related person</i> ? e <i>related person</i> under common <i>control</i> ? related person act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the erson and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are id at the <i>related person</i> ? re answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>c</i> ts' assets: and Street 1: Number and Street 2: State: Country: ZIP+4/Postal Code: dress is a private residence, check this box: ted person is an investment adviser, is it exempt from registration? wer is yes, under what exemption?	C C C C Uustody Yess	© © © ✓ of
7. 8. 9.	<ul> <li>(p)</li> <li>Do y</li> <li>Are</li> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(a)</li> <li>(b)</li> <li>(a)</li> <li>(a)</li> <li>(a)</li> <li>(a)</li> </ul>	you and the poes the <i>r</i> <i>clients</i> ? If you are overcome <i>related pe</i> maintained If you hav your <i>client</i> Number a City: If this add If the <i>rela</i> If the answ FOREIGN Is the <i>rela</i>	or are you <i>controlled</i> by the <i>related person</i> ? e <i>related person</i> under common <i>control</i> ? related person act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the erson and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are ad at the <i>related person</i> ? re answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>c</i> <i>ts'</i> assets: and Street 1: Number and Street 2: State: Country: ZIP+4/Postal Code: dress is a private residence, check this box: <i>ted person</i> is an investment adviser, is it exempt from registration? wer is yes, under what exemption? ENTITY	C C C Uustody Yes C	© © © ? of © © ©
7. 8. 9.	<ul> <li>(p)</li> <li>Do y</li> <li>Are</li> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(a)</li> <li>(b)</li> <li>(a)</li> <li>(a)</li> <li>(a)</li> <li>(a)</li> </ul>	you and the poes the <i>r</i> <i>clients</i> ? If you are overcome <i>related pe</i> maintained If you hav your <i>client</i> Number a City: If this add If the <i>rela</i> If the answ FOREIGN Is the <i>rela</i>	or are you <i>controlled</i> by the <i>related person</i> ? e <i>related person</i> under common <i>control</i> ? related person act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the erson and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are d at the <i>related person</i> ? re answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>c</i> ts' assets: and Street 1: Number and Street 2: State: Country: ZIP+4/Postal Code: dress is a private residence, check this box: ted person is an investment adviser, is it exempt from registration? wer is yes, under what exemption? ENTITY ated person registered with a foreign financial regulatory authority ? wer is yes, list the name and country, in English of each foreign financial regulatory authority with which the r	C C C Uustody Yes C	© © C C C C C C C C C C C C C C C C C C
7. 8. 9.	<ul> <li>(p)</li> <li>Do )</li> <li>Are</li> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(a)</li> <li>(b)</li> <li>(a)</li> <li>(b)</li> </ul>	you and the poes the r clients? If you are overcome related pe maintained If you hav your client Number a City: If this add If the relat If the answ FOREIGN Is the relat If the answ person is n	or are you <i>controlled</i> by the <i>related person</i> ? e <i>related person</i> under common <i>control</i> ? related person act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>erson</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are d at the <i>related person</i> ? re answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>c</i> ts' assets: and Street 1: Number and Street 2: State: Country: ZIP+4/Postal Code: dress is a private residence, check this box: ted <i>person</i> is an investment adviser, is it exempt from registration? wer is yes, under what exemption? ENTITY ated <i>person</i> registered with a <i>foreign financial regulatory authority</i> with which the <i>r</i> registered.	C C C C Uustody Yes © C C C C C C C C C C C C C C C C C C	• • • • • • •

1. Legal Name of *Related Person*: KVT GP, LLC

2.	Primary Business Name of <i>Related Person</i> : KVT GP, LLC			
_				
3.	<i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) -			
	or			
	Other			
4.	Related Person's			
	(a) CRD Number (if any):			
	(b) CIK Number(s) (if any):			
	No Information Filed			
5.	Related Person is: (check all that apply)			
	(a) broker-dealer, municipal securities dealer, or government securities broker or dealer			
	<ul> <li>(b)  dther investment adviser (including financial planners)</li> <li>(c)  registered municipal advisor</li> </ul>			
	(d)  registered security-based swap dealer			
	(e)  major security-based swap participant			
	<ul> <li>(f)</li></ul>			
	(h) D banking or thrift institution			
	(i) Turst company			
	<ul> <li>(j) □ accountant or accounting firm</li> <li>(k) □ lawyer or law firm</li> </ul>			
	(i) insurance company or agency			
	(m) pension consultant			
	(n) real estate broker or dealer			
	<ul> <li>(o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> <li>(p) Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</li> </ul>			
		Yes	5 N	o
6.	Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	$\odot$	C	
7.	Are you and the <i>related person</i> under common <i>control</i> ?	o	6	0
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	6	0
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	Ċ	5
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for a your <i>clients'</i> assets:	ustody	′ of	
	Number and Street 1:     Number and Street 2:       Citrue     Country:			
	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:			
		Yes	; N	0
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	C	2
	(b) If the answer is yes, under what exemption?			
10.	(a) Is the related person registered with a foreign financial regulatory authority?	0	G	
	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the	related		
	person is registered. No Information Filed			
11.	Do you and the <i>related person</i> share any <i>supervised persons</i> ?	o	c	5

12. Do you and the *related person* share the same physical location?

1.	Legal Name of <i>Related Person</i> : KKT GP, LLC		
2.	Primary Business Name of <i>Related Person</i> : KKT GP, LLC		
3.	<i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's (a) CRD Number (if any):		
	(b) CIK Number(s) (if any): No Information Filed		
5.	Related Person is: (check all that apply)         (a)       broker-dealer, municipal securities dealer, or government securities broker or dealer         (b)       other investment adviser (including financial planners)         (c)       registered municipal advisor         (d)       registered municipal advisor         (d)       registered security-based swap dealer         (e)       major security-based swap participant         (f)       Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)         (g)       futures commission merchant         (h)       banking or thrift institution         (i)       trust company         (j)       accountant or accounting firm         (k)       lawyer or law firm         (l)       insurance company or agency         (m)       pension consultant         (n)       real estate broker or dealer         (o)       sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles         (p)       sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
7.	Are you and the <i>related person</i> under common <i>control</i> ?	0	o
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	õ	_
	<ul> <li>(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i>' funds or securities that are maintained at the <i>related person</i>?</li> <li>(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i>'s office responsible for <i>cus</i> your <i>clients</i>' assets: <ul> <li>Number and Street 1:</li> <li>City:</li> <li>State:</li> <li>Country:</li> <li>ZIP+4/Postal Code:</li> </ul> </li> </ul>	C Stody	⊙ of
		Yes	No
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	$\odot$
	(b) If the answer is yes, under what exemption?		

/22,	50 PM IARD - All Sections [User Name: amay123, OrgID: 160006]		
10.	a) Is the related person registered with a foreign financial regulatory authority ?	o	
	b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relation person</i> is registered.	tea	1
	No Information Filed		
11.	o you and the <i>related person</i> share any <i>supervised persons</i> ?	Θ	
12.	o you and the <i>related person</i> share the same physical location?	•	
1.	egal Name of <i>Related Person</i> : JM FUND GP LLC		
2.	rimary Business Name of <i>Related Person</i> : JM FUND GP LLC		
3.	elated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	r ther		
4.	elated Person's		
	a) CRD Number (if any):		
	o) CIK Number(s) (if any):		
	No Information Filed		
	c)       registered municipal advisor         d)       registered security-based swap dealer         major security-based swap participant         commodity pool operator or commodity trading advisor (whether registered or exempt from registration)         g)       futures commission merchant         h)       banking or thrift institution         i)       trust company         i)       accountant or accounting firm         k)       lawyer or law firm         i)       insurance company or agency         m)       pension consultant         real estate broker or dealer         sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles         sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Ye	5
6.	o you control or are you controlled by the related person?	o ⊡	
	re you and the <i>related person</i> under common <i>control</i> ?	o	
7.			
	a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	
		0	
7. 8.	<ul> <li>clients?</li> <li>o) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are</li> </ul>	0	

5/18/22,	, 2:50 PM IARD - All Sections [User Name: amay123, OrgID: 160006]				
		City:State:Country:ZIP+4/Postal Code:If this address is a private residence, check this box:			
9.	(a)	If the related percent is an investment advisor is it events from registration?	es O	No ©	
	(b)	If the answer is yes, under what exemption?			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	$\odot$	
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relate person</i> is registered.	ed		
		No Information Filed			
11.	Do y	you and the <i>related person</i> share any <i>supervised persons</i> ?	•	o	
12.	Do y	you and the <i>related person</i> share the same physical location?	•	0	
1.	-	al Name of <i>Related Person</i> : N SQUARE MANAGER I, LLC			
2.		hary Business Name of <i>Related Person</i> : N SQUARE MANAGER I, LLC			
3.	Rela -	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	or Othe	er			
4.		ted Person's CRD Number (if any):			
	(b)	CIK Number(s) (if any): No Information Filed			
5.	Rela	<i>ted Person</i> is: (check all that apply)			
	. ,	<ul> <li>broker-dealer, municipal securities dealer, or government securities broker or dealer</li> <li>other investment adviser (including financial planners)</li> </ul>			
	(c)	registered municipal advisor			
		registered security-based swap dealer			
		major security-based swap participant			
	(f) (g)	<ul> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> </ul>			
	(9) (h)	banking or thrift institution			
	(i)	Trust company			
	(j)	accountant or accounting firm			
	(k)	awyer or law firm			
	(I) (m)	insurance company or agency			
	(m) (n)				
	. ,	<ul> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles			
6.	Do y	you control or are you controlled by the related person?	_	No O	
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	$oldsymbol{\circ}$	
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	o	

2:50	50 PM IARD - All Sections [User Name: amay123, OrgID: 160006]			
(b)	overcome the presumption that you	are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	0	o
(c)	If you have answered "yes" to quest your <i>clients'</i> assets:	tion 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i>	tody	′ of
	Number and Street 1:	Number and Street 2:		
	City: State:	Country: ZIP+4/Postal Code:		
	If this address is a private residence	e, check this box: 🗖		
			Yes	5 No
(a)	If the <i>related person</i> is an investme	nt adviser, is it exempt from registration?	$\circ$	0
(b)	If the answer is yes, under what exe	emption?		
(a)	Is the related person registered with	n a foreign financial regulatory authority ?	0	o
(b)	If the answer is yes, list the name a <i>person</i> is registered.	nd country, in English of each foreign financial regulatory authority with which the rel	ated	I
		No Information Filed		
Do y	you and the <i>related person</i> share any	supervised persons?	$oldsymbol{\circ}$	0
Do y	you and the <i>related person</i> share the	same physical location?	©	0
	<ul> <li>(b)</li> <li>(c)</li> <li>(a)</li> <li>(b)</li> <li>(b)</li> <li>(b)</li> </ul>	<ul> <li>overcome the presumption that you related person and thus are not req maintained at the related person?</li> <li>(c) If you have answered "yes" to quest your clients' assets: Number and Street 1: City: State: If this address is a private residence</li> <li>(a) If the related person is an investmet</li> <li>(b) If the answer is yes, under what exercises</li> <li>(a) Is the related person registered with</li> <li>(b) If the answer is yes, list the name a person is registered.</li> <li>Do you and the related person share any</li> </ul>	<ul> <li>(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i>?</li> <li>(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets: <ul> <li>Number and Street 1:</li> <li>Number and Street 2:</li> <li>City:</li> <li>State:</li> <li>Country:</li> <li>ZIP+4/Postal Code:</li> </ul> </li> <li>(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?</li> <li>(b) If the answer is yes, under what exemption?</li> <li>(a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i>?</li> <li>(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel person</i> is registered.</li> </ul>	<ul> <li>(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?</li> <li>(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody your clients' assets: <ul> <li>Number and Street 1:</li> <li>Number and Street 2:</li> <li>City:</li> <li>State:</li> <li>Country:</li> <li>ZIP+4/Postal Code:</li> <li>If the related person is an investment adviser, is it exempt from registration?</li> </ul> </li> <li>(a) If the related person registered with a foreign financial regulatory authority?</li> <li>(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.</li> <li>No Information Filed</li> </ul>

	Yes No
B. Are you an adviser to any private fund?	οo

Item 7 Private Fund Reporting

If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.

In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designation in place of the fund's name.

		1     2     3     >>     Funds per Page:     15     V     Total Funds: 37	
. P	RIVATE FUND		
nfo	ormation About the Private Fund		
L.	(a) Name of the <i>private fund</i> :		
	CAYUGA LAKE FUND, L.P.		
	(b) <i>Private fund</i> identification num (include the "805-" prefix also		
	805-4163269793	, ,	
2.	Under the laws of what state or co	untry is the <i>private fund</i> organized:	
	State:	Country:	
	Delaware	United States	

H GP, LLC	
if filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage fund.	e(s) this <i>pri</i>
No Information Filed	
private fund (check all that apply; you must check at least one): 1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investme f 1940	ent Compan
<ol> <li>qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investme f 1940</li> </ol>	ent Compan
he name and country, in English, of each foreign financial regulatory authority with which the private fund is r	egistered.
No Information Filed	
	Yes
is this a "master fund" in a master-feeder arrangement?	O ivato fund?
If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>pr</i> No Information Filed	
	Yes
Is this a "feeder fund" in a master-feeder arrangement?	0
If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>privat</i> Name of <i>private fund</i> :	<i>e runa</i> inve
Private fund identification number: (include the "805-" prefix also)	
: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a si ection 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	ngle Sched
u are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions 1), for each of the feeder funds answer the following questions:	to this Sec
No Information Filed	
E: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") inv cantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a	n "master fu 5) invests
urposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series cantially all of its assets in a single master fund.	Yes
antially all of its assets in a single master fund.	<u></u>
	⊙ other poole

the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

 $^{\circ}$  hedge fund  $^{\circ}$  liquidity fund  $^{\circ}$  private equity fund  $^{\circ}$  real estate fund  $^{\circ}$  securitized asset fund  $^{\circ}$  venture capital fund  $^{\circ}$  other *private fund*: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

Current gross asset value of the *private fund*:
 \$ 77,698,226

#### **Ownership**

12. Minimum investment commitment required of an investor in the private fund:

\$0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

- 13. Approximate number of the *private fund's* beneficial owners:
  - 2
- 14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:1%
- 15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds: 0%
  - (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the The section 3(c)(1) of - 16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*: 0%

#### Your Advisory Services

			Yes	No		
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	$\circ$	$\odot$		
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	fund.	If		
		No Information Filed				
			Yes	No		
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	0	•		
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to <i>fund</i> . If the answer to question 18.(a) is "no," leave this question blank.					
		No Information Filed				
			Yes	No		
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$		
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.				
20.	App 0%	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?				

