# **FORM ADV**

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

**Primary Business Name: TOWNSEND HOLDINGS LLC CRD Number: 160006** 

**Annual Amendment - All Sections** 

3/30/2023 9:19:01 AM

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 Identifying Information Responses to this Item tell us who you are, where you are doing business, and how we can contact you. If you are filing an umbrella registration, the information in Item 1 should be provided for the filing adviser only. General Instruction 5 provides information to assist you with filing an umbrella registration. 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. C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.(1)), enter the new name and specify whether the name change is of  $\square$  your legal name **or**  $\square$  your primary business name: 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.O. 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:  $\Box$ 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,

Rev. 10/2021

you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest twenty-five offices in terms of numbers of employees as of the end of your most recently

	completed fiscal year	r.			
	(2) Days of week that yo	ou normally conduct bu	usiness at your <i>principal office ar</i>	nd place of business:	
	Monday - Friday  Normal business hou  8:30 AM - 5:30 PM  (3) Telephone number a	urs at this location:			
	216-781-9090 (4) Facsimile number at				
	216-781-1407 (5) What is the total nur	mber of offices, other t	han your <i>principal office and pla</i> est recently completed fiscal year	ce of business, at which you conduct investn ?	nent
G.	Mailing address, if differe	ent from your <i>principal</i>	office and place of business add	ress:	
	Number and Street 1:		Number and Street 2	:	
	City:	State:	Country:	ZIP+4/Postal Code:	
	If this address is a priva	te residence, check thi	s box: □		
Н.	If you are a sole proprieto	or, state your full resid	ence address, if different from y	our principal office and place of business add	dress in
	Number and Street 1:		Number and Street 2	:	
	City:	State:	Country:	ZIP+4/Postal Code:	
I.	Do you have one or more Twitter, Facebook and Lin		on publicly available social medi	a platforms (including, but not limited to,	Yes N ⊙ (
	Section 1.I. of Schedule I the web, you may list the address. Do not provide I	D. If a website address e portal without listing the addresses of websi ide the individual electi	s serves as a portal through whic addresses for all of the other inf tes or accounts on publicly avail.	counts on publicly available social media plan th to access other information you have publ formation. You may need to list more than or able social media platforms where you do no employees or the addresses of employee acc	ished on ne portal ot control
J.	Chief Compliance Officer				
				If you are an <i>exempt reporting adviser</i> , you ne. If not, you must complete Item 1.K. belo	
	Name: AIMEE B. MAY		Other titles, if any: CHIEF COMPLIANCE OFFI	CER	
	Telephone number: 2164304690		Facsimile number, if any: 216-781-1407		
	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) AIMEE.MAY@AON.COM				
	company registered unde	er the Investment Com		other than you, a <i>related person</i> or an invested for providing chief compliance officer services.	
	Name:				

https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG\_PK=1735257

IRS Employer Identification Number:

K.		Person: If a person other than the series of		er is authoriz	zed to receive information	n and	
	Name: NATALIE DONOHUE BOESKEN		Titles: COMPLIANCE ASSOCIATE	E			
	Telephone number: 216-4304726		Facsimile number, if any: 216-781-1407				
	Number and Street 1: 950 MAIN AVENUE		Number and Street 2: SUITE 1600				
	City: CLEVELAND	State: Ohio	Country: United States	ZIP+4/ 44113	Postal Code:		
	Electronic mail (e-mail) addre	•					
L.	Do you maintain some or all of	f the books and records you are	required to keep under Se	ection 204 of	the Advisers Act or	Yes	
	•	other than your <i>principal office a</i>	·	CCION 204 01	the Advisers Act, of	•	0
	If "yes," complete Section 1.L.	of Schedule D.				Yes	No
М.	Are you registered with a forei	gn financial regulatory authority	?			0	•
		istered with a foreign financial re thority. If "yes," complete Section		if you have a	an affiliate that is registe	red witi	h a
						Yes	No
N.	Are you a public reporting com	pany under Sections 12 or 15(d	) of the Securities Exchan	ge Act of 19	34?	0	⊚
	Did you have \$1 billion or more	a in accepte on the last day of yo	un maat vaaant fiaaal vaav	<b>.</b>		Yes	
0.	If yes, what is the approximate		ur most recent uscai year?	•		0	•
	C \$1 billion to less than \$10						
	c \$10 billion to less than \$5	50 billion					
	C \$50 billion or more						
		r, "assets" refers to your total as al assets shown on the balance s				Determi	ine
P.	Provide your <i>Legal Entity Iden</i>	tifier if you have one:					
	A legal entity identifier is a uni legal entity identifier.	que number that companies use	e to identify each other in t	the financial	marketplace. You may n	ot have	e a
<b>656</b>	TTON 4 D. OU D No.						
SEC	TION 1.B. Other Business Na	mes					
	t your other business names and ch business name.	d the jurisdictions in which you ι	use them. You must compl	ete a separa	ate Schedule D Section 1	.B. for	
Na	me: THE TOWNSEND GROUP						
Jui	risdictions						
P	AL	<b>☑</b> IL	<b>☑</b> NE		<b>☑</b> SC		
	AK	☑ IN	<b>☑</b> NV		<b>☑</b> SD		
	AZ	<b>☑</b> IA	<b>☑</b> NH		<b>☑</b> TN		

# 28-29 DOVER STREET 4TH FLOOR City: State: Country: ZIP+4/Postal Code: LONDON United Kingdom W1S 4NA If this address is a private residence, check this box: $\Box$ Telephone Number: Facsimile Number, if any: +442075787100 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? 16 Are other business activities conducted at this office location? (check all that apply) (1) Broker-dealer (registered or unregistered) $\square$ (2) Bank (including a separately identifiable department or division of a bank) (3) Insurance broker or agent $\square$ (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*).

3/30/23, 9:19 AM

TWO EXCHANGE SQUARE		Number and Street 2: SUITE 2903; 29TH FLOOF	3
City: CENTRAL	State:	Country: Hong Kong	ZIP+4/Postal Code:
If this address is a private residence, check this b	ox: 🗆		
Telephone Number: +852-3468-5900	Facsimile Numb +852-9022-062	•	
If this office location is also required to be registed dealer or investment adviser on the Uniform Bran			
How many <i>employees</i> perform investment adviso 9	ry functions from t	his office location?	
Are other business activities conducted at this off (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable de (3) Insurance broker or agent (4) Commodity pool operator or commodity trace (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm	partment or division	on of a bank)	rom registration)
Describe any other <i>investment-related</i> business a	activities conducted	from this office location:	
Complete the following information for each office advisory business. You must complete a separate are registered only with the SEC, or if you are an <i>employees</i> ).	Schedule D Section	n 1.F. for each location. If y	ou are applying for SEC registration, if you
Number and Street 1: 425 MARKET STREET		Number and Street 2:	
		SUITE 2800	
•	State: California	Country: United States	ZIP+4/Postal Code: 94105
,	California —	Country:	•
SAN FRANCISCO  If this address is a private residence, check this b	California —	Country: United States	•
SAN FRANCISCO  If this address is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence.	California  Pox:   Facsimile Number, in the service of the service	Country: United States  f any: a state securities authority	94105 as a branch office location for a broker-
SAN FRANCISCO  If this address is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence, check this but the saddress is a private residence of the saddress is a saddress in the saddress in the saddress is a saddress in the saddress in the saddress in the saddress is a saddress in the saddress in t	California  Pox:   Facsimile Number, in the service of the service	Country: United States  f any: a state securities authority ion Form (Form BR), please	94105 as a branch office location for a broker-

(5) Register	ed municipal advisor				
(6) Accounta	ant or accounting firm				
(7) Lawyer (	or law firm				
Describe any o	ther <i>investment-related</i> busin	ess activities conduc	ted from this office loca	cion:	
advisory busine	ess. You must complete a sepa	arate Schedule D Sec	ction 1.F. for each location	ace of business, at which you conduct investm on. If you are applying for SEC registration, if y largest twenty-five offices (in terms of number	you
Number and St			Number and Street 2	:	
City: CHICAGO		State: Illinois	Country: United States	ZIP+4/Postal Code: 60601	
If this address	is a private residence, check t	this box:			
Telephone Num 13123810350	nber:	Facsimile Num	ber, if any:		
				hority as a branch office location for a broker- please provide the CRD Branch Number here:	
How many <i>emp</i>	ployees perform investment a	dvisory functions fro	m this office location?		
	ness activities conducted at th	•	eck all that apply)		
(2) Bank (in	lealer (registered or unregiste cluding a separately identifiab ce broker or agent	•	ision of a bank)		
(4) Commod	dity pool operator or commodi ed municipal advisor	ty trading advisor (w	hether registered or exc	empt from registration)	
	ant or accounting firm				
Describe any o	ther <i>investment-related</i> busin	ess activities conduc	ted from this office loca	cion:	
advisory busine	ess. You must complete a sepa	arate Schedule D Sec	ction 1.F. for each location	ace of business, at which you conduct investmon. If you are applying for SEC registration, if y largest twenty-five offices (in terms of number	you
Number and St 20 BAY STREET			Number and Stree	et 2:	
City: TORONTO		State:	Country: Canada	ZIP+4/Postal Code: M5J 2N9	
If this address	is a private residence, check t	this box:			
Telephone Num +14162275684		Facsimile N	umber, if any:		

If this office location is also required to be regis dealer or investment adviser on the Uniform Bro			·			
How many <i>employees</i> perform investment advis	sory functions fr	om this office location?				
Are other business activities conducted at this office location? (check all that apply)  (1) Broker-dealer (registered or unregistered) (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 <i>investment-related</i> business	activities condu	acted from this office loca	ation:			
SECTION 1.I. Website Addresses						
(including, but not limited to, Twitter, Facebook	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	e Social Media P	Platform: HTTP://WWV	/.TOWNSENDGROUP.COM			
Address of Website/Account on Publicly Available	e Social Media P	Platform: https://www.	linkedin.com/company/the-townsend-group/about/			
SECTION 1.L. Location of Books and Records	<b>.</b>					
Complete the following information for each loc of business. You must complete a separate School	-	• •	records, other than your <i>principal office and place</i>			
Name of entity where books and records are ke ACCESS RECORDS MANAGEMENT	pt:					
Number and Street 1: ONE ANDREWS CIRCLE		Number and Street 2	:			
City: BRECKSVILLE	State: Ohio	Country: United States	ZIP+4/Postal Code: 44141			
If this address is a private residence, check this	box:					
Telephone Number: 440-838-8611	Facsimile num	nber, if any:				
This is (check one):						
C one of your branch offices or affiliates.						
a third-party unaffiliated recordkeeper.						
C other.						

Briefly describe the books and records SOME COMPANY RECORDS ARE MAIN		RE OFFSITE STORAGE FAC	ILITY.	
Name of entity where books and record TOWNSEND GROUP ASIA LTD.	rds are kept:			
Number and Street 1: TWO EXCHANGE SQUARE		Number and Street 2 STE 2903; 29TH FLO		
City: CENTRAL	State:	Country: Hong Kong	ZIP+4/Postal Code:	
If this address is a private residence,	check this box:			
Telephone Number: +852-3468-5900	Facsimile n +852-9022	umber, if any: -0620		
This is (check one):				
<ul><li>one of your branch offices or affilia</li></ul>	ites.			
C a third-party unaffiliated recordked	eper.			
C other.				
Briefly describe the books and records SOME INFORMATION RELATED TO INV		CONDUCTED IN THIS OFFI	CE.	
Name of entity where books and record TOWNSEND HOLDINGS LLC	rds are kept:			
Number and Street 1: 425 MARKET STREET		Number and Street SUITE 2800	2:	
City:	State:	Country:	ZIP+4/Postal Code:	
SAN FRANCISCO	California	United States	94105	
If this address is a private residence,	check this box: $\square$			
Telephone Number: 415-321-7156	Facsimile numb	er, if any:		
This is (check one):				
• one of your branch offices or affilia	ates.			
C a third-party unaffiliated recordked	eper.			
C other.				
Briefly describe the books and records SOME INFORMATION RELATED TO INV		AND CLIENTS SERVICED O	UT OF THIS OFFICE.	
Name of entity where books and record TOWNSEND GROUP EUROPE LTD.	rds are kept:			
Number and Street 1: 28-29 DOVER STREET		Number and Street 2: 4TH FLOOR		

City: LONDON	State:	Country: United Kingdom	ZIP+4/Postal Code: W1S 4NA
20112011		omea migaom	W15
If this address is a private residence, check t	his box:		
Telephone Number:	Facsimile num	ber, if any:	
+207-495-7784	+207-317-055		
This is (check one):			
• one of your branch offices or affiliates.			
$^{ extsf{C}}$ a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept a SOME INFORMATION RELATED TO INVESTME		CONDUCTED IN THIS OFFICE.	
Name of entity where books and records are PROOFPOINT, INC	kept:		
Number and Street 1:		Number and Street 2:	
892 ROSS DRIVE City:	State:	Country:	ZIP+4/Postal Code:
SUNNYVALE	California	United States	94089
If this address is a private residence, check t	nis box:		
Telephone Number:	Facsimile numb	per, if any:	
408-517-4710			
This is (check one):			
O one of your branch offices or affiliates.			
<ul> <li>a third-party unaffiliated recordkeeper.</li> </ul>			
O other.			
Briefly describe the books and records kept a EMAIL RETENTION	t this location.		
Name of entity where books and records are AON CHICAGO OFFICE	kept:		
AON CHICAGO OFFICE			
Number and Street 1:		Number and Street 2:	
200 EAST RANDOLPH	G		770.4/0.4.40.4
City: CHICAGO	State: Illinois	Country: United States	ZIP+4/Postal Code: 60601
If this address is a private residence, check t	his box:		
Telephone Number:	Facsimile nur	mber, if any:	
13123810350		, - ,	

_				
• one of your branch offices or affiliates.				
C a third-party unaffiliated recordkeeper.				
O other.				
Briefly describe the books and records kept at SOME INFORMATION RELATED TO INVESTMEN		NDUCTED IN THIS O	FFICE.	
Name of entity where books and records are k AON CANADA OFFICE	ept:			
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 thi	s box:			
Telephone Number: +14162275684	Facsimile nu	umber, if any:		
This is (check one):				
• one of your branch offices or affiliates.				
O a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept at SOME INFORMATION RELATED TO INVESTMEN		NDUCTED IN THIS O	FFICE.	
	T RESEARCH CO	NDUCTED IN THIS O	FFICE.	
SOME INFORMATION RELATED TO INVESTMEN  Name of entity where books and records are k	T RESEARCH CO	NDUCTED IN THIS O		
Name of entity where books and records are k GLOBAL RELAY  Number and Street 1: 22 CAMBIE STREET City:	T RESEARCH CO	Number and St Country:	reet 2: ZIP+4/Postal Code:	
Name of entity where books and records are k GLOBAL RELAY  Number and Street 1: 22 CAMBIE STREET	T RESEARCH CO	Number and St	reet 2:	
Name of entity where books and records are k GLOBAL RELAY  Number and Street 1: 22 CAMBIE STREET City:	ept: State:	Number and St Country:	reet 2: ZIP+4/Postal Code:	
Name of entity where books and records are k GLOBAL RELAY  Number and Street 1: 22 CAMBIE STREET  City: VANCOUVER	ept: State:	Number and St Country:	reet 2: ZIP+4/Postal Code:	
Name of entity where books and records are k GLOBAL RELAY  Number and Street 1: 22 CAMBIE STREET  City: VANCOUVER  If this address is a private residence, check this	ept: State:	Number and St Country: Canada	reet 2: ZIP+4/Postal Code:	
Name of entity where books and records are k GLOBAL RELAY  Number and Street 1: 22 CAMBIE STREET City: VANCOUVER  If this address is a private residence, check thi	ept: State:	Number and St Country: Canada	reet 2: ZIP+4/Postal Code:	
Name of entity where books and records are k GLOBAL RELAY  Number and Street 1: 22 CAMBIE STREET City: VANCOUVER  If this address is a private residence, check thi Telephone Number: 866-484-6630	ept: State:	Number and St Country: Canada	reet 2: ZIP+4/Postal Code:	
Name of entity where books and records are k GLOBAL RELAY  Number and Street 1: 22 CAMBIE STREET City: VANCOUVER  If this address is a private residence, check thi Telephone Number: 866-484-6630  This is (check one):	ept: State:	Number and St Country: Canada	reet 2: ZIP+4/Postal Code:	
Name of entity where books and records are k GLOBAL RELAY  Number and Street 1: 22 CAMBIE STREET City: VANCOUVER  If this address is a private residence, check thi Telephone Number: 866-484-6630  This is (check one):  one of your branch offices or affiliates.	ept: State:	Number and St Country: Canada	reet 2: ZIP+4/Postal Code:	
Name of entity where books and records are k GLOBAL RELAY  Number and Street 1: 22 CAMBIE STREET City: VANCOUVER  If this address is a private residence, check thi Telephone Number: 866-484-6630  This is (check one):  one of your branch offices or affiliates. a third-party unaffiliated recordkeeper.	ept: State:	Number and St Country: Canada	reet 2: ZIP+4/Postal Code:	

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

No Information Filed

#### Item 2 SEC Registration/Reporting

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting an *annual updating amendment* to your SEC registration. If you are filing an *umbrella registration*, the information in Item 2 should be provided for the *filing adviser* only.

Α.	To r sub	egiste mittin	er (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 are 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 ms.
	You	(the	adviser):
	✓	(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 annual updating amendment 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 but less than \$100 million (in U.S. dollars) and you are either:
			(a) not required to be registered as an adviser with the state securities authority of the state where you maintain your principal office and place of business; 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 the state securities authority.
		(3)	Reserved
		(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 investment 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.
		(10)	are a <b>multi-state adviser</b> 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 <b>received an SEC order</b> 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.
Sta	te Se	ecurit	ties Authority Notice Filings and State Reporting by Exempt Reporting Advisers

C. Under state laws, SEC-registered advisers may be required to provide to state securities authorities a copy of the Form ADV and any amendments they file with the SEC. These are called notice filings. In addition, exempt reporting advisers may be required to provide state securities authorities with a copy of reports and any amendments they file with the SEC. If this is an initial application or report, 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

Jurisdictions				
□ AL	□ IL	□ NE	□ sc	
□ AK	□ IN	□ NV	□ SD	
□ AZ	□ IA	□ NH	□ TN	
□ AR	□ KS	□ NJ	□ TX	
□ ca	□ KY	□ NM	□ ∪т	
□ со	□ LA	□ NY	□ VT	
□ ст	□ ме	□ NC	□ VI	
□ DE	□ MD	□ ND	□ VA	
□ DC	□ ма	□ он	∥ □ wa	
□ FL	□ MI	□ ок	□ wv	
□ GA	□ MN	□ OR	□ wi	
□ GU	□ MS	□ PA	□ WY	
□ ні	□ MO	□ PR	- vv I	
	□ MT	□ RI		
ION 2.A.(8) Related A  are relying on the exert common control with a	). <b>Adviser</b> mption in rule 203A-2(b) from	the prohibition on registration bec egistered with the SEC and your <i>p</i>	amendment must be filed before the example of the cause you control, are controlled by, or rincipal office and place of business is	are
ION 2.A.(8) Related A  I are relying on the exe  I common control with a  I as that of the registered  I of Registered Investm  Number of Registered I	Adviser  mption in rule 203A-2(b) from an investment adviser that is red adviser, provide the followin ent Adviser  nvestment Adviser	the prohibition on registration bec egistered with the SEC and your <i>p</i>	cause you <i>control</i> , are <i>controlled</i> by, or	are
ION 2.A.(8) Related A  I are relying on the exe  I common control with a  as that of the registere  The of Registered Investments	Adviser  mption in rule 203A-2(b) from an investment adviser that is red adviser, provide the followin ent Adviser  nvestment Adviser	the prohibition on registration bec egistered with the SEC and your <i>p</i>	cause you <i>control</i> , are <i>controlled</i> by, or	are
ION 2.A.(8) Related As a great relying on the exercommon control with a sas that of the registered of Registered Investment of Registered Investme	Adviser  mption in rule 203A-2(b) from an investment adviser that is red adviser, provide the followin ent Adviser  nvestment Adviser	the prohibition on registration bec egistered with the SEC and your <i>p</i>	cause you control, are controlled by, or rincipal office and place of business is	end of
ION 2.A.(8) Related As a are relying on the exercommon control with a sas that of the registered in the exercommon control with a sas that of the registered in the exercommon control with a sas that of the registered in the exercommon control with a sas that of the registered in the exercommon control with a same relying on rule 20. EC registration within 1. It is the appropriate boosentations:	mption in rule 203A-2(b) from an investment adviser that is red adviser, provide the following ent Adviser  nivestment Adviser  nivestment Adviser  ent Adviser Expecting to be 3A-2(c), the exemption from the 20 days, you are required to mixes, you will be deemed to have	the prohibition on registration bee egistered with the SEC and your p g information:  Eligible for Commission Regist ne prohibition on registration available certain representations about e made the required representation	ration within 120 Days able to an adviser that expects to be elyour eligibility for SEC registration. By	are the
ION 2.A.(8) Related A  u are relying on the exert common control with a  e as that of the registered  of Registered Investment  Number of Registered I  Number of Registered I  EON 2.A.(9) Investment  u are relying on rule 200  EC registration within 100  sentations:  am not registered or received.	mption in rule 203A-2(b) from an investment adviser that is red adviser, provide the following ent Adviser  nivestment Adviser  nivestment Adviser  ent Adviser Expecting to be 3A-2(c), the exemption from the 20 days, you are required to makes, you will be deemed to have quired to be registered with the	the prohibition on registration bee egistered with the SEC and your p g information:  Eligible for Commission Regist ne prohibition on registration available certain representations about e made the required representation	ration within 120 Days Table to an adviser that expects to be elegant. You must make both of these	are the

### 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 register as an investment adviser with the <i>state securities authorities</i> 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 <i>state securities authorities</i> 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 <i>state securities authorities</i> in those states.
SECTION 2.A.(12) SEC Exemptive Order
If you are relying upon an SEC <i>order</i> exempting you from the prohibition on registration, provide the following information:
Application Number:
803-
Date of order:

#### **Item 3 Form of Organization**

If you are filing an *umbrella registration*, the information in Item 3 should be provided for the *filing adviser* only.

- A. How are you organized?
  - C Corporation
  - C Sole Proprietorship
  - C Limited Liability Partnership (LLP)
  - C Partnership
  - Limited Liability Company (LLC)
  - C Limited Partnership (LP)
  - Other (specify):

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

- B. 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 changing your response to this Item, see Part 1A Instruction 4.

#### **Item 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)?

•

If "yes", complete Item 4.B. and Section 4 of Schedule D.

B. 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, check "No." See Part 1A Instruction 4.

#### **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), (4), and (5).

- A. Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.