Yes No

Yes       No.         21. Has the private fund's rorm of lie number (if any):       Image: the private fund's form of lie number (if any):         Form D file number       (21.4927489)         32. If yes, provide the private fund's form of lie number (if any):       Image: the private fund's form of lie number (if any):         Form D file number       (21.4927489)         33. (a) (1) Are the private fund's financial statements subject to an annual audit?       Image: the private fund's financial statements subject to an annual audit?       Image: the private fund was more than one auditing firm, you must complete questions (b) through (h) below. If the private fund was more than one auditing firm, you must complete questions (b) through (h) below. If the private fund was more than one auditing firm, you must complete questions (b) through (h) below. If the private fund was more than one auditing firm, you must complete questions (b) through (h) below. If the private fund was more than one auditing firm: complete questions (b) through (h) below. If the private fund was more than one auditing firm: grims office responsible for the private fund's audit (city, state and country): City: State: Country: City: City: City: State: Country: City: City: City: City: State: Country: City: City: City: City: State: Country: City:	<u>Priv</u>	vate Offering		
Form D file number       D21-9324889         B. SERVICE PROVIDERS       Auditors         23. (a) (1) Are the private fund's financial statements subject to an annual audi?       C         (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.       C         CAMP       If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.       C         Additional Auditor Information : 1 Record(s) Filed.       If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (r) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (r) separately for each auditing firm.         (b) Name of the auditing firm:       ERNST & YOUNG LLP         (c) The location of the auditing firm: soffice responsible for the private fund's audit (city, state and country):       C:         (c):       State:       Country:         (d) Is the auditing firm registered with the Public Company Accounting Oversight Board?       C         (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?       C         (f) If "yes, Public Company Accounting Oversight Board-Assigned Number:       C         42       (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting C       C         (g) Are the private fund's audited financial statements for the private fund since your last annual updating amendment cont	21.			_
B21-8924889         B. SERVICE PROVIDERS         Auditors         23. (a) (1) Are the private fund's financial statements subject to an annual audi?       C         CARP2         If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.       C         CAAP2         If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.         Additional Auditor Information : I Record(s) Filed.         If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.         ERNST & YOUNG LP         (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: State: Country: CLEVELAND Onio United States         (d) Is the auditing firm an independent public accountant?       C         (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?       C         (f) If "yes, Public Company Accounting Oversight Board-Assigned Number: 42       C         (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's audited financial statements for the most recently completed fiscal year distributed to the moversight Board in accordance with its rules?	22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
B. SERVICE PROVIDERS  Auditors  Yes No  (2) (1) Are the private fund's financial statements subject to an annual audi?  (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.  (2) If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (h) below. If the private fund uses more than one auditing firm: ERNST & YOUNG LLP  (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: State: Country: City: City: State: Country: City: City: City: State: Country: City: Cit		Form D file number		
Autions 2. (a) (1) Are the private fund's financial statements subject to an annual aud? 2. (b) (1) Are the private fund's financial statements subject to an annual aud? 2. (c) (1) the answer to question 23.(a)(1) is 'yes,' respond to questions (b) through (h) below. If the private fund uses more that are auditing firm, you must complete questions (b) through (h) below. If the private fund uses more than are auditing firm, you must complete questions (b) through (h) below. If the private fund uses more than are auditing firm: exponent to questions (b) through (h) below. If the private fund uses more than are auditing firm: exponent to questions (b) through (h) below. If the private fund uses more than are auditing firm: generately for each auditing firm. 3. (c) (c) Name of the auditing firm: septement to guestions (b) through (h) below. If the private fund uses more than one auditing firm: generately for each auditing firm. 3. (c) (c) The location of the auditing firm: septement to purvise fund's audit (citry, state and country): 3. (c) (c) The location of the auditing firm: septement public accountant? 3. (c) Is the auditing firm registered with the Public Company Accounting Oversight Board? 4. (c) Is the auditing firm registered with the Public Company Accounting Oversight Board? 4. (c) If yes, 'to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board? 4. (c) If yes, 'to (e) above, is the auditing firm for the private fund since your last annual updating armendment cortain uncusified gaines. 5. (c) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating armendment cortain uncusified gaines. 5. (c) Do all of the reports to Yet Received. 5. (c) Word Charge word the treports is available. 5. (c) Do all of the reports to Yet Received. 5. (c) Do all of the reports to Yet Received. 5. (c) Do all of the reports to Yet Received. 5. (c) Do all of the reports to Yet Received. 5. (c) Do all of the reports to Yet Rec		021-8924889		
Yes       No         23. (a) (1) Are the private fund's financial statements subject to an annual audit?       C       C         (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.       C       C         Additional Auditor Information : 1 Record(s) Filed.       If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (h) below. If the private fund uses more than one auditing firm was to complete questions (b) through (h) below. If the private fund uses more than one auditing firm:         ERNST & YOUNG LLP       If the answer to question of the auditing firm's office responsible for the private fund's audit (city, state and country):       City:         State:       Country:       City:       State:       Country:         City:       State:       Country:       City:       C         (d) Is the auditing firm an independent public accountant?       ©       ©       ©         (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?       ©       ©       ©         (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?       ©       ©         (h) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the audiung amendment contal unqualified opinions?	B. SE	ERVICE PROVIDERS		
(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?       C         CGAP?       The answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.         Additional Auditor Information : 1 Record(s) Filed.       If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm: extra other auditing firm: extra other auditing firm: extra other auditing firm on independent public accountant?       C         (c) The location of the auditing firm sofice responsible for the private fund's audit (city, state and country): City: State: Country: CLEVELAND Ohio United States       Yes No         (d) Is the auditing firm an independent public accountant?       C       C         (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?       C       C         If yes, Public Company Accounting Oversight Board-Assigned Number: 42       C       C       C         (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?       Yes No         (a) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?       C       C	Aud	litors	Yes	5 No
GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information : 1 Record(s) Filed.  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm:     error than one auditing firm: you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:     ERNST & YOUNG LLP  (c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country):     City: State: Country:     CLEVELAND Ohio United States  Yes No (d) Is the auditing firm an <i>independent public accountant</i> ?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting C C Oversight Board in accordance with its rules?  (g) Are the <i>private fund</i> 's audited financial statements for the most recently completed fiscal year distributed to the <i>private fund</i> 's investors?  (h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified opinions? <sup>a</sup> Yes <sup>C</sup> No <sup>C</sup> Report Not Yet Received <i>T</i> you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No	23.	(a) (1) Are the private fund's financial statements subject to an annual audit?	$\odot$	0
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more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.         (b) Name of the auditing firm:         ERNST & YOUNG LLP         (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):         City:       State:         CLEVELAND       Ohio         (d) Is the auditing firm an independent public accountant?       C         (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?       C         (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?       C         (f) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?       C       C         (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?       C       C         C* Yes C No C Report Not Yet Received       If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.       Yes No		Additional Auditor Information : 1 Record(s) Filed.		
ERNST & YOUNG LLP   (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: CLEVELAND   (d) Is the auditing firm an independent public accountant?   (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?   (f) If yes, Public Company Accounting Oversight Board-Assigned Number: 42   (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?   Yes No (a) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors? (b) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions? © Yes O No C Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available. Prime Broker Yes No Yes No Yes No				
City: State: Country:   CLEVELAND Ohio   United States     (d) Is the auditing firm an independent public accountant?   (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?   (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?   (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting   (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting   (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?   (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?   (f) Yes C No C Report Not Yet Received   If you check "Report Not Yet Received." you must promptly file an amendment to your Form ADV to update your response when the report is available.   Prime Broker  14 (a) Does the private fund is and updating amendment.				
(d) Is the auditing firm an independent public accountant?       (e)         (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?       (f)         (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting       (f)         (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting       (f)         (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?       (f)         (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?       (f)         (f) Yes (C) No (C) Report Not Yet Received       If you check "Report Not Yet Received       If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.				
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If yes, Public Company Accounting Oversight Board-Assigned Number: 42 (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules? (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors? (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions? (e) Yes (D) No (C) Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available. Prime Broker Yes No 24. (a) Does the private fund use one or more prime broker?		(d) Is the auditing firm an <i>independent public accountant</i> ?		_
<ul> <li>42</li> <li>(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?</li> <li>Yes No</li> <li>(g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?</li> <li>(h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?</li> <li>Yes O No O Report Not Yet Received</li> <li>If you check "Report Not Yet Received</li> <li>If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.</li> </ul> Prime Broker Yes No		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	$\odot$	0
Oversight Board in accordance with its rules?       Yes No         (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?       © ©         (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?       © Yes © No © Report Not Yet Received         If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.       Yes No         Prime Broker       Yes No				
<ul> <li>(g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?</li> <li>(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified opinions?</li> <li>⊙ Yes ○ No ○ Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.</li> </ul> Prime Broker Yes No			•	o
<ul> <li>(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified opinions?</li> <li>Yes O No O Report Not Yet Received</li> <li>If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.</li> </ul> Prime Broker Yes No				-
If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available. Prime Broker Yes No 24 (2) Does the private fund use one or more prime brokers?		(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i>	contai	n
when the report is available.  Prime Broker  Yes No 24 (2) Does the private fund use one or more prime brokers?		⊙ Yes ○ No ○ Report Not Yet Received		
Yes No			spons	9
24 (a) Door the private fund use one or more prime brokers?	<u>Prir</u>	ne Broker		
0 0	24.	(a) Does the <i>private fund</i> use one or more prime brokers?		

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

#### <u>Custodian</u>

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

No Information Filed

#### **Administrator**

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

No Information Filed

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

#### **Marketers**

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

#### A. PRIVATE FUND

#### Information About the Private Fund

1. (a) Name of the *private fund*:

COMMONFUND STRATEGIC SOLUTIONS REAL ESTATE OPPORTUNITY FUND 2011, L.P.

Yes No

Yes No

Yes No

 $\odot$ 

 $\odot$ 

22, 2:50 F	PM IARD - All Sections [User Name: amay123, OrgID: 160006]
(b)	) <i>Private fund</i> identification number: (include the "805-" prefix also) 805-9392525412
2. Un	der the laws of what state or country is the <i>private fund</i> organized:
	State: Country:
	Delaware United States
	) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
	ame of General Partner, Manager, Trustee, or Director
C	SSG REAL ESTATE PARTNERS I, LLC
(b)	) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>privat fund</i> .
	No Information Filed
4. Th	e private fund (check all that apply; you must check at least one):
V	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company
Ac	t of 1940
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company
AC	t of 1940
5. Lis	t the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.
	No Information Filed
6 (5)	Yes N
	) Is this a "master fund" in a master-feeder arrangement?
(b)	) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?
	No Information Filed
	Yes N
(c)	Yes N Is this a "feeder fund" in a master-feeder arrangement?
(u	) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests Name of <i>private fund</i> :
	Private fund identification number:
	(include the "805-" prefix also)
	TE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.
	you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Sectic 3.(1), for each of the feeder funds answer the following questions:
	No Information Filed
su	TE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or bstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund
	purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests bstantially all of its assets in a single master fund.

8.	(a)	Is this <i>private fund</i> a "fund of funds"?	$\odot$	0
		TE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pertonner vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	poole	d
	(b)	If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	$\circ$	$\odot$
	_		Yes	No
9.		ing your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	Θ
10.	Wha	at type of fund is the <i>private fund</i> ?		
		hedge fund $^{\circ}$ liquidity fund $^{\circ}$ private equity fund $^{\circ}$ real estate fund $^{\circ}$ securitized asset fund $^{\circ}$ venture capital f ner <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	und <sup>i</sup>	0
	NOT	<b>FE: For definitions of these fund types, please see</b> Instruction 6 of the Instructions to Part 1A.		
11.		rent gross asset value of the <i>private fund</i> : 2,952,350		
<u>0w</u>	ners	ship		
12.	Min	imum investment commitment required of an investor in the private fund:		
	\$ 2!	50,000		
		FE: Report the amount routinely required of investors who are not your related persons (even if different from the amount in the organizational documents of the fund).	ount	set
13.	Арр 37	proximate number of the <i>private fund's</i> beneficial owners:		
14.	Wha 0%	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
			Yes	No
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	©	0
16.	Wha 4%	at is the approximate percentage of the <i>private fund</i> beneficially owned by non-United States persons:		
<u>Yoı</u>	ur Ac	lvisory Services		
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	Yes	No ⊙
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.		
		No Information Filed		
			Yes	No
18.		Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	0	o
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>p fund</i> . If the answer to question 18.(a) is "no," leave this question blank.	orivat	e

Name of Other Adviser to private fund	e fund SEC file number	
COMMONFUND ASSET MANAGEMENT COMPANY, INC.	801-56548	110689

		Ye	s N
19. A	re your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	6
٨	OTE: For purposes of this question, do not consider feeder funds of the private fund.		
	pproximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? %		
<u>Priva</u>	te Offering		
		Ye	s N
	as the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities ct of 1933?	O	0
22. I	yes, provide the <i>private fund's</i> Form D file number (if any):		
- F	orm D file number		
	)21-167003		
B. SER Audit	VICE PROVIDERS		
		Ye	es N
23. (	a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	œ	0
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	œ	0
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses m one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	nore t	han
		nore t	han
	one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		han
	<ul> <li>one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.</li> <li>Additional Auditor Information : 1 Record(s) Filed.</li> <li>If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.</li> <li>(b) Name of the auditing firm:</li> </ul>		han
	one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.          Additional Auditor Information : 1 Record(s) Filed.         If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		han
	<ul> <li>one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.</li> <li>Additional Auditor Information : 1 Record(s) Filed.</li> <li>If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.</li> <li>(b) Name of the auditing firm:</li> </ul>		han
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	<ul> <li>one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.</li> <li>Additional Auditor Information : 1 Record(s) Filed.</li> <li>If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.</li> <li>(b) Name of the auditing firm: ERNST &amp; YOUNG LLP</li> <li>(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):</li> </ul>	5	
	one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.          Additional Auditor Information : 1 Record(s) Filed.         If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.         (b) Name of the auditing firm:         ERNST & YOUNG LLP         (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):         City:       State:         CLEVELAND       Ohio	Yes	No
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	<ul> <li>one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.</li> <li>Additional Auditor Information : 1 Record(s) Filed.</li> <li>If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.</li> <li>(b) Name of the auditing firm: <ul> <li>ERNST &amp; YOUNG LLP</li> </ul> </li> <li>(c) The location of the auditing firm's office responsible for the <i>private fund</i>'s audit (city, state and country): <ul> <li>City:</li> <li>State:</li> <li>Country:</li> <li>CLEVELAND</li> <li>Ohio</li> <li>United States</li> </ul> </li> <li>(d) Is the auditing firm an <i>independent public accountant</i>?</li> <li>(e) Is the auditing firm registered with the Public Company Accounting Oversight Board? <ul> <li>If yes, Public Company Accounting Oversight Board-Assigned Number:</li> <li>42</li> </ul> </li> <li>(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting</li> </ul>	Yes ©	<b>No</b> O
	<ul> <li>one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.</li> <li>Additional Auditor Information : 1 Record(s) Filed.</li> <li>If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.</li> <li>(b) Name of the auditing firm: <ul> <li>ERNST &amp; YOUNG LLP</li> </ul> </li> <li>(c) The location of the auditing firm's office responsible for the <i>private fund</i>'s audit (city, state and country): <ul> <li>City:</li> <li>State:</li> <li>Country:</li> <li>CLEVELAND</li> <li>Ohio</li> <li>United States</li> </ul> </li> <li>(d) Is the auditing firm an <i>independent public accountant</i>?</li> <li>(e) Is the auditing firm registered with the Public Company Accounting Oversight Board? <ul> <li>If yes, Public Company Accounting Oversight Board-Assigned Number:</li> <li>42</li> </ul> </li> <li>(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting</li> </ul>	Yes ©	<b>No</b> O

● Yes ○ No ○ Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

### **Prime Broker**

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

#### No Information Filed

#### **Custodian**

# Yes No

Yes No

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25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

No Information Filed

#### **Administrator**

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

No Information Filed

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

## **Marketers**

Yes No

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28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