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- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
  - (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) 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?
  - (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?

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?
  - (2) Approximately what percentage of your *clients* are non-*United States persons*?
- 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 Client(s)	(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		\$ 0
(f) Pooled investment vehicles (other than investment companies and business development companies)	39		\$ 9,236,924,950
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	20		\$ 8,526,891,978
(h) Charitable organizations	1	P	\$ 100,753,487
(i) State or municipal <i>government entities</i> (including government pension plans)	4	Ø	\$ 2,156,452,738
(j) Other investment advisers	0		\$ 0
(k) Insurance companies	1	P	\$ 218,151,227
(I) Sovereign wealth funds and foreign official institutions	3	P	\$ 3,669,244,159
(m) Corporations or other businesses not listed above	0		\$ 0
(n) Other:	0		\$ 0

#### **Compensation Arrangements**

= .	You are compensated	d for vour investm	ent advisory services	by (check all that apply):

(1) A percentage of assets under your management	of assets under your management	•
--	---------------------------------	---

(3) Subscription fees (for a newsletter or periodical)

(4) Fixed fees (other than subscription fees)

 $\Box$  (5) Commissions

(6) Performance-based fees

#### Item 5 Information About Your Advisory Business - Regulatory Assets Under Management

# **Regulatory Assets Under Management**

Yes No

-0

- F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios?
  - (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) \$ 18,596,639,242 (d) 58

Non-Discretionary: (b) \$ 5,311,779,297 (e) 10

Total: (c) \$ 23,908,418,539 (f) 68

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*?

\$ 9,022,925,844

# Item 5 Information About Your Advisory Business - Advisory Activities

#### **Advisory Activities**

G. What type(s) of advisory services do you provide? Check all that apply.

	<ul> <li>☐ (1) Financial planning services</li> <li>☐ (2) Portfolio management for individuals and/or small businesses</li> <li>☐ (3) Portfolio management for investment companies (as well as "business development companies" that have made are election pursuant to section 54 of the Investment Company Act of 1940)</li> <li>☑ (4) Portfolio management for pooled investment vehicles (other than investment companies)</li> <li>☑ (5) Portfolio management for businesses (other than small businesses) or institutional clients (other than registered investment companies and other pooled investment vehicles)</li> <li>☐ (6) Pension consulting services</li> <li>☑ (7) Selection of other advisers (including private fund managers)</li> <li>☐ (8) Publication of periodicals or newsletters</li> </ul>	1	
	☐ (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	t	
	company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report or 814 number of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Schedulin 5.G.(3) of Schedulin Section 5.		
н.	If you provide financial planning services, to how many <i>clients</i> did you provide these services during your last fiscal year?  O  O  1 - 10  C  11 - 25  C  26 - 50  C  51 - 100  O  101 - 250  C  251 - 500  More than 500  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 s advisory relationship with those investors.		
т	(1) Do you participate in a wrap fee program?	Yes	
1.	(2) If you participate in a <i>wrap fee program</i> , what is the amount of your regulatory assets under management attributable to as:	C actin	<b>⊙</b> g
	<ul> <li>(a) sponsor to a wrap fee program</li> <li>\$</li> <li>(b) portfolio manager for a wrap fee program?</li> <li>\$</li> <li>(c) sponsor to and portfolio manager for the same wrap fee program?</li> <li>\$</li> </ul>		
	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 Section 5.I.(2) of Schedule D.	in	
	If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a multiple that is offered through a wrap fee program, do not check Item $5.I.(1)$ or enter any amounts in response to Item $5.I.(2)$ .	tual fo	
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 to limited types of investments?		O
	(2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management?	0	•

K.	Separately Managed Account <i>Clients</i>						
	(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> )?	Yes ⊙	No C				
	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?	0	•				
	If yes, complete Section 5.K.(2) of Schedule D.						
	(3) Do you engage in derivative transactions on behalf of any of the separately managed account <i>clients</i> that you advise?	0	•				
	If yes, complete Section 5.K.(2) of Schedule D.						
	(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?	•	0				
	If yes, complete Section 5.K.(3) of Schedule D for each custodian.						
L.	Marketing Activities	Vec	No				
	(1) Do any of your <i>advertisements</i> include:	163	110				
	(a) Performance results?	•	0				
	(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	•	0				
	(c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•				
	(d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•				
	(e) Third-party ratings?	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	•				
	(3) Do any of your advertisements include hypothetical performance?	•	0				
	(4) Do any of your advertisements include predecessor performance ?	0	•				
SEC	TION 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).

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.

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

Generally describe any assets included in "Other"

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

☑ 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	(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) 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.

(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

(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

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

 $\circ$ 

- (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? \$ 6,391,226,514

,				,g,				
(a)	Legal name of custodian:							
	BANK OF NEW YORK MELLON							
(b)	Primary business name of custod	ian:						
	BANK OF NEW YORK MELLON							
(c)	The location(s) of the custodian's	office(s) responsible for cus	tody of the assets :					
	City:	State:		Country:				
	EVERETT	Massachusetts		United States				
					Yes No			
(d)	Is the custodian a related person	of your firm?			0.0			
(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 <i>legal entity</i> identifier (if any)							
(g)	What amount of your regulatory	assets under management a	ttributable to separately	managed accounts is held	at the custodian?			
	\$ 3,740,664,438							
(a)	Legal name of custodian:							
	JP MORGAN CHASE							
(b)	Primary business name of custod	ian:						
	JP MORGAN CHASE							
(c)	The location(s) of the custodian's	office(s) responsible for cus	tody of the assets :					
	City:	State:	Cou	untry:				
	NEW YORK	New York	Uni	ited States				
					Yes No			
(d)	Is the custodian a related person	of your firm?			0 0			
(e)	If the custodian is a broker-deale	er, provide its SEC registratio	n number (if any)					
	-							
(f)	If the custodian is not a broker-d identifier (if any)	ealer, or is a broker-dealer b	ut does not have an SE	C registration number, prov	ide its <i>legal entity</i>			
(g)	What amount of your regulatory \$ 3,167,909,516	assets under management a	ttributable to separately	managed accounts is held	at the custodian?			

Tton	n 6 0	ther Business Activities						
		em, we request information about your firm's other business activities.						
A.	You	are actively engaged in business as a (check all that apply):  (1) broker-dealer (registered or unregistered) (2) registered representative of a broker-dealer (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (4) futures commission merchant (5) real estate broker, dealer, or agent (6) insurance broker or agent (7) bank (including a separately identifiable department or division of a bank) (8) trust company (9) registered municipal advisor (10) registered security-based swap dealer (11) major security-based swap participant (12) accountant or accounting firm (13) lawyer or law firm (14) other financial product salesperson (specify):						
	6.A.	or screaule D.  Yes	Nο					
В.	(1)	Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?	···					
	(2)	If yes, is this other business your primary business?	0					
		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.						
		Yes	No					
	(3)	Do you sell products or provide services other than investment advice to your advisory <i>clients</i> ?	⊙					
		If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.						
SECTION 6.A. Names of Your Other Businesses								
		No Information Filed						
SEC	TION	6.B.(2) Description of Primary Business						
Des	cribe	your primary business (not your investment advisory business):						
If y	ou en	gage in that business under a different name, provide that name:						
SEC	TION	6.B.(3) Description of Other Products and Services						
		other products or services you sell to your <i>client</i> . You may omit products and services that you listed in Section 6.B.(2) above.						
If y	ou en	gage 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
- $\square$  (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:

EAST SEA GP, LLC

2. Primary Business Name of Related Person:

EAST SEA GP, 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.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n)	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 banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant		
	(p)	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?	•	О
7.	Are y	you and the related person under common control?	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	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>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: $\Box$	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
		If the answer is yes, under what exemption?	0	О
	(-)			
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>relaperson</i> is registered.	ted	
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	•	O
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	0
1.	l eus	I Name of <i>Related Person</i> :		
••	_	EP III SECONDARY MANAGER, LLC		
2.		ary Business Name of <i>Related Person</i> : EP III SECONDARY MANAGER, LLC		

3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	er		
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)		
	` ,	broker-dealer, municipal securities dealer, or government securities broker or dealer		
		other investment adviser (including financial planners)		
	(c) (d)	registered municipal 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)	trust company		
	(j) (k)	□ accountant or accounting firm □ lawyer or law firm		
	(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		
6.	Do v	you control or are you controlled by the related person?	Yes	_
0.	D0 y	to a control of are you controlled by the related person:	⊚	О
7.	Are	you and the related person under common control?	0	•
Q	(2)	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.	(a)	clients?	0	⊚
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	$\circ$	$\circ$
		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 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 cust	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 ?	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>relaperson</i> is registered.	ated	
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	•	O
12	Do v	ou and the <i>related person</i> share the same physical location?	_	_
	_	and	•	О

1.	_	I Name of <i>Related Person</i> : FRELD GENERAL PARTNER, LLC		
2.		ary Business Name of <i>Related Person</i> : FRELD GENERAL PARTNER, LLC		
3.	Relat	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) (e)	ted 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  registered security-based swap dealer  major security-based swap participant  vector commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(h) (i) (j)	futures commission merchant banking or thrift institution trust company accountant or accounting firm		
		☐ lawyer or law firm ☐ 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		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	⊚	0
7.	Are y	ou and the related person under common control?	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 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?	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:		
		If this dedress is a private residence, effect this 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	•
	(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>relaperson</i> is registered.	ated	

		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?	•	0		
1.		al Name of <i>Related Person</i> : I M&G IP CREDIT FUND GP LLC				
2.	2. Primary Business Name of <i>Related Person</i> : AON M&G IP CREDIT FUND GP LLC					
3.	Rela -	ted Person's 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.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (g) (k) (n) (o) (p)	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 banking or thrift institution 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  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?	О	⊙		
7.	Are	you and the related person under common control?	⊙	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 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?	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: $\Box$				
			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?	_	_
10.	(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> .	C lated	⊙
	(-)	person is registered.		
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	О	⊙
12.	Do y	rou and the <i>related person</i> share the same physical location?	0	0
				_
1.		Il Name of Related Person:		
	AON	TRUST COMPANY		
2.		ary Business Name of <i>Related Person</i> : TRUST COMPANY		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	or Othe	er		
4.		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(5)	No Information Filed		
5.	Pola	ted Person is: (check all that apply)		
٥.		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		
	(1)	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		
_	_		Yes	: No
6.	ро у	ou control or are you controlled by the related person?	О	⊙
7.	Are	you and the related person under common control?	•	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	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	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 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>custody</i> your <i>clients'</i> assets:	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:	
			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?	•
	(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.  No Information Filed	
11.	Do y	ou and the related person share any supervised persons?	•
12	Do v	ou and the <i>related person</i> share the same physical location?	_
12.	БО у	ou and the related person share the same physical location?	•
1.	_	l Name of <i>Related Person</i> :	
	TOW	NSEND ALPHA MANAGER I, LLC	
2.	Prim	ary Business Name of <i>Related Person</i> :	
	TOW	NSEND ALPHA MANAGER I, LLC	
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	
	-		
	or Othe	er en	
	D - 1-	to different de	
4.		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)	
.		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)	
	,	futures commission merchant	
	(h) (i)	banking or thrift institution trust company	
	(i)	accountant or accounting firm	
		□ lawyer or law firm	
	(I)	insurance company or agency	
	(m)		
	(n)	real estate broker or dealer	
	(o) (p)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	
	(P)		No
6.	Do y	ou control or are you controlled by the related person?	0
I		~	-

7.	Are	you and the related person under common control?	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 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?	0	О
	(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: $\Box$		
		If this address is a private residence, theth 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?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	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>relaperson</i> is registered.	ated	
		No Information Filed		
11.	Do y	rou and the related person share any supervised persons?	⊙	О
12.	Do y	you and the related person share the same physical location?	•	0
1.	Lega	al Name of <i>Related Person</i> :		
	TOW	NSEND ALPHA MANAGER III, L.P.		
2.		ary Business Name of <i>Related Person</i> : /NSEND ALPHA MANAGER III, L.P.		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	er er		
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)			
	(b)	other investment adviser (including financial planners)		
	. ,	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>		
	(r) (g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k) (l)	□ lawyer or law firm □ insurance company or agency		

	(m)			
	(n)	_		
	(o)	<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 partner, managing member (or equivalent) or pooled investment venicles	Yes	No
6.	Do y	you 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	⊙
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	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: $\square$		
		If this address is a private residence, theta this box.	Yes	No
9.	(a)	If the <i>related person</i> 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 ?	О	•
	(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 v	you and the related person share any supervised persons?	_	_
		and the related person shall any supervised persone.	⊙	О
12.	Do y	you and the related person share the same physical location?	•	0
1.	TTG Prim	al Name of <i>Related Person</i> :  GERMAN INVESTMENTS I LLC  hary Business Name of <i>Related Person</i> :  GERMAN INVESTMENTS I LLC		
3.	Rela -	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.	Rela	nted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	nted 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)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)			
	(h)			
		□ trust company		
	٠,	accountant or accounting firm		
		□ lawyer or law firm		
		insurance company or agency		
	(m)	· · · · · · · · · · · · · · · · · · ·		
	(n)			
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	` ,	sponsor of syndicator of inflitted partnerships (of equivalent), excluding pooled investment vehicles  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(P)	sponsor, general partner, managing member (or equivalent) or pooled investment venicles	Voc	No
<sub>c</sub>	Day	and control on two years controlled by the related marcon?		NO
6.	ро у	ou control or are you controlled by the related person?	⊚	О
7.	Are y	you and the related person under common control?	0	•
	,	, , , , , , , , , , , , , , , , , , ,	0	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	0	•
	(h)	clients?  If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you		_
	(b)	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	О	О
		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
		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: $\Box$		
9.	(2)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		No
9.			О	О
	(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	٠
		person is registered.		
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	⊙	$\circ$
12.	Do y	ou and the <i>related person</i> share the same physical location?	⊙	$\circ$
1	Lean	I Name of <i>Related Person</i> :		
1.		ADVANTAGE FUNDS LLC		
	7.014	TIE VIII TIGE TONDS LEG		
2	Prim	ary Business Name of <i>Related Person</i> :		
		ADVANTAGE FUNDS LLC		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
		- 120405		
	or			
	Othe	er		
4.		ted Person's		
	(a)	CRD Number (if any):		
		310335		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
		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)	☐ trust company		
	(j)	accountant or accounting firm		
	(k)	☐ lawyer or law firm		
	(1)	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
6.	Do y	ou control or are you controlled by the related person?	$\circ$	⊙
7.	Are	you and the related person under common control?	•	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	_	_
	(5)	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 related person?		
	(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: $\Box$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	⊙
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	$\circ$	⊙
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relative property of the same and country.	ated	
		person is registered.		
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\circ$	⊙
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	•
			_	
1.	_	l Name of <i>Related Person</i> :		
	AON	INVESTMENTS CANADA INC.		
2.		ary Business Name of <i>Related Person</i> :		
	AUN	INVESTMENTS CANADA INC.		
2	Dolo	tod Parson's SEC File Number (if any) (e.g. 901 9 966 903 )		
3.	кеіа -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	er		
1				ı

4. <i>F</i>	Relat	red Person's		
(	(a)	CRD Number (if any):		
(	(b)	CIK Number(s) (if any):		
		No Information Filed		
5. <i>F</i>	Relat	red Person is: (check all that apply)		
	(a)			
(	(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		
(		□ trust company		
(		accountant or accounting firm		
· `		lawyer or law firm		
		insurance company or agency		
1	(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	Na
6. E	)	ou control or are you controlled by the related person?		
0. L	50 y	od control of are you controlled by the related person:	0	⊚
7. A	Are v	rou and the related person under common control?	•	_
	,		·	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	0	•
		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 <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 clients' assets:	louy	Oi
		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: $\square$		
ļ			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 ?	_	_
		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>	• Dated	0
	. ,	person is registered.	accu	
		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 - Newfoundland and Labrador, Financial Services Regulation Division  Canada - Nova Scotia Securities Commission		$\dashv$

		Name of Country/English Name of Foreign Financial Regulatory Authority		
		Canada - Quebec, Financial Markets Authority		
		Canada - Saskatchewan Financial Services Commission		
		Canada - Yukon Territories, Registrar of Securities		
11.	. Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	0	•
12.	. Do y	ou and the <i>related person</i> share the same physical location?	0	•
1.		I Name of <i>Related Person</i> : INVESTMENTS LIMITED		
2.		ary Business Name of <i>Related Person</i> : INVESTMENTS LIMITED		
3.	Relat -	red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	r		
4.	Relat	red Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o)	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 banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer	Yes	No
6.	Do yo	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	Yes O	
			•	12
7.	Are y	ou and the related person under common control?	•	0
8.		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	•
		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?		0
		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?	•	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?	•	0
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rela		~
	(-)	person is registered.		
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		United Kingdom - Financial Conduct Authority		
11	Do v	rou and the <i>related person</i> share any <i>supervised persons</i> ?	_	_
	БО у	ou and the related person share any supervised persons:	0	⊚
	_			
12.	ро у	you and the related person share the same physical location?	$\circ$	⊙
		I Nove of Deleted Decree		
1.	_	Name of Related Person:		
	KKI	GP, LLC		
_	Duino	any Pusiness Name of Related Parson		
2.		ary Business Name of <i>Related Person</i> :  GP, LLC		
	IXIXI	or, elec		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
3.	-	ted refsorts see the Number (ii diff) (e.g., our , o , ood , ouz )		
	or			
	Othe	er en		
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)	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		
	(1)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	$\square$ 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	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	•

8.	(a)	Does the <i>related person</i> act as a qualified custodian for you <i>clients</i> ?	clients in connection with advisory services you provide to	0	•
	(b)	If you are registering or registered with the SEC and you had overcome the presumption that you are not operationally in <i>related person</i> and thus are not required to obtain a surprisumaintained at the <i>related person</i> ?	dependent (pursuant to rule 206(4)-2(d)(5)) from the	0	О
	(c)	If you have answered "yes" to question 8.(a) above, provide your <i>clients'</i> assets:	e the location of the <i>related person's</i> office responsible for <i>custo</i>	ody	of
			nber and Street 2:		
		·	intry: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$			
	, ,			Yes	No
9.		If the <i>related person</i> is an investment adviser, is it exempt to	rom registration?	$\circ$	⊙
	(b)	If the answer is yes, under what exemption?			
10.	(a)	Is the related person registered with a foreign financial regu	latory authority ?	0	•
	(b)	If the answer is yes, list the name and country, in English of person is registered.	each foreign financial regulatory authority with which the rela	ted	
			oformation Filed		
11.	Do v	ou and the related person share any supervised persons?		~	$\sim$
	,	ou and ano rolated person shall any super need persons.		⊙	
12.	Do y	ou and the related person share the same physical location?		•	0
1.	Lega	Il Name of <i>Related Person</i> :			
	SA S	PECIAL SITUATIONS GENERAL PARTNER, LLC			
	Б.:	D. Charles No. 11 of Deleted Dr. 11			
2.		ary Business Name of <i>Related Person</i> : SPECIAL SITUATIONS GENERAL PARTNER, LLC			
	5, ( 5	TECHNE STIGHTS OF THE TAXABLE TAXABLE TO THE TAXABLE TAXABLE TO THE TAXABLE TA			
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 8	02-)		
	- or				
	Othe	er			
4.		ted Person's			
	(a)	CRD Number (if any):			
	(b)	CIK Number(s) (if any):			
	(5)		formation Filed		
5.	Relai	ted Person is: (check all that apply)			
	(a)		nt securities broker or dealer		
	(b)	$\square$ 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			
		banking or thrift institution			
	(i)	trust company			
	(j) (k)	☐ accountant or accounting firm ☐ lawyer or law firm			
	(K) (I)	insurance company or agency			
	(m)				
	(n)	real estate broker or dealer			

	(o) (p)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles 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?	•	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> ?	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> ?	C	О
	(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: $\square$		
			Yes	No
9.	(a)	If the related person 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 ?	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>relaperson</i> is registered.		
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	•	0
			٠	
12.	Do y	you and the <i>related person</i> share the same physical location?	⊚	0
1.		al Name of <i>Related Person</i> : E TAHOE II GP, LLC		
2.		nary Business Name of <i>Related Person</i> : E TAHOE II GP, LLC		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or Oth	er		
	Dolo	stad Darson la		
4.		ated Person's  CRD Number (if any):		
	(h)	CIV Number(a) (if any)		
	(b)	CIK Number(s) (if any):  No Information Filed		
		TO INDIVIDUOI FIED		
5.	Rela	ated Person is: (check all that apply)		
	(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		
[1	,			1

	(h)	banking or thrift institution		
	(i)	☐ trust company		
	(j)	accountant or accounting firm		
		lawyer or law firm		
	` '	insurance company or agency		
	(m)	· · · ·		
	(n)			
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	,			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	<b>.</b>	
_	_		Yes	No
6.	ро у	ou control or are you controlled by the related person?	⊙	$\circ$
7.	Are y	you and the related person under common control?	$\circ$	$\odot$
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	0	•
		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 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: $\Box$		
			Yes	No
9.	(a)	If the <i>related person</i> 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	•
		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>		·
	(D)	person is registered.	ateu	
		No Information Filed		
11	Do v	ou and the related person share any supervised persons?	_	_
11.	БО у	ou and the related person share any supervised persons:	⊚	0
	_			
12.	Do y	ou and the <i>related person</i> share the same physical location?	⊙	$\circ$
1.	_	I Name of Related Person:		
	MCN	FUND GP LLC		
2.		ary Business Name of <i>Related Person</i> :		
	MLM	FUND GP LLC		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe	r		
4.		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)		

	` ,	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)			
	(c)	registered municipal advisor		
	٠,	registered security-based swap dealer major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
		futures commission merchant		
	(h)			
	(i)	□ trust company		
	(j)	accountant or accounting firm		
	(k)			
	(1)	insurance company or agency		
	(m)	· ·		
	(n)			
	` ,	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	V	NI.
6.	Dov	you control or are you controlled by the related person?	Yes	_
0.	БО у	tou control of are you controlled by the related person!	⊙	О
7.	۸ra	you and the related person under common control?	_	_
<b>'</b> '	Ale	you and the related person under common control:	О	⊙
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?		٠
	(b)		$\circ$	$\circ$
		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 clients' funds or securities that are maintained at the related person?		
	(c)		tody	of
	(0)	your clients' assets:	louy	OI
		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: $\square$	<b>V</b>	
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	_
		If the answer is yes, under what exemption?	О	⊚
	(D)	If the diswer is yes, under what exemption:		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	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.		
	_	No Information Filed		
11.	До у	you and the related person share any supervised persons?	⊙	$\circ$
12	D	and the valeted verses shows the serve above the serve		
12.	ро у	you and the related person share the same physical location?	⊙	$\circ$
1.	Lega	al Name of Related Person:		
	WES	ST LAKE GENERAL PARTNER, LLC		
	WES			
2.	Prim	ary Business Name of <i>Related Person</i> :		
2.	Prim	ST LAKE GENERAL PARTNER, LLC		
	Prim WES	or LAKE GENERAL PARTNER, LLC  nary Business Name of <i>Related Person</i> :  ST LAKE GENERAL PARTNER, LLC		
3.	Prim WES	ary Business Name of <i>Related Person</i> :		
	Prim WES	or LAKE GENERAL PARTNER, LLC  nary Business Name of <i>Related Person</i> :  ST LAKE GENERAL PARTNER, LLC		
	Prim WES <i>Rela</i>	or LAKE GENERAL PARTNER, LLC  nary Business Name of <i>Related Person</i> :  ST LAKE GENERAL PARTNER, LLC  Steed Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	Prim WES Rela	or LAKE GENERAL PARTNER, LLC  nary Business Name of <i>Related Person</i> :  ST LAKE GENERAL PARTNER, LLC  Steed Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		