Yes No

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A. PRIVATE FUND		
<ol> <li>(a) Name of the private fund: COMMONFUND STRATEGIC SOLUTIONS REAL ESTATE OPPORTUNITY FUND 2014, L.P.</li> <li>(b) Private fund identification number: (include the '805-* prefix also) a05-5025596966</li> <li>Under the laws of what state or country is the private fund organized: State: Country: Delaware United States</li> <li>(a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity): Name of General Partner, Manager, Trustee, or Director CFSSG REAL ESTATE PARTNERS II, LLC         (b) If filing an unbrefla registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private And. No Information Filed         (b) If filing an unbrefla registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private And. No Information Filed         (c) Qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940         (c) Qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940         (c) Qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940         (c) Is this a "master fund" in a master-feeder arrangement?</li></ol>	A. P	IVATE FUND
<ul> <li>COMMONFUND STRATEGIC SOLUTIONS REAL ESTATE OPPORTUNITY FUND 2014, L.P.</li> <li>(b) Private fund identification number: (include the '305-' private subs) 305-502959696</li> <li>2. Under the laws of what state or country is the private fund organized: State: Delaware</li> <li>(a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):</li> <li>Name of General Partner, Manager, Trustee, or Director (CFSSG REAL ESTATE PARTNERS II, LLC</li> <li>(b) If filing an unthrelia registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. No Information Filed</li> <li>(c) (a) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>(c) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>(c) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>(c) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>(c) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>(a) Is this a "master fund" in a master-feeder arrangement?</li> <li>(b) If yes, what is the name and private fund identification number (if any) of the feeder fund in which this private fund invests? Name of private fund in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? Name of private fund identification number: (include the "805-" prefix also)</li> <li>NOTE: You must complete question for each master-feeder arrangement regardless of whether you are fili</li></ul>	Info	rmation About the Private Fund
<ul> <li>COMMONFUND STRATEGIC SOLUTIONS REAL ESTATE OPPORTUNITY FUND 2014, L.P.</li> <li>(b) Private fund identification number: (include the '805-' pretix also) 805-502959696</li> <li>2. Under the laws of what state or country is the private fund organized: State: Country: Delaware United States</li> <li>(a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):</li> <li>Name of General Partner, Manager, Trustee, or Director CrSSG REAL ESTATE PARTNERS II, LLC</li> <li>(b) If filing an unbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.</li> <li>No Information Filed</li> <li>The private fund (check all that apply: you must check at least one):</li> <li>Ø (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>J. Ust the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.</li> <li>No Information Filed</li> <li>List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.</li> <li>No Information Filed</li> <li>Ves No</li> <li>(c) Is this a "master fund" in a master-feeder arrangement?</li> <li>(c) G</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li></ul>		
<ul> <li>(b) Private fund identification number: (Include the '805" prefix also) 805-502559666</li> <li>2. Under the laws of what state or country is the private fund organized: State: Country: Delaware Cuntry: Delaware Cuntry: Delaware Cuntry: Name of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity): Name of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity): Name of General Partner, Manager, Trustee, or Directors (cFSSG REAL ESTATE PARTNERS II, LLC (b) If fling an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. No Information Filed 4. The private fund (check all that apply; you must check at least one): Ø (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 Ø (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 Ø (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 Ø (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 Ø (2) qualifies for the exclusion from the definition of investment or fund is registered. No Information Filed Ø (a) Is this a "master fund" in a master-feeder arrangement? (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund No Information Filed Ø (b) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? Name of private fund: Private fund identification number: (include the "805-" prefix also) NOTE: You must complete question 5 for eech master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.8.(1) for t</li></ul>	1.	(a) Name of the <i>private fund</i> :
Include the "805-" prefix also)         805-5029596966         2. Under the laws of what state or country is the private fund organized:         State:       Country:         Delaware       United States         3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):         Name of General Partner, Manager, Trustee, or Director         [cFSSG REAL ESTATE PARTNERS II, LLC         (b) If fling an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.         No Information Filed         4. The private fund (check all that apply; you must check at least one):         V (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940         5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.         No Information Filed         Yes Not         (c) Is this a "master fund" in a master-feeder arrangement?       C       G         (d) If yes, what is the name and private fund identification number (if any) of the feeder fund in which this private fund invests?       No Information Filed         Ves Not       (c) Is this a "feeder fund" in a master-feeder arrangement?       C       G         (d) If yes, what is the name and private fund identification number (if any) of the master fund in w		COMMONFUND STRATEGIC SOLUTIONS REAL ESTATE OPPORTUNITY FUND 2014, L.P.
805-5025956966         2. Under the laws of what state or country is the private fund organized: State:       Country: United States         3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):         Name of General Partner, Manager, Trustee, or Directors         (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.         (c) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.         (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.         (c) If youalifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940         5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.         No Information Filed         Ves No         (c) (a) Is this a "master fund" in a master-feeder arrangement?       C @         (b) If yes, what is the name and private fund identification number (if any) of the feeder fund is investing in this private fund invests?         Name of private fund:       No Information Filed         Ves No       (c) Is this a "feeder fund" in a master-feeder arrangement?       C @         (c) If yes, what is the name and private fund identification number (if any) of the master fund in		
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State:       Country:         United States         3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):         Name of General Partner, Manager, Trustee, or Director         CFSSG REAL ESTATE PARTNERS II, LLC         (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.         (c)       No Information Filed         4. The private fund (check all that apply; you must check at least one):       ✓         ✓       (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940         5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.         No Information Filed         ✓         (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?         No Information Filed         ✓         ✓         (c) Is this a "feeder fund" in a master-feeder arrangement?       C       ©       ©         (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?       Name of private fund:         Name of private fund:       na amster-feeder arrangement?       C       ©       ©       C		805-5029596966
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<ul> <li>3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity): <ul> <li>Name of General Partner, Manager, Trustee, or Director</li> <li>CFSSG REAL ESTATE PARTNERS II, LLC</li> <li>(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.</li> <li>No Information Filed</li> </ul> </li> <li>4. The private fund (check all that apply; you must check at least one): <ul> <li>✓ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>✓ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> </ul> </li> <li>5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. <ul> <li>No Information Filed</li> </ul> </li> <li>5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.</li> <li>(a) Is this a "master fund" in a master-feeder arrangement? <ul> <li>(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund?</li> <li>No Information Filed</li> </ul> </li> <li>Ves Not is the name and private fund identification number (if any) of the master fund in which this private fund invests? Name of private</li></ul>		
Name of General Partner, Manager, Trustee, or Director         CFSSIG REAL ESTATE PARTNERS II, LLC         (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.         No Information Filed         4. The private fund (check all that apply; you must check at least one):         ✓       (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940         ✓       (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940         ✓       (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940         ✓       (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940         ✓       (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940         ✓       (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940         ✓       (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940         ✓       (2) qualifies the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.         (b) If yes, what is the name and		
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<ul> <li>(b) If filing an <i>umbrella registration</i>, identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i>.</li> <li>No Information Filed</li> <li>4. The <i>private fund</i> (check all that apply; you must check at least one):</li> <li>✓ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>✓ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>5. List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.</li> <li>No Information Filed</li> <li>Yes No</li> <li>(a) Is this a "master fund" in a master-feeder arrangement?</li> <li>C C C</li> <li>(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i>?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) C C</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) C C</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(c) C C</li> <li>(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i>:</li> <li><i>Priva</i></li></ul>		
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No Information Filed         Yes No         6. (a) Is this a "master fund" in a master-feeder arrangement?       ©         (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?         No Information Filed         Yes No         (c) Is this a "feeder fund" in a master-feeder arrangement?         (c) Is this a "feeder fund" in a master-feeder arrangement?         (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? Name of private fund:         Private fund identification number:         (include the "805-" prefix also)         NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement according to the instructions to this Section         7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section		Act of 1940
Yes       No         6. (a) Is this a "master fund" in a master-feeder arrangement?       Image: Comparison of the feeder funds investing in this private fund?         (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?       No Information Filed         Yes No         (c) Is this a "feeder fund" in a master-feeder arrangement?       Image: Comparison of the master fund in which this private fund invests?         (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?       Name of private fund:         Private fund identification number:       (include the "805-" prefix also)         NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section         7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section	5.	
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	7.	

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

		105	
8.	(a) Is this <i>private fund</i> a "fund of funds"?	$\odot$	0
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	poole	t
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	$\odot$
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	Θ
10.	What type of fund is the <i>private fund</i> ?		
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 $^{
m O}$  hedge fund  $^{
m O}$  liquidity fund  $^{
m O}$  private equity fund  $^{
m O}$  real estate fund  $^{
m O}$  securitized asset fund  $^{
m O}$  venture capital fund  $^{
m O}$ Other private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*: \$ 84,050,034

# **Ownership**

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 250,000

NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

#### 49

- 14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*: 1%
- 15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds: ۵%

# $\circ$

- (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the 👩 Investment Company Act of 1940, are sales of the fund limited to qualified clients?
- 16. What is the approximate percentage of the *private fund* beneficially owned by non-United States persons: 4%

# Your Advisory Services

- 17. (a) Are you a subadviser to this private fund?
  - (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer to question 17.(a) is "no," leave this question blank.

Yes No

Yes No

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Yes No

IARD - All Sections [User Name: amay123, OrgID: 160006]

No Information Filed

	fund?							
(b)			is "yes," provide the name a 18.(a) is "no," leave this que		, if any, of the othe	r advisers to the	priva	ate
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		MONFUND ASSET MANAGE			01-56548	110689		
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Δre	vour	clients solicited to invest in	the private fund?					
			do not consider feeder fund	ls of the private fun	4		0	
			our <i>clients</i> has invested in th					
0%		ing						
ivate	e Offeri	<u>1119</u>					Ye	5
. Has	s the <i>pi</i>	rivate fund ever relied on a	n exemption from registratio	on of its securities u	nder Regulation D o	of the Securities	.0	-
	of 193						e	
. If ye	ves, pro	ovide the <i>private fund's</i> For	m D file number (if any):					
		file number						
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ıditor	(1) An (2) If GAAP If the one a Addi If th (b) (c)	re the <i>private fund's</i> financi the answer to question 23. answer to question 23.(a)( auditing firm, you must com <b>itional Auditor Informati</b> the answer to question 23.(a re than one auditing firm, y Name of the auditing firm ERNST & YOUNG LLP The location of the auditin City: CLEVELAND	.(a)(1) is "yes," are the finan (1) is "yes," respond to ques inplete questions (b) through ion : <b>1 Record(s) Filed.</b> a)(1) is "yes," respond to que you must complete questions h: n: ng firm's office responsible for State:	ncial statements prestions (b) through (f (f) separately for eau restions (b) through (b) through (f) sep or the <i>private fund's</i> Country: United Sta	ach auditing firm. (h) below. If the <i>priv</i> (h) below. If the <i>pr</i> parately for each au audit (city, state an	<i>rivate fund</i> uses m <i>rivate fund</i> uses Iditing firm.	© ©	han
ıditor	(1) Au (2) If GAAP If the one a Addi If th (b) (c) (d)	re the <i>private fund's</i> financi the answer to question 23. answer to question 23.(a)( auditing firm, you must com <b>itional Auditor Informati</b> the answer to question 23.(a) are than one auditing firm, y Name of the auditing firm ERNST & YOUNG LLP The location of the auditin City: CLEVELAND Is the auditing firm an <i>ind</i>	.(a)(1) is "yes," are the finan (1) is "yes," respond to ques inplete questions (b) through ion : <b>1 Record(s) Filed.</b> a)(1) is "yes," respond to que you must complete questions to state: Ohio	ncial statements prestions (b) through (f (f) separately for eau estions (b) through s (b) through (f) sep or the <i>private fund's</i> Country: United Sta	ach auditing firm. (h) below. If the <i>priv</i> (h) below. If the <i>pr</i> barately for each au audit (city, state an	<i>rivate fund</i> uses m <i>rivate fund</i> uses Iditing firm.	© ore th	har
ıditor	(1) Au (2) If GAAP If the one a Addi If th (b) (c) (d)	re the <i>private fund's</i> financi the answer to question 23. answer to question 23.(a)( auditing firm, you must com <b>itional Auditor Informati</b> the answer to question 23.(a) the audition firm, you must complete the auditing firm an <i>ind</i> the auditing firm register	.(a)(1) is "yes," are the finan (1) is "yes," respond to ques inplete questions (b) through ion : <b>1 Record(s) Filed.</b> a)(1) is "yes," respond to que you must complete questions in: in: ing firm's office responsible for State: Ohio dependent public accountant tered with the Public Compar	ncial statements pre stions (b) through (f (f) separately for ea restions (b) through s (b) through (f) sep or the <i>private fund's</i> Country: United Sta ?	ach auditing firm. (h) below. If the <i>priv</i> (h) below. If the <i>pr</i> barately for each au audit (city, state an	<i>rivate fund</i> uses m <i>rivate fund</i> uses Iditing firm.	€ oore th Yes €	nar Ni
ıditor	(1) Au (2) If GAAP If the one a Addi If th (b) (c) (d)	re the <i>private fund's</i> financi the answer to question 23. answer to question 23.(a)( auditing firm, you must com <b>itional Auditor Informati</b> the answer to question 23.(a) the audition firm, you must complete the auditing firm an <i>ind</i> the auditing firm register	.(a)(1) is "yes," are the finan (1) is "yes," respond to ques inplete questions (b) through ion : <b>1 Record(s) Filed.</b> a)(1) is "yes," respond to que you must complete questions to girm's office responsible for State: Ohio dependent public accountant	ncial statements pre stions (b) through (f (f) separately for ea restions (b) through s (b) through (f) sep or the <i>private fund's</i> Country: United Sta ?	ach auditing firm. (h) below. If the <i>priv</i> (h) below. If the <i>pr</i> barately for each au audit (city, state an	<i>rivate fund</i> uses m <i>rivate fund</i> uses Iditing firm.	€ oore th Yes €	nar Na

(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?

#### Yes No

Yes No

Yes No

Yes No

 $\odot$ 

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 $\odot$ 

- (g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?
- (h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

• Yes ○ No ○ Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

#### **Prime Broker**

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

#### No Information Filed

#### **Custodian**

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

No Information Filed

#### **Administrator**

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

No Information Filed

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

**Marketers** 

28.	(a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.
	No Information Filed
A. PI	RIVATE FUND
<u>Info</u>	ormation About the Private Fund
1.	(a) Name of the <i>private fund</i> :
	DEERE & COMPANY WELFARE BENEFIT FUND, LP
	(b) Private fund identification number:
	(include the "805-" prefix also)
	805-5461955365
2.	Under the laws of what state or country is the <i>private fund</i> organized:
	State: Country:
	Delaware United States
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):
	Name of General Partner, Manager, Trustee, or Director
	JDPT MANAGER, LLC
	(b) If filing an umbrally registration identify the filing advicer and/or relying advicer(c) that energy(c) or manage(c) this private
	(b) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> .
	No Information Filed
4.	The <i>private fund</i> (check all that apply; you must check at least one):
	$\Box$ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940
	✓ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.
	No Information Filed
<i>c</i>	Yes No
6.	(a) Is this a "master fund" in a master-feeder arrangement? O O
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?
	No Information Filed
	Yes No
	(c) Is this a "feeder fund" in a master-feeder arrangement?
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?
	Name of <i>private fund</i> :
	Private fund identification number:
	(include the "805-" prefix also)
	х - ··· р - ··· /

	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single S D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	scheut	ne
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th 7.B.(1), for each of the feeder funds answer the following questions:	is Sec	tion
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest al substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mas for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investive substantially all of its assets in a single master fund.	ter fu	nd"
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	$\odot$	$\circ$
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	poole	d
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	$\odot$
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	Θ
10.	What type of fund is the <i>private fund</i> ?		
	$^{\circ}$ hedge fund $^{\circ}$ liquidity fund $^{\circ}$ private equity fund $^{\circ}$ real estate fund $^{\circ}$ securitized asset fund $^{\circ}$ venture capital Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	fund	©
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 175,000,000		
<u>0w</u>	mership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the am forth in the organizational documents of the fund).	nount	set
13.	Approximate number of the <i>private fund's</i> beneficial owners: 2		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0

#### 5/1

8/22,	, 2:5	50 PI	M IARD - All Sections [User Name: amay123, OrgID: 160006]		
		0%	at is the approximate percentage of the <i>private fund</i> beneficially owned by non-United States persons:		
-				Yes	N
1	17.	(a)	Are you a subadviser to this <i>private fund</i> ?	$\circ$	e
		(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	fund.	If
			No Information Filed		
				Yes	N
1	18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	0	0
		(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the p	privat	е

*fund*. If the answer to question 18.(a) is "no," leave this question blank.

			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$
	NOT	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App 0%	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	/ate	<u>Offering</u>		
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	Yes ©	No C
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
	ERVI litor	CE PROVIDERS	M	
22	(-)		Yes	NO
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	$\odot$	0
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	$\odot$	0
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses mo one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re tha	an
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		

No Information Filed

(b) Name of the auditing firm: ERNST & YOUNG

(c) The location of the auditing firm's office responsible for the *private fund's* audit (city, state and country): City: State: Country: CLEVELAND Ohio United States

(d) Is the auditing firm an *independent public accountant*?

Yes No

 $\odot$ О

Yes No  $\odot$ 

Yes No

 $\mathbf{O}$  $\odot$ 

(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	©	o
If yes, Public Company Accounting Oversight Board-Assigned Number: 42		
(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	۲	0

# (g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

○ Yes ○ No ④ Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

#### Prime Broker

24. (a) Does the *private fund* use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

#### <u>Custodian</u>

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

No Information Filed

#### **Administrator**

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

No Information Filed

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?
100%

Yes No

Yes No

Yes No

Yes No

o ⊙

 $\odot$ 

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

#### <u>Marketers</u>

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

# A. PRIVATE FUND

# Information About the Private Fund

- 1. (a) Name of the *private fund*: GPF REAL ESTATE LP
  - (b) Private fund identification number: (include the "805-" prefix also)
     805-4365747713
- 2. Under the laws of what state or country is the *private fund* organized: State: Country:

Guernsey

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee, or Director	
LAKE ERIE REAL ESTATE GENERAL PARTNER LIMITED	

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

 $\Box$  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.

No Information Filed

6. (a) Is this a "master fund" in a master-feeder arrangement?

Yes No

Yes No

 $\circ \circ$ 

 $\odot$   $\odot$ 

(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?

No Information Filed

- (c) Is this a "feeder fund" in a master-feeder arrangement?
- (d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests? Name of *private fund*:

*Private fund* identification number: (include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

8. (a) Is this *private fund* a "fund of funds"?
 NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.
 (b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

Yes No

C

#### Yes No

9.	During your last fiscal year, did the private fund invest in securities issued by investment companies registered under	0	$\odot$
	the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?		

10. What type of fund is the *private fund*?

 $^{\circ}$  hedge fund  $^{\circ}$  liquidity fund  $^{\circ}$  private equity fund  $^{\circ}$  real estate fund  $^{\circ}$  securitized asset fund  $^{\circ}$  venture capital fund  $^{\circ}$  other *private fund*: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*: \$ 471,762,239

#### **Ownership**

12. Minimum investment commitment required of an investor in the private fund:

\$0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

2

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:0%

15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	0 /0		Yes	No
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section $3(c)(1)$ of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	C
6.	Wha 100	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : %		
(ou	r Ad	visory Services		
7	(2)	Are you a subadvisor to this private fund?	Yes	_
L/.	• •	Are you a subadviser to this <i>private fund</i> ? If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i>	C fund	⊡ ⊡f
	(D)	the answer to question 17.(a) is "no," leave this question blank.	iunu.	11
		No Information Filed		
0	(-)		Yes	N
8.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	0	0
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the $\mu$ fund. If the answer to question 18.(a) is "no," leave this question blank.	orivat	e
		No Information Filed		
			Yes	No
.9.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	œ
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
Priv	0%	Offering		
	ucc		Yes	No
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	۲	С
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
		CE PROVIDERS		
Aud	itor	$\Sigma$	Yes	N
23.	(a)	(1) Are the private fund's financial statements subject to an annual audit?	$\odot$	C
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	•
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses mo one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re tha	an
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm: ERNST & YOUNG		

	(c) The location of the auditing firm's office res	nonsible for the private f	und's audit (city, state and country).		
	City:	State:	Country:		
	ST. PETERS PORT		Guernsey		
				Yes	No
	(d) Is the auditing firm an <i>independent public a</i>	accountant?		$\odot$	0
	(e) Is the auditing firm registered with the Publ	lic Company Accounting	Oversight Board?	o	0
	If yes, Public Company Accounting Oversigh 1438	nt Board-Assigned Numb	er:		
	(f) If "yes" to (e) above, is the auditing firm su Oversight Board in accordance with its rules		on by the Public Company Accounting	۲	0
	Are the <i>private fund's</i> audited financial statements <i>private fund's</i> investors?	s for the most recently co	ompleted fiscal year distributed to the	Ye C	s N
(h)	Do all of the reports prepared by the auditing firm unqualified opinions?	for the <i>private fund</i> sinc	e your last annual updating amendme	e <i>nt</i> conta	ain
	● Yes ○ No ○ Report Not Yet Received				
	If you check "Report Not Yet Received," you must when the report is available.	promptly file an amendr	nent to your Form ADV to update you	r respons	se
me B	Broker				
(a)	Does the <i>private fund</i> use one or more prime brok	rers?		Ye	s N
. (u)	If the answer to question 24.(a) is "yes," respond		(e) below for each prime broker the	orivate f	
	uses. If the <i>private fund</i> uses more than one prim prime broker.	e broker, you must comp	lete questions (b) through (e) separa	tely for e	each
		e broker, you must comp No Information Filed	lete questions (b) through (e) separa	tely for e	each
uctodi	prime broker.		lete questions (b) through (e) separa	tely for e	each
ıstodi	prime broker.		lete questions (b) through (e) separa	·	
	prime broker.	No Information Filed		·	s N
i. (a)	prime broker. an Does the <i>private fund</i> use any custodians (includir	No Information Filed ng the prime brokers liste to questions (b) through	ed above) to hold some or all of its (g) below for each custodian the <i>priv</i>	Ye C	s N ) (3
i. (a)	prime broker.  an Does the private fund use any custodians (includin assets? If the answer to question 25.(a) is "yes," respond uses. If the private fund uses more than one custor	No Information Filed ng the prime brokers liste to questions (b) through	ed above) to hold some or all of its (g) below for each custodian the <i>priv</i>	Ye C	s N
. (a)	prime broker.  an Does the private fund use any custodians (includin assets? If the answer to question 25.(a) is "yes," respond uses. If the private fund uses more than one custor	No Information Filed ng the prime brokers liste to questions (b) through odian, you must complete	ed above) to hold some or all of its (g) below for each custodian the <i>priv</i>	Ye C	es N ) (6
. (a)	prime broker.  an Does the private fund use any custodians (includin assets? If the answer to question 25.(a) is "yes," respond uses. If the private fund uses more than one custor	No Information Filed ng the prime brokers liste to questions (b) through odian, you must complete	ed above) to hold some or all of its (g) below for each custodian the <i>priv</i>	Ye C rate fund r for eacl	s <b>s N</b> ) (3 h
. (a) Iminis	prime broker.  an Does the private fund use any custodians (includir assets? If the answer to question 25.(a) is "yes," respond uses. If the private fund uses more than one custo custodian.  strator	No Information Filed ng the prime brokers liste to questions (b) through odian, you must complete No Information Filed	ed above) to hold some or all of its (g) below for each custodian the <i>priv</i>	Ye C rate fund r for eacl	s <b>s N</b> ) (3 h
dminis	prime broker.  an Does the private fund use any custodians (includir assets? If the answer to question 25.(a) is "yes," respond uses. If the private fund uses more than one custo custodian.	No Information Filed Ing the prime brokers lister to questions (b) through odian, you must complete No Information Filed than your firm? to questions (b) through	ed above) to hold some or all of its (g) below for each custodian the <i>priv</i> e questions (b) through (g) separately (f) below. If the <i>private fund</i> uses mo	Ye C vate fund v for eacl Ye	s N h

		If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.	
		(b) Name of administrator:	
		NORTHERN TRUST	
		(c) Location of administrator (city, state and country):	
		City:State:Country:ST. PETERS PORTGuernsey	
		(d) Is the administrator a related person of your firm?       • • • • • • • • • • • • • • • • • • •	>
		(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?	
		● Yes (provided to all investors) <sup>○</sup> Some (provided to some but not all investors) <sup>○</sup> No (provided to no investors)	
		<ul> <li>(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) <i>private fund's</i> investors? If investor account statements are not sent to the (rest of the) <i>private fund's</i> investors, respond "not applicable."</li> <li>NOT APPLICABLE</li> </ul>	
	obta	ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, includin- aining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, calculations (including allocations) was the valuation determined by such <i>person</i> .	
<u>Mar</u>	kete		5 No
28.	(a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	o
		You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions through (g) separately for each marketer.	-
		No Information Filed	
A. PF	RIVAT	TE FUND	
<u>Info</u>	rmat	tion About the Private Fund	
1.	(a)	Name of the <i>private fund</i> :	
	(6)	GRE PARTNERSHIP IIA CO-INVESTMENT L.P.	
	• •	Private fund identification number: (include the "805-" prefix also)	
		805-2672609085	

<sup>2.</sup> Under the laws of what state or country is the *private fund* organized:

State	•
Juaite	

Ite REAL ESTATE GP LTD  Ing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private No Information Filed  Ite fund (check all that apply; you must check at least one): Ute alifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Compare alifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compare ame and country, in English, of each foreign financial regulatory authority with which the private fund is registered. No Information Filed  Yes s a "master fund" in a master-feeder arrangement? No Information Filed  Yes s a "feeder fund" in a master-feeder arrangement? s, what is the name and private fund identification number (if any) of the master fund in which this private fund invest s, what is the name and private fund identification number (if any) of the master fund in which this private fund invest s, what is the name and private fund identification number (if any) of the master fund in which this private fund invest
No Information Filed         te fund (check all that apply; you must check at least one):         ualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Compare         ualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compare         ualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compare         ualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compare         ame and country, in English, of each foreign financial regulatory authority with which the private fund is registered.         No Information Filed         Yes         s a "master fund" in a master-feeder arrangement?         S, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?         No Information Filed         Yes         s a "feeder fund" in a master-feeder arrangement?
te fund (check all that apply; you must check at least one): Jalifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Compan 40 Jalifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compan 40 ame and country, in English, of each foreign financial regulatory authority with which the private fund is registered. No Information Filed Yes 5, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund? No Information Filed S a "feeder fund" in a master-feeder arrangement?
ualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Compare aualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compare ame and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered. No Information Filed Yess s a "master fund" in a master-feeder arrangement? No Information Filed Yess s a "feeder fund" in a master-feeder arrangement?
ualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Compare aualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compare ame and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered. No Information Filed Yess s a "master fund" in a master-feeder arrangement? No Information Filed Yess s a "feeder fund" in a master-feeder arrangement?
ame and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered. No Information Filed Yess s a "master fund" in a master-feeder arrangement? No Information number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed Yess s a "feeder fund" in a master-feeder arrangement?
No Information Filed       Yes         s a "master fund" in a master-feeder arrangement?       O         s, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?       No Information Filed         Yes         s a "feeder fund" in a master-feeder arrangement?         Yes         s a "feeder fund" in a master-feeder arrangement?
Yes s a "master fund" in a master-feeder arrangement? s, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed Yes s a "feeder fund" in a master-feeder arrangement?
s a "master fund" in a master-feeder arrangement?  s, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?  No Information Filed  Yes s a "feeder fund" in a master-feeder arrangement?
s, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?  No Information Filed  Yes s a "feeder fund" in a master-feeder arrangement?
No Information Filed Yes s a "feeder fund" in a master-feeder arrangement?
s a "feeder fund" in a master-feeder arrangement?
s a "feeder fund" in a master-feeder arrangement?
e of <i>private fund</i> : <i>te fund</i> identification number:
ide the "805-" prefix also) u must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sched n 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.
filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Sec or each of the feeder funds answer the following questions:
No Information Filed
נ סי e

#### Yes No

9. During your last fiscal year, did the private fund invest in securities issued by investment companies registered under G the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? 10. What type of fund is the *private fund*? 🖸 hedge fund 🖸 liquidity fund 🖸 private equity fund 🖸 real estate fund 🖸 securitized asset fund 🔿 venture capital fund 📀 Other private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. 11. Current gross asset value of the *private fund*: \$ 346,695,393 **Ownership** 12. Minimum investment commitment required of an investor in the private fund: \$ 0 NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund). 13. Approximate number of the *private fund's* beneficial owners: 2 14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*: 0% 15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds: 0% Yes No (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the  $\odot$  $\mathbf{O}$ Investment Company Act of 1940, are sales of the fund limited to qualified clients? 16. What is the approximate percentage of the *private fund* beneficially owned by non-United States persons: 100% Your Advisory Services Yes No 17. (a) Are you a subadviser to this private fund?  $\odot$ (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer to question 17.(a) is "no," leave this question blank. No Information Filed Yes No 18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private  $\odot$ fund? (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the private fund. If the answer to question 18.(a) is "no," leave this question blank. No Information Filed Yes No 19. Are your *clients* solicited to invest in the *private fund*?  $\odot$ NOTE: For purposes of this question, do not consider feeder funds of the private fund. 20. Approximately what percentage of your *clients* has invested in the *private fund*? 0%

Private Offering		Vee	N -
21. Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of Act of 1933?	the Securities	©	No C
22. If yes, provide the <i>private fund's</i> Form D file number (if any):			
No Information Filed			
B. SERVICE PROVIDERS			
Auditors		Yes	No
23. (a) (1) Are the private fund's financial statements subject to an annual audit?		$\odot$	0
(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance GAAP?	with U.S.	0	۲
If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>privat</i> one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	te fund uses mo	re th	an
Additional Auditor Information : 1 Record(s) Filed.			
If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the prive more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) separately for each auditing firm, you must complete questions (b) through (f) through (f) separately for each auditing firm, you must complete questions (b) through (f) through (f) separately for each auditing firm, you must complete questions (f) through (f) through (f) through (f) throu			
(b) Name of the auditing firm: ERNST & YOUNG LLP			
(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and City: State: Country:	l country):	:	
ST PETERS PORT Guernsey	Y	'es l	No
(d) Is the auditing firm an <i>independent public accountant</i> ?			0
(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	c	•	0
If yes, Public Company Accounting Oversight Board-Assigned Number: 1438			
(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company of Oversight Board in accordance with its rules?	Accounting (	•	0
(g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distrib <i>private fund's</i> investors?	uted to the	Yes ⊙	No C
(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating</i> unqualified opinions?	g amendment c	ontai	n
If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to a when the report is available.	update your res <sub>l</sub>	pons	e
Prime Broker			
24. (a) Does the <i>private fund</i> use one or more prime brokers?		Yes	No ⊙

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

#### **Custodian**

25. (a) Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its O assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

No Information Filed

#### Administrator

Yes No **@** |

 $\mathbf{O}$ 

Yes No

 $\odot$ 

26. (a) Does the private fund use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one . 1. (0)

	ne answer to question 26.(a) is "yes, n one administrator, you must compl			
(b)	Name of administrator:			
	NORTHERN TRUST INTERNATIONAL	FUND ADMINISTRATION SERV	ICES	
(c)	Location of administrator (city, state	e and country):		
	City:	State:	Country:	
	ST PETERS PORT		Guernsey	
(d)	Is the administrator a <i>related perso</i>	n of your firm?		Yes I
(e)	Does the administrator prepare and	send investor account stateme	nts to the <i>private fund's</i> invo	estors?
	• Yes (provided to all investors) • investors)	Some (provided to some but n	ot all investors) <sup>O</sup> No (provi	ded to no
(f)	If the answer to question 26.(e) is ' private fund's investors? If investor respond "not applicable."			-
<u>  </u>				
	ur last fiscal year, what percentage o	f the <i>private fund's</i> assets (by v	value) was valued by a <i>perso</i>	on, such as an
	ur last fiscal year, what percentage o tor, that is not your <i>related person</i> ?	f the <i>private fund's</i> assets (by v	value) was valued by a <i>persc</i>	on, such as an

fee calculations (including allocations) was the valuation determined by such person.

# <u>Marketers</u> Yes No 28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes? 0 $\odot$ You must answer "yes" whether the person acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the private fund uses. If the private fund uses more than one marketer you must complete questions (b) through (g) separately for each marketer. No Information Filed A. PRIVATE FUND Information About the Private Fund 1. (a) Name of the *private fund*: GRE PARTNERSHIP IIA L.P. (b) Private fund identification number: (include the "805-" prefix also) 805-4828541054 2. Under the laws of what state or country is the *private fund* organized: State: Country: Guernsey 3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity): Name of General Partner, Manager, Trustee, or Director LAKE ERIE REAL ESTATE GP LTD (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. No Information Filed The *private fund* (check all that apply; you must check at least one): 4. 🗹 (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 🗹 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. No Information Filed Yes No 6. (a) Is this a "master fund" in a master-feeder arrangement? $\odot$ (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund? No Information Filed Yes No (c) Is this a "feeder fund" in a master-feeder arrangement? $\odot$ œ (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?

https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG\_PK=1652620

Name of *private fund*:

Private fund identification number: (include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

## No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

8. (a) Is this private fund a "fund of funds"?  $\odot$   $\circ$ NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person?

 $\circ$ 

## Yes No

Yes No

- 9. During your last fiscal year, did the private fund invest in securities issued by investment companies registered under  $\odot$ the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?
- 10. What type of fund is the private fund?

 $^{
m O}$  hedge fund  $^{
m O}$  liquidity fund  $^{
m O}$  private equity fund  $^{
m O}$  real estate fund  $^{
m O}$  securitized asset fund  $^{
m O}$  venture capital fund  $^{
m O}$ Other private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*: \$ 90,757,902

# **Ownership**

12. Minimum investment commitment required of an investor in the private fund:

#### \$ 0

2

NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund).

- 13. Approximate number of the *private fund's* beneficial owners:
- 14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*: 0%
- 15. (a) What is the approximate percentage of the private fund beneficially owned (in the aggregate) by funds of funds: 0%

#### Yes No

	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section $3(c)(1)$ of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	$\odot$	0
16.	Wha 100	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : %		
You	ur Ad	lvisory Services		
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	Yes	NO
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.		
		No Information Filed		
			Yes	No
18.		Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	0	$\odot$
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the $\mu$ <i>fund</i> . If the answer to question 18.(a) is "no," leave this question blank.	orivat	е
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Pri</u>	vate	<u>Offering</u>		
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	Yes ©	No C
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
	ERVI ditor:	CE PROVIDERS		
			Yes	No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	$\odot$	0
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	$\circ$	$\odot$
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses mo one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re tha	3n
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm: ERNST & YOUNG LLP		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		

	City: ST PETERS PORT	State: Country: Guernsey		
			Yes	No
(d)	) Is the auditing firm an <i>indep</i>	pendent public accountant?	۲	0
(e)	) Is the auditing firm registere	ed with the Public Company Accounting Oversight Board?	۲	0
	If yes, Public Company Acco 1438	unting Oversight Board-Assigned Number:		
(f)	If "yes" to (e) above, is the a Oversight Board in accordan	auditing firm subject to regular inspection by the Public Company Accounting ice with its rules?	۲	0
			Ye	es N
	the <i>private fund's</i> audited finar ate fund's investors?	ncial statements for the most recently completed fiscal year distributed to the	e e	) (
	Il of the reports prepared by th alified opinions?	he auditing firm for the <i>private fund</i> since your last annual updating amendm	<i>ent</i> conta	ain
Θy	es O No O Report Not Yet Re	eceived		
If yo		ved," you must promptly file an amendment to your Form ADV to update you	ır respon	se
ime Broke	<u>r</u>		Ye	es N
. (a) Does	s the <i>private fund</i> use one or m	nore prime brokers?	c	
If the	e answer to question 24.(a) is	"yes," respond to questions (b) through (e) below for each prime broker the	privace i	unu
uses		e than one prime broker, you must complete questions (b) through (e) separa		
uses	. If the <i>private fund</i> uses more			
uses	. If the <i>private fund</i> uses more	e than one prime broker, you must complete questions (b) through (e) separa	itely for o	each
uses prim	. If the <i>private fund</i> uses more e broker.	e than one prime broker, you must complete questions (b) through (e) separa	itely for o	
uses prim	. If the <i>private fund</i> uses more e broker.	e than one prime broker, you must complete questions (b) through (e) separa	itely for o	each
uses prim . (a) Does asse If the uses	. If the <i>private fund</i> uses more e broker. s the <i>private fund</i> use any cust ts? e answer to question 25.(a) is	e than one prime broker, you must complete questions (b) through (e) separa	Ye Ye	each es N d
uses prim . (a) Does asse If the uses	. If the <i>private fund</i> uses more e broker. s the <i>private fund</i> use any cust ts? e answer to question 25.(a) is . If the <i>private fund</i> uses more	e than one prime broker, you must complete questions (b) through (e) separa No Information Filed codians (including the prime brokers listed above) to hold some or all of its "yes," respond to questions (b) through (g) below for each custodian the <i>pri</i>	Ye Ye	each es N d
uses prim . (a) Does asse If the uses	. If the <i>private fund</i> uses more e broker. s the <i>private fund</i> use any cust ts? e answer to question 25.(a) is . If the <i>private fund</i> uses more	e than one prime broker, you must complete questions (b) through (e) separa No Information Filed codians (including the prime brokers listed above) to hold some or all of its "yes," respond to questions (b) through (g) below for each custodian the <i>pri</i> e than one custodian, you must complete questions (b) through (g) separatel	Ye Ye	es N
uses prim . (a) Does asse If the uses custo	. If the <i>private fund</i> uses more e broker. s the <i>private fund</i> use any cust ts? e answer to question 25.(a) is . If the <i>private fund</i> uses more odian.	e than one prime broker, you must complete questions (b) through (e) separa No Information Filed codians (including the prime brokers listed above) to hold some or all of its "yes," respond to questions (b) through (g) below for each custodian the <i>pri</i> e than one custodian, you must complete questions (b) through (g) separatel	Ye Ye vate fund y for eac	each es N d
uses prim	. If the <i>private fund</i> uses more e broker. s the <i>private fund</i> use any cust ts? e answer to question 25.(a) is . If the <i>private fund</i> uses more odian.	e than one prime broker, you must complete questions (b) through (e) separa No Information Filed codians (including the prime brokers listed above) to hold some or all of its "yes," respond to questions (b) through (g) below for each custodian the <i>pri</i> e than one custodian, you must complete questions (b) through (g) separatel	Ye Ye vate fund y for eac	each es N h es N
uses prim	. If the <i>private fund</i> uses more e broker. s the <i>private fund</i> use any cust ts? e answer to question 25.(a) is . If the <i>private fund</i> uses more odian.	e than one prime broker, you must complete questions (b) through (e) separa No Information Filed codians (including the prime brokers listed above) to hold some or all of its "yes," respond to questions (b) through (g) below for each custodian the <i>pri</i> e than one custodian, you must complete questions (b) through (g) separatel No Information Filed	Ye Ye Vate fund Y for eac	each es N h es N