	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):  No Information Filed		
5.	Relation (a) (b) (c) (d) (e)	□ other investment adviser (including financial planners) □ registered municipal advisor □ registered security-based swap dealer		
	(f) (g) (h) (i) (j)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  futures commission merchant		
	(l) (m) (n)	☐ insurance company or agency pension consultant real estate broker or dealer		
	(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>		
6.	Do y	and a section of the control of the	∕es ⊙	No C
	Aro.	volumed the valeted nevern under common central?		
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	•
	(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	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>custo</i> your <i>clients'</i> assets:	dy	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:		
	(2)		es/	No
9.	` ,	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?	0	0
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	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>relat person</i> is registered.	ed	
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	⊙	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	0
1.	TOW	Il Name of <i>Related Person</i> : INSEND STRATEGIC VENTURES GP, LLC  ary Business Name of <i>Related Person</i> : INSEND STRATEGIC VENTURES GP, LLC		

3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	ur — — — — — — — — — — — — — — — — — — —		
4.		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):  No Information Filed		
		No Illiottiation Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n)	<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>		
6.			Yes •	No C
			~	~
7.	Are y	you and the related person under common control?	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 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?	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:	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: $\Box$		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	_
J.	. ,	If the answer is yes, under what exemption?	0	О
10	(2)	To the veleted never veristand with a feweign financial very letter outbouits.		
10.		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>relative</i> .	C ited	•
		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

1.		I Name of <i>Related Person</i> : H GP, LLC		
2.		ary Business Name of <i>Related Person</i> : H GP, LLC		
3.	Relat	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) (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> </ul>		
	(h) (i)	☐ futures commission merchant ☐ banking or thrift institution ☐ trust company ☐ accountant or accounting firm		
		☐ lawyer or law firm ☐ 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		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	⊙	0
7.	Are y	you and the related person under common control?	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 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?	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:		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	o
	(b)	If the answer is yes, under what exemption?		
10.		Is the related person registered with a foreign financial regulatory authority ?	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>relaperson</i> is registered.	ated	

	No Information Filed		
11.	Do you and the related person share any supervised persons?	•	0
12.	Do you and the <i>related person</i> share the same physical location?	•	0
1.	Legal Name of <i>Related Person</i> : CFSSG REAL ESTATE PARTNERS I, LLC		
2.	Primary Business Name of <i>Related Person</i> : CFSSG REAL ESTATE PARTNERS I, 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)	Yes	No
6.	Do you control or are you controlled by the related person?	•	0
7.	Are you and the related person under common control?	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	•
	<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 customers.</li> </ul>	C stody	of
	your <i>clients'</i> assets:  Number and Street 1:  Number and Street 2:	louy	JI
	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: $\Box$	Vac	Na

9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		
10.		Is the related person registered with a foreign financial regulatory authority?	О	⊙
	(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>relaperson</i> is registered.	atea	
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	•	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	$\odot$	О
1.		I Name of <i>Related Person</i> : SECURITIES LLC		
	,			
2.	Prim	ary Business Name of Related Person:		
	AON	SECURITIES LLC		
3.	Relai	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
		- 106546		
	or			
	Othe	r		
4.	Relai	ted Person's		
		CRD Number (if any):		
		4138		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Relat	ted Person is: (check all that apply)		
	. ,	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	. ,	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> </ul>		
	(c) (d)			
		major security-based swap participant		
	. ,	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
		futures commission merchant		
	(h)	$\square$ banking or thrift institution		
	(i)	□ trust company		
	(j)	accountant or accounting firm		
		lawyer or law firm		
	(I)	insurance company or agency		
	(m) (n)	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		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	0	⊙
7.	Are y	you and the related person under common control?	$\odot$	О
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	$\circ$	⊙
	(b)	clients?  If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	_	
	(5)	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 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>custody</i> your <i>clients'</i> assets:	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:	No
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 ?	•
	(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.	
		No Information Filed	
11.	Do y	ou and the related person share any supervised persons?	•
12	D	and the related course shows the course showing beaution?	
12.	ро у	ou and the <i>related person</i> share the same physical location?	⊙
1.		Name of Related Person:	
	AON	INVESTMENTS USA INC.	
2.	Prim	ary Business Name of Related Person:	
	AON	INVESTMENTS USA INC.	
3.	Rela	ed Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	
		17219	
	or Othe	r	
4.		ed Person's CRD Number (if any):	
	(a)	105596	
	(b)	CIK Number(s) (if any):	
		No Information Filed	
_			
5.		ed Person is: (check all that apply) $\square$ broker-dealer, municipal securities dealer, or government securities broker or dealer	
	(a) (b)	<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	
	(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) (k)	<ul> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> </ul>	
	(K) (I)	insurance company or agency	
	. ,	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	. No
6.	Do v	ou central or are you centralled by the related narron?	_
1	,	ou control of are you controlled by the related person?	⊚

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 <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 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?			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: $\Box$	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	•	
	(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>related person</i> is registered.			
		No Information Filed			
11.	Do y	ou and the related person share any supervised persons?	•	O	
12.	Do y	ou and the related person share the same physical location?	0	•	
	<ol> <li>Legal Name of Related Person:         <ul> <li>LAKE TAHOE III GP, LLC</li> </ul> </li> <li>Primary Business Name of Related Person:         <ul> <li>LAKE TAHOE III GP, LLC</li> </ul> </li> </ol>				
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	-				
	or Othe	er en			
4.	Pola	ted Person's			
٦.		CRD Number (if any):			
	(h)	CTV Number(e) (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) (d)	registered municipal advisor registered security-based swap dealer			
		major security-based swap participant			
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			
	(g)	futures commission merchant			
	(h) (i)	□ banking or thrift institution □ trust company			
	(i) (j)	accountant or accounting firm			
	(k)	lawyer or law firm			
	(1)	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	<b>.</b>	
6.	Do y	you control or are you controlled by the related person?	Yes ⊙	No C
7.	Are	you and the related person under common control?	o	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	•
	(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?	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:	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?	C	_
	(b)	If the answer is yes, under what exemption?	0	0
	( - )			
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relative	ited	
		person is registered.		
11	Dox	No Information Filed you and the <i>related person</i> share any <i>supervised persons</i> ?	_	
11.	D0 }	you and the related person share any supervised persons:	⊚	О
12.	Doy	you and the <i>related person</i> share the same physical location?	•	О
1.	CFS	al Name of <i>Related Person</i> : SG REAL ESTATE PARTNERS II, LLC  nary Business Name of <i>Related Person</i> : SG REAL ESTATE PARTNERS II, LLC		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Oth	er		
4.		ated Person's  CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(5)	No Information Filed		
5.	Relation (a) (b) (c) (d) (e)	broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant		

	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)			
	(h)			
	(i)	□ trust company		
	(j)	accountant or accounting firm		
		□ lawyer or law firm		
		insurance company or agency		
	(n)	· · · · · · · · · · · · · · · · · · ·		
	(n)			
		_		
	` ,			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	V	NI.
		and the second distribute the deleter of 2	Yes	NO
6.	ро у	ou control or are you controlled by the related person?	⊙	$\circ$
7.	Are y	you and the related person under common control?	$\circ$	$\odot$
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 <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	$\circ$	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 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> 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 ?	0	•
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rela	ated	
		person is registered.		
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	$\odot$	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	0
1.	Lega	l Name of <i>Related Person</i> :		
	TOW	NSEND GROUP EUROPE LIMITED		
2.	Prim	ary Business Name of <i>Related Person</i> :		
	TOW	NSEND GROUP EUROPE LIMITED		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe			
	D - 1 -	tad Davaania		
4.		CRD Number (if any)		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(0)	No Information Filed		
		No Information Filed		
II.				

5.	Related Person is: (check all that apply)				
	(a)				
		other investment adviser (including financial planners)			
		registered municipal 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)	$\square$ banking or thrift institution			
	(i)	☐ trust company			
		accountant or accounting firm			
	(k)	lawyer or law firm			
	(1)	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				
_				No	
6.	Do y	ou control or are you controlled by the related person?	$\odot$	$\circ$	
7.	Are	you and the related person under common control?	$\odot$	О	
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	$\circ$	$\circ$	
		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> ?			
	(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>	odv	of	
	(C)	your clients' assets:	ouy	OI	
		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?	$\odot$	$\circ$	
	(b)	If the answer is yes, under what exemption?			
		FOREIGN ENTITY			
10.		Is the related person registered with a foreign financial regulatory authority?	⊚	$\circ$	
	(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.  Name of Country/English Name of Foreign Financial Regulatory Authority		-	
		United Kingdom - Financial Conduct Authority		$-\parallel$	
11	Dav				
11.	ро у	ou and the <i>related person</i> share any <i>supervised persons</i> ?	⊚	0	
12	Davi	an and the related names shows the same physical leasting?			
12.	ро у	ou and the <i>related person</i> share the same physical location?	⊚	0	
1.	Lega	l Name of Related Person:			
		SOLUTIONS UK LIMITED			
2.		ary Business Name of Related Person:			
	AON	SOLUTIONS UK LIMITED			
2	Dala	tad Parcania SEC File Number (if any.) (e.g. 901 9 966 903 )			
3.	reia -	ted 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):		
	(5)	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		
		registered security-based swap dealer		
		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) (j)	☐ trust company ☐ accountant or accounting firm		
		lawyer or law firm		
	(I)	insurance company or agency		
	(m)			
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	$\square$ 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?	$\circ$	⊙
7.	Are y	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	⊙
	(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?	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: $\Box$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\odot$	О
	(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
	(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	
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		United Kingdom - Financial Conduct Authority		
11.	Do y	you and the related person share any supervised persons?	•	0
12.	Do y	you and the <i>related person</i> share the same physical location?	0	•

1.	Legal Name of <i>Related Person</i> : AON SOLUTIONS IRELAND LIMITED						
2.		ary Business Name of <i>Related Person</i> : SOLUTIONS IRELAND LIMITED					
3.	Rela -	ted Person's 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.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m)	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 banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency	Yes	No			
6.	Do y	ou control or are you controlled by the related person?	0	•			
7.	Are	you and the related person under common control?	•	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 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?	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: □					
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes				
J.	. ,	If the answer is yes, under what exemption?  FOREIGN ENTITY	•	0			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	•	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 person is registered.	e <i>related</i>	1
	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Ireland - Central Bank of Ireland		
11.	Do you and the related person share any supervised persons?	0	•
12.	Do you and the <i>related person</i> share the same physical location?	0	•
1.	Legal Name of <i>Related Person</i> :		
	TTG MANAGER, LLC		
2.	Primary Business Name of <i>Related Person</i> : TTG MANAGER, LLC		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's		
	<ul><li>(a) CRD Number (if any):</li><li>(b) CIK Number(s) (if any):</li></ul>		
	No Information Filed		
	<ul> <li>(a) □ broker-dealer, municipal securities dealer, or government securities broker or dealer</li> <li>(b) □ other investment adviser (including financial planners)</li> <li>(c) □ registered municipal advisor</li> <li>(d) □ registered security-based swap dealer</li> <li>(e) □ major security-based swap participant</li> <li>(f) □ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>(g) □ futures commission merchant</li> <li>(h) □ banking or thrift institution</li> <li>(i) □ trust company</li> <li>(j) □ accountant or accounting firm</li> <li>(k) □ lawyer or law firm</li> <li>(l) □ insurance company or agency</li> <li>(m) □ pension consultant</li> <li>(n) □ real estate broker or dealer</li> <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>	Was	
		Yes	s No
6.	Do you 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	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 <i>clients</i> ?	to 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 clients' funds or securities that are maintained at the related person? (c) If you have appropriate "you" to question 8 (a) above provide the location of the related person's effice respectible for	e	o of
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible fo your clients' assets:	r <i>custody</i>	' Of

		Number and Street 1:		Number and Street 2:			
		City:  If this address is a prive	State: vate residence, check this box: I	Country:	ZIP+4/Postal Code:		
		ii tilis addicess is a privi	ate residence, effect this box.		Ye	es I	No
9.	(a)	If the <i>related person</i> is	an investment adviser, is it exe	mpt from registration?		5	0
	(b)	If the answer is yes, un	nder what exemption?				
10.		·	egistered with a <i>foreign financia</i>		c		⊚
	(b)	If the answer is yes, list person is registered.	t the name and country, in Engl	lish of each <i>foreign finan</i>	cial regulatory authority with which the related	d	
		person is registered.		No Information Filed			
11.	Doy	ou and the related perso	on share any supervised persons	s?	ē	a	0
							~
12.	Do y	ou and the related perso	on share the same physical loca	tion?	•	ð	0
						_	=
1.	Lega	al Name of <i>Related Perso</i>	on:				
	PEN	N SQUARE MANAGER II,	LLC				
2.		nary Business Name of <i>Re</i> N SQUARE MANAGER II,					
	I LIV	N SQUARE MANAGER II,	LLC				
3.	Rela	ted Person's SEC File Nu	ımber (if any) (e.g., 801-, 8-, 86	66-, 802-)			
	-						
	or Oth	ar.					
	Oth	<del>2</del> 1					
4.	Rela	ted Person's					
	(a)	CRD Number (if any):					
	(h)	CIK Number(s) (if any):					
	(b)	CIR Number(s) (ii arry).	•	No Information Filed			
5.		ted Person is: (check all		mmont consulting bunker	or doplor		
	(a) (b)		nicipal securities dealer, or gove adviser (including financial planr		or dealer		
	(c)		• •	.0.0)			
	(d)	registered security	r-based swap dealer				
	(e)	******	sed swap participant				
	(f)	******	perator or commodity trading ac	dvisor (whether registere	ed or exempt from registration)		
	(g) (h)	futures commission banking or thrift in					
	(i)	trust company	Stration				
	(j)	accountant or acco	ounting firm				
	(k)	☐ lawyer or law firm					
	(1)	insurance company	• •				
	(m)						
	(n) (o)	real estate broker of sponsor or syndical	or dealer ator of limited partnerships (or e	equivalent), excluding no	oled investment vehicles		
	(p)		artner, managing member (or e				
			`			es I	No
6.	Do y	ou <i>control</i> or are you <i>col</i>	introlled by the related person?		6	ð	o
7.	Are	you and the <i>related perso</i>	son under common control?		c	)	⊙

8.	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 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?	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:	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: $\Box$	Voc	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
	` ,	If the answer is yes, under what exemption?	0	0
	(-)			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	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.  No Information Filed		
11	Do v	rou and the related person share any supervised persons?	_	_
11.	БО у	ou and the related person share any supervised persons:	⊚	О
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	0
1.	Lena	Il Name of <i>Related Person</i> :		
		SECURITIES INVESTMENT MANAGEMENT INC.		
2.		ary Business Name of Related Person:		
	AON	SECURITIES INVESTMENT MANAGEMENT INC.		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe			
1	Dala	ted Person's		
٦.		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		
	. ,	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
		registered security-based swap dealer		
		<ul> <li>□ major security-based swap participant</li> <li>□ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>		
	(f) (g)	<ul><li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li><li>futures commission merchant</li></ul>		
	(y) (h)	banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	☐ lawyer or law firm		
	(1)	insurance company or agency		
	(m)			
		real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		

	(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	you and the related person under common control?	$\odot$	$\circ$		
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 <i>clients</i> ?	О	⊙		
	(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?	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: $\Box$				
			Yes	No		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	$\odot$		
	(b)	If the answer is yes, under what exemption?				
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	$\odot$	$\circ$		
	(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.				
		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.	Do y	ou and the related person share any supervised persons?	О	$\odot$		
12.	Do y	rou and the <i>related person</i> share the same physical location?	0	•		
					il	
1.	Lega	Il Name of Related Person:				
	_	NSEND RE GLOBAL GP LIMITED				
2.		ary Business Name of <i>Related Person</i> :				
	TOW	INSEND RE GLOBAL GP LIMITED				
	D - /-	tod Deutschle CEC File Number (if ann) (a.e. 001 0 000 000 )				
3.	-	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)				
	or					
	Othe	er				
4.	Rela	ted Person's				
	(a)	CRD Number (if any):				
	(L)	CTI/ Numbers/a) (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)	$\square$ 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)			
	(i)	trust company		
		accountant or accounting firm		
		lawyer or law firm		
	(l) (m)	insurance company or agency pension consultant		
		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	rou control or are you controlled by the related person?	•	0
				_
7.	Are y	you and the related person under common control?	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> ?	О	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	_	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>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	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	$\odot$
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	_	_
-0.		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>	ted.	⊙
	(5)	person is registered.	ica	
		No Information Filed		
11.	Do y	rou and the related person share any supervised persons?	$\odot$	$\circ$
12.	Do y	rou and the <i>related person</i> share the same physical location?	$\odot$	$\circ$
1.	Lega	Il Name of Related Person:		
	JDPT	TMANAGER, LLC		
	Б.:	Desires News of Deleted Desires		
2.		ary Business Name of <i>Related Person</i> : 「MANAGER, LLC		
	30			
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or Othe			
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(h)	CTV Number(e) (if any)		
	(b)	CIK Number(s) (if any):  No Information Filed		
1		110 Information Filed		