22, 2:50 PN	IARD - A	Il Sections [User Name: a	amay123, OrgID: 160006]			
	If the answer to question 26.(a) is "yes," respon than one administrator, you must complete ques			ses more		
	(b) Name of administrator: NORTHERN TRUST INTERNATIONAL FUND A	DMINISTRATION SERV	ICES			
	(c) Location of administrator (city, state and cou	untry).				
	City: ST PETERS PORT	State:	Country: Guernsey			
			Guennicy	Yes No		
	(d) Is the administrator a <i>related person</i> of your	r firm?		00		
	(e) Does the administrator prepare and send in	vestor account stateme	nts to the <i>private fund's</i> investors?			
	• Yes (provided to all investors) • Some (provided to all investors)	provided to some but n	ot all investors) $^{iginedown}$ No (provided to	no		
	(f) If the answer to question 26.(e) is "no" or "s private fund's investors? If investor account respond "not applicable."					
	ining any relevant quotes, and (ii) the valuation us alculations (including allocations) was the valuatio <u>rs</u>			AISTRIDUTIONS, ANA		
	(a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purpose You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municip other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete through (g) separately for each marketer.					
		No Information Filed				
A. PRIVAT	E FUND					
<u>Informat</u>	ion About the Private Fund					
(b)	Name of the <i>private fund</i> : GRE PARTNERSHIP IIB L.P. <i>Private fund</i> identification number: (include the "805-" prefix also)					
	805-7034996319					
	er the laws of what state or country is the <i>private f</i>	-				
		Country: Guernsey				

LAKE ERIE REAL ESTATE GP LTD		
(b) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) t <i>fund</i> .	his <i>pri</i>	ivat
No Information Filed		
The <i>private fund</i> (check all that apply; you must check at least one):		
$\mathbf{V}$ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Co Act of 1940	ompar	۱y
(2) qualifies for the exclusion from the definition of investment company under section $3(c)(7)$ of the Investment Co Act of 1940	ompar	۱y
List the name and country, in English, of each foreign financial regulatory authority with which the private fund is regist	ered.	
No Information Filed		
	Yes	5 N
(a) Is this a "master fund" in a master-feeder arrangement?	0	Ģ
(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private</i>	fund?	<b>,</b>
No Information Filed		
	Yes	5 N
(c) Is this a "feeder fund" in a master-feeder arrangement?	0	6
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fun</i>	d inve	ests
Name of <i>private fund</i> :		
Private fund identification number: (include the "805-" prefix also)		
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	Sched	lule
D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the		
D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th 7.B.(1), for each of the feeder funds answer the following questions:	ll or ster fu	und
D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investantially all of its assets in a single master fund.	nis Seo Il or ster fu	und
D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th 7.B.(1), for each of the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest	ll or ster fu ests Yes	und s N
D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv substantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other	ll or ster fu ests Yes	und s N
D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions: NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invisubstantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ll or ster fu ests Yes • poole	und s N ed
D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions: NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invisubstantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ll or ster fu ests Yes O poole	und s N ed

the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

 $^{\circ}$  hedge fund  $^{\circ}$  liquidity fund  $^{\circ}$  private equity fund  $^{\circ}$  real estate fund  $^{\circ}$  securitized asset fund  $^{\circ}$  venture capital fund  $^{\circ}$  other *private fund*: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

 Current gross asset value of the *private fund*: \$ 124,811,412

#### <u>Ownership</u>

12. Minimum investment commitment required of an investor in the private fund:

\$0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

- 13. Approximate number of the *private fund's* beneficial owners:
  - 2
- 14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:1%
- 15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds: 0%
  - (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the The section 3(c)(1) of - 16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*: 100%

## Your Advisory Services

			Yes	No				
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	$\circ$	$\odot$				
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private the answer to question 17.(a) is "no," leave this question blank.							
		No Information Filed						
			Yes	No				
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	0	$\odot$				
	(b)	) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the pri fund. If the answer to question 18.(a) is "no," leave this question blank.						
	No Information Filed							
			Yes	No				
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$				
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.						
20.	<ul> <li>Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i>?</li> <li>0%</li> </ul>							

Yes No

# 5/18/22, 2:50 PM

Priv	vate Offering		
		Yes	No
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	O	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. SE	ERVICE PROVIDERS		
Aud	litors		
22	(a) (1) Are the private fundle financial statements subject to an appual sudit $2$	Yes	s No
23.	<ul> <li>(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?</li> <li>(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.</li> </ul>	•	0
	GAAP?	0	O
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses mo none auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re th	an
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm:		
	ERNST & YOUNG LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City:     State:     Country:       ST PETERS PORT     Guernsey		
	N 1	Yes	No
	(d) Is the auditing firm an <i>independent public accountant</i> ?	•	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1438		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	o	0
		Yes	5 No
	(g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	$\odot$	0
	(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> c unqualified opinions?	ontai	n
	$\odot$ Yes $\odot$ No $\odot$ Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your res when the report is available.	pons	е
<u>Prir</u>	ne Broker		
		Ye	5 No
24.	(a) Does the <i>private fund</i> use one or more prime brokers?	0	$\odot$
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the priva	ite fu	nd

uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

## <u>Custodian</u>

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

No Information Filed

# **Administrator**

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

	he answer to question 26.(a) is "yes n one administrator, you must comp				
(b)	Name of administrator:				
	NORTHERN TRUST INTERNATIONA	AL FUND ADMINISTRATION SER	VICES		
(c)	Location of administrator (city, sta	ate and country):			
	City:	State:	Country:		
	ST PETERS PORT		Guernsey		
				Yes I	
(d)	Is the administrator a <i>related pers</i>	son of your firm?		0 (	
(e)	Does the administrator prepare an	nd send investor account staten	nents to the <i>private fund's</i> inv	estors?	
	• Yes (provided to all investors) • investors)	$^{m O}$ Some (provided to some but	not all investors) $^{m{O}}$ No (provi	ded to no	
(f)	If the answer to question 26.(e) is private fund's investors? If investo respond "not applicable."			-	
respond "not applicable." uring your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as an					

fee calculations (including allocations) was the valuation determined by such person.

Yes No

Yes No

 $\odot$   $\circ$ 

<u>Market</u>	ters			
		Y	'es	No
28. (a)		vices of someone other than you or your <i>employees</i> for marketing purposes?	0	C
	other solicitor, or similar person.	he <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below f <i>und</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questio narketer.	or	<b>)</b>
				_
		No Information Filed		
. PRIVA	ATE FUND			
nforma	ation About the Private Fund			
1. (a)	Name of the <i>private fund</i> :			
(b)	GREAT PLAINS NDT, LP <i>Private fund</i> identification numbe (include the "205" arefin also)	r:		
	(include the "805-" prefix also) 805-9146736410			
	005 5110/50110			
2. Un	der the laws of what state or count	ry is the <i>private fund</i> organized:		
	State: Delaware	Country: United States		
Na	ame of General Partner, Manage DWNSEND GREAT LAKES AND PLAII			_
(b)	If filing an umbrella registration, fund.	identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this p	oriva	t
		No Information Filed		_
4. The	e <i>private fund</i> (check all that apply			
I Act	t of 1940	n the definition of investment company under section $3(c)(1)$ of the Investment Comp		
<b>⊡</b> Act	(2) qualifies for the exclusion from t of 1940	n the definition of investment company under section $3(c)(7)$ of the Investment Comp	any	
5. List	t the name and country, in English,	of each foreign financial regulatory authority with which the private fund is registered	۱.	
		No Information Filed		
		Y	es	4
	Is this a "master fund" in a master		0	6
(b)	If yes, what is the name and priv	ate fund identification number (if any) of the feeder funds investing in this private fund	d?	
		No. Information Filed		
		No Information Filed		
			es	4
	Is this a "feeder fund" in a maste	۲	es i	- الا

*Private fund* identification number: (include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

#### No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

8.	(a) Is this <i>private fund</i> a "fund of funds"?	$\odot$	0
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	poole	d
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	$\odot$

#### Yes No

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

 $^{\circ}$  hedge fund  $^{\circ}$  liquidity fund  $^{\circ}$  private equity fund  $^{\circ}$  real estate fund  $^{\circ}$  securitized asset fund  $^{\circ}$  venture capital fund  $^{\circ}$  other *private fund*: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

Current gross asset value of the *private fund*:
 \$ 319,878,224

## <u>Ownership</u>

12. Minimum investment commitment required of an investor in the *private fund*:

\$0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

3

- 14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:0%
- 15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds: 0%

Yes No

- (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the <a>O</a> Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?
- 16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*: 0%

# Your Advisory Services

- 17. (a) Are you a subadviser to this *private fund*?
  - (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

## No Information Filed

- 18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*?
  - (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

No Information Filed

19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?

# Private Offering

0%

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?

22. If yes, provide the *private fund's* Form D file number (if any):

s Form D me number (	li aliy).	
	No Information Filed	

# **B. SERVICE PROVIDERS**

# Auditors

					Yes	No
23.	(a)	(1) Are the <i>private fund's</i> financial statements su	ubject to an annual au	ıdit?	$\odot$	$\circ$
		(2) If the answer to question 23.(a)(1) is "yes," GAAP?	are the financial state	ments prepared in accordance with U.S.	0	0
		If the answer to question 23.(a)(1) is "yes," response auditing firm, you must complete questions			e tha	n
		Additional Auditor Information : 1 Record(	s) Filed.			
		If the answer to question 23.(a)(1) is "yes," remove than one auditing firm, you must complete				
		(b) Name of the auditing firm: ERNST & YOUNG LLP				
		(c) The location of the auditing firm's office re				
		City: S	State:	Country:		

Yes No

Yes No

Yes No

Yes No

 $\circ$   $\circ$ 

	CLEVELAND	Ohio	United States				
				Yes	No		
	(d) Is the auditing firm an <i>in</i>	ndependent public accountant	?	Θ	0		
	(e) Is the auditing firm regis	stered with the Public Compar	ny Accounting Oversight Board?	۲	0		
	If yes, Public Company / 42	Accounting Oversight Board-A	ssigned Number:				
	(f) If "yes" to (e) above, is Oversight Board in acco		egular inspection by the Public Company Acc	ounting 💽	0		
<i>(</i> )					s No		
(g)	Are the <i>private fund's</i> audited private fund's investors?	financial statements for the m	ost recently completed fiscal year distribute	d to the 🛛 💽	0		
(h)	Do all of the reports prepared unqualified opinions?	by the auditing firm for the <i>pr</i>	ivate fund since your last annual updating a	<i>mendment</i> conta	in		
	⊙ Yes ◯ No ◯ Report Not Y	et Received					
	If you check "Report Not Yet R when the report is available.	eceived," you must promptly	file an amendment to your Form ADV to upo	late your respons	se		
<u>Prime E</u>	Broker			Ye	s No		
24. (a)	Does the private fund use one	or more prime brokers?		C	o		
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the puses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate prime broker.						
	prime broker.						
	prime broker.	No Info	rmation Filed				
Custodi		No Info	rmation Filed		c No		
	lian Does the <i>private fund</i> use any		rmation Filed ne brokers listed above) to hold some or all		s No		
	lian Does the <i>private fund</i> use any assets? If the answer to question 25.(a	custodians (including the prin ) is "yes," respond to questio		of its C	o		
	lian Does the <i>private fund</i> use any assets? If the answer to question 25.(a uses. If the <i>private fund</i> uses r	custodians (including the prin a) is "yes," respond to questio nore than one custodian, you	ne brokers listed above) to hold some or all o ns (b) through (g) below for each custodian	of its C	o		
	lian Does the <i>private fund</i> use any assets? If the answer to question 25.(a uses. If the <i>private fund</i> uses r	custodians (including the prin a) is "yes," respond to questio nore than one custodian, you	ne brokers listed above) to hold some or all ns (b) through (g) below for each custodian must complete questions (b) through (g) se	of its C	o		
25. (a)	lian Does the <i>private fund</i> use any assets? If the answer to question 25.(a uses. If the <i>private fund</i> uses r	custodians (including the prin a) is "yes," respond to questio nore than one custodian, you	ne brokers listed above) to hold some or all ns (b) through (g) below for each custodian must complete questions (b) through (g) se	of its C	o		
25. (a)	lian Does the <i>private fund</i> use any assets? If the answer to question 25.(a uses. If the <i>private fund</i> uses r custodian.	custodians (including the prin i) is "yes," respond to questio nore than one custodian, you No Info	ne brokers listed above) to hold some or all o ns (b) through (g) below for each custodian must complete questions (b) through (g) se rmation Filed	of its C the <i>private fund</i> eparately for each	o		
25. (a)	lian Does the <i>private fund</i> use any assets? If the answer to question 25.(a uses. If the <i>private fund</i> uses r custodian.  istrator Does the <i>private fund</i> use an a If the answer to question 26.(a	custodians (including the prin ) is "yes," respond to question nore than one custodian, you No Info No Info dministrator other than your ) is "yes," respond to question	ne brokers listed above) to hold some or all o ns (b) through (g) below for each custodian must complete questions (b) through (g) se rmation Filed	of its C the <i>private fund</i> eparately for each Ye	s No		

27. During your last fiscal year, what percentage of the private fund's assets (by value) was valued by a person, such as an administrator, that is not your related person?

## 100%

Include only those assets where (i) such person carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such person.

## **Marketers**

28. (a) Does the private fund use the services of someone other than you or your employees for marketing purposes?

You must answer "yes" whether the person acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the private fund uses. If the private fund uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

# A. PRIVATE FUND

# Information About the Private Fund

- 1. (a) Name of the *private fund*: GREAT PLAINS PENSION, LP
  - (b) Private fund identification number: (include the "805-" prefix also) 805-7672207471
- 2. Under the laws of what state or country is the *private fund* organized: State:
  - Delaware

Country: United States

(a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity): 3.

Name of General Partner, Manager, Trustee, or Director	
TOWNSEND GREAT LAKES AND PLAINS GP, LLC	

(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

🗹 (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

🗹 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. 5. No Information Filed

Yes No œ

O

Yes No

 $\mathbf{O}$  $\odot$ 

(a) Is this a "master fund" in a master-feeder arrangement? 6.

(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?

No	Inforn	nation	Filed

- (c) Is this a "feeder fund" in a master-feeder arrangement?
- (d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests? Name of *private fund*:

*Private fund* identification number: (include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

#### No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	$\odot$	$\circ$
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other private investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	pooled	ł
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	$\odot$
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	Θ
10.	What type of fund is the <i>private fund</i> ?		
	$^{\circ}$ hedge fund $^{\circ}$ liquidity fund $^{\circ}$ private equity fund $^{\circ}$ real estate fund $^{\circ}$ securitized asset fund $^{\circ}$ venture capital f Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	<sup>f</sup> und (	9
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> :		
	\$ 314,260,201		
<u>0w</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the private fund:		
	\$ 0		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the am forth in the organizational documents of the fund).	ount s	set
13.	Approximate number of the <i>private fund's</i> beneficial owners:		
	1		

Yes No

- 14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:0%
- 15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds: 0%
  - (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?
- 16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:0%

	_			
<u>Yo</u>	ur A	dvisory Services	Yes	No
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	0	$\odot$
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	fund.	If
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	0	©
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>fund</i> . If the answer to question 18.(a) is "no," leave this question blank.	orivat	е
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Ар; 0%	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Pri</u>	vate	Offering		
			Yes	No
21.		s the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	۲	0

22. If yes, provide the *private fund's* Form D file number (if any):

B.	SERVICE	PROVIDERS
υ.	SERVICE	INCVIDENS

Auditors			
	Yes	No	
23. (a) (1) Are the private fund's financial statements subject to an annual audit?	$\odot$	0	
(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	۲	o	
If the answer to question 23.(a)(1) is "yes." respond to questions (b) through (h) below. If the private fund uses more	ore tha	an	

No Information Filed

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

# Additional Auditor Information : 1 Record(s) Filed.

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

Yes No

	(b)	Name of the auditing firm:			
		ERNST & YOUNG LLP			
	(c)	The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and co	ountry):		
		City: State: Country:			
		CLEVELAND Ohio United States			
				Yes	No
	(d)	Is the auditing firm an <i>independent public accountant</i> ?		Θ	0
	(e)	Is the auditing firm registered with the Public Company Accounting Oversight Board?		o	0
		If yes, Public Company Accounting Oversight Board-Assigned Number: 42			
	(f)	If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Acc Oversight Board in accordance with its rules?	counting	o	o
				Ye	s No
(g)		he <i>private fund's</i> audited financial statements for the most recently completed fiscal year distribute te fund's investors?	ed to the	e	0
(h)		II of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating a</i> alified opinions?	mendment	conta	ain
	• Ye	es <sup>C</sup> No <sup>C</sup> Report Not Yet Received			
		u check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to upd	date vour re	รกดก	se
		n the report is available.	,,	-	
Prime I	Broker	r		Ve	s No
				Ye	s No
	Does If the uses.	the <i>private fund</i> use one or more prime brokers? e answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime bro . If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e e broker.	-	C ate f	o ⊙ und
	Does If the uses.	the <i>private fund</i> use one or more prime brokers? e answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime bro . If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e	-	C ate f	o ⊙ und
	Does If the uses.	the <i>private fund</i> use one or more prime brokers? e answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime brok. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e e broker.	-	C ate f	o ⊙ und
24. (a)	Does If the uses. prime	the <i>private fund</i> use one or more prime brokers? e answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime brok. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e e broker.	-	C ate f for e	each
24. (a) <u>Custod</u>	Does If the uses. prime	the <i>private fund</i> use one or more prime brokers? e answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime brok . If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e e broker. No Information Filed	) separately	C ate f for e	o ⊙ und
24. (a) <u>Custod</u>	Does If the uses. prime	the <i>private fund</i> use one or more prime brokers? e answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime brok . If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e e broker. No Information Filed	) separately	C ate f for e	e s No
<u>Custod</u>	Does If the uses. prime ian Does asset: If the	the <i>private fund</i> use one or more prime brokers? e answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime brok . If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e e broker. No Information Filed	) separately of its the <i>private</i>	Cate f for e Ye Current	s No
24. (a) <u>Custod</u>	Does If the uses. prime ian Does assets If the uses.	the <i>private fund</i> use one or more prime brokers? e answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime brok . If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e e broker. No Information Filed	) separately of its the <i>private</i>	Cate f for e Ye Current	s No
24. (a) <u>Custod</u> 25. (a)	Does If the uses. prime ian Does asset: If the uses. custo	the <i>private fund</i> use one or more prime brokers? a answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e e broker. No Information Filed the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all ts? a answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) sedian. No Information Filed	) separately of its the <i>private</i>	Cate f for e Ye Current	s No
24. (a) <u>Custod</u>	Does If the uses. prime ian Does asset: If the uses. custo	the <i>private fund</i> use one or more prime brokers? a answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e e broker. No Information Filed the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all ts? a answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) sedian. No Information Filed	) separately of its the <i>private</i>	Ye funa eac	es No
24. (a) <u>Custod</u> 25. (a) <u>Admini</u>	Does If the uses. prime ian Does asset: If the uses. custo strato	the <i>private fund</i> use one or more prime brokers? a answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e e broker. No Information Filed the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all ts? a answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) sedian. No Information Filed	) separately of its the <i>private</i>	Ye funa eac	s No

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

No Information Filed

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

## <u>Marketers</u>

# Yes No

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

## A. PRIVATE FUND

## Information About the Private Fund

- 1. (a) Name of the *private fund*: JDPT FUND, L.P.
  - (b) *Private fund* identification number: (include the "805-" prefix also) 805-4728834775

2. Under the laws of what state or country is the *private fund* organized:

State:	Country:
Delaware	United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

 Name of General Partner, Manager, Trustee, or Director

 JDPT MANAGER, LLC

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

 $\Box$  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 

Γ	No Information Filed		
-		Yes	No
(	a) Is this a "master fund" in a master-feeder arrangement?	0	$\odot$
(	b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private</i>	fund?	
	No Information Filed		
		Yes	No
(	c) Is this a "feeder fund" in a master-feeder arrangement?	0	$\odot$
(	d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fun</i> Name of <i>private fund</i> :	d inves	sts?
	<i>Private fund</i> identification number: (include the "805-" prefix also)		
	OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single b, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	Schedu	ıle
	f you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the .B.(1), for each of the feeder funds answer the following questions:	nis Sect	tion
	No Information Filed		
s fo	IOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv ubstantially all of its assets in a single master fund.	ster fu	nd"
s fo	ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv	ster fu	
s fo s (	ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv ubstantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"?	ster fur ests Yes ©	No C
s fo s (, N	ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv ubstantially all of its assets in a single master fund.	ster fur ests Yes ©	No C
s fo s ( N ir	ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv ubstantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other	ster fur ests Yes ©	No C
s fo s ( N ir	ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv ubstantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other negativestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ster fui ests Yes r pooleo	No C d
s fa s ( M ir ( C	ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv ubstantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other negativestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ster fun ests Yes or pooled	No C d
s fa ( N ir ( L t	<ul> <li>ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invubstantially all of its assets in a single master fund.</li> <li>a) Is this <i>private fund</i> a "fund of funds"?</li> <li>IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other twestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.</li> <li>b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i>?</li> </ul>	ster fun ests Yes or pooled C Yes	No O O No
s f ( N ir (	<ul> <li>ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invubstantially all of its assets in a single master fund.</li> <li>a) Is this <i>private fund</i> a "fund of funds"?</li> <li>IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other network vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.</li> <li>b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i>?</li> </ul>	ster fur ests Yes or pooled Yes O	No 0 1 0 No 0
s fo s (, N ir () C tl tl V (,	ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv ubstantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? Puring your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ?	ster fur ests Yes or pooled Yes O	No 0 1 0 No 0
s f s (, N ir () U t t V ( , N O	ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv ubstantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? Puring your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? <i>U</i> hat type of fund is the <i>private fund</i> ? I hedge fund <sup>C</sup> liquidity fund <sup>O</sup> private equity fund <sup>O</sup> real estate fund <sup>O</sup> securitized asset fund <sup>O</sup> venture capital Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	ster fur ests Yes or pooled Yes O	No 0 1 0 No 0
sfas (, Nir) () Dth V (, N C \$	ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv ubstantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? wuring your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under ne Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? D hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital Dther <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS IOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. Surrent gross asset value of the <i>private fund</i> : 731,010,363	ster fur ests Yes or pooled Yes O	No 0 1 0 No 0
sfas (, Nir) () Dth V (, N C \$	ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv ubstantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? Indep fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital Dther <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS HOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	ster fur ests Yes or pooled Yes O	No O O No O

\$0

	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount forth in the organizational documents of the fund).	ount s	set
13.	Approximate number of the <i>private fund's</i> beneficial owners: 2		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 1%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes O	No C
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
<u>Υοι</u>	r Advisory Services	Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	_	_
	<ul><li>(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.</li></ul>	C fund.	⊙ If
	No Information Filed		
	<ul><li>fund?</li><li>(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>p</i> fund. If the answer to question 18.(a) is "no," leave this question blank.</li></ul>	orivate	9
	No Information Filed		
10	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	Yes	No
19.	NOTE: For purposes of this question, do not consider feeder funds of the private fund.	o	©
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
<u>Priv</u>	rate Offering	Yes	No
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	$\odot$	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
B. SI	021-203229 ERVICE PROVIDERS		
<u>Auc</u>	litors		
		Yes	

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	$\odot$	0
If the answer to question $23.(a)(1)$ is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses mor one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	e tha	an

		litional Auditor Information : 1 Record(s) Filed.			_					
		the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fun</i> ore than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm								
	(b) Name of the auditing firm: ERNST & YOUNG									
	<ul> <li>(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):</li> <li>City: State: Country:</li> </ul>									
		CLEVELAND Ohio United States	Vac	. NI.						
	(d)	) Is the auditing firm an independent public accountant?	Yes ©							
	(e)	) Is the auditing firm registered with the Public Company Accounting Oversight Board?	o	o	I					
		If yes, Public Company Accounting Oversight Board-Assigned Number: 42								
	(f)	) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Account Oversight Board in accordance with its rules?	ting 💿	c	I					
			v	es	No					
(g)		the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to ate fund's investors?	the	_	0					
(h)		II of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amen</i> ualified opinions?	dment cont	ain:						
	• Ye	res $^{m C}$ No $^{m C}$ Report Not Yet Received								
	If you	nu check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update n the report is available.	your respor	ıse						
Prime E	Broker	: <u>r</u>								
			Y	es	No					
24. (a)	Does	s the <i>private fund</i> use one or more prime brokers?	(	0	$\odot$					
	uses.	e answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker . If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) sep le broker.								
		No Information Filed								
Custod	ian		v							
25. (a)	Does assets	s the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of it: ts?	<b>c</b>	es O	NO ©					
		e answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the . If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separa odian.								

#### No Information Filed

## Administrator

26.	(a)	Does the	private fu	<i>und</i> use an	administrator	other than	your firm?
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If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

No Information Filed

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

## **Marketers**

#### Yes No

Yes No

28. (a) Does the private fund use the services of someone other than you or your employees for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

## A. PRIVATE FUND

#### Information About the Private Fund

1. (a) Name of the *private fund*:

KKT, L.P.

- (b) Private fund identification number: (include the "805-" prefix also)
   805-1766052441
- Under the laws of what state or country is the *private fund* organized: State: Country:

Guernsey

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee, or Director					
KKT GP, LLC					

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

 $\mathbf{V}$  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.

No Information Filed

- 6. (a) Is this a "master fund" in a master-feeder arrangement?
  - (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?

No Information Filed

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests? Name of *private fund*:

*Private fund* identification number: (include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

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Yes No

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Yes No

Yes No

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#### Yes No

- 9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?
- 10. What type of fund is the *private fund*?

 $^{\circ}$  hedge fund  $^{\circ}$  liquidity fund  $^{\circ}$  private equity fund  $^{\circ}$  real estate fund  $^{\circ}$  securitized asset fund  $^{\circ}$  venture capital fund  $^{\circ}$  other *private fund*: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

20. <b>Priv</b> 21.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ? <i>NOTE: For purposes of this question, do not consider feeder funds of the private fund</i> . Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%	○ Yes ⊙	© No O
20. <u>Priv</u>	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ? <i>NOTE: For purposes of this question, do not consider feeder funds of the private fund</i> . Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0% <b>rate Offering</b> Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities	Yes	No
20.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ? <i>NOTE: For purposes of this question, do not consider feeder funds of the private fund</i> . Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%	~	~
	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ? <i>NOTE: For purposes of this question, do not consider feeder funds of the private fund.</i> Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?	0	۲
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
19.		0	$\odot$
		Yes	No
	No Information Filed	.,	
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the prefund. If the answer to question 18.(a) is "no," leave this question blank.	rivat	e
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	Yes O	No ⊙
	No Information Filed		
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private for</i> the answer to question 17.(a) is "no," leave this question blank.	und.	If
17.	(a) Are you a subadviser to this <i>private fund</i> ?	Yes O	$\odot$
<u>Yoı</u>	ir Advisory Services		
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 99%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes ©	No C
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : $1\%$		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 2		
	\$ 0 NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amo forth in the organizational documents of the fund).	ounts	set
	nership Minimum investment commitment required of an investor in the <i>private fund</i> :		
C UW			
Ow			
	Current gross asset value of the <i>private fund</i> : \$ 202,000,000		

<u>ditors</u>			
		Ye	s I
. , .	1) Are the <i>private fund's</i> financial statements subject to an annual audit?	6	5
	2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	C	)
	f the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	more t	han
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	S	
	(b) Name of the auditing firm:		
	ERNST & YOUNG LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country:		
	ST PETERS PORT Guernsey	<b>X</b>	
	(d) Is the auditing firm an <i>independent public accountant</i> ?	Yes ©	NO C
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	o	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1438		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	٥	0
-		V.	_
	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?	6	is N
• •	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last annual updating amendmen Inqualified opinions?	it conta	in
	🗅 Yes 🔿 No 💿 Report Not Yet Received		
	f you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your vhen the report is available.	respon	se
me Br	<u>oker</u>		
(-) -	Door the private fund use one or more prime brokers?	Ye	s I
. ,	Does the <i>private fund</i> use one or more prime brokers?	C ivata f	
ι	f the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>p</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate prime broker.		

Custodian

#### Yes No

 $\odot$  $^{\circ}$ 

assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

25. (a) Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its

No Information Filed

#### **Administrator**

26. (a) Does the *private fund* use an administrator other than your firm?

Yes No

Yes No

 $\odot$ 0

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

No Information Filed

27. During your last fiscal year, what percentage of the private fund's assets (by value) was valued by a person, such as an administrator, that is not your related person?

100%

Include only those assets where (i) such person carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such person.

#### **Marketers**

- 28. (a) Does the private fund use the services of someone other than you or your employees for marketing purposes?
  - O  $\odot$ You must answer "yes" whether the person acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the private fund uses. If the private fund uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

## A. PRIVATE FUND

## Information About the Private Fund

1. (a) Name of the *private fund*:

KVT, L.P.

(b) Private fund identification number: (include the "805-" prefix also) 805-4089633764

2. Under the laws of what state or country is the *private fund* organized:

State: Delaware

Country:
United States

<ul> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.</li></ul>	Name of Gen	eral Partner, Manager, Trustee, or Director	
Kind.       No Information Filed         The private fund (check all that apply; you must check at least one):       (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company         (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company         (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company         (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company         (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company         (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company         (3) Is this a "master fund" in a master-feeder arrangement?       C         (b) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invest       No         Name of private fund identification number:       C       C         (Include the "885-" prefix also)       No       Information Filed         NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedulo, D, Section 7.8.(1) for a master-feeder arrangement, one or more funds ("feeder funds") invest all or nubustantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder funds") invest all or usubstantially all of their assets in a single	KVT GP, LLC		
Kind.       No Information Filed         The private fund (check all that apply; you must check at least one):       (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company kt of 1940         ILI:       (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company kt of 1940         ILI:       Information Filed         Value       Value         (a) last his a "master fund" in a master-feeder arrangement?       C         (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund invest       Vest         (c) Is this a "feeder fund" in a master-feeder arrangement?       C         (c) Is this a "feeder fund" in a master-feeder arrangement?       C         (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invest Name of private fund identification number:       (Include the "885-" prefix also)         NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund'). A fund would also be a "feeder fund" investing in a "master fund for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of their assets in a single multiple classes (or series) of shares or interests,			
The private fund (check all that apply; you must check at least one):		umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) the	nis <i>pri</i>
Q       (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940         Q       (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940         List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.         No Information Filed         (a) Is this a "master fund" in a master-feeder arrangement?       C         (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?         No Information Filed         Yes         (c) Is this a "feeder fund" in a master-feeder arrangement?       C         (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invest Name of private fund:         Name of private fund:       Yes         Name of private fund:       Private fund identification number:         (include the "805-" prefix also)       No Information Filed         NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedue         0, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.         If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Sect .B.(1), for each of the feeder funds' ansever the following ques		No Information Filed	
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Act of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940  (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940  (4) Is this a "master fund" in English, of each foreign financial regulatory authority with which the private fund is registered. No Information Filed  (5) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?  (5) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund identification number (if any) of the master fund in which this private fund invest Name of private fund:  Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedue 0, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Sect. C.B.(1), for each of the feeder funds answer the following questions:  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fued"). A fund would also be a "feeder funds") invest all or substantially all of their assets in a single fund ("master fued"). A fund would also be a "feeder fund" investing in a "master fued").  (a) Is this private fund a "fund of funds"?  (b) If the fueder fund a "fund of funds"?  (c) If the index the divent in the divent many due way on be a related more many investing in a "master fued".  (b) If the choir due action in the master fued many and way on be arefued more many fueded m	-		
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NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	(include the optimal of the optimal	ne "805-" prefix also) st complete question 6 for each master-feeder arrangement regardless of whether you are filing a single S .(1) for the master-feeder arrangement or reporting on the funds separately. g a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th ch of the feeder funds answer the following questions: No Information Filed poses of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest al Il of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mas f this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest	is Sec I or ster fu
investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	(include the optimal of the optimal	ne "805-" prefix also) st complete question 6 for each master-feeder arrangement regardless of whether you are filing a single S .(1) for the master-feeder arrangement or reporting on the funds separately. g a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th ch of the feeder funds answer the following questions: No Information Filed poses of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest al Il of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mas f this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest	is Seo I or ster fu
(b) If you does the private fund invest in funds managed by you or by a related percent	(include the NOTE: You mu D, Section 7.B If you are filing 7.B.(1), for ea NOTE: For pur substantially a for purposes o substantially a	ne "805-" prefix also) st complete question 6 for each master-feeder arrangement regardless of whether you are filing a single S (1) for the master-feeder arrangement or reporting on the funds separately. g a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th ch of the feeder funds answer the following questions: No Information Filed poses of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest al II of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mas f this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inve II of its assets in a single master fund.	is Seo I or ster fu
	(include the NOTE: You mu D, Section 7.B If you are filing 7.B.(1), for ea NOTE: For pur substantially a for purposes o substantially a (a) Is this <i>prin</i> NOTE: For pur	ne "805-" prefix also) st complete question 6 for each master-feeder arrangement regardless of whether you are filing a single S .(1) for the master-feeder arrangement or reporting on the funds separately. g a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th ch of the feeder funds answer the following questions: No Information Filed poses of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest al II of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mas f this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inve II of its assets in a single master fund. <i>vate fund</i> a "fund of funds"? poses of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other	l or ster fu yes ©
	(include the NOTE: You mu D, Section 7.B If you are filing 7.B.(1), for ea NOTE: For pur substantially a for purposes o substantially a (a) Is this <i>prin</i> NOTE: For pur investment vel	ne "805-" prefix also) st complete question 6 for each master-feeder arrangement regardless of whether you are filing a single S .(1) for the master-feeder arrangement or reporting on the funds separately. g a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th ch of the feeder funds answer the following questions: No Information Filed poses of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest al ll of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mas f this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inve ll of its assets in a single master fund. vate fund a "fund of funds"? poses of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other hicles, regardless of whether they are also private funds or registered investment companies.	l or ster fu ests Yes poole
During your last fiscal year, did the private fund invest in securities issued by investment companies registered under	(include the NOTE: You mu D, Section 7.B If you are filing 7.B.(1), for ea NOTE: For pur substantially a for purposes o substantially a (a) Is this <i>priv</i> NOTE: For pur investment vel (b) If yes, door	ne "805-" prefix also) st complete question 6 for each master-feeder arrangement regardless of whether you are filing a single 5 (1) for the master-feeder arrangement or reporting on the funds separately. g a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th ch of the feeder funds answer the following questions: No Information Filed poses of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest al ll of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mas f this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inve ll of its assets in a single master fund. <i>vate fund</i> a "fund of funds"? poses of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other hicles, regardless of whether they are also <i>private funds</i> or registered investment companies. es the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	l or ster fu ests Yes poole

https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG\_PK=1652620

the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

10. What type of fund is the *private fund*?

 $^{\circ}$  hedge fund  $^{\circ}$  liquidity fund  $^{\circ}$  private equity fund  $^{\circ}$  real estate fund  $^{\circ}$  securitized asset fund  $^{\circ}$  venture capital fund  $^{\circ}$  other *private fund*: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS

NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.