5. Related Person is: (Check all that apphy)  (a)   broken-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 municipal advisor  (d)   registered municipal advisor  (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)   lawyer or law firm  (l)   parainance company or agency  (m)   pension consultant  (n)   preliated person of finited partnerships (or equivalent), excluding pooled investment vehicles  (p)   sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p)   sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p)   sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p)   sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p)   sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p)   sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p)   sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p)   sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p)   sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p)   sponsor or general partner, managing member (or equivalent), excluding pooled investment vehicles  (p)   sponsor or general partner, managing member (preliated person) is equivalent, excluding pooled linvestment vehicles  (p)   spo							
(b) ☐ other investment adviser (including financial planners)  (c) ☐ registered municipal advisor  (d) ☐ registered security-based swap pacaler  (e) ☐ major security-based swap participant  (f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  (g) ☐ futures commodity be a commodity trading advisor (whether registered or exempt from registration)  (g) ☐ trust commony  (g) ☐ insurance company or agency  (g) ☐ insurance company or agency  (g) ☐ insurance company or agency  (g) ☐ provide to the provide or dealer  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (g) ☐ soonsoor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (g) ☐ soonsoor or syndicator  (	5.	Rela	red Person is: (check all that apply)				
(c) □ registered municipal advisor		(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer				
(d) ☐ registered security-based swap dealer (e) ☐ major security-based swap participant (f) Ø 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 (ii) ☐ real estate broker or dealer (ii) ☐ real estate broker or dealer (iii) ☐ real estate preson under common control?  7. Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients? (iii) ☐ trust company (iii) ☐ trust company (iii) ☐ trust company (iii) ☐ real estate person act as a qualified custodian for your clients in connection with advisory services you provide to clients? (iv) ☐ trust are registering or registered with the SEC and you have answered "ves," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(0)(5)) from the related person and that 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 "ves" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' sessets:  Number and Street 1:  City: If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' sessets:  Number and Street 1:  Number and Street 1:  Other related person is an investment adviser, is it exempt from registration?  Yes No  10. (a) If the related person is an investment adviser, is it exempt from registration?  (b) If the answer is yes, list the name and country, in English							
Co							
(i) □ commodify pool operator or commodify 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 (i) □ 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 6. Do you control or are you controlled by the related person? 6. C 7. Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody of your clients' assets:  Number and Street 1:  City: Country: 2IP+4/Postal Code:  If this address is a private residence, check this box: □  If this address is a private residence, check this box: □  O if the related person is an investment adviser, is it exempt from registration?  (c) If the answer is yes, under what exemption?  10. (a) Is the related person share any supervised persons?  (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.  No Information Filed  11. Do you and the related Person share the same physical location?  12. Do you and the related Person share the same physical location?  13. Legal Name of Related Persons  TOWNSEND ALPHA							
(g) ☐ futures commission merchant (h) ☐ banking or thirit institution (i) ☐ trust company (i) ☐ accountant or accounting firm (k) ☐ lawyer or law firm (i) ☐ insurance company or agency (m) ☐ pension consultant (i) ☐ real estate broker or dealer (i) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (j) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (j) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (j) ☐ sponsor, ogeneral partner, managing member (or equivalent) of pooled investment vehicles (j) ☐ sponsor, ogeneral partner, managing member (or equivalent), excluding pooled investment vehicles (j) ☐ sponsor, ogeneral partner, managing member (or equivalent), excluding pooled investment vehicles  Yes No 6. Do you control or are you controlled by the related person?  7. Are you and the related person under common control?  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to C G G C C C C C C C C C C C C C C C C		(e)					
(h)  □ banking or thrift institution (i) □ trust company (ii) □ accountant or accounting firm (k) □ lawyer or law firm (k) □ lawyer or law firm (i) □ insurance company or agency (m) □ pension consultant (ii) □ real estate broker or dealer (ii) □ sponsor or syndictor 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 you control or are you controlled by the related person?  6. Are you and the related person under common control?  7. Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody of your clients' assets:  Number and Street 1:  Number and Street 2:  City:  City:  City:  State:  City:  State:  Country:  ZIP+4/Postal Code:  If this address is a private residence, check this box:  If this address is a private residence, check this box:  Wes No  (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.  No Information Filed  1. Legal Name of Related person share the same physical location?  6. C  2. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC		(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)				
(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 6. Do you control or are you controlled by the related person? (c) □ one the related person under common control? (d) □ one the related person under common control? (e) □ one the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients? (e) 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? (c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:  Number and Street 1:  City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box: □  Yes No (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.  No Information Filed  1. Legal Name of Related person share any supervised persons?  C C  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC		(3)					
(i) □ accountant or accounting firm (ix) □ lawyer or law firm (ix) □ pension consultant (iv) □ pension consultant (iv) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (iv) □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles  Yes No 6. Do you control or are you controlled by the related person? (iv) □ can determine the related person under common control? (iv) □ for you and the related person under common control? (iv) □ for 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? (c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:  Number and Street 1: Number and Street 2: Clip: 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? (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.  No Information Filed  11. Do you and the related person share the same physical location?  (c) Country: TOWNSEND ALPHA MANAGER II, LLC  Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC		(h)	banking or thrift institution				
(k)  □ lawyer or law firm (f) □ insurance company or agency (m) □ pension consultant (n) □ real estate broker or dealer (a) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) ☑ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (p) ☑ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (p) ☑ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (p) ☑ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles  Yes No (c) O you control or are you controlled by the related person? (c) O you control or are you controlled by the related person? (d) O best the related person and tas a qualified custodian for your clients in connection with advisory services you provide to of 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 related person and that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person of the related person is office responsible for custody of your clients' assets:  Number and Street 1:  Number and Street 1:  Number and Street 2:  Country: 2IP+4/Postal Code:  If this address is a private residence, check this box: □  Yes No  10. (a) If the related person is an investment adviser, is it exempt from registration?  C C  (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.  No Information Filed  11. Do you and the related person share the same physical location?  C C  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC			·				
(ii) □ insurance company or agency (iii) □ pension consultant (i) □ real estate broker or dealer (i) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (ii) □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles (iv) □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles (iv) □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles  Yes No  Do you control or are you controlled by the related person?  Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody of your clients' assets:  Number and Street 1:  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?  (b) If the answer is yes, under what exemption?  10. (a) Is the related person registered with a foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  © C  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC		(j)	accountant or accounting firm				
(m) □ pension consultant (n) □ real estate broker or dealer (o) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) ☑ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles  Yes No  Do you control or are you controlled by the related person?  Are you and the related person under common control?  Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody of your clients' assets:  Number and Street 1:  Number and Street 1:  Clity: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box: □  Yes No  (a) If the related person is an investment adviser, is it exempt from registration?  (b) If the answer is yes, under what exemption?  (c) If this answer is yes, under what exemption?  (c) 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 you and the related person share the same physical location?  (c) C  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC		(k)	lawyer or law firm				
(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  Do you control or are you controlled by the related person?		(1)	insurance company or agency				
(o)		(m)	pension consultant				
(p) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles  Yes No  Do you control or are you controlled by the related person?  Are you and the related person under common control?  Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody 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:  Yes No  (b) If the related person is an investment adviser, is it exempt from registration?  (c) If you have 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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share the same physical location?  12. Do you and the related Person:  TOWNSEND ALPHA MANAGER II, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC		(n)	real estate broker or dealer				
6. Do you control or are you controlled by the related person?  6. Do you control or are you controlled by the related person?  6. Are you and the related person under common control?  6. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody of your clients' assets:  Number and Street 1:  City:  State:  Country:  ZIP+4/Postal Code:  If this address is a private residence, check this box:  (b) If the related person is an investment adviser, is it exempt from registration?  (c) If you have answere is yes, under what exemption?  (d) If the answer is yes, under what exemption?  (e) 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 you and the related person share any supervised persons?  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC		(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles				
6. Do you control or are you controlled by the related person?  6. C  7. Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody 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:  We so No  (b) If the related person is an investment adviser, is it exempt from registration?  (c) If you have answer is yes, under what exemption?  (d) If the answer is yes, under what exemption?  (e) 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 you and the related person share any supervised persons?  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  24. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC		(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles				
7. Are you and the related person under common control?  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody 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:  Wes No  (b) If the related person is an investment adviser, is it exempt from registration?  (c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:  No If the related person is an investment adviser, is it exempt from registration?  (d) If the answer is yes, under what exemption?  (e) 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 Filled  11. Do you and the related person share any supervised persons?  (e) Do you and the related person share the same physical location?  12. Legal Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC				Yes	No		
8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 205(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?  (c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody 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:  Wes No  (b) If the related person is an investment adviser, is it exempt from registration?  (c) If the answer is yes, under what exemption?  10. (a) Is the related person registered with a foreign financial regulatory authority?  (d) 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 you and the related person share any supervised persons?  (e) Country:  Legal Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC	6.	Do y	ou control or are you controlled by the related person?	$\odot$	0		
8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 205(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?  (c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody 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:  Wes No  (b) If the related person is an investment adviser, is it exempt from registration?  (c) If the answer is yes, under what exemption?  10. (a) Is the related person registered with a foreign financial regulatory authority?  (d) 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 you and the related person share any supervised persons?  (e) Country:  Legal Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC							
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 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 custody 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:  Wes No  9. (a) If the related person 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?  (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.  No Information Filed  11. Do you and the related person share any supervised persons?  C C  12. Do you and the related Person:  TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC	7.	Are y	ou and the related person under common control?	0	•		
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 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 custody 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:  Wes No  9. (a) If the related person 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?  (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.  No Information Filed  11. Do you and the related person share any supervised persons?  C  C  C  C  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC							
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?  (c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:  Number and Street 1:  City:  State:  Country:  ZIP+4/Postal Code:  If this address is a private residence, check this box:  9. (a) If the related person 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?  (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.  No Information Filed  11. Do you and the related person share any supervised persons?  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  24. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC	8.	(a)		0	•		
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 custody of your clients' assets:  Number and Street 1:  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?  (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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  C  C  C  C  C  C  C  C  C  C  C  C  C		(b)		0	0		
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 custody of your clients' assets:  Number and Street 1:  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?  (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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  O  Legal Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC							
(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:  Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:  9. (a) If the related person 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? (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.  No Information Filed  11. Do you and the related person share any supervised persons?  © C  12. Do you and the related person share the same physical location?  © C  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  24. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC							
your clients' assets: Number and Street 1: City: State: 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? (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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  O  C  C  C  C  C  C  C  C  C  C  C  C		(-)					
Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   9. (a) If the related person 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? (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.  No Information Filed  11. Do you and the related person share any supervised persons?  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  24. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC		(C)		louy	OI		
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? (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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  24. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC							
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?  (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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  24. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC							
9. (a) If the related person 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?  (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.  No Information Filed  11. Do you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  (d) If the answer is yes, under what exemption?  (e) C  1. Legal Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER II, LLC							
(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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  24. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC				Yes	No		
(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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  © C  12. Do you and the related person share the same physical location?  © C  14. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  25. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC	9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0		
(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.  No Information Filed  11. Do you and the related person share any supervised persons?  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  14. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC		(b)	If the answer is yes, under what exemption?	~	~		
(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.  No Information Filed  11. Do you and the related person share any supervised persons?  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  14. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC							
11. Do you and the related person share any supervised persons?  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  24. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC	10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	•		
No Information Filed  11. Do you and the related person share any supervised persons?  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  14. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC		(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rel	ated			
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?  13. Legal Name of <i>Related Person</i> : TOWNSEND ALPHA MANAGER II, LLC  14. Primary Business Name of <i>Related Person</i> : TOWNSEND ALPHA MANAGER II, LLC							
12. Do you and the <i>related person</i> share the same physical location?  1. Legal Name of <i>Related Person</i> : TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of <i>Related Person</i> : TOWNSEND ALPHA MANAGER II, LLC			No Information Filed				
12. Do you and the <i>related person</i> share the same physical location?  1. Legal Name of <i>Related Person</i> : TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of <i>Related Person</i> : TOWNSEND ALPHA MANAGER II, LLC	11.	Do y	ou and the related person share any supervised persons?	•	0		
1. Legal Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER II, LLC				~			
1. Legal Name of <i>Related Person</i> :    TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of <i>Related Person</i> :    TOWNSEND ALPHA MANAGER II, LLC	12.	Do y	ou and the <i>related person</i> share the same physical location?	•			
TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of <i>Related Person</i> : TOWNSEND ALPHA MANAGER II, LLC				•	~		
TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of <i>Related Person</i> : TOWNSEND ALPHA MANAGER II, LLC							
TOWNSEND ALPHA MANAGER II, LLC  2. Primary Business Name of <i>Related Person</i> : TOWNSEND ALPHA MANAGER II, LLC							
Primary Business Name of <i>Related Person</i> :     TOWNSEND ALPHA MANAGER II, LLC	1.	Lega	Name of Related Person:				
TOWNSEND ALPHA MANAGER II, LLC		TOW	NSEND ALPHA MANAGER II, LLC				
TOWNSEND ALPHA MANAGER II, LLC							
	2.						
3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		TOW	NSEND ALPHA MANAGER II, LLC				
3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) -							
<del>-</del>	3.	Rela	red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)				
	1	_					

	or			
	Othe			
4.	Rela	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) (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>		
	(ı) (g)	futures commission merchant		
		banking or thrift institution		
	(i)	☐ trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(m)	_ `		
	(n) (o)	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		
	(1)		Yes	No
6.	Do y	ou control or are you controlled by the related person?	•	
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\circ$	⊙
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> ?	$\circ$	⊙
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	0	
	(-)	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	-	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 <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	toay	ог
		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: $\Box$		
	(-)	The stated as a sixty and a stated to the state of the st	Yes	No
9.		If the <i>related person</i> is an investment adviser, is it exempt from registration?	О	0
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	_	
10.		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 ated	•
	(5)	person is registered.	accu	
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	$\odot$	О
12.	Do y	you and the related person share the same physical location?	$\odot$	0

1.	_	of <i>Related Person</i> : REF GP, LLC		
2.	-	iness Name of <i>Related Person</i> : REF GP, LLC		
3.	Related Pers	on's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other			
4.	Related Pers	on's umber (if any):		
	(b) CIK Nu	mber(s) (if any):		
	(5) 52.11.11	No Information Filed		
5.	(a) ☐ br (b) ☐ ot (c) ☐ re (d) ☐ re (e) ☐ m (f) ☑ cc (g) ☐ fu	con is: (check all that apply) oker-dealer, municipal securities dealer, or government securities broker or dealer her investment adviser (including financial planners) gistered municipal advisor gistered security-based swap dealer ajor security-based swap participant mmodity pool operator or commodity trading advisor (whether registered or exempt from registration) tures commission merchant anking or thrift institution		
	(i)	ust company countant or accounting firm wyer or law firm surance company or agency ension consultant al estate broker or dealer onsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles onsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
6.	Do you cont	rol or are you controlled by the related person?	•	0
7.	Are you and	the related person under common control?	0	•
8.	(a) Does t	ne related person act as a qualified custodian for your clients in connection with advisory services you provide to	0	•
	overco related	are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you me the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the person and thus are not required to obtain a surprise examination for your clients' funds or securities that are ined at the related person?	0	0
		have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cus ients' assets:	tody	of
		er and Street 1: Number and Street 2:		
	City: If this	State: Country: ZIP+4/Postal Code: address is a private residence, check this box: $\square$		
	1. (1115	dualics is a private residence, effect this box.	Yes	No
9.	(a) If the i	related person is an investment adviser, is it exempt from registration?	$\circ$	$\circ$
	(b) If the a	answer is yes, under what exemption?		
10.	(a) Is the	related person registered with a foreign financial regulatory authority?	0	•
		answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rela	ated	
	person	is registered.  No Information Filed		

11.	. Do y	ou and the related person share any supervised persons?	•	0
12.	. Do y	ou and the related person share the same physical location?	•	0
	WES	Il Name of <i>Related Person</i> : IT LAKE II GENERAL PARTNER, LLC ary Business Name of <i>Related Person</i> :		
		T LAKE II GENERAL PARTNER, LLC		
3.	Rela -	ted Person's 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.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k)	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 banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant	Yes	No
6.	Do y	ou control or are you controlled by the related person?		0
7.	Are	you and the related person under common control?	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 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?	0	О
	(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:  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?		
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>rela</i>	ited	•
	person is registered.		
	No Information Filed		
11.	Do you and the related person share any supervised persons?	⊙	О
12.	Do you and the <i>related person</i> share the same physical location?	_	_
		⊚	0
	Local Manager of Bullitand Barrary		
1.	Legal Name of <i>Related Person</i> : TOWNSEND LAKE CONSTANCE GP, LTD.		
2.	Primary Business Name of Related Person:		
	TOWNSEND LAKE CONSTANCE GP, LTD.		
	Polated Poussyle CEC File Number (if any) (a.g., 001, 0, 000, 002)		
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)		
J.	(a) Droker-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		
	<ul> <li>(f) ✓ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>(g) ☐ futures commission merchant</li> </ul>		
	(h) ☐ banking or thrift institution		
	(i)		
	(j) accountant or accounting firm		
	(k) awyer or law firm		
	(I) insurance company or agency		
	<ul><li>(m) □ pension consultant</li><li>(n) □ real estate broker or dealer</li></ul>		
	(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
6.	Do you control or are you controlled by the related person?	$\odot$	$\circ$
7.	Are you and the related person under common control?	$\circ$	$\odot$
	(a) Doce the veleted nearest as a qualified such dies for your alients in any other life in the life of the life 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	⊙
	(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 clients' funds or securities that are maintained at the related person?		
	mamamad 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>custod</i> your <i>clients'</i> assets:	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: $\Box$		
		Ye	es I	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	5	o
	(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 foreign financial regulatory authority with which the relate	d	
		person is registered.  No Information Filed		
111.	. Бо у	ou and the related person share any supervised persons?	9	0
12	. Do v	rou and the <i>related person</i> share the same physical location?		_
	,	ou and the related person share the same physical location:	9	
1.		Name of Related Person:		
	LAKI	E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
2.	Drim	ary Business Name of <i>Related Person</i> :		
Z.		E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe	er en		
	D = /=	tod Dougoule		
4.		ted Person's  CRD Number (if any):		
	(a)	CAD Number (II dity).		
	(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>		
	٠,	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		
	(1)	insurance company or agency		
	(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		
_	Do	you control or are you controlled by the related person?	es I	_
6.	ъо у	ou control or are you controlled by the related person?	9	0
_	۸	you and the related percentuader common control?		
7.	AIE	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> ?	clients in connection with advisory services you provide to $$	•
	(b)	If you are registering or registered with the SEC and you have overcome the presumption that you are not operationally inderelated person and thus are not required to obtain a surprise maintained at the related person?	ependent (pursuant to rule 206(4)-2(d)(5)) from the	О
	(c)	If you have answered "yes" to question 8.(a) above, provide to your <i>clients'</i> assets:	the location of the <i>related person's</i> office responsible for <i>custody</i>	of
		•	per and Street 2:	
		City: State: Coun	try: ZIP+4/Postal Code:	
		If this address is a private residence, check this box: $\Box$		
	, ,			No
9.		If the <i>related person</i> is an investment adviser, is it exempt fro	om registration?	0
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regula	ntory authority?	•
	(b)	If the answer is yes, list the name and country, in English of $\epsilon$ person is registered.	each foreign financial regulatory authority with which the related	
		•	ormation Filed	
11.	Do y	you and the related person share any supervised persons?	0	•
12.	Do y	you and the <i>related person</i> share the same physical location?	o	⊙
1.	_	al Name of <i>Related Person</i> :		
	THE	KEY WEST SAXON GROUP, LLC		
2.	Prim	nary Business Name of <i>Related Person</i> :		
		KEY WEST SAXON GROUP, LLC		
3.	Relai	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 80	2-)	
	or			
	Othe	2		
1	Pola	ted Person's		
4.		CRD Number (if any):		
	(u)	CAD Number (ii uny).		
	(b)	CIK Number(s) (if any):		
		No Info	ormation Filed	
5.	Rela	ted Person is: (check all that apply)		
	(a)	$\square$ broker-dealer, municipal securities dealer, or government	securities broker or dealer	
		other investment adviser (including financial planners)		
		registered municipal advisor		
		registered security-based swap dealer		
	(e)	major security-based swap participant	Table Carried and Carried Control of the Carr	
	(f)	commodity pool operator or commodity trading advisor (	wnetner registered or exempt from registration)	
	(g) (h)	futures commission merchant		
	(h) (i)	□ banking or thrift institution □ trust company		
	(i) (j)	accountant or accounting firm		
		□ lawyer or law firm		
	(I)	insurance company or agency		
	(m)			
	(n)	real estate broker or dealer		

	(o) (p)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles 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?	•	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> ?	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>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: $\square$		
			Yes	No
9.	(a)	If the related person 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	•
	(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>relaperson</i> is registered.		
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	•	0
			٠	
12.	Do y	you and the <i>related person</i> share the same physical location?	⊙	0
1.	_	al Name of <i>Related Person</i> : TOWNSEND GROUP LLC		
2.		nary Business Name of <i>Related Person</i> : TOWNSEND GROUP LLC		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or Oth	er		
4.	Dol-	ated Person's		
4.		CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(-)	No Information Filed		
5.		nted Person is: (check all that apply)		
	( - )	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		

(i) ☐ rust company (ii) ☐ sourceutant or accounting firm (ix) ☐ lawyer or leaf firm (ix) ☐ lawyer or leaf firm (ix) ☐ lawyer or leaf firm (ix) ☐ persian consultant (iii) ☐ persian consultant (iv) ☐ persian consultant (iv) ☐ soonsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (iv) ☐ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (iv) ☐ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (iv) ☐ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles  Yes No  Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients (iv) 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 at the related person of the related person is diffice responsible for custody of 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 custody of your clients' sasets:  Number and Street 1:  City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box: ☐ Ves No  (c) If the related person is an investment adviser, is it exempt from registration?  Yes No  (iv) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person registered.  No Information Filed  1. Logal Name of Related Person:  STRATEGIC MANAGER III, LLC  2. Primary Business tlame of Related Person:  STRATEGIC MANAGER III, LLC  3. Related Person's SEC File Number (if any):  No Information Filed  5. Related Person is: (check all that apply)		(h)			
(k)   lawyer or law firm   lawyer or lawyer   lawyer   lawyer or lawyer   lawy			☐ trust company ☐ accountant or accounting firm		
(m) ☐ penison consultant  (n) ☐ real estate broker or dealer  (n) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p) Ø sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p) Ø sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p) Ø Ø sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p) Ø Ø ovu control or are you controlled by the related person?  (c) C  Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?  (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?  (a) Evo user 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(0(5)) from the related person as this are not required to obtain a surprise examination for your clients finds or securities that are maintained at the related person are not required to obtain a surprise examination for your clients finds or securities that are maintained at the related person is office responsible for custody of your clients finds or securities that are maintained at the related person is find the related person is a private residence, check this box: ☐ Ves No (your clients) assets:  Number and Street 1: Number and Street 2: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: ☐ Ves No (your clients) as a private residence, check this box: ☐ Ves No (your clients) as a private residence, check this box: ☐ Ves No (your clients) as a private residence, check this box: ☐ Ves No (your clients) as a private residence, check this box: ☐ Ves No (your clients) as a private residence, check this box: ☐ Ves No (your clients) as a private resi					
(n) ☐ real estate broker or dealer (s) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) ₱ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles  Ves No 6. Do you control or are you controlled by the related person?  7. Are you and the related person under common control?  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to chells? (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 2064)-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 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 custody of your clients' sasets:  Number and Street 1:  Chr: State: Country: 21P+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?  (b) If the answer is yes, six the name and country, in English of each foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person:  STRATEGIC MANAGER III, LLC  24. Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  35. Related Person's  (a) CRD Number (if any):  (b) CIK Number(s) (if any):  No Information Filed			· · · · · · · · · · · · · · · · · · ·		
(a) ☐ spansor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (b) ☐ spansor, general partner, managing member (or equivalent) of pooled investment vehicles  7. Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to ☐ €  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to ☐ €  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to ☐ €  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to ☐ €  8. (a) Does the related person act as a qualified custodian for your clients in accordance (your clients) asset in the related person and thus are not required to obtain a surprise examination for your clients finds 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 custody of your clients' insulatory assets:  Number and Street 1:  (c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' insulator and Street 1:  (c) If this address is a provised residence, check this box: ☐ Yes No  10. (a) If the related person is an investment adviser, is it exempt from registration?  (b) If the answer is yes, under what exemption?  10. (a) If the related person share with a foreign financial regulatory authority?  (c) 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. Legal Name of Related Person:  STRATEGIC MANAGER III, LLC  Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  Related Person's  (a) CRD Number (if any):  (b) CIK Number(s		. ,			
(p)  Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles  Yes No  5. Do you control or are you controlled by the related person?  6. C  7. Are you and the related person under common control?  7. Are you and the related person under common control?  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to chemis?  (b) If you are 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?  (c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:  Number and Street 1:  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?  (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 registred.  No Information Filed  11. Do you and the related person share any supervised persons?  12. Do you and the related Person share the same physical location?  13. Legal Name of Related Person:  STRATEGIC MANAGER III, LLC  24. Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  25. Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  26. CIK Number(s) (if any):  No Information Filed			_		
No information Filed  Teal No pour control or are you controlled by the related person?  6. C  7. Are you and the related person under common control?  7. Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to C (clients?  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to C (clients?  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to C (clients?  8. (a) Experimental to the control operation of the related person of the related person of the related person and the related person?  9. (a) If you have answered "yes" to question 8. (a) above, provide the location of the related person's office responsible for custody of your clients' assets:  10. Number and Street 1:  11. Number and Street 2:  12. City:  13. State:  14. City:  15. State:  16. Country:  17. C. G.  18. When the related person is an investment adviser, is it exempt from registration?  19. (a) If the related person is an investment adviser, is it exempt from registration?  10. (a) Is the related person registered with a foreign financial regulatory authority?  10. (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.  11. Do you and the related person share any supervised persons?  12. Do you and the related Person:  13. STRATEGIC MANAGER III, LLC  14. Related Person's  15. Legal Name of Related Person:  15. STRATEGIC MANAGER III, LLC  16. CRD Number (if any):  17. (a) CRD Number (if any):  18. Information Filed		` ,			
7. Are you and the related person under common control?  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody of your clients' assets:  Number and Street 1:  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?  (c) G  (b) If the answer is yes, under what exemption?  10. (a) Is the related person registered with a foreign financial regulatory authority?  (c) G  (d) 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 you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  (d) C  Related Person's  (a) CRD Number (if any):  (b) CIK Number(s) (if any):  No Information Filed		(1-)		Yes	No
8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody 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:   Yes No  9. (a) If the related person 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?  (c) G  (d) 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 you and the related person share any supervised persons?  (c) C  Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  2. Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  3. Related Person's  (a) CRD Number (if any):  (b) CIK Number(s) (if any):  No Information Filed	6.	Do y	ou control or are you controlled by the related person?	$\odot$	0
8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to 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 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 custody 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:   Yes No  9. (a) If the related person 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?  (c) G  (d) 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 you and the related person share any supervised persons?  (c) C  Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  2. Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  3. Related Person's  (a) CRD Number (if any):  (b) CIK Number(s) (if any):  No Information Filed	7	Are v	you and the related person under common control?	_	_
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 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's office responsible for custody of your clients' assets:  Number and Street 1:  City:  State:  City:  State:  State:  City:  State:  If this address is a private residence, check this box:  If the related person 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?  (c) 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 you and the related person share any supervised persons?  C C  12. Do you and the related person share the same physical location?  13. 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	<i>,</i> .	AIC )	you and the related person under common controls	О	•
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?  (c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assests:  Number and Street 1:  Number and Street 2:  Clty:  State:  Country:  ZIP+4/Postal Code:  If this address is a private residence, check this box:  Outry:  Yes No  9. (a) If the related person 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?  (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.  No Information Filed  11. Do you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  13. 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	8.	(a)		0	•
(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody 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:  Yes No  9. (a) If the related person 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?  (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.  No Information Filed  11. Do you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  (d) If the answer is registered.  Roll Information Filed  13. Legal Name of Related Person:  STRATEGIC MANAGER III, LLC  24. Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  35. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  or Other  46. Related Person's  (a) CRD Number (if any):  (b) CIK Number(s) (if any):  No Information Filed		(b)	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	О	0
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?  (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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  (d) Legal Name of Related Person:  STRATEGIC MANAGER III, LLC  2. Primary Business Name of Related Person:  STRATEGIC MANAGER III, 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		(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
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?  (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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  (d) 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  1. Legal Name of Related Person share the same physical location?  (e) C  1. Legal Name of Related Person:  STRATEGIC MANAGER III, LLC  2. Primary Business Name of Related Person:  STRATEGIC MANAGER III, 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):  No Information Filed					
9. (a) If the related person 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?  (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.  No Information Filed  11. Do you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person:  STRATEGIC MANAGER III, LLC  24. Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  35. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  or  Other  46. Related Person's  (a) CRD Number (if any):  No Information Filed			· · · · · · · · · · · · · · · · · · ·		
9. (a) If the related person 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?  (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.  No Information Filed  11. Do you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  (d) C  13. Legal Name of Related Person:  STRATEGIC MANAGER III, LLC  14. Primary Business Name of Related Person:  STRATEGIC MANAGER III, LLC  15. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  or  Other  16. C  17. Related Person's  (a) CRD Number (if any):  (b) CIK Number(s) (if any):  No Information Filed			If this address is a private residence, theck this box.	Yes	. No
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 related person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  (c) C  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person:  STRATEGIC MANAGER III, LLC  14. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  or  Other  15. Other  16. C  17. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  or  Other  18. Related Person's  (a) CRD Number (if any):  No Information Filed	9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
(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.  No Information Filed  11. Do you and the related person share any supervised persons?  © C  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person:  STRATEGIC MANAGER III, LLC  14. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  or Other  15. Related Person's  (a) CRD Number (if any):  No Information Filed		(b)	If the answer is yes, under what exemption?		
(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.  No Information Filed  11. Do you and the related person share any supervised persons?  © C  12. Do you and the related person share the same physical location?  1. Legal Name of Related Person: STRATEGIC MANAGER III, LLC  2. Primary Business Name of Related Person: STRATEGIC MANAGER III, 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):  No Information Filed	10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	0
No Information Filed  11. Do you and the related person share any supervised persons?  © C  12. Do you and the related person share the same physical location?  1. Legal Name of Related Person:     STRATEGIC MANAGER III, LLC  2. Primary Business Name of Related Person:     STRATEGIC MANAGER III, 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):     No Information Filed		(b)		ated	~
12. Do you and the <i>related person</i> share the same physical location?  1. Legal Name of <i>Related Person</i> : STRATEGIC MANAGER III, LLC  2. Primary Business Name of <i>Related Person</i> : STRATEGIC MANAGER III, LLC  3. <i>Related Person</i> 's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or Other  4. <i>Related Person</i> 's (a) <i>CRD</i> Number (if any): (b) CIK Number(s) (if any):  No Information Filed					
1. Legal Name of <i>Related Person</i> : STRATEGIC MANAGER III, LLC  2. Primary Business Name of <i>Related Person</i> : STRATEGIC MANAGER III, LLC  3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	11.	Do y	ou and the related person share any supervised persons?	•	0
1. Legal Name of <i>Related Person</i> : STRATEGIC MANAGER III, LLC  2. Primary Business Name of <i>Related Person</i> : STRATEGIC MANAGER III, LLC  3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	12	Do v	you and the related percon share the same physical location?	_	
STRATEGIC MANAGER III, LLC  2. Primary Business Name of <i>Related Person</i> : STRATEGIC MANAGER III, LLC  3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	12.	ро у	ou and the related person share the same physical location:	⊚	0
STRATEGIC MANAGER III, LLC  2. Primary Business Name of <i>Related Person</i> : STRATEGIC MANAGER III, LLC  3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)					
STRATEGIC MANAGER III, LLC  2. Primary Business Name of <i>Related Person</i> : STRATEGIC MANAGER III, LLC  3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	1.	Lega	Il Name of <i>Related Person</i> :		
STRATEGIC MANAGER III, 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		STRA	ATEGIC MANAGER III, LLC		
STRATEGIC MANAGER III, 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	2	Drim	ary Ruciness Name of Palated Parson		
or Other  4. Related Person's (a) CRD Number (if any): (b) CIK Number(s) (if any):  No Information Filed	۷.		·		
or Other  4. Related Person's (a) CRD Number (if any): (b) CIK Number(s) (if any):  No Information Filed					
Other  4. Related Person's (a) CRD Number (if any): (b) CIK Number(s) (if any):  No Information Filed	3.	Relai	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
4. Related Person's (a) CRD Number (if any): (b) CIK Number(s) (if any):  No Information Filed					
(a) CRD Number (if any):  (b) CIK Number(s) (if any):  No Information Filed		Othe			
(b) CIK Number(s) (if any):  No Information Filed	4.	Relat	ted Person's		
No Information Filed		(a)	CRD Number (if any):		
		(b)	CIK Number(s) (if any):		
5. Related Person is: (check all that apply)			No Information Filed		
5. Related Person is: (check all that apply)					
	5.	Relat	ted Person is: (check all that apply)		