 Current gross asset value of the *private fund*: \$ 43,125,154

#### **Ownership**

12. Minimum investment commitment required of an investor in the private fund:

\$0

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

- 13. Approximate number of the *private fund's* beneficial owners:
  - 2
- 14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:4%
- 15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds: 0%
  - (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the The section 3(c)(1) of - 16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*: 99%

## Your Advisory Services

			Yes	No
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	$\circ$	$\odot$
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	fund.	If
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	0	$\odot$
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>fund</i> . If the answer to question 18.(a) is "no," leave this question blank.	orivat	9
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Арр 0%	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		

Yes No

# 5/18/22, 2:50 PM

Priv	vate Offering		
21		Yes	5 No
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	0	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. SI	ERVICE PROVIDERS		
<u>Auc</u>	litors		
23	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	_	s No
201	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.	•	0
	GAAP?	O	0
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses mo one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re th	ian
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm:		
	ERNST & YOUNG LLP		
	<ul> <li>(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):</li> <li>City: State: Country:</li> </ul>		
	CLEVELAND     Ohio     United States		
	۲ ۲	Yes	No
	(d) Is the auditing firm an <i>independent public accountant</i> ?	o	o
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	o	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 42		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
		Ye	s No
	(g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	0	0
	(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> of unqualified opinions?	onta	in
	$\odot$ Yes $\odot$ No $\odot$ Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your res when the report is available.	pons	е
Priv	ne Broker		
		Ye	s No
24.	(a) Does the <i>private fund</i> use one or more prime brokers?	0	$\odot$
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the priva	ite fi	ınd

uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

#### **Custodian**

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

No Information Filed

#### **Administrator**

26. (a) Does the *private fund* use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

No Information Filed

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

# **Marketers**

28. (a) Does the private fund use the services of someone other than you or your employees for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

#### A. PRIVATE FUND

## Information About the Private Fund

- 1. (a) Name of the *private fund*:
  - LAKE CONSTANCE LP
  - (b) *Private fund* identification number:

Yes No

Yes No

 $\odot$ 

Yes No

(include the "805-" prefix also) 805-8163083718

State:

2. Under the laws of what state or country is the *private fund* organized:

# Country: Guernsey

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee, or Director
TOWNSEND LAKE CONSTANCE GP LTD

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

	No Information Filed	
4.	The private fund (check all that apply; you must check at least one):	
	$\Box$ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940	/
	$\mathbf{\overline{C}}$ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940	/
5.		
5.		
5.	List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.	No
	List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered. No Information Filed	No ©

# No Information Filed

- (c) Is this a "feeder fund" in a master-feeder arrangement?
- (d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests? Name of *private fund*:

*Private fund* identification number: (include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

Yes No

Yes No

8.	(a)	Is this <i>private fund</i> a "fund of funds"?	$\odot$	0
		E: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other percent vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	poole	t
	(b)	If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	$\odot$	0
			Yes	No
9.		ing your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	$\odot$
10.	Wha	at type of fund is the <i>private fund</i> ?		
		hedge fund $^{\circ}$ liquidity fund $^{\circ}$ private equity fund $^{\circ}$ real estate fund $^{\circ}$ securitized asset fund $^{\circ}$ venture capital f ner <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	und <sup>I</sup>	0
	ΝΟΤ	E: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.		rent gross asset value of the <i>private fund</i> : 35,639,891		
<u>0w</u>	ners	hip		
12.	Mini	imum investment commitment required of an investor in the private fund:		
		E: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount hin the organizational documents of the fund).	ount	set
13.	App 1	roximate number of the <i>private fund's</i> beneficial owners:		
14.	Wha 1%	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section $3(c)(1)$ of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes O	No O
16.	Wha 100	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : %		
<u>Yoı</u>	ur Ad	lvisory Services	Maa	
17.	(a)	Are you a subadviser to this private fund?	Yes	No ©
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	fund.	If
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	0	۲
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the $\mu$ fund. If the answer to question 18.(a) is "no," leave this question blank.	orivat	е
		No Information Filed		

		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
0.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
riv	ate Offering		
4		Yes	No
1.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	0	O
2.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
. SE	RVICE PROVIDERS		
ud	itors	Yes	s No
3.	(a) (1) Are the private fund's financial statements subject to an annual audit?	$\odot$	0
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	$\odot$
	GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses mo	re th	an
	one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm: ERNST & YOUNG		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country:		
	ST. PETERS PORT Guernsey	íes I	No
	(d) Is the auditing firm an independent public accountant?	_	0
	(a) Is the auditing firm registered with the Public Company Accounting Overeight Reard?	_	
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	o	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1438		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
		Yes	5 No
	(g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the	$\odot$	0
	<ul><li><i>private fund's</i> investors?</li><li>(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> c</li></ul>	ontai	n
	unqualified opinions?		
	⊙ Yes ○ No ○ Report Not Yet Received		

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

# **Prime Broker**

24. (a) Does the private fund use one or more prime brokers?

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

# Custodian

25. (a) Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

No Information Filed

# Administrator

26. (a) Does the private fund use an administrator other than your firm?

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

Additional Administrator Information : 1 Record(s) Filed.

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

Country:

Guernsey

(b) Name of administrator: NORTHERN TRUST INTERNATIONAL FUND ADMINISTRATION SERVICES.

(c) Location of administrator (city, state and country): City: State:

ST PETER PORT

- (d) Is the administrator a related person of your firm?
- (e) Does the administrator prepare and send investor account statements to the private fund's investors?

• Yes (provided to all investors) <sup>C</sup> Some (provided to some but not all investors) <sup>C</sup> No (provided to no investors)

(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable."

Yes No

0  $\odot$   $\mathbf{O}$ 

Yes No  $\circ$ 

Yes No

 $\odot$  $\mathbf{O}$ 

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

## 100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

# **Marketers**

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

Yes No

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

# A. PRIVATE FUND

# Information About the Private Fund

- 1. (a) Name of the *private fund*: LAKE TAHOE II, L.P.
  - (b) Private fund identification number: (include the "805-" prefix also)
     805-3009989365

2. Under the laws of what state or country is the *private fund* organized: State: Country: Delaware United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee, or Director
LAKE TAHOE II GP, LLC

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

 $\mathbf{V}$  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.
 No Information Filed

No Information Flied

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?

Yes No

 $\circ$   $\circ$ 

No Information Filed	
----------------------	--

- (c) Is this a "feeder fund" in a master-feeder arrangement?
- (d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests? Name of *private fund*:

*Private fund* identification number: (include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

#### No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	$\odot$	$\circ$
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	pooled	d
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	$\odot$
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	0
10.	What type of fund is the <i>private fund</i> ?		
	$^{\circ}$ hedge fund $^{\circ}$ liquidity fund $^{\circ}$ private equity fund $^{\circ}$ real estate fund $^{\circ}$ securitized asset fund $^{\circ}$ venture capital Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	fund <sup>I</sup>	0
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> :		
	\$ 99,115,540		
<u>0w</u>	nership		
12.	Minimum investment commitment required of an investor in the private fund:		
	\$ 0		

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

2

Yes No

3/22, 2:5	50 PN	IARD - All Sections [User Name: amay123, OrgID: 160006]		
14.	Wha 5%	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
		If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes ©	No O
16.	Wha 95%	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
You	ır Ad	lvisory Services	N	
17	(a)	Are you a subadviser to this <i>private fund</i> ?	Yes	NO
1/.			0	• •
		If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> at the answer to question 17.(a) is "no," leave this question blank.	runa.	11
		No Information Filed		
			Yes	No
18.		Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	0	Θ
		If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>p</i> fund. If the answer to question 18.(a) is "no," leave this question blank.	orivat	е
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.	Ĩ	~
20.	Аррі 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Priv	vate	<u>Offering</u>		
			Yes	No
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	O	0
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		

# **B. SERVICE PROVIDERS**

Auditors		
	Yes	No
23. (a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	$\odot$	$\circ$
(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	$\odot$	0
If the prover to question $22$ (a)(1) is "use " respond to questions (b) through (b) holes. If the private fund uses m	awa tha	

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

# Additional Auditor Information : 1 Record(s) Filed.

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

		N C.1 1997 C				
(h) <u>Prime l</u>	(b)	Name of the auditing firm: ERNST & YOUNG LLP				
	(c)	The location of the auditing firm's office	responsible for t	the <i>private fund's</i> audit (city, state and country):		
		City:	State:	Country:		
		CLEVELAND	Ohio	United States		
	(4)	Is the sudition firm on independent sub	lia accountant?		Yes	No
	(a)	Is the auditing firm an <i>independent publ</i>	iic accountant?		$\odot$	0
	(e)	Is the auditing firm registered with the F	Public Company	Accounting Oversight Board?	$\odot$	0
		If yes, Public Company Accounting Overs 42	sight Board-Assi	igned Number:		
	(f)	If "yes" to (e) above, is the auditing firm Oversight Board in accordance with its m		ular inspection by the Public Company Accounting	o	o
					Ye	es No
(g)		e <i>private fund's</i> audited financial stateme e <i>fund's</i> investors?	ents for the mos	t recently completed fiscal year distributed to the	G	0
(h)		of the reports prepared by the auditing f lified opinions?	irm for the <i>priva</i>	ate fund since your last annual updating amendmen	nt cont	ain
	🖸 Ye	s $^{m O}$ No $^{m O}$ Report Not Yet Received				
		check "Report Not Yet Received," you m the report is available.	ust promptly file	e an amendment to your Form ADV to update your	respon	se
<u>Prime E</u>	Broker				Ye	es No
		the <i>private fund</i> use one or more prime b	prokers?		Ye	es No
	Does If the uses.	answer to question 24.(a) is "yes," respo	ond to questions	(b) through (e) below for each prime broker the <i>pr</i> u must complete questions (b) through (e) separate	c rivate f	o o Tund
<u>Prime E</u> 24. (a)	Does If the uses.	answer to question 24.(a) is "yes," respo If the <i>private fund</i> uses more than one p	ond to questions rime broker, you		c rivate f	o o Tund
	Does If the uses.	answer to question 24.(a) is "yes," respo If the <i>private fund</i> uses more than one p	ond to questions rime broker, you	u must complete questions (b) through (e) separate	c rivate f	o o Tund
	Does If the uses. prime	answer to question 24.(a) is "yes," respo If the <i>private fund</i> uses more than one p	ond to questions rime broker, you	u must complete questions (b) through (e) separate	( rivate i ely for	iund each
24. (a) <u>Custodi</u>	Does If the uses. prime	answer to question 24.(a) is "yes," respo If the <i>private fund</i> uses more than one p broker. the <i>private fund</i> use any custodians (inclu	nd to questions rime broker, you No Inform	u must complete questions (b) through (e) separate	( rivate i ely for	es No
24. (a) <u>Custodi</u>	Does If the uses. prime	answer to question 24.(a) is "yes," respo If the <i>private fund</i> uses more than one p broker. the <i>private fund</i> use any custodians (inclu ? answer to question 25.(a) is "yes," respo If the <i>private fund</i> uses more than one cu	nd to questions rime broker, you No Inform uding the prime and to questions	u must complete questions (b) through (e) separate	C rivate f ely for Ye C te fund	es No
24. (a) <u>Custodi</u>	Does If the uses. prime	answer to question 24.(a) is "yes," respo If the <i>private fund</i> uses more than one p broker. the <i>private fund</i> use any custodians (inclu ? answer to question 25.(a) is "yes," respo If the <i>private fund</i> uses more than one cu	nd to questions rime broker, you No Inform uding the prime and to questions ustodian, you m	u must complete questions (b) through (e) separate nation Filed brokers listed above) to hold some or all of its (b) through (g) below for each custodian the <i>priva</i>	C rivate f ely for Ye C te fund	es No
24. (a) Custodi 25. (a)	Does If the uses. prime	answer to question 24.(a) is "yes," respo If the <i>private fund</i> uses more than one p broker. the <i>private fund</i> use any custodians (inclu ? answer to question 25.(a) is "yes," respo If the <i>private fund</i> uses more than one cu dian.	nd to questions rime broker, you No Inform uding the prime and to questions ustodian, you m	u must complete questions (b) through (e) separate nation Filed brokers listed above) to hold some or all of its (b) through (g) below for each custodian the <i>priva</i> ust complete questions (b) through (g) separately f	C rivate f ely for Ye C te fund	es No
24. (a) <u>Custodi</u>	Does If the uses. prime	answer to question 24.(a) is "yes," respo If the <i>private fund</i> uses more than one p broker. the <i>private fund</i> use any custodians (inclu ? answer to question 25.(a) is "yes," respo If the <i>private fund</i> uses more than one cu dian.	nd to questions rime broker, you No Inform uding the prime and to questions ustodian, you m	u must complete questions (b) through (e) separate nation Filed brokers listed above) to hold some or all of its (b) through (g) below for each custodian the <i>priva</i> ust complete questions (b) through (g) separately f	C rivate f ely for Ve te func for eac	es No

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

# <u>Marketers</u>

#### Yes No

 $\odot$ 

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

1 2 3 >> Funds per Page: 15 ♥ Total Funds: 37

SECTION 7.B.(2) Private Fund Reporting

No Information Filed

# Item 8 Participation or Interest in Client Transactions

In this Item, we request information about your participation and interest in your *clients*' transactions. This information identifies additional areas in which conflicts of interest may occur between you and your *clients*. Newly-formed advisers should base responses to these questions on the types of participation and interest that you expect to engage in during the next year.

Like Item 7, Item 8 requires you to provide information about you and your related persons, including foreign affiliates.

Pro	priet	ary Interest in <i>Client</i> Transactions		
Α.	Do	you or any <i>related person</i> :	Yes	No
	(1)	buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?	$\circ$	$\odot$
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	$\odot$	$\circ$
	(3)	recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	۲	o
Sal	es In	terest in <i>Client</i> Transactions		
в.	Do	you or any <i>related person</i> :	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	$\odot$	0
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	۲	0
	(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	0	$\odot$
Inv	estm	nent or Brokerage Discretion		
C.	Do	you or any related person have discretionary authority to determine the:	Yes	No
	(1)	securities to be bought or sold for a <i>client's</i> account?	$\odot$	0
	(2)	amount of securities to be bought or sold for a <i>client's</i> account?	$\odot$	0
	(3)	broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?	$\odot$	0
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	$\odot$	0
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	o	0
E.	Doy	you or any related person recommend brokers or dealers to clients?	$\odot$	0
F.	If yo	ou answer "yes" to E. above, are any of the brokers or dealers related persons?	0	$\odot$
G.	(1)	Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	0	$\odot$
	(2)	If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	0	0
н.	(1)	Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	$\odot$	0
	(2)	Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)?	۲	0
I.		you or any <i>related person</i> , including any <i>employee</i> , directly or indirectly, receive compensation from any <i>person</i> (other n you or any <i>related person</i> ) for <i>client</i> referrals?	o	۲
	In y	our response to Item 8.I., do not include the regular salary you pay to an employee.		
	Iten	esponding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in a n 8.H.) or received from (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is l t in part, on the number or amount of client referrals.		