ll.	(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)		
	(3)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(m) (n)	<u> </u>		
	(II) (O)	_		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(P)	Sponsor, general partitler, managing member (or equivalent) or pooled investment venicles	Yes	No
6.	Do v	you control or are you controlled by the related person?	· · · ·	
	,		· ·	0
7.	Are	you and the related person under common control?	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	$\circ$	О
		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> 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: $\Box$		
			Yes	No
∥9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	(C)
9.	• ,		0	О
9.	• ,	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?	0	O
	(b)		0	•
	(b)	If the answer is yes, under what exemption?  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>related</i> person registered with a <i>foreign financial regulatory authority</i> with which the <i>related</i> person registered with a <i>foreign financial regulatory authority</i> with which the <i>related</i> person registered with a <i>foreign financial regulatory authority</i> with which the <i>related</i> person registered with a <i>foreign financial regulatory authority</i> ?	0	
	(b)	If the answer is yes, under what exemption?  Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	0	
10.	(b) (a) (b)	If the answer is yes, under what exemption?  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>relaperson</i> is registered.  No Information Filed	C ated	•
10.	(b) (a) (b)	If the answer is yes, under what exemption?  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>relaperson</i> is registered.	0	
10.	(b) (a) (b) Do y	If the answer is yes, under what exemption?  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>relaperson</i> is registered.  No Information Filed	C ated	•
10.	(b) (a) (b) Do y	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?	○ lated ⊙	•
10. 11. 12.	(b) (a) (b) Do y	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?	○ lated ⊙	•
10. 11. 12.	(b) (a) (b) Do y	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?	○ lated ⊙	•
10. 11. 12.	(b) (a) (b) Do y	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?	○ lated ⊙	•
11.	(b) (a) (b) Do y Do y	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed you and the related person share any supervised persons?  You and the related person share the same physical location?  If Name of Related Person:  INSEND OPPORTUNITY ZONE FUND GP, LLC	○ lated ⊙	•
10. 11. 12.	(b) (a) (b)  Do y  Do y  Legator	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?	○ lated ⊙	•
10. 11. 12. 1.	(b) (a) (b)  Do y  Do y  Lega TOW	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  You and the related person share any supervised persons?  You and the related person share the same physical location?  INSEND OPPORTUNITY ZONE FUND GP, LLC  Harry Business Name of Related Person:  YNSEND OPPORTUNITY ZONE FUND GP, LLC	○ lated ⊙	•
11.	(b) (a) (b)  Do y  Do y  Lega TOW	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?  INSEND OPPORTUNITY ZONE FUND GP, LLC hard Business Name of Related Person:	○ lated ⊙	•
10. 11. 12. 1.	(b) (a) (b) Do y Do y Lega TOW Prim TOW Rela	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  You and the related person share any supervised persons?  You and the related person share the same physical location?  INSEND OPPORTUNITY ZONE FUND GP, LLC  Harry Business Name of Related Person:  YNSEND OPPORTUNITY ZONE FUND GP, LLC	○ lated ⊙	•
10. 11. 12. 1.	(b) (a) (b)  Do y  Do y  Lega TOW	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?  INSEND OPPORTUNITY ZONE FUND GP, LLC rary Business Name of Related Person:  YNSEND OPPORTUNITY ZONE FUND GP, LLC red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	○ lated ⊙	•
10. 11. 12. 1.	(b) (a) (b) Do y Do y Lega TOW Prim TOW Rela - or	If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?  INSEND OPPORTUNITY ZONE FUND GP, LLC rary Business Name of Related Person:  YNSEND OPPORTUNITY ZONE FUND GP, LLC red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	○ lated ⊙	•

	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):  No Information Filed		
5.	<i>Rela</i> (a) (b) (c)	other investment adviser (including financial planners)		
	(d) (e) (f) (g) (h) (i)	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		
	(j) (k) (l) (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>		
6.	Do y	and any time to the controlled by the related manage.		No 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	•
	(b)	If you are registering an registered with the CEC and you have appropriately the question Q (a) above have you	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>custo</i> your <i>clients'</i> assets:	ody	of
		Number and Street 1:  City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:		
			⁄es	No
9.	(a) (b)	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?	0	•
10.	(a) (b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relative	C ted	•
		person is registered.  No Information Filed		
11.	Do y	iou and the related person share any supervised persons?	•	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	0
1.	LAKI	al Name of <i>Related Person</i> : E TAHOE IV GP, LLC Dary Business Name of <i>Related Person</i> :		
	LAKI	E TAHOE IV GP, LLC		

3.	Rela	nted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe			
4.	Rela	ited Person's  CRD Number (if any):		
	(a)	CRD Number (ii arry).		
	(b)	CIK Number(s) (if any):  No Information Filed		
		NO INFORMATION FRIED		
5.	(a)	<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>		
6.	Do y	you control or are you controlled by the related person?	Yes ⊙	O
7.	Are	you and the related person under common control?	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 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?	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:		
		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?	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	⊚
	(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>relaperson</i> is registered.	ated	
11	Do:	No Information Filed	_	
11.	DO )	you and the related person share any supervised persons?	⊚	0
12.	Do y	you and the related person share the same physical location?	⊙	0

1.	_	nl Name of <i>Related Person</i> : VNSEND GROUP ASIA LTD.		
2.		ary Business Name of <i>Related Person</i> : /NSEND GROUP ASIA LTD.		
3.	Rela -	ted Person's 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.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (o) (p)	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 banking or thrift institution 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 sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	: Nc
		you 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	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 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?	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>cut</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:		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	No O
	( )	If the answer is yes, under what exemption? FOREIGN ENTITY	٠	
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	•

	(b)	o) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory</i> person is registered.  No Information Filed	authority with which the related	
11.	Do v	o you and the <i>related person</i> share any <i>supervised persons</i> ?		_
	υ,	y you and the related person share any supervised persons.	•	0
12.	Do y	o you and the <i>related person</i> share the same physical location?	•	0
1.	_	egal Name of <i>Related Person</i> : FG CORE PLUS INVESTMENTS , LLC		
2.		rimary Business Name of <i>Related Person</i> : TG CORE PLUS INVESTMENTS , LLC		
3.	Rela -	elated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe			
4.		elated Person's  O CRD Number (if any):		
	(b)	O) CIK Number(s) (if any):		
		No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (j) (k) (l) (m) (n) (o)	registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt f futures commission merchant banking or thrift institution 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 investme	nt vehicles es	; No
6.	Do y	o you control or are you controlled by the related person?		0
7.	Are	re you and the <i>related person</i> under common <i>control</i> ?	0	•
8.	(a)			•
	(b)	clients? If you are registering or registered with the SEC and you have answered "yes," to question 8 overcome the presumption that you are not operationally independent (pursuant to rule 206( related person and thus are not required to obtain a surprise examination for your clients' fur maintained at the related person?	(4)-2(d)(5)) from the	0
	(c)	your <i>clients'</i> assets:	n's office responsible for <i>custody</i>	of
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Posta	l Code:	

		If this address is a private residence, check this box: $\Box$		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		No
		If the answer is yes, under what exemption?	0	0
	(-)			
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>relat</i>	ted	
		person is registered.  No Information Filed		
11.	Do y	rou and the related person share any supervised persons?	•	0
			~	
12.	Do y	rou and the <i>related person</i> share the same physical location?	⊙	$\circ$
1.	Lega	nl Name of <i>Related Person</i> :		
	_	IV KOREA FEEDER GENERAL PARTNER, LLC		
2.		ary Business Name of <i>Related Person</i> : IV KOREA FEEDER GENERAL PARTNER, LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	er en		
4.	Rela	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)		
3.	(a)	_		
	(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)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  futures commission merchant		
		banking or thrift institution		
	(i)	□ trust company		
	(j)	$\square$ accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(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	rou control or are you controlled by the related person?	⊙	$^{\circ}$
7.	Are v	you and the <i>related person</i> under common <i>control</i> ?	_	_
'	, u.C.	you and the related person under common control:	О	•
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 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?	0	О
	(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:  Number and Street 1:  Number and Street 2:	ody	of
		City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:		
		· ·	Yes	No
9.		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 ?	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>relat person</i> is registered.	ted	٠
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	$\circ$
12	Do w	ou and the <i>related person</i> share the same physical location?	_	_
12.	Бо у	ou and the related person share the same physical location?	⊚	О
1	l ena	I Name of <i>Related Person</i> :		
	_	OLTESSO GP S.A.R.L.		
2.		ary Business Name of <i>Related Person</i> : OLTESSO GP S.A.R.L.		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	er		
	5 / .			
4.		ted Person's  CRD Number (if any):		
	(u)	CAD Hamber (II dily).		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.		ted Person is: (check all that apply)		
	(a)			
	(b) (c)			
		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 ☐ banking or thrift institution		
	. ,	□ trust company		
	(j)	accountant or accounting firm		
	` ,	lawyer or law firm		
	(l) (m)	☐ insurance company or agency ☐ pension consultant		
		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	Ves	Na

6. Do you control or are you controlled by the related person?					
7.	Are	you and the related person under common control?	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 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?	0	О	
	(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: $\square$			
		Trains 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?	$\circ$	•	
	(b)	If the answer is yes, under what exemption?			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	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>relaperson</i> is registered.	ated		
		No Information Filed			
11.	Do y	ou and the related person share any supervised persons?	$\odot$	0	
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	0	
	KVT	Il Name of <i>Related Person</i> : GP, LLC			
2.		ary Business Name of <i>Related Person</i> : GP, LLC			
3.	-	ted 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.		ted Person is: (check all that apply)  Description 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) (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>			
	(r) (g)	futures commission merchant			
	(h)	banking or thrift institution			
	(i)	☐ trust company ☐ accountant or accounting firm			
1	(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		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	⊚	$\circ$
7.	Are	you and the related person under common control?	$\circ$	$\odot$
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 <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 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?	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?	$\circ$	$\odot$
	(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>relaperson</i> is registered.	ated	
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	•	0
12.	Do y	you and the related person share the same physical location?	•	0
		al Name of Deleted Devector		
1.	_	Name of Related Person:		
	PEINI	N SQUARE MANAGER I, LLC		
2.	Drim	nary Business Name of Related Person:		
۷.		N SQUARE MANAGER I, LLC		
		N SQUARE FINITION IN LEG		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe	er		
4.	Rela	ated Person's		
		CRD Number (if any):		
	(a)			
	(a) (b)	CIK Number(s) (if any):		
		CIK Number(s) (if any):  No Information Filed		
F	(b)	No Information Filed		
5.	(b)	No Information Filed  ated Person is: (check all that apply)		
5.	(b)  Rela (a)	No Information Filed  ated Person is: (check all that apply)  broker-dealer, municipal securities dealer, or government securities broker or dealer		
5.	(b)  Rela (a)	No Information Filed  ated Person is: (check all that apply)		

	(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)	accountant or accounting firm		
		lawyer or law firm		
	(l) (m)	☐ insurance company or agency ☐ pension consultant		
		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		
	(P)		Yes	No
6.	Do v	you control or are you controlled by the related person?	_	_
.	υ,	ou control of the you controlled by the related person.	⊚	О
7.	Δra	you and the related person under common control?	_	_
' .	AIC	you and the related person under common control:	О	⊚
0	(2)	Does the related person act as a qualified sustedian for your clients in connection with advisory convices 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> ?	$\circ$	⊙
	(b)	75	_	_
	(6)	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	О	0
		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 custo	ody	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:	V	Na
<b>a</b>	(2)	Tetho weleted a superior of investment oddies is it consent form a sistematical	Yes	
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		No C
9.	• ,	Tetho weleted a superior of investment oddies is it consent form a sistematical		
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?	0	0
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	0	
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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>related</i>	0	0
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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>relations</i> person is registered.	0	0
10.	(b) (a) (b)	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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>related person</i> is registered.  No Information Filed	C C ted	<ul><li>○</li></ul>
10.	(b) (a) (b)	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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>relations</i> person is registered.	0	0
10.	(b) (a) (b) Do y	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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>relate person</i> is registered.  No Information Filed rou and the <i>related person</i> share any <i>supervised persons</i> ?	○ c ted	0 0
10.	(b) (a) (b) Do y	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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>related person</i> is registered.  No Information Filed	C C ted	<ul><li>○</li></ul>
10.	(b) (a) (b) Do y	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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>relate person</i> is registered.  No Information Filed rou and the <i>related person</i> share any <i>supervised persons</i> ?	○ c ted	0 0
10.	(b) (a) (b) Do y	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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>relate person</i> is registered.  No Information Filed rou and the <i>related person</i> share any <i>supervised persons</i> ?	○ c ted	0 0
11.	(b) (a) (b) Do y	If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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>relate person</i> is registered.  No Information Filed rou and the <i>related person</i> share any <i>supervised persons</i> ?	○ c ted	0 0
11.	(b) (a) (b) Do y	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed you and the related person share any supervised persons?  You and the related person share the same physical location?	○ c ted	0 0
11.	(b) (a) (b) Do y	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?	○ c ted	0 0
10. 11. 12.	(b) (a) (b) Do y Do y Lega AON	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?  If Name of Related Person: HEWITT INC.  Pary Business Name of Related Person:	○ c ted	0 0
10. 11. 12.	(b) (a) (b) Do y Do y Lega AON	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?  If Name of Related Person: HEWITT INC.	○ c ted	0 0
10. 11. 12. 1.	(b) (a) (b) Do y Do y Lega AON	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the relate person is registered.  No Information Filed rou and the related person share any supervised persons?  The value of Related Person:  HEWITT INC.  The value of Related Person:  HEWITT INC.  The value of Related Person:  HEWITT INC.	○ c ted	0 0
10. 11. 12.	(b) (a) (b) Do y Do y Lega AON	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?  If Name of Related Person: HEWITT INC.  Pary Business Name of Related Person:	○ c ted	0 0
10. 11. 12. 1.	(b) (a) (b)  Do y  Do y  Lega AON  Prim AON  Rela	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the relate person is registered.  No Information Filed rou and the related person share any supervised persons?  The value of Related Person:  HEWITT INC.  The value of Related Person:  HEWITT INC.  The value of Related Person:  HEWITT INC.	○ c ted	0 0
10. 11. 12. 1.	(b) (a) (b) Do y Do y Lega AON Prim AON Rela - or	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?  If Name of Related Person: HEWITT INC.  Rary Business Name of Related Person: HEWITT INC.  Ited Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	○ c ted	0 0
10. 11. 12. 1.	(b) (a) (b)  Do y  Do y  Lega AON  Prim AON  Rela	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed rou and the related person share any supervised persons?  You and the related person share the same physical location?  If Name of Related Person: HEWITT INC.  Rary Business Name of Related Person: HEWITT INC.  Ited Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	○ c ted	0 0
10. 11. 12. 1. 2.	(b) (a) (b)  Do y  Do y  Lega AON  Prim AON  Rela  or Other	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  You and the related person share any supervised persons?  You and the related person share the same physical location?  In Name of Related Person: HEWITT INC.  HEWITT INC.  Ited Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	○ c ted	0 0
10. 11. 12. 1.	(b) (a) (b)  Do y  Do y  Lega AON  Prim AON  Rela  or Other	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  You and the related person share any supervised persons?  You and the related person share the same physical location?  If Name of Related Person: HEWITT INC.  HEWITT INC.  HEWITT INC.  HEWITT INC.  HEWITT INC.  HEWITT SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	○ c ted	0 0
10. 11. 12. 1. 2.	(b) (a) (b)  Do y  Do y  Lega AON  Prim AON  Rela  or Other	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  You and the related person share any supervised persons?  You and the related person share the same physical location?  In Name of Related Person: HEWITT INC.  HEWITT INC.  Ited Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	○ c ted	0 0
10. 11. 12. 1. 2.	(b) (a) (b)  Do y  Do y  Lega AON  Prim AON  Rela or Other  Rela (a)	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  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 foreign financial regulatory authority with which the related person is registered.  No Information Filed  You and the related person share any supervised persons?  You and the related person share the same physical location?  If Name of Related Person: HEWITT INC.  HEWITT INC.  HEWITT INC.  HEWITT INC.  HEWITT INC.  HEWITT SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	○ c ted	0 0

## No Information Filed

5.	Rela	ted Person is: (check all that apply)		
	(a)	_		
	(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		
	(1)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	$\square$ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(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?	0	•
7.	Are	you and the related person under common control?	•	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	0	0
		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 <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>	cody	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 <i>related person</i> is an investment adviser, is it exempt from registration?		0
		If the answer is yes, under what exemption?	œ	0
	(D)	FOREIGN ENTITY		
		TOKEIGH ENTITY		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
		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>		٠
	(D)	person is registered.	neu	
		No Information Filed		
11.	Do v	ou and the related person share any supervised persons?	_	_
	_,	ou and the related person on the unit outper rised personier	О	⊚
12	Do v	ou and the <i>related person</i> share the same physical location?	_	_
12.	D0 y	ou and the related person share the same physical location:	0	⊚
1.	Lega	I Name of <i>Related Person</i> :		
		NSEND GREAT LAKES AND PLAINS GP, LLC		
2.	Prim	ary Business Name of <i>Related Person</i> :		
	TOW	NSEND GREAT LAKES AND PLAINS GP, 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):		
(h) CIV Number(c) (if any):		
(b) CIK Number(s) (if any):  No Information Filed		
5. Related Person is: (check all that apply)		
(a) Droker-dealer, municipal securities dealer, or government securities broker or dealer		
<ul><li>(b) □ other investment adviser (including financial planners)</li><li>(c) □ registered municipal advisor</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)  utures commission merchant		
(h)  anking or thrift institution		
(i)   trust company		
(j) $\square$ accountant or accounting firm		
(k) 🔲 lawyer or law firm		
(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>		
(p) Sponsor, general partier, managing member (or equivalent) or pooled investment venicles	Yes	s No
6. Do you control or are you controlled by the related person?	•	
	٠	
7. Are you and the <i>related person</i> under common <i>control</i> ?	0	•
	~	~
8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provid	e to O	•
clients?		
(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 clients' funds or securities that a	ıra	
maintained at the <i>related person</i> ?	10	
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible f	or custody	∕ of
your <i>clients'</i> assets:	ŕ	
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: $\square$	Vos	s No
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?		
	0	0
(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> ?	_	_
(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the	C he <i>related</i>	
person is registered.	c , clated	
No Information Filed		
11. Do you and the related person share any supervised persons?	•	0
12. Do you and the related person share the same physical location?	•	0

1.		Il Name of <i>Related Person</i> : F MANAGER I, LLC		
2.		ary Business Name of <i>Related Person</i> : F MANAGER I, LLC		
3.	Relai	ted Person's 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		
		No Information Fried		
5.	(a) (b) (c) (d) (e) (f) (g) (h)	<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>		
	(j) (k) (l) (m) (n) (o)	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		
	(p)	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?	•	0
7.	Are y	you and the related person under common control?	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 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?	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:	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:		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	O
	(b)	If the answer is yes, under what exemption?		
10.		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 person</i> is registered.	ited	

	No Information Filed		
11.	Do you and the related person share any supervised persons?	⊙	О
12.	Do you and the <i>related person</i> share the same physical location?	•	0
1.	Legal Name of <i>Related Person</i> : AON IP ADVANTAGE FUND GP LLC		
2.	Primary Business Name of <i>Related Person</i> : AON IP ADVANTAGE FUND GP 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)   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
6.	Do you 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
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 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?	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>cus</i> your <i>clients'</i> assets:	tody	of
	Number and Street 1:  City:  State:  Country:  ZIP+4/Postal Code:  If this address is a private residence, check this box:		
		Vac	No

9	. (a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0	
	(b)	If the answer is yes, under what exemption?			
1	0. (a)	Is the related person registered with a foreign financial regulatory authority ?	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>relate person</i> is registered.	ed		
		No Information Filed			
1	1. Do	you and the related person share any supervised persons?	0	•	
1	2. Do	you and the <i>related person</i> share the same physical location?	0	•	

[tem	7	Private	Fund	Reporting
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Yes No

 $\circ$ 

B. Are you an adviser to any *private fund*?

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.

## SECTION 7.B.(1) Private Fund Reporting

	-1	2	3	>>	Funds per Page:	15	~	Total Funds: 39
--	----	---	---	----	-----------------	----	---	-----------------

A. PRIVATE FUND

#### **Information About the Private Fund**

1. (a) Name of the private fund:

CAYUGA LAKE FUND, L.P.

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

805-4163269793

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

CIF-H 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 <i>private fund</i> (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
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?
	(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?
	(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)
7.	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.  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"?
	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.
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?
	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.)?
10.	What type of fund is the <i>private fund</i> ?
	$^{ m C}$ hedge fund $^{ m C}$ liquidity fund $^{ m C}$ private equity fund $^{ m C}$ real estate fund $^{ m C}$ securitized asset fund $^{ m C}$ venture capital fund $^{ m C}$ Other <i>private fund</i> : 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 <i>private fund</i> :		
	\$ 77,734,043		
<u>Ow</u>	<u>nership</u>		
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).	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%		
		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
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
<u>Yοι</u>	ur Advisory Services	Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	•
	(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	•
	(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 fund. If the answer to question 18.(a) is "no," leave this question blank.	orivate	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.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?  0%		
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?	· ©	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-8924889		
1			

R	CED	/ICE	DD ()	/IDFRS
_	>CK	vil E	PRUN	ハロソヒドラ

Auditor	<u>'S</u>					
					Yes	No
23. (a)		the <i>private fund's</i> financial stateme	_		⊙	$\circ$
	(2) If		"yes," are the fina	ncial statements prepared in accordance with U.S.	⊚	0
				stions (b) through (h) below. If the <i>private fund</i> uses m n (f) separately for each auditing firm.	ore tha	₃n
	Addit	ional Auditor Information: 1 Re	cord(s) Filed.			
				uestions (b) through (h) below. If the <i>private fund</i> uses is (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 of City:	ffice responsible fo State:	or the <i>private fund's</i> audit (city, state and country):  Country:		
		CLEVELAND	Ohio	United States		
					Yes I	No
	(d)	Is the auditing firm an <i>independent</i>	public accountant	??	•	0
	(e)	Is the auditing firm registered with	the Public Compar	ny Accounting Oversight Board?	•	0
		If yes, Public Company Accounting ( 42	Oversight Board-A	ssigned Number:		
		If "yes" to (e) above, is the auditing Oversight Board in accordance with		egular inspection by the Public Company Accounting	•	0
					Yes	. No
(g)		e private fund's audited financial sta e fund's investors?	atements for the m	nost recently completed fiscal year distributed to the	•	0
(h)		of the reports prepared by the audit ified opinions?	ting firm for the <i>pr</i>	rivate fund since your last annual updating amendment	contaiı	n
	<b>⊙</b> Ye:	O No C Report Not Yet Received				
		check "Report Not Yet Received," yo he report is available.	ou must promptly	file an amendment to your Form ADV to update your re	sponse	?
Prime E	<u>Broker</u>				Vos	. No
24. (a)	Does t	he <i>private fund</i> use one or more pri	me brokers?		res	: No
,	uses.			ons (b) through (e) below for each prime broker the <i>priv</i> you must complete questions (b) through (e) separately		
			No Info	ormation Filed		

Custo	<u>lian</u>	Yes I
25. (	Does the <i>private fund</i> 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 <i>priv</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately custodian.	
	custouran.	
	No Information Filed	
Admi	<u>istrator</u>	Yes N
26. (	Does the <i>private fund</i> use an administrator other than your firm?	0
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses m administrator, you must complete questions (b) through (f) separately for each administrator.	ore than one
	No Information Filed	
	taining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or dist e calculations (including allocations) was the valuation determined by such <i>person</i> .	
28 (	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	Yes M
-0. (	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) 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.	below for
	No Information Filed	
. PRI	ATE FUND	
<u>nforr</u>	ation About the <i>Private Fund</i>	
(	Name of the <i>private fund</i> :  COMMONFUND STRATEGIC SOLUTIONS REAL ESTATE OPPORTUNITY FUND 2011, L.P.	
	Private fund identification number:	
(	(include the "805-" prefix also) 805-9392525412	
·		

**United States** 

Delaware

Name of General Partner, Manager, Trustee, or Director	
CFSSG REAL ESTATE PARTNERS I, LLC	
<ul><li>(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponso fund.</li></ul>	r(s) or manage(s) this <i>private</i>
No Information Filed	
The <i>private fund</i> (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 Act of 1940	of the Investment Company
$lack{f C}$ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) c Act of 1940	of the Investment Company
List the name and country, in English, of each foreign financial regulatory authority with which the $ ho$	private fund is registered.
No Information Filed	
	Yes No
(a) Is this a "master fund" in a master-feeder arrangement?	0.0
(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds inve	~ ~
No Information Filed	
	Yes No
(c) Is this a "feeder fund" in a master-feeder arrangement?	
	C • C hich this <i>private fund</i> invests?
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in what Name of <i>private fund</i> :	
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in wh	
(d) If yes, what is the name and private fund identification number (if any) of the master fund in which was a private fund: Private fund identification number:	hich this <i>private fund</i> invests?
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which 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	hich this <i>private fund</i> invests? u are filing a single Schedule
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in what 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, 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 section of the funds separately.	hich this <i>private fund</i> invests? u are filing a single Schedule
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which 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, 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 feeder funds answer the following questions:	hich this <i>private fund</i> invests?  u are filing a single Schedule  the instructions to this Section  der funds") invest all or  " investing in a "master fund"
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in who 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, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the 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 ("feesubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund for purposes of this question if it issued multiple classes (or series) of shares or interests, and each in the same of the same o	hich this <i>private fund</i> invests?  u are filing a single Schedule  the instructions to this Section  der funds") invest all or " investing in a "master fund" class (or series) invests
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in who 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, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the 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 ("feesubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund for purposes of this question if it issued multiple classes (or series) of shares or interests, and each in the same of the same o	hich this <i>private fund</i> invests?  u are filing a single Schedule  the instructions to this Section  der funds") invest all or " investing in a "master fund" class (or series) invests  Yes No
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in wind 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 your 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 factor 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 ("feeds substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund for purposes of this question if it issued multiple classes (or series) of shares or interests, and each is substantially all of its assets in a single master fund.	u are filing a single Schedule the instructions to this Section der funds") invest all or " investing in a "master fund" class (or series) invests  Yes No  total assets in other pooled
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in who 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 possible. (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 following questions:  No Information Filed  **NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feesubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund for purposes of this question if it issued multiple classes (or series) of shares or interests, and each 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 investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment complete the private funds or registered investment complete the p	total assets in other pooled inventes.
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in wind 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 provide to the provide pr	total assets in other pooled

9.	During your last fiscal year, did the <i>private fund</i> invest in securities issu Investment Company Act of 1940 (other than "money market funds," to			e o o	•
10.	What type of fund is the <i>private fund</i> ?				
	$^{ m C}$ hedge fund $^{ m C}$ liquidity fund $^{ m C}$ private equity fund $^{ m C}$ real estate f Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL		•	fund 🤨	
	NOTE: For definitions of these fund types, please see Instruction 6 of the	ne Instructions to Part 1A.			
11.	Current gross asset value of the <i>private fund</i> : \$48,202,132				
<u>Ow</u>	<u>nership</u>				
12.	Minimum investment commitment required of an investor in the <i>private</i> \$ 250,000	e fund:			
	NOTE: Report the amount routinely required of investors who are not ye forth in the organizational documents of the fund).	our <i>related persons</i> (even if o	lifferent from the am	ount set	:
13.	Approximate number of the <i>private fund's</i> beneficial owners: 37				
14.	What is the approximate percentage of the $\emph{private fund}$ beneficially own $0\%$	ned by you and your <i>related</i>	persons:		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially 0%	owned (in the aggregate) b	y funds of funds:		
	(b) If the private fund qualifies for the exclusion from the definition of Investment Company Act of 1940, are sales of the fund limited to a		ection 3(c)(1) of the	Yes N	_
16.	What is the approximate percentage of the <i>private fund</i> beneficially own 4%	ned by non- <i>United States per</i>	sons:		
<u>You</u>	ur Advisory Services				
17	(a) Are your a subadviser to this private fund?			Yes N	lo
17.	<ul><li>(a) Are you a subadviser to this <i>private fund</i>?</li><li>(b) If the answer to question 17.(a) is "yes," provide the name and SE</li></ul>	C file number if any of the a	dviser of the <i>private</i>		⊚
	the answer to question 17.(a) is "no," leave this question blank.	e me number, if any, or the a	aviser of the private	rana. II	
	No Informatio	n Filed			
				Yes N	lo
18.	(a) Do any investment advisers (other than the investment advisers lis fund?	, , ,			0
	(b) If the answer to question 18.(a) is "yes," provide the name and SE fund. If the answer to question 18.(a) is "no," leave this question be		ther advisers to the	private	
	Name of Other Adviser to <i>private fund</i>	SEC file number	CRD number	-	$\Box$
	COMMONFUND OCIO, INC.	801-56548	110689		
				Yes N	lo
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?			0 (	⊙
	NOTE: For purposes of this question, do not consider feeder funds of the	e private fund.			
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>priva</i>	ate fund?			
	, , , , , , , , , , , , , , , , , , ,				

0%

**Prime Broker** 

<u>Priv</u>	vate Offering		
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?	Yes ©	No C
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-167003		
B. SI	ERVICE PROVIDERS		
Auc	<u>litors</u>		
		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.	$\odot$	0
	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 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 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:  CLEVELAND Ohio United States		
	Y	es l	or
	(d) Is the auditing firm an independent public accountant?	•	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	
	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?	•	
		V	NI-
	(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?	ves ⊙	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 amendment</i> counqualified opinions?	ontaii	า
	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 respondent the report is available.	oonse	;

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 t uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) sep prime broker.		
No Information Filed		
<u>Custodian</u>	Vaa	NI-
25. (a) Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets?	Yes	© No
If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separa custodian.		
No Information Filed		
<u>Administrator</u>	Yes	No
26. (a) Does the <i>private fund</i> use an administrator other than your firm?	res	•
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses administrator, you must complete questions (b) through (f) separately for each administrator.	more than or	
No Information Filed		
<ul> <li>27. During your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i>, such administrator, that is not your <i>related person</i>?</li> <li>100%</li> <li>Include only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or fee calculations (including allocations) was the valuation determined by such <i>person</i>.</li> </ul>	any, including	
<u>Marketers</u>	Yes	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	s? o	•
You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipe 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.	(g) below for	(b)
No Information Filed		

A. PRIVATE FUND

## Information About the Private Fund

(b) <i>Private fund</i> identification number: (include the "805-" prefix also)	REAL ESTATE OPPORTUNITY FUND 2014, L.P.
(include the oos prenx diso)	
805-5029596966	
Under the laws of what state or country is	he <i>private fund</i> organized:
State:	Country: United States
Deldware	Office States
(a) Name(s) of General Partner, Manager,	rustee, or Directors (or <i>persons</i> serving in a similar capacity):
Name of General Partner, Manager, T	istee, or Director
CFSSG REAL ESTATE PARTNERS II, LLC	
(b) If filing an <i>umbrella registration</i> , iden fund.	y the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this prive
	No Information Filed
	definition of investment company under section 3(c)(1) of the Investment Company
	definition of investment company under section 3(c)(7) of the Investment Company
List the name and country, in English, of $\epsilon$	ch foreign financial regulatory authority with which the private fund is registered.
	No Information Filed
	Yes
•	
(b) If yes, what is the name and <i>private</i> in	and 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-fee	er arrangement?
(d) If yes, what is the name and <i>private</i> in Name of <i>private fund</i> :	nd identification number (if any) of the master fund in which this <i>private fund</i> inves
Private fund identification number: (include the "805-" prefix also)	
•	ch master-feeder arrangement regardless of whether you are filing a single Schedu rangement or reporting on the funds separately.
	$\sim 7.B.(1)$ for a master-feeder arrangement according to the instructions to this Sector the following questions:
	No Information Filed
	Delaware  (a) Name(s) of General Partner, Manager, Towns of General Partner, Manager, Towns of General Partner, Manager, Towns of General Partners II, LLC  (b) If filling an umbrella registration, identify fund.  The private fund (check all that apply; you refund.  (1) qualifies for the exclusion from the conditional Act of 1940  (2) qualifies for the exclusion from the conditional Act of 1940  List the name and country, in English, of each of 1940  (a) Is this a "master fund" in a master-feed (b) If yes, what is the name and private fund (c) Is this a "feeder fund" in a master-feed (d) If yes, what is the name and private fund Name of private fund:  Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each of the private fund of the master-feeder are conditional and private fund of the master fund of the maste

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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) invessubstantially all of its assets in a single master fund.	ts	
		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 p investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ooled	I
	(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.	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	•
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 for other private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	und (	•
	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> :  \$ 55,635,570		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :  \$ 250,000		
	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: 49		
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%		
	(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
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 4%		
You	ur Advisory Services		
17	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	
1/.		C	T£
	(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 t</i> the answer to question 17.(a) is "no," leave this question blank.	una.	11
	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> ?	•	О

(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.

Name of Other Adviser to <i>private fund</i>	SEC file number	CRD number
COMMONFUND OCIO, INC.	801-56548	110689

	СОМ	MONFUND OCIO, INC.		801-56548	110689		
					Y	es/	No
19.	Are your o	clients solicited to invest in the	ne <i>private fund</i> ?			0	•
	NOTE: For	purposes of this question, c	lo not consider feeder funds of	the private fund.			
20.	Approxima	ately what percentage of you	r <i>clients</i> has invested in the <i>pi</i>	rivate fund?			
	0%						
<u>Priv</u>	vate Offer	i <u>ng</u>					
					Y	es/	No
21.	Has the pa		exemption from registration o	f its securities under Regulation D o	of the Securities	•	0
22.	If yes, pro	vide the <i>private fund's</i> Form	D file number (if any):				
	Form D f	ile number					
	021-1670	003					
	ERVICE PRO	SVIDENCE			,	⁄es	No
23.	(a) (1) A	e the <i>private fund's</i> financia	I statements subject to an ann	ual audit?		_	_
		the answer to question 23.(	-	I statements prepared in accordance	o with LLC	⊙ ⊙	0
	If the	answer to question 23.(a)(1		ns (b) through (h) below. If the <i>priv</i>	ate fund uses more	tha	n
		tional Auditor Information		separately for each auditing firm.			
	Addi	tional Additor Information	ir. 1 Record(5) Fried.				
				ons (b) through (h) below. If the <i>pr</i> ) through (f) separately for each au			
	(b)	Name of the auditing firm:					
		ERNST & YOUNG LLP					
	(c)	The location of the auditing	firm's office responsible for th	e <i>private fund's</i> audit (city, state ar	nd country):		
		City:	State:	Country:			
		CLEVELAND	Ohio	United States	Va	- N	
	(d)	Is the auditing firm an inde	pendent public accountant?		re: ⊙	s N	.
	(e)	Is the auditing firm register	ed with the Public Company A	ccounting Oversight Board?	•	c	,
		If yes, Public Company Accorda	ounting Oversight Board-Assig	ned Number:			

Yes No

Oversight Board in accordance with its rules?

(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting

(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
(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> unqualified opinions?	contair	1
	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 rewhen the report is available.	sponse	1
Prime B	<u>Broker</u>	Yes	No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	0	•
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>priv</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.		
	No Information Filed		
Custodi	<u>ian</u>	V	NI -
25. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its		No
23. (4)	assets?	0	•
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for custodian.		
	No Information Filed		
Adminis	<u>strator</u>	Yes	No
26. (a)	Does the <i>private fund</i> use an administrator other than your firm?	0	•
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more administrator, you must complete questions (b) through (f) separately for each administrator.		
	No Information Filed		
adn 100 Incl	ring 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 ninistrator, that is not your <i>related person</i> ?  10%  104  104  105  106  107  108  109  109  109  109  109  109  109	cluding	
	calculations (including allocations) was the valuation determined by such <i>person</i> .		
Markete		Yes	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?	0	•
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal adviother solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questionuph (g) separately for each marketer.	ow for	(b)

-,		
		No Information Filed
A. PR	VATE FUND	
Infor	mation About the <i>Private Fund</i>	
1.	a) Name of the <i>private fund</i> :	
	DEERE & COMPANY WELFARE BENE	FIT FUND, LP
	b) <i>Private fund</i> identification number: (include the "805-" prefix also)	
	805-5461955365	
2.	Inder 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, Manag	er, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
	Name of General Partner, Manager	, Trustee, or Director
	JDPT MANAGER, LLC	
ſ	<ul> <li>If filing an umbrella registration, id fund.</li> </ul>	entify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>priva</i>
		No Information Filed
4.	The <i>private fund</i> (check all that apply;	wou must check at least one).
1		the definition of investment company under section 3(c)(1) of the Investment Company
	(2) qualifies for the exclusion from Act of 1940	the definition of investment company under section 3(c)(7) of the Investment Company
5.	ist the name and country, in English, c	of each foreign financial regulatory authority with which the private fund is registered.
	,, 3 ,	No Information Filed
		Yes
6.	a) Is this a "master fund" in a master	-feeder arrangement?
	b) If yes, what is the name and privat	re 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?
	d) If yes, what is the name and <i>privat</i> Name of <i>private fund</i> :	re fund identification number (if any) of the master fund in which this private fund invests
	Private fund identification number:	
	(include the "805-" prefix also)	
	(include the "805-" prefix also)	

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D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule

	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mast for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investigation in a single master fund.	er fur	nd"
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	$\odot$	О
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other private funds or registered investment companies.	ooled	l
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	•
		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	⊙
10.	What type of fund is the <i>private fund</i> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital for other private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	und (	•
	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> :		
	\$ 141,205,405		
<u>Ow</u>	<u>nership</u>		
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).	ount s	set
13.	Approximate number of the <i>private fund's</i> beneficial owners:		
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%		
	(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
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		

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L7.	(a)	) Are you a subadviser to this <i>private fund</i> ?		0	$\odot$
		) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the answer to question 17.(a) is "no," leave this question blank.	he adviser of the <i>private f</i>	und	If
		No Information Filed			
				Yes	S No
8.		) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A. fund?	3.(b)) advise the <i>private</i>	0	©
		) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of t fund. If the answer to question 18.(a) is "no," leave this question blank.	the other advisers to the p	riva	te
		No Information Filed			
				Yes	S N
	Are	re your <i>clients</i> solicited to invest in the <i>private fund</i> ?		O	•
	NOT	OTE: For purposes of this question, do not consider feeder funds of the private fund.			
٠.	Appi 0%	oproximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? %			
iv	ate	e Offering		Yes	s N
		as the <i>private fund</i> ever relied on an exemption from registration of its securities under Regula tt of 1933?	ation D of the Securities	•	C
	If ye	yes, provide the <i>private fund's</i> Form D file number (if any):			
		No Information Filed			
3	(a)	) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?		Yes	S No
•		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in ac GAAP?	cordance with U.S.	•	C
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If one auditing firm, you must complete questions (b) through (f) separately for each auditing	•	e 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. more than one auditing firm, you must complete questions (b) through (f) separately for			
		(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: CLEVELAND Ohio United States			
		CELVELAND Office States	Y	es	No
		(d) Is the auditing firm an independent public accountant?	G	9	0
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	6	9	O
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  If yes, Public Company Accounting Oversight Board-Assigned Number:	ē	0	0

**Marketers** 

	(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	0
		Yes	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?	•	О
(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> unqualified opinions?	contair	1
	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 rewhen the report is available.	esponse	ļ
Prime B	<u>Broker</u>	<b>W</b> = =	<b>N</b> 1.
24 (a)	Does the <i>private fund</i> use one or more prime brokers?	Yes	No
24. (a)	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>pri</i>	C vata fu	. <b>⊙</b>
	uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.		
	No Information Filed		
25. (a)	Does the <i>private fund</i> 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 <i>private</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately focustodian.	C e fund	No ⊙
	No Information Filed		
Adminis	<u>strator</u>		
		Yes	No
26. (a)	Does the <i>private fund</i> use an administrator other than your firm?	0	⊙
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more administrator, you must complete questions (b) through (f) separately for each administrator.	than o	ne
	No Information Filed		
<b>.</b> -			
adn	ring 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 ar ministrator, that is not your <i>related person</i> ?	1	
100		achidia -	
obta	lude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, ir raining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distrib calculations (including allocations) was the valuation determined by such <i>person</i> .	_	

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		Yes	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?	•
		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. PR	IVAT	TE FUND	
Info	rmat	tion About the <i>Private Fund</i>	
1.	(a)	Name of the <i>private fund</i> :	
		EAST SEA MAIN FUND, LP	
	٠,	Private fund identification number:	
		(include the "805-" prefix also)	
		805-2610111090	
2.	Und	er the laws of what state or country is the <i>private fund</i> organized:	
		State: Country:	
		Delaware United States	
3.		Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	
		me of General Partner, Manager, Trustee, or Director	
	EAS	ST SEA 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(s) this <i>priv fund</i> .	ate
		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 of 1940	/
		(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company 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	
	(a)		No
	` ,	Is this a "feeder fund" in a master-feeder arrangement?	⊙
		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> investored Name of <i>private fund</i> :	its?