22, 1	2:50 F	PM	IARD - All Sections [User Name: amay123, OrgID: 160006]		
tem	1 9 C	ustody			
			<i>related person</i> has <i>custody</i> of <i>client</i> (other than <i>clients</i> that are investment companies in 0) assets and about your custodial practices.	regist	:ere
A.	(1)	Do you have <i>custody</i> of any advi	sory clients':	Yes	; N(
		(a) cash or bank accounts?		$\odot$	С
		(b) securities?		$\odot$	0
	dedi advi	uct your advisory fees directly from sory services you provide to client	th the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because m your clients' accounts, or (ii) a related person has custody of client assets in connecti ts, but you have overcome the presumption that you are not operationally independent -2(d)(5)) from the related person.	ion wi	
	(2)	If you checked "yes" to Item 9.A of <i>clients</i> for which you have <i>cus</i>	.(1)(a) or (b), what is the approximate amount of <i>client</i> funds and securities and total r <i>tody</i> :	numb	er
		U.S. Dollar Amount	Total Number of <i>Clients</i>		
		(a) \$ 8,452,548,153	(b) 37		
В.	you	r related person has custody of clin nose assets and number of those of (2). In connection with advisory servi	the amount of those assets and the number of those clients in your response to Item 9. ent assets in connection with advisory services you provide to clients, do not include the clients in your response to 9.A.(2). Instead, include that information in your response to ices you provide to clients, do any of your related persons have custody of any of your	e amo Diten	oun n
		advisory <i>clients</i> ':			
		(a) cash or bank accounts?		$\odot$	С
		(b) securities?		⊙	С
	You	are required to answer this item r	regardless of how you answered Item 9.A.(1)(a) or (b).		
	(2)	If you checked "yes" to Item 9.B of <i>clients</i> for which your <i>related</i> p	.(1)(a) or (b), what is the approximate amount of <i>client</i> funds and securities and total r persons have custody:	numb	er
		U.S. Dollar Amount	Total Number of <i>Clients</i>		
		(a) \$ 8,452,548,153	(b) 37		
С.	-	ou or your <i>related persons</i> have <i>cu</i> ck all the following that apply:	ustody of client funds or securities in connection with advisory services you provide to c	lients	<i>.</i> ,
	(1)	A qualified custodian(s) sends ac vehicle(s) you manage.	count statements at least quarterly to the investors in the pooled investment	V	
	(2)	An <i>independent public accountan</i> financial statements are distribut	nt audits annually the pooled investment vehicle(s) that you manage and the audited ted to the investors in the pools.	V	
	(3)	An independent public accountan	nt conducts an annual surprise examination of <i>client</i> funds and securities.		
	(4)		nt prepares an internal control report with respect to custodial services when you or d custodians for <i>client</i> funds and securities.		
	or e. Sect	xamination or prepare an internal	<i>C.</i> (4), list in Section 9.C. of Schedule <i>D</i> the accountants that are engaged to perform th control report. (If you checked Item 9.C.(2), you do not have to list auditor information ady provided this information with respect to the private funds you advise in Section 7.1	n in	
		ou or your <i>related person(s)</i> act a	as qualified custodians for your <i>clients</i> in connection with advisory services you provide	Yes	; N
D.		lients?			
D.	to c	<i>lients</i> ? you act as a qualified custodian		0	0

If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

- E. If you are filing your *annual updating amendment* and you were subject to a surprise examination by an *independent public accountant* during your last fiscal year, provide the date (MM/YYYY) the examination commenced:
- F. If you or your *related persons* have *custody* of *client* funds or securities, how many *persons*, including, but not limited to, you and your *related persons*, act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?
   7

SECTION 9.C. Independent Public Accountant

No Information Filed

### **Item 10 Control Persons**

In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you. If you are filing an *umbrella registration*, the information in Item 10 should be provided for the *filing adviser* only.

If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.

### Yes No

AON PLC

A. Does any person not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, control your management or policies? o

If yes, complete Section 10.A. of Schedule D.

B. If any *person* named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please complete Section 10.B. of Schedule D.

### SECTION 10.A. Control Persons

# No Information Filed

### SECTION 10.B. Control Person Public Reporting Companies

- B. If any *person* named in Schedules A, B, or C, or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please provide the following information (you must complete a separate Schedule D Section 10.B. for each public reporting company):
  - (1) Full legal name of the public reporting company:
  - (2) The public reporting company's CIK number (Central Index Key number that the SEC assigns to each reporting 315293 company):

### Item 11 Disclosure Information

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your *advisory affiliates*. We use this information to determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the *filing adviser* and all *relying advisers* under an *umbrella registration*.

Your *advisory affiliates* are: (1) all of your current *employees* (other than *employees* performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any *person* performing similar functions); and (3) all *persons* directly or indirectly *controlling* you or *controlled* by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your *advisory affiliates* are.

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A. (2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). 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.

You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.

		Yes	No
Do	any of the events below involve you or any of your supervised persons?	0	$\odot$
For	"yes" answers to the following questions, complete a Criminal Action DRP:		
Α.	In the past ten years, have you or any advisory affiliate:	Yes	No
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any <i>felony</i> ?	0	$\odot$
	(2) been <i>charged</i> with any <i>felony</i> ?	0	$\odot$
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your r to Item 11.A.(2) to charges that are currently pending.	espo	nse
в.	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a misdemeanor involving: investments or an investment-related business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	0	0
	(2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)?	$\circ$	$\odot$
<u>For</u>	"yes" answers to the following questions, complete a Regulatory Action DRP:		
C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	No
	(1) <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission?	$\circ$	$\odot$
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	$\circ$	$\odot$
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	O
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	$\circ$	$\odot$
	(5) imposed a civil money penalty on you or any <i>advisory affiliate</i> , or <i>ordered</i> you or any <i>advisory affiliate</i> to cease and desist from any activity?	0	$\odot$
D.	Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:		
	(1) ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical?	0	©
	(2) ever <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of <i>investment-related</i> regulations or statutes?	0	©
	(3) ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	0	۲
	(4) in the past ten years, entered an order against you or any advisory affiliate in connection with an investment-related	$\circ$	$\odot$
://cr	d.finra.org/lad/Content/PrintHist/Adv/Sections/crd iad AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG PK=1652620		147/ <sup>,</sup>

activity?

	(	ever denied, suspended, or revoked your or any <i>advisory affiliate's</i> registration or license, or otherwise prevented you or any <i>advisory affiliate</i> , by <i>order</i> , from associating with an <i>investment-related</i> business or restricted your or any <i>advisory affiliate's</i> activity?	o	۲
E.	Has a	any self-regulatory organization or commodities exchange ever:		
	(1)	found you or any advisory affiliate to have made a false statement or omission?	0	$\odot$
	• •	<i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of its rules (other than a violation designated as a " <i>minor rule violation</i> " under a plan approved by the SEC)?	o	۲

- (3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?
- (4) disciplined you or any *advisory affiliate* by expelling or suspending you or the *advisory affiliate* from membership, barring or suspending you or the *advisory affiliate* from association with other members, or otherwise restricting your or the *advisory affiliate's* activities?
- F. Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any *advisory affiliate* ever been revoked or suspended?
- G. Are you or any *advisory affiliate* now the subject of any regulatory *proceeding* that could result in a "yes" answer to any part O of Item 11.C., 11.D., or 11.E.?

<u>For</u>	<u>"yes'</u>	answers to the following questions, complete a Civil Judicial Action DRP:		
н.	(1)	Has any domestic or foreign court: Ye	es	No
		(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?		$\odot$
		(b) ever <i>found</i> that you or any <i>advisory affiliate</i> were <i>involved</i> in a violation of <i>investment-related</i> statutes or regulations?		0
		(c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any <i>advisory affiliate</i> by a state or <i>foreign financial regulatory authority</i> ?		0
	(2)	Are you or any <i>advisory affiliate</i> now the subject of any civil <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.H.(1)?		•

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### **Item 12 Small Businesses**

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC **and** you indicated in response to Item 5.F.(2)(c) that you have regulatory assets under management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

For purposes of this Item 12 only:

- Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person's* total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).
- *Control* means the power to direct or cause the direction of the management or policies of a *person*, whether through ownership of securities, by contract, or otherwise. Any *person* that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or more of the profits, of another *person* is presumed to *control* the other *person*.

		Ye	s	No
Α.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	С	5	o
If "y	yes," you do not need to answer Items 12.B. and 12.C.			
в.	Do you:			
	<ol> <li>control another investment adviser that had regulatory assets under management (calculated in response to Ite (2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?</li> </ol>	em 5.F. C	>	0
	(2) <i>control</i> another <i>person</i> (other than a natural person) that had total assets of \$5 million or more on the last day most recent fiscal year?	of its C	5	0
C.	Are you:			
	(1) controlled by or under common control with another investment adviser that had regulatory assets under manage (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent year?	- C	,	0
	(2) <i>controlled</i> by or under common <i>control</i> with another <i>person</i> (other than a natural person) that had total assets million or more on the last day of its most recent fiscal year?	of \$5 C	5	0

## Schedule A

## **Direct Owners and Executive Officers**

- 1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
- 2. Direct Owners and Executive Officers. List below the names of:
  - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer (Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
  - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act); Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
  - (c) if you are organized as a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
  - (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
  - (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
- 3. Do you have any indirect owners to be reported on Schedule B? Yes No
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
- 5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: NA less than 5% B 10% but less than 25% D 50% but less than 75%
  - A 5% but less than 10% C 25% but less than 50% E 75% or more
- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
  - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act. (c) Complete each column.

FULL LEGAL NAME (Individuals:	DE/FE/I	Title or	Date Title or	Ownership	Control	PR	CRD No. If None: S.S. No.
Last Name, First Name, Middle		Status	Status Acquired	Code	Person		and Date of Birth, IRS Tax
Name)			ΜΜ/ΥΥΥΥ				No. or Employer ID No.
WHITE, BRIAN, MICHAEL	I	CHIEF FINANCIAL OFFICER	01/2015	NA	N	N	2711192
GTCR/AAM BLOCKER CORP	DE	MEMBER	12/2017	E	Y	N	45-3337009
WEIHRAUCH, RONALD, LEE	I	CHIEF OPERATING OFFICER	03/2018	NA	Y	N	5655016
May, Aimee, Brooke	I	CHIEF COMPLIANCE OFFICER	12/2019	NA	N	N	7214282
FRAMMARTINO, ANTHONY, DEMETRIO	I	PRESIDENT	05/2022	NA	Y	N	4623701

## Schedule B

## **Indirect Owners**

- 1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
- 2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
  - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.

- (b) in the case of an owner that is a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
- (c) in the case of an owner that is a trust, the trust and each trustee; and
- (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
- 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
- 5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: C 25% but less than 50% E 75% or more

D - 50% but less than 75% F - Other (general partner, trustee, or elected manager)

- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
  - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
  - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Entity in Which Interest is Owned	Status	Date Status Acquired MM/YYYY	-	Control Person		<i>CRD</i> No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
AON CONSULTING, INC.	DE	GTCR/AAM BLOCKER CORP	OWNER	12/2017	E	Y	N	22-2232264
AON PLC	FE	AON US INTERNATIONAL HOLDINGS LIMITED	OWNER	08/1986	E	Y	Y	36-3051915
AON GROUP, INC	DE	AON CONSULTING, INC.	OWNER	12/2018	E	Y	N	52-0969822
AON CORPORATION	DE	AON GROUP, INC	OWNER	12/2018	E	Y	Ν	36-3051915
AON GLOBAL HOLDINGS LIMITED	FE	AON CORPORATION	OWNER	01/2015	E	Y	N	98-1199820
AON US INTERNATIONAL HOLDINGS LIMITED	FE	AON GLOBAL HOLDINGS LIMITED	OWNER	12/2018	E	Y	N	98-1117371

### Schedule D - Miscellaneous

You may use the space below to explain a response to an Item or to provide any other information.

ITEM 5F(2); ITEM 7.B.: TOWNSEND RELIES ON THIRD PARTIES TO PROVIDE ASSET VALUATIONS. SOME OF THESE PARTIES TAKE MORE THAN 90 DAYS AFTER THE CALENDAR YEAR END TO PROVIDE SUCH VALUATIONS. AS A RESULT, TOWNSEND HAS CALCULATED ITS RESPONSE TO QUESTION 5F(2) USING SEPTEMBER 30, 2021 VALUATIONS. TOWNSEND HAS CALCULATED ITS RESPONSE TO ITEM 7.B. USING SEPTEMBER 30, 2021 VALUATIONS. IF FIGURES CHANGE MATERIALLY FROM SEPTEMBER 30, 2021 TO DECEMBER 31, 2021, TOWNSEND WILL PROMPTLY UPDATE ITS RESPONSE TO QUESTION 5F(2) AND APPLICABLE ITEMS IN 7.B. ITEM 8A(2): TOWNSEND DIRECTORS, OFFICERS, EMPLOYEES AND RELATED PERSONS MAY DIRECTLY INVEST IN SECURITIES THAT ARE RECOMMENDED TO CLIENTS, TOWNSEND ACTS AS INVESTMENT MANAGER FOR THE LIMITED PARTNERSHIPS THAT ARE IDENTIFIED IN THIS SCHEDULE D. AN AFFILIATE OF TOWNSEND MAY SERVE AS THE GENERAL PARTNER OR MANAGING MEMBER AND THEREFORE MAY TAKE SMALL EQUITY INTERESTS IN THOSE LIMITED PARTNERSHIPS. BECAUSE THE LIMITED PARTNERSHIPS THAT ARE MANAGED BY TOWNSEND OFTEN INVEST ALONGSIDE TOWNSEND'S INSTITUTIONAL CLIENTS, SOME OF TOWNSEND'S RELATED PERSONS INDIRECTLY BUY OR SELL (THROUGH THE LIMITED PARTNERSHIPS THAT TOWNSEND MANAGES) SECURITIES THAT ARE RECOMMENDED TO CLIENTS. DEPENDING ON THE TYPE OF INVESTMENT BEING MADE AND THE PARTICULAR NEEDS OF DIFFERENT CLIENTS, RECOMMENDATIONS TO CLIENTS MAY NOT ALWAYS BE MADE AT THE TIME THAT LIMITED PARTNERSHIPS MANAGED BY TOWNSEND ACOUIRE AN INTEREST. ITEM 8B(2): TOWNSEND (1) HAS CREATED SEVERAL CUSTOMIZED VEHICLES FOR WHICH A RELATED PERSON SERVES AS THE GENERAL PARTNER TO ADDRESS SPECIFIC OBJECTIVES OF CERTAIN CLIENTS AND MAY CREATE SIMILAR VEHICLES IN THE FUTURE; (2) HAS CREATED AND MAY CREATE IN THE FUTURE POOLED VEHICLES TO PERMIT CLIENTS TO ACCESS SPECIFIED OPPORTUNITIES THAT MULTIPLE CLIENTS WOULD NOT OTHERWISE BE ABLE TO ACCESS; AND (3) HAS CREATED AND MAY CREATE IN THE FUTURE POOLED VEHICLES IN WHICH CLIENTS OF TOWNSEND INVEST. In item 7, we indicate that we have an affiliate that is an insurance company or agency. Townsend is a whollyowned indirect subsidiary of Aon plc, as such, Townsend is affiliated with various insurance agencies.

No Information Filed

DRP Pages	
CRIMINAL DISCLOSURE REPORTING PAGE (ADV)	
No Information Filed	
REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)	
No Information Filed	
CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)	
No Information Filed	

# Part 2

# Exemption from brochure delivery requirements for SEC-registered advisers

SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering a brochure to *all* of your advisory clients, you do not have to prepare a brochure.

Are you exempt from delivering a brochure to all of your clients under these rules?

Yes No

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If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
365897	2022 TOWNSEND ADV PART II	Pension plans/profit sharing plans, Foundations/charities, Government/municipal, Other institutional, Private funds or pools, Selection of Other Advisers/Solicitors
369679	2022 TOWNSEND ADV PART II	Pension plans/profit sharing plans, Foundations/charities, Government/municipal, Other institutional, Private funds or pools, Selection of Other Advisers/Solicitors

CRS	Type(s)	Affiliate Info	Retire					
	There are	e no CRS filings to display.						
	CRS		CRS       Type(s)       Affiliate Info         There are no CRS filings to display.					

#### **Execution Pages**

## DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

## Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a *notice filing*.

## Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature: AIMEE MAY Printed Name: AIMEE MAY Adviser *CRD* Number: 160006 Date: MM/DD/YYYY 05/18/2022 Title: CHIEF COMPLIANCE OFFICER

## NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

## 1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding* or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

## 2. Appointment and Consent: Effect on Partnerships

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

### IARD - All Sections [User Name: amay123, OrgID: 160006]

# 3. Non-Resident Investment Adviser Undertaking Regarding Books and Records

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

## Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:

Printed Name: Adviser *CRD* Number: 160006 Date: MM/DD/YYYY Title:

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