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 *private fund* a "fund of funds"?

⊙ C

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?

•

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.)?

Yes No

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

O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O 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:

\$ 1,010,000,000

# <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%

Yes No

		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 99%	et is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
<u>Yοι</u>	ır Ad	visory Services		
17	(a)	Are you a subadviser to this <i>private fund</i> ?	Yes	
	(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.	C fund.	If
		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	•
		If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the $p$ fund. If the answer to question 18.(a) is "no," leave this question blank.	orivate	j
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Appı 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Priv	/ate	<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?	•	0
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
B. S	ERVIO	CE PROVIDERS		
Aud	litors	<u>s</u>	Yes	No
23.	(a)	(1) Are the private fund's financial statements subject to an annual audit?	•	0
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	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 more auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re tha	n
		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: CLEVELAND		State: Ohio	Country: United States		
	(4)	Is the auditing firm a	n indenendent nuh	olic accounta	nt?	Yes	
	(u)	13 the additing min di	тисрепаене рав	ne accountai	nt:	•	
	(e)	Is the auditing firm re	egistered with the F	Public Comp	any Accounting Oversight Board?	•	0
		If yes, Public Compan	y Accounting Over	rsight Board-	-Assigned Number:		
	(f)	If "yes" to (e) above, Oversight Board in ac			regular inspection by the Public Company Accounting	•	0
						Υє	es No
(g)		ne <i>private fund's</i> audite e fund's investors?	ed financial statem	ents for the	most recently completed fiscal year distributed to the	C	•
(h)		of the reports prepare dified opinions?	ed by the auditing f	firm for the ,	private fund since your last annual updating amendmen	t conta	ain
	C Ye	s ○ No ⓒ Report No	t Yet Received				
	-	check "Report Not Yet the report is available		nust promptl <sub>j</sub>	y file an amendment to your Form ADV to update your r	espons	se
Prime E	roker					۷c	es No
24. (a)	Does	the <i>private fund</i> use o	ne or more prime l	brokers?		(	:s 140
	uses.				tions (b) through (e) below for each prime broker the <i>pr</i> , you must complete questions (b) through (e) separate		
				No In	oformation Filed		
Custodi	an_						
	_					Ye	es No
25. (a)	Does	•	ny custodians (incl	luding the pr	rime brokers listed above) to hold some or all of its	C	0
		If the <i>private fund</i> use			cions (b) through (g) below for each custodian the <i>privat</i> ou must complete questions (b) through (g) separately f		
				No In	oformation Filed		
<u>Adminis</u>	strato	<u>r</u>				Υє	es No
26. (a)	Does	the <i>private fund</i> use a	n administrator oth	her than you	ır firm?	c	•
					tions (b) through (f) below. If the <i>private fund</i> uses more separately for each administrator.	e than	one
				No In	oformation 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

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

3 6

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.

#### A. PRIVATE FUND

#### **Information About the Private Fund**

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

EAST SEA SIDECAR, LP

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

805-3486451095

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

EAST SEA 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
- 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?	$\circ$	$\odot$
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund	nd?	
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	$\circ$	$\odot$
	(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund in	ives	ts?
	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 Sch D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	nedu	le
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:	Sect	ion
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all o substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master 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.	r fur	nd"
0		Yes	No
8.	(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 poinvestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	<b>⊙</b> oled	0
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	0
		~	~
	·	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	•
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 fund $^{\circ}$ other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	nd <sup>(</sup>	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> : \$ 505,000,000		
<u>Ow</u>	<u>rnership</u>		
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 amount forth in the organizational documents of the fund).	unt s	et

13. Approximate number of the  $\it private fund's$  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> :		
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 Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?		No C
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 99%		
You	Advisory Services	Vac	. No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	_	_
	(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>prive</i> the answer to question 17.(a) is "no," leave this question blank.	C ate fund.	<b>⊙</b> 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>prive fund</i> ?	ate C	•
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to t fund. If the answer to question 18.(a) is "no," leave this question blank.	ne <i>privat</i>	e
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	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> ?		
<u>Priv</u>	ate Offering	Vaa	. No
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securitie Act of 1933?		O
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. S	RVICE PROVIDERS		
Aud	<u>tors</u>		
22	(a) (1) Are the private fundle financial statements subject to an appual audit?	Yes	No -
۷۵.	<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
	If 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 tha	эn
	Additional Auditor Information: 1 Record(s) Filed.		

		he answer to question $23.(a)(1)$ is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> use re than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	 es	
	(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:  Clay:  Clay:		
		CLEVELAND Ohio United States	Yes	No
	(d)	Is the auditing firm an independent public accountant?	res ⊙	C
	(e)	Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	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)		ne private fund's audited financial statements for the most recently completed fiscal year distributed to the te fund's investors?	С	•
(h)		of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i> alified opinions?	าt conta	in
	C Ye	es C No G Report Not Yet Received		
	If you	check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your the report is available.	respons	e
Prime B	Broker	<u>:</u>	Vo	s No
24 (a)	Does	the <i>private fund</i> use one or more prime brokers?	_	_
Z.: (a)	If the uses.	answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>p</i> . If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate broker.		ınd
		No Information Filed		
<u>Custodi</u>	<u>an</u>			
			Ye	s No
25. (a)	assets		С	•
		answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>priva</i> If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately dian.		ı
		No Information Filed		

# **Administrator**

Administrator, you must complete questions (b) through (f) separately for each administrator.  No Information Filed  7. During 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 administrator, that is not your <i>related person</i> ?  100%  Include only those assets where (i) such <i>person</i> 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, a fee calculations (including allocations) was the valuation determined by such <i>person</i> .  1arketers  Yes  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	And indistrator, you must complete questions (b) through (f) separately for each administrator.  No Information Filed  7. 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, a fee calculations (including allocations) was the valuation determined by such person.  1arketers  Yes  8. (a) Does the private fund use the services of someone other than you or your employees for marketing purposes?  You must answer "vest" whether the person acts as a placement agent, consultant, finder, introducer, municipal advisor other solicitor, or similar person. If the answer to question 28.(a) is "vest," respond to questions (b) through (q) below for each such marketer the private fund uses. If the private fund uses more than one marketer you must complete questions (through (q) separately for each marketer.  No Information Filed  PRIVATE FUND  Information About the Private fund:  (a) Name of the private fund:  (c) PREAL ESTATE LP  (b) Private fund identification number:  (include the "805." prefix also)  805-4365747713  Under the laws of what state or country is the private fund organized:  State:  Country:  Gountry:  Gountry:  Gountry:  Gountry:  Gountry:  Gountry:  Gountry:  Alame of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):  Name of General Partner, Manager, Trustee, or Director (or persons serving in a similar capacity):  Name of General Partner, Manager, Trustee, or Director (or persons serving in a similar capacity):  Name of General Partner, Manager, Trustee, or Director (or persons serving in a similar capacity):	·	a) Does the <i>private fund</i> use an administrator other than your firm?
7. During 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 administrator, that is not your <i>related person</i> ?  100%  Include only those assets where (1) such <i>person</i> 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, a fee calculations (including allocations) was the valuation determined by such <i>person</i> .  **Iarketers**  **Ves**  8. (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 more than one marketer you must complete questions (through (g) separately for each marketer.  **No Information Filed**  **PRIVATE FUND**  **Information About the **Private fund**  GPF REAL ESTATE LP  (b) **Private fund identification number: (include the "805-" prefix also)  805-4365747713  **Under the laws of what state or country is the **private fund* organized:  **Country:** Guernsey  (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 priva fund.	7. 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 (1) 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, a fee calculations (including allocations) was the valuation determined by such person.  Iarketers  Yes  8. (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 more than one marketer you must complete questions (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private fund:  GPF REAL ESTATE LP  (b) Private fund identification number: (include the "805-" prefix also) 805-4365747713  Under the laws of what state or country is the private fund organized:  Country: Guernsey  (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 (LKE ERIE REAL ESTATE GENERAL PARTNER LIMITED		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.
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, a fee calculations (including allocations) was the valuation determined by such person.  Yes  8. (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 her private fund uses. If the private fund uses more than one marketer you must complete questions (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private fund:  GPF REAL ESTATE LP  (b) Private fund identification number:  (include the "805-" prefix also)  805-4365747713  Under the laws of what state or country is the private fund organized:  State:  Country:  Guernsey  (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	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, a fee calculations (including allocations) was the valuation determined by such person.  Yes  8. (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 (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private fund:  GPF REAL ESTATE LP  (b) Private fund identification number:  (include the "805-" prefix also)  805-4365747713  Under the laws of what state or country is the private fund organized:  State:  Country:  Guernsey  (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		No Information Filed
obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, a fee calculations (including allocations) was the valuation determined by such person.  Yes  8. (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 (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private Fund  (a) Name of the private fund:  GPF REAL ESTATE LP  (b) Private fund identification number:  (include the "805-" prefix also)  805-4365747713  Under the laws of what state or country is the private fund organized:  State:  Country:  Guernsey  (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.	obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, a fee calculations (including allocations) was the valuation determined by such person.  Yes  8. (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 (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private Fund  (a) Name of the private fund:  GPF REAL ESTATE LP  (b) Private fund identification number:  (include the "805-" prefix also)  805-4365747713  Under the laws of what state or country is the private fund organized:  State:  Country:  Guernsey  (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.	ā	administrator, that is not your related person?
Yes 3. (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 (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private Fund  (a) Name of the private fund:	Yes 3. (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 (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private fund:  GPF REAL ESTATE LP  (b) Private fund identification number:  (include the "805-" prefix also)  805-4365747713  Under the laws of what state or country is the private fund organized:  State:  Country:  Guernsey  (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	C	obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, a
3. (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 (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private Fund  (a) Name of the private fund:  GPF REAL ESTATE LP  (b) Private fund identification number:  (include the "805-" prefix also)  805-4365747713  Under the laws of what state or country is the private fund organized:  State:  Country:  Guemsey  (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	3. (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 (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private Fund:  GPF REAL ESTATE LP  (b) Private fund identification number: (include the "805-" prefix also) 805-4365747713  Under the laws of what state or country is the private fund organized: State:  Country: Guernsey  (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	ark	
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 (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private Fund  (a) Name of the private fund:     GPF REAL ESTATE LP  (b) Private fund identification number:     (include the "805-" prefix also)     805-4365747713  Under the laws of what state or country is the private fund organized:     State:	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 (through (g) separately for each marketer.  No Information Filed  PRIVATE FUND  formation About the Private Fund  (a) Name of the private fund:     GPF REAL ESTATE LP  (b) Private fund identification number:     (include the "805-" prefix also)     805-4365747713  Under the laws of what state or country is the private fund organized:     State:	3. (	
PRIVATE FUND  formation About the Private Fund  (a) Name of the private fund:     GPF REAL ESTATE LP (b) Private fund identification number:     (include the "805-" prefix also)     805-4365747713  Under the laws of what state or country is the private fund organized:     State:	PRIVATE FUND  formation About the Private Fund  (a) Name of the private fund:     GPF REAL ESTATE LP (b) Private fund identification number:     (include the "805-" prefix also)     805-4365747713  Under the laws of what state or country is the private fund organized:     State:		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 (
(a) Name of the private fund:    GPF REAL ESTATE LP (b) Private fund identification number:    (include the "805-" prefix also)    805-4365747713  Under the laws of what state or country is the private fund organized:    State: Country:    Guernsey  (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 filling an umbrella registration, identify the filling adviser and/or relying adviser(s) that sponsor(s) or manage(s) this privatiund.	(a) Name of the private fund:    GPF REAL ESTATE LP (b) Private fund identification number:    (include the "805-" prefix also)    805-4365747713  Under the laws of what state or country is the private fund organized:    State: Country:    Guernsey  (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 filling an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this privatund.		No Information Filed
GPF REAL ESTATE LP  (b) Private fund identification number:   (include the "805-" prefix also)   805-4365747713  Under the laws of what state or country is the private fund organized:   State:	GPF REAL ESTATE LP  (b) Private fund identification number:   (include the "805-" prefix also)   805-4365747713  Under the laws of what state or country is the private fund organized:   State: Country:		
(b) Private fund identification number:     (include the "805-" prefix also)     805-4365747713  Under the laws of what state or country is the private fund organized:     State:	(b) Private fund identification number:     (include the "805-" prefix also)     805-4365747713  Under the laws of what state or country is the private fund organized:     State:	(	a) Name of the <i>private fund</i> :
(include the "805-" prefix also) 805-4365747713  Under the laws of what state or country is the private fund organized: State: Country: Guernsey  (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 privation.	(include the "805-" prefix also) 805-4365747713  Under the laws of what state or country is the private fund organized: State: Country: Guernsey  (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 privation.		GPF REAL ESTATE LP
Under the laws of what state or country is the <i>private fund</i> organized:  State:  Country: Guernsey  (a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  Name of General Partner, Manager, Trustee, or Director  LAKE ERIE REAL ESTATE GENERAL PARTNER LIMITED  (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>privatund</i> .	Under the laws of what state or country is the <i>private fund</i> organized:  State:  Country: Guernsey  (a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  Name of General Partner, Manager, Trustee, or Director  LAKE ERIE REAL ESTATE GENERAL PARTNER LIMITED  (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>privatund</i> .	(	
State:  Country: Guernsey  (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 prival fund.	State:  Country: Guernsey  (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 privalend.		
(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  Name of General Partner, Manager, Trustee, or Director  LAKE ERIE REAL ESTATE GENERAL PARTNER LIMITED  (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>privafund</i> .	(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 privalend.	ι	Inder the laws of what state or country is the <i>private fund</i> organized:
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 privation.	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 privature.		State: Country:
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 prival fund.	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 prival fund.		Guernsey
(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>privafund</i> .	(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>priva</i> fund.	. (	a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
fund.	fund.	(	a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  Name of General Partner, Manager, Trustee, or Director
No Information Filed	No Information Filed	(	a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  Name of General Partner, Manager, Trustee, or Director
		. (	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  Name of General Partner, Manager, Trustee, or Director  LAKE ERIE REAL ESTATE GENERAL PARTNER LIMITED  (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>priva</i>
The private fund (check all that apply; you must check at least one):			(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 prival fund.  No Information Filed

	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered	i.
	No Information Filed	
	•	es No
	(a) Is this a "master fund" in a master-feeder arrangement?	0 0
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund	d?
	No Information Filed	
	·	'es No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	C 0
	(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> ir	
	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 Sch D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	edule
	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 57.B.(1), for each of the feeder funds answer the following questions:	Section
	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 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.	fund"
	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 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.  (a) Is this private fund a "fund of funds"?	fund"  'es No  O
	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 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.  (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 po	fund"  'es No  O
	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 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.  (a) Is this private fund a "fund of funds"?	fund"  'es No  O
	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 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.  (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 poinvestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	fund"  Yes No  Oled
	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 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.  (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 poinvestment 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> ?	fund"  Yes No  Oled
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master 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.  (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 poinvestment 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> ?  During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the	fund"  Yes No Opled  C G  Yes No
1.	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 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.  (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 poinvestment 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> ?  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.)?	fund"  Yes No Oled  C O O O O O O O O O O O O O O O O O O
١.	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 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.  (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 poinvestment 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> ?  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.)?  What type of fund is the <i>private fund</i> ?  Phedge fund © liquidity fund © private equity fund © real estate fund © securitized asset fund © venture capital funds.	fund"  Yes No Oled  C O O O O O O O O O O O O O O O O O O

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).	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> : 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> ?		C
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 100%		
You	ur Advisory Services	V	N.a
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		
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> ?	Yes O	No ⊙
	(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 fund. If the answer to question 18.(a) is "no," leave this question blank.	orivate	e
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	⊙
	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> ?  0%		
<u>Priv</u>	<u>vate Offering</u>	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?	0	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. S	ERVICE PROVIDERS		
Aud	<u>ditors</u>	Yes	No

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=\&viewChanges=N\&FLNG\_PK=1735257$ 

	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	•	)
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	С	)
	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.	ore th	nan
	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		
	(d) Is the auditing firm an independent public accountant?	Yes ⊙	N <sub>C</sub>
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	c
	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?	•	C
		Ye	s
	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	)
	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> unqualified opinions?	conta	in
	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.	spons	se
ne B	<u>roker</u>	Ye	s
(a)	Does the <i>private fund</i> use one or more prime brokers?	С	,
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>priv</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.		
	No Information Filed		
todia			
		Ye	s

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

		custo	odian.			
			No Information Filed			
<u>Adı</u>	minis	strato	<u>or</u>			
26	(2)	Door	s the <i>private fund</i> use an administrator other than your firm?	,	Yes	
20.	(a)	If the	e answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses inistrator, you must complete questions (b) through (f) separately for each administrator.	more tha	<b>⊙</b> an or	C ne
		Addi	litional Administrator Information : 1 Record(s) Filed.			
			the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> use an one administrator, you must complete questions (b) through (f) separately for each administrator.	s more		
		(b)	) Name of administrator:			
			NORTHERN TRUST			
		(c)	Location of administrator (city, state and country):			
			City: State: Country: ST. PETERS PORT Guernsey			
				Yes	No	
		(d)	) Is the administrator a <i>related person</i> of your firm?	0	$\odot$	
		(e)	) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?			
			• Yes (provided to all investors) ○ Some (provided to some but not all investors) ○ No (provided to n investors)	D		
		(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 investor applicable."  NOT APPLICABLE			
27.		· .	our 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		
	adn		rator, that is not your related person?			
	Incl obta	ude or aining	only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if a pany relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or dulations (including allocations) was the valuation determined by such <i>person</i> .	• •	_	and
Maı	rkete	ers			.,	
28.	(a)	Does	s the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?		Yes	
	(4)	You n other each	must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal resolutions, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (go such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must completing the completing of the private fund uses more than one marketer you must completing the completing of the completing that the private fund uses more than one marketer you must completing the completing that the private fund uses more than one marketer you must completing the completing that the private fund uses more than one marketer you must complete the completing that the private fund uses more than one marketer you must complete the completing that the private fund uses more than one marketer you must complete the completing that the private fund uses more than one marketer you must complete the completing that the private fund uses more than one marketer you must complete the completing that the private fund uses more than one marketer you must complete the completing that the private fund uses more than one marketer you must complete the private fund uses marketer you must be privated to the private fund uses marketer you must be privated to the private fund uses marketer you must be privated to the private fund uses marketer you must be privated to the private fund uses marketer you must be privated to the private fund uses where you was a fund of the	ıl advisoı g) below	for	(b)
			No Information Filed			

Α.	P	RΙ	VA	TE	Fι	JND
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Information	About the	e Private	Fund

1. (a) Name of the private fund:

GRE PARTNERSHIP IIA CO-INVESTMENT L.P.

(b) Private fund identification number:

(include the "805-" prefix also)

805-2672609085

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

- 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
- 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  $\circ$ 

**(** 

- 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

 $\odot$ 

- (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:

	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mast for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investigation in a single master fund.	er fur	nd"
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	•	0
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other private funds or registered investment companies.	ooled	t
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	$\circ$	$\odot$
0	District the Control of the Control of Control of the Control of t	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	•
10.	What type of fund is the <i>private fund</i> ?		
	$^{ m C}$ hedge fund $^{ m C}$ liquidity fund $^{ m C}$ private equity fund $^{ m C}$ real estate fund $^{ m C}$ securitized asset fund $^{ m C}$ venture capital f Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	und <sup>(</sup>	⊚
	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> :		
	\$ 359,414,175		
<u>Ow</u>	<u>rnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :		
	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> : 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
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 100%		
<u>You</u>	ur Advisory Services		
		Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	•

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=\&viewChanges=N\&FLNG\_PK=1735257$ 

the answer to question 17.(a) is "no," leave this question blank.

(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

				es N
18.	(6	a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the priv fund?	rate (	9
	(l	b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to fund. If the answer to question 18.(a) is "no," leave this question blank.	:he <i>priv</i>	ate
		No Information Filed		
				es N
10	^	re your clients solicited to invest in the private fund?	10	25 IN
19.		re your <i>clients</i> solicited to invest in the <i>private fund</i> ?	C	9
	Ν	OTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.		pproximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
	0	%		
Priv	va	te Offering		
				es N
21.		las the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securiti ct of 1933?	es e	0 0
22.	Ιf	yes, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
3. S	ER	VICE PROVIDERS		
Aud	dit	ors		
			Y	es N
23.	( ;	a) (1) Are the private fund's financial statements subject to an annual audit?	,	. ,
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.		
		GAAP?	C	9
		If 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> us more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	es	
		(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		
			Yes	No
		(d) Is the auditing firm an independent public accountant?	_	_
		(-)	•	О
		(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?	•	О

		,	res	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?	ne	•	О
(h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amenda</i> unqualified opinions?	<i>ment</i> con	itain	
	● 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 you when the report is available.	our respo	nse	
<u>Prime I</u>	<u>Broker</u>	_		
24 (a)	Does the <i>private fund</i> use one or more prime brokers?	`	Yes	_
24. (u)	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker th	e nrivate	C) fun	d
	uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate broker.			
	No Information Filed			
Custod	ian_	,	Yes	Na
25. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its	1	C	•
( )	assets?		_	·
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the puses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separate custodian.			
	No Information Filed			
<u>Admini</u>	<u>strator</u>	_		
26 (a)	Does the <i>private fund</i> use an administrator other than your firm?	`	Yes	_
20. (u)	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses administrator, you must complete questions (b) through (f) separately for each administrator.	more tha	on or	C ne
	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 <i>private fund</i> use than one administrator, you must complete questions (b) through (f) separately for each administrator.	es more		
	(b) Name of administrator:			
	NORTHERN TRUST INTERNATIONAL FUND ADMINISTRATION SERVICES			
	(c) Location of administrator (city, state and country):			
	City: State: Country:			
	ST PETERS PORT Guernsey	Yes	Na	
	(d) Is the administrator a <i>related person</i> of your firm?	_	_	
		О	•	
	(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?			

 $\odot$  Yes (provided to all investors)  $\bigcirc$  Some (provided to some but not all investors)  $\bigcirc$  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."
- 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

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

 $\circ$ 

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

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

List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered	ed.
No Information Filed	
	Yes No
(a) Is this a "master fund" in a master-feeder arrangement?	0 0
(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>	nd?
No Information Filed	
	Yes No
(c) Is this a "feeder fund" in a master-feeder arrangement?	0 0
(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund is	nvests?
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 Sci 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 this 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 c substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?	er fund" s Yes No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all c substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.	er fund" :s Yes No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest 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 parts.	er fund" :s Yes No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest 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 princestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	er fund" s  Yes No Opoled
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest 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 princestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	Yes No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest 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 poinvestment 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> ?  During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the	er fund" s  Yes No cooled  Yes No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest 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 princestment 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> ?  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.)?	er fund" s  Yes No cooled  Yes No Cooled  Cooled  Cooled  Cooled
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest 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 privatement 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> ?  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.)?  What type of fund is the <i>private fund</i> ?  Phedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital funds.	er fund" s  Yes No cooled  Yes No Cooled  Cooled  Cooled  Cooled

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: 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%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the	Yes	_
	Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	•	О
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 100%		
Voi	ır Advisory Services		
100		Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	•
	(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	•
	(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 fund. If the answer to question 18.(a) is "no," leave this question blank.	orivate	e 
	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.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?  0%		
<u>Priv</u>	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
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. SI	ERVICE PROVIDERS		
Aud	<u>litors</u>	Yes	No

. (a) (1	) Are the <i>private fund's</i> financial statements subject to an annual audit?	•	C
	2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. AAP?	0	6
	the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses me auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re th	an
A	Additional Auditor Information: 1 Record(s) Filed.		
- 11	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		
	(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?	•	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	s 1º
	re the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>rivate fund's</i> investors?	•	1
	o all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> o equalified opinions?	contai	n
•	Yes O No O Report Not Yet Received		
	you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your res hen the report is available.	ponse	е
me Bro	<u>oker</u>		
(a) D	oes the <i>private fund</i> use one or more prime brokers?	Yes	
If us	the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>privo</i> ses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately rime broker.		
	No Information Filed		
stodian	<u>.</u>		
(c) <u>c</u>	and the minute fund use any quatedians (including the minute hardone listed the AVI shall access to 10.00	Yes	s I
	oes the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its ssets?	0	1
	the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private</i> ses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for		

	custodian.	
	No Information Filed	
Admini		es No
26 (a)	Doos the private fund use an administrator other than your firm?	
20. (u)	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 administrator, you must complete questions (b) through (f) separately for each administrator.	one
	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 <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 INTERNATIONAL FUND ADMINISTRATION SERVICES	
	(c) Location of administrator (city, state and country):	
	City: State: Country: ST PETERS PORT Guernsey	
	Yes I	No
	(d) Is the administrator a <i>related person</i> 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) • Some (provided to some but not all investors) • 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."	)
adn 100 Incl obta	ring 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 ninistrator, that is not your <i>related person</i> ?  10%  10de only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, includi 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> .	
Market		N-
28. (a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	es No
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor of 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 question through (g) separately for each marketer.	or or
	No Information Filed	

А. Р	RIVATE FUND
Info	ormation About the <i>Private Fund</i>
1.	<ul> <li>(a) Name of the private fund: GRE PARTNERSHIP IIB L.P.</li> <li>(b) Private fund identification number: (include the "805-" prefix also) 805-7034996319</li> </ul>
2.	Under the laws of what state or country is the <i>private fund</i> organized:
	State: Country: Guernsey
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
	Name of General Partner, Manager, Trustee, or Director
	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) 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
	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?
	(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 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 substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mast for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investigations and each class (or series) investigations are substantially all of its assets in a single master fund.	er fu	nd"
		Yes	No
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 provided investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	oole	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	•
10.	What type of fund is the <i>private fund</i> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital for other private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	und	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> : \$ 127,369,871		
<u>Ow</u>	<u>rnership</u>		
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).	ount :	set
13.	Approximate number of the <i>private fund's</i> beneficial owners:		
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%		
	(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
	investment company Act of 1940, are sales of the fulla limited to qualified thems:		
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 100%		
<u>Υοι</u>	ur Advisory Services		
17	(a) Are you a subadviser to this private fund?	Yes	No
1/.	<ul><li>(a) Are you a subadviser to this <i>private fund</i>?</li><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></li></ul>	C fund	Tf
	the answer to question 17.(a) is "no," leave this question blank.	anu.	11

18. <b>(</b> a			
	a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the partial fund?	rivate (	) (
(t	b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers t fund. If the answer to question 18.(a) is "no," leave this question blank.	the <i>prive</i>	ate
	No Information Filed		
		Ye	s N
9. A	are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	(	5 (
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.	,	•
	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Privat	te Offering		
			es N
	las the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Secur act of 1933?	ities (	0
2. If	f yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
CED	RVICE PROVIDERS		
SER	VICE PROVIDERS		
udit	tor <u>s</u>		
		Ye	
			:5 1
3. (a	a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	6	
. (ā	<ul><li>a) (1) Are the private fund's 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. GAAP?</li></ul>	e c	9 (
.3. (a	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.	ć	5 (
?3. (a	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> us	ć	5 (
.3. (á	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> us one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	es more t	5 (
.3. (á	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund us 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 more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	es more t	5 (
23. (ē	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund us 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	es more t	5 (
3. (ξ	<ul> <li>(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> us 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> more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:</li> </ul>	es more t	5 (
3. (ξ	<ul> <li>(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund us 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 more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:  ERNST &amp; YOUNG LLP</li> </ul>	es more t	
3. (á	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> us 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> 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	es more t	han
3. (á	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> us 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> 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:	es more t	han
3. (á	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> us 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> 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	es more t	han
23. (á	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund us 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 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:  Country:  ST PETERS PORT  Guernsey  (d) Is the auditing firm an independent public accountant?	es more t	han No

		,	res	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?	ne	•	О
(h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amenda</i> unqualified opinions?	<i>ment</i> con	itain	
	● 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 you when the report is available.	our respo	nse	
<u>Prime I</u>	<u>Broker</u>	_		
24 (a)	Does the <i>private fund</i> use one or more prime brokers?	`	Yes	_
24. (u)	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker th	e nrivate	C) fun	d
	uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate broker.			
	No Information Filed			
Custod	ian_	,	Yes	Na
25. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its	1	C	•
( )	assets?		_	·
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the puses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separate custodian.			
	No Information Filed			
<u>Admini</u>	<u>strator</u>	_		
26 (a)	Does the <i>private fund</i> use an administrator other than your firm?	`	Yes	_
20. (u)	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses administrator, you must complete questions (b) through (f) separately for each administrator.	more tha	on or	C ne
	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 <i>private fund</i> use than one administrator, you must complete questions (b) through (f) separately for each administrator.	es more		
	(b) Name of administrator:			
	NORTHERN TRUST INTERNATIONAL FUND ADMINISTRATION SERVICES			
	(c) Location of administrator (city, state and country):			
	City: State: Country:			
	ST PETERS PORT Guernsey	Yes	Na	
	(d) Is the administrator a <i>related person</i> of your firm?	_	_	
		О	•	
	(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?			

 $\odot$  Yes (provided to all investors)  $\bigcirc$  Some (provided to some but not all investors)  $\bigcirc$  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."
- 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

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

 $\circ$ 

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.

Nο	Information	Filad
INO	IIIIOIIIIauoii	riieu

#### A. PRIVATE FUND

#### **Information About the Private Fund**

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

GREAT PLAINS NDT, LP

(b) *Private fund* identification number: (include the "805-" prefix also) 805-9146736410

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

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 Compan Act of 1940	У
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	s No
6.	(a) 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	s No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	$\odot$
	(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 fund</i> invented Name of <i>private fund</i> :	sts?
	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 Sched D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	ule
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Sec 7.B.(1), for each of the feeder funds answer the following questions:	tion
	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 furd" 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.	
_		s No
8.	(a) Is this private fund a "fund of funds"?	္ဝ
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poole investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	a
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	•
	· · · · · · · · · · · · · · · · · · ·	
	Yes	s 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.)?	•
10.	What type of fund is the <i>private fund</i> ?	
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	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> : \$ 342,478,071	
<u>Ow</u>	<u>vnership</u>	

12.	Minimum investment commitment required of an investor in the <i>private fund</i> :	tritinely required of investors who are not your <i>related persons</i> (even if different from the amount set cuments of the fund).  **rivate fund's beneficial owners:  **rentage of the **private fund* beneficially owned by you and your **related persons*:  **percentage of the **private fund* beneficially owned (in the aggregate) by funds of funds:  **percentage of the **private fund* beneficially owned (in the aggregate) by funds of funds:  **Pes No* cot 1940, are sales of the fund limited to **qualified clients?*  **Pentage of the **private fund* beneficially owned by non-United States persons:  **Pes No* cot 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the **private fund.**  **No Information Filed**  **Yes No* cot 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the **private estion 18.(a) is "no," leave this question blank.  **No Information Filed**  **Yes No* cot 18.(a) is "no," leave this question blank.  **No Information Filed**  **Yes No over in the **private fund?*  **Yes No o	
	\$ 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:		
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%		
	(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> ?		
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
Υοι	ur Advisory Services		
17	(a) Are you a subadvisor to this private fund?		
17.	<ul><li>(a) Are you a subadviser to this <i>private fund</i>?</li><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>		
		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> ?		
	(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 fund. If the answer to question 18.(a) is "no," leave this question blank.	orivate	9
	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.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?  0%		
Priv	vate Offering	V	NI-
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?		
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
R SI	ERVICE PROVIDERS		
ال .ت			
Aud	<u>ditors</u>	Yes	No

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=\&viewChanges=N\&FLNG\_PK=1735257$ 

	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	***	
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. 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 moone 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.		
	more than one additing min, you must complete questions (b) through (i) separately for each additing min.		
	(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:		
	CLEVELAND Ohio United States		
		Yes	No
	(d) Is the auditing firm an independent public accountant?	•	C
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	0	С
			`
	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?	•	C
( - <b>)</b>		Ye	S
	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?	⊚	
	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> cunqualified opinions?	conta	in
		conta	in
	unqualified opinions?		
	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 res	spons	e
е В	unqualified opinions?  Yes O No O 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.  Toker	spons <b>Ye</b>	re <b>s</b>
<b>іе В</b> і	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 reswhen the report is available.  Toker  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 uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately	Ye Ye Cate fu	se s
<b>пе В</b>	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 reswhen the report is available.  Toker  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 private fund use one or more prime broker the private fund use one or more prime brokers?	Ye Ye Cate fu	se s
<b>1е В</b>	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 reswhen the report is available.  Toker  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 uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately	Ye Ye Cate fu	se s
<b>1е В</b>	unqualified opinions?  Yes O No O Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your reswhen the report is available.  Toker  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 seems. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.	Ye Ye Cate fu	se s
<b>1е В</b>	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 reswhen the report is available.  Toker  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 uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.  No Information Filed	Ye C Cate fu	s s und acl
ne Bi (a)	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 reswhen the report is available.  Toker  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 uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.  No Information Filed	Ye Ye Cate fu	s I

	custodian.	
	No Table and the Ethal	
	No Information Filed	
Adı	<u>inistrator</u> Yes	No
26.	a) Does the <i>private fund</i> 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 <i>private fund</i> uses more than or 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 <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as an administrator, that is not your <i>related person</i> ?  1.00%  Include only those assets where (i) such <i>person</i> 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, a fee calculations (including allocations) was the valuation determined by such <i>person</i> .	and
Ma	<u>reters</u> Yes	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?	•
	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.	b)
	No Information Filed	
A. P	VATE FUND	
Info	mation About the <i>Private Fund</i>	
1.	a) Name of the <i>private fund</i> :	
	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 <i>private fund</i> organized:	
	State: Country: Delaware United States	
3.	a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	
	Name of General Partner, Manager, Trustee, or Director	_
	TOWNSEND GREAT LAKES AND PLAINS GP, 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>fund</i> .	riv	ate
	No Information Filed		
	The <i>private fund</i> (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 Compact of 1940	any	
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Comp Act of 1940	any	
	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered		
	No Information Filed		
	Y	es	N
	(a) Is this a "master fund" in a master-feeder arrangement?	0	G
	(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>	1?	
	No Information Filed		
	Y	es	N
	(c) Is this a "feeder fund" in a master-feeder arrangement?	_	Ó
	(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> in	ା /est	
	Name of <i>private fund</i> :	<i>(</i> C3)	
	Hame of private rand.		
	Private fund identification number:		
	(include the "805-" prefix also)		
	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this S 7.B.(1), for each of the feeder funds answer the following questions:	ect	or
	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 for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests	fun	d
	substantially all of its assets in a single master fund.		
		es	Ν
		⊙	(
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poor investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	led	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?		(
	Y	es	N
	Description of the second of t	es O	O.
١.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the		
١.	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	1

3, 9:	19 A <b>l</b>	M IARD - All Sections [User Name: amay123, OrgID: 160006]		
	NOT	TE: 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> : 55,072,037		
<u>Ow</u>	ners	<u>ship</u>		
12.	\$ 0 NOT	imum investment commitment required of an investor in the <i>private fund</i> :  TE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amon h in the organizational documents of the fund).	unt s	et
13.	App	roximate number of the <i>private fund's</i> beneficial owners:		
14.	Wha	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 ⊙	No C
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
You	ır Ac	<u>lvisory Services</u>		
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> for 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 fund</i> ?		⊙
	(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>pi</i> fund. If the answer to question 18.(a) is "no," leave this question blank.	ivate	?
		No Information Filed		
			Yes	No
19.		your clients solicited to invest in the private fund?  TE: For purposes of this question, do not consider feeder funds of the private fund.	0	•
20.	App	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	<u>rate</u>	<u>Offering</u>	Yes	No

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

Act of 1933?

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

 $\odot$   $\circ$ 

No Information Filed

D	SERVIC		$\cap$ V/II	DEDC
о.	SERVIC	ヒPK	OVI	JEKS.

A	п	d	i	t	n	r	

Yes No

23. (a) (1) Are the *private fund's* 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?

0

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.

(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: Country:

CLEVELAND Ohio United States

Yes No

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

⊙ ⊙

(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?

⊙ ○

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? • o

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?

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 brokers?

 $\circ$ 

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.

			Yes	No
25.	(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets?	0	⊙
		If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private</i>	fund	
		uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for		
		custodian.		
		No Information Filed		
<u>Adr</u>	minis	<u>strator</u>		
			Yes	No
26.	(a)	Does the <i>private fund</i> use an administrator other than your firm?	0	$\odot$
		If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more administrator, you must complete questions (b) through (f) separately for each administrator.	than o	ne
		No Information Filed		
27.	adm 100 Incl	ing 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 ninistrator, that is not your <i>related person</i> ?  Which is not your related person carried out the valuation procedure established for that asset, if any, in		
	fee rkete	aining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions (including allocations) was the valuation determined by such <i>person</i> .  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 advother solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) beleach such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questionuph (g) separately for each marketer.	Yes C isor or ow for	No <b>©</b>
	fee rkete	calculations (including allocations) was the valuation determined by such <i>person</i> .  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 advother solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) belieach such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete que	Yes C isor or ow for	No ⊙
28.	fee fee (a)	Calculations (including allocations) was the valuation determined by such <i>person</i> .  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 advother solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) beleach such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questioning (g) separately for each marketer.	Yes C isor or ow for	No ⊙
28. A. PF	fee fee (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 advother solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) beleach such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete question (g) separately for each marketer.  No Information Filed	Yes C isor or ow for	No <b>©</b>
28. A. PF	fee  (a)  RIVA	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 advother solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) beleach such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete question (g) separately for each marketer.  No Information Filed	Yes C isor or ow for	No <b>©</b>
A. PI	fee  (a)  RIVA	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 advother solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) beleach such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questionship (g) separately for each marketer.  No Information Filed	Yes C isor or ow for	No <b>©</b>
A. PI	fee (a) RIVA (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 advother solicitor, or similar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) beleach such marketer the private fund uses. If the private fund uses more than one marketer you must complete questionugh (g) separately for each marketer.  No Information Filed  TE FUND  tion About the Private Fund  Name of the private fund:  JDPT FUND, L.P.  Private fund identification number:	Yes C isor or ow for	No <b>©</b>
A. PI	fee (a) RIVA (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 advother solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) beleach such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questionugh (g) separately for each marketer.  No Information Filed  TE FUND  tion About the <i>Private Fund</i> Name of the <i>private fund</i> :  JDPT FUND, L.P. <i>Private fund</i> identification number:  (include the "805-" prefix also)	Yes C isor or ow for	No <b>©</b>
A. PI	fee (a) RIVA (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 advother solicitor, or similar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) beleach such marketer the private fund uses. If the private fund uses more than one marketer you must complete questionugh (g) separately for each marketer.  No Information Filed  TE FUND  tion About the Private Fund  Name of the private fund:  JDPT FUND, L.P.  Private fund identification number:	Yes C isor or ow for	No <b>©</b>

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

	State: Delaware	Country: United States	
3.		er, Trustee, or Directors (or <i>persons</i> serving in a similar	capacity):
	Name of General Partner, Manager,	Trustee, or Director	
	JDPT MANAGER, LLC		
	(b) If filing an <i>umbrella registration</i> , ide fund.	entify the filing adviser and/or relying adviser(s) that sp	oonsor(s) or manage(s) this <i>private</i>
		No Information Filed	
4.	The private fund (check all that apply; y	ou must check at least one):	
	$\square$ (1) qualifies for the exclusion from t Act of 1940	he definition of investment company under section 3(c	)(1) of the Investment Company
	(2) qualifies for the exclusion from t Act of 1940	he definition of investment company under section 3(c	)(7) of the Investment Company
5.	List the name and country, in English, of	f each foreign financial regulatory authority with which	the <i>private fund</i> is registered.
		No Information Filed	
6.	(a) Is this a "master fund" in a master-	fooder arrangement?	Yes No
0.		recuer arrangement: e fund identification number (if any) of the feeder funds	C • investing in this private fund?
	(b) If yes, what is the name and private	No Information Filed	s investing in this private rand:
		No Illiottiladoli Flica	
			Yes No
	(c) Is this a "feeder fund" in a master-f	eeder arrangement?	0.0
	(d) If yes, what is the name and <i>private</i> Name of <i>private fund</i> :	e fund identification number (if any) of the master fund	in which this <i>private fund</i> invests?
	Private fund identification number: (include the "805-" prefix also)		
	-	r each master-feeder arrangement regardless of wheth arrangement or reporting on the funds separately.	er you are filing a single Schedule
7.	If you are filing a single Schedule D, Sec 7.B.(1), for each of the feeder funds ans	ction 7.B.(1) for a master-feeder arrangement accordin swer the following questions:	g to the instructions to this Section
		No Information Filed	
	substantially all of their assets in a singl	7, in a master-feeder arrangement, one or more funds e fund ("master fund"). A fund would also be a "feeder multiple classes (or series) of shares or interests, and a master fund.	fund" investing in a "master fund"
			Yes No
8.	(a) Is this <i>private fund</i> a "fund of funds	"?	<b>©</b> 0
		y, answer "yes" if the fund invests 10 percent or more oner they are also <i>private funds</i> or registered investmen	
	(b) If yes, does the private fund invest	in funds managed by you or by a related person?	0.0

		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.)?	O	•
10.	What type of fund is the <i>private fund</i> ?		
	$^{ m C}$ hedge fund $^{ m C}$ liquidity fund $^{ m C}$ private equity fund $^{ m C}$ real estate fund $^{ m C}$ securitized asset fund $^{ m C}$ venture capital of the private fund: 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> :		
	\$ 717,148,042		
<u>Ow</u>	<u>nership</u>		
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).	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>	ur Advisory Services		
		Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	•
	(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.	tuna.	11
	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	•
	(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 fund. If the answer to question 18.(a) is "no," leave this question blank.	orivate	9
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	•
	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> ?		

0%

**Prime Broker** 

<u>Priv</u>	vate Offering		
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?	Yes ©	O O
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-203229		
B. SE	ERVICE PROVIDERS		
Aud	<u>litors</u>		
		Yes	No No
23.	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	⊙	$\circ$
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	⊙	$\circ$
	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 auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ore the	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 responsible for the <i>private fund's</i> audit (city, state and country):  City: State: Country:  CLEVELAND Ohio United States		
		Yes	No
	(d) Is the auditing firm an independent public accountant?	•	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	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
		Var	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?	contai	n
	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 res when the report is available.	ponse	<b>.</b>

24. (a) Does the <i>private fund</i> use one or more prime brokers?	0	0
If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>priv</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.		
No Information Filed		
Custodian	Yes	No
25. (a) Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets?	0	•
If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for custodian.		
No Information Filed		
<u>Administrator</u>	Yes	No
26. (a) Does the <i>private fund</i> use an administrator other than your firm?	0	•
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more administrator, you must complete questions (b) through (f) separately for each administrator.	than oi	ne
No Information Filed		
27. During 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 administrator, that is not your <i>related person</i> ? 100% Include only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, incobtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distribution fee calculations (including allocations) was the valuation determined by such <i>person</i> .	_	and
<u>Marketers</u>	Yes	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?	0	•
You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advious other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete que through (g) separately for each marketer.	w for	(b)
No Information Filed		

A. PRIVATE FUND

# Information About the Private Fund

KKT, L.P.  Private fund identification number:  (include the "805-" prefix also)  805-1766052441   der the laws of what state or country is the private fund organized:  State:  Country: Guernsey  Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):  Interest General Partner, Manager, Trustee, or Director  TG GP, LLC  If filling an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.  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 Investment Company of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940  (3) the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.
der the laws of what state or country is the <i>private fund</i> organized:  State:  Country: Guernsey  Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): Inne of General Partner, Manager, Trustee, or Director  CT 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(s) this <i>private fund</i> .  No Information Filed  Perivate 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 of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
der the laws of what state or country is the <i>private fund</i> organized:  State:  Country: Guernsey  Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  In each General Partner, Manager, Trustee, or Director  CT 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(s) this <i>private fund</i> .  No Information Filed  Perivate 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 of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  The General Partner, Manager, Trustee, or Director  To 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(s) this <i>private fund</i> .  No Information Filed  Perivate 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 of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  The General Partner, Manager, Trustee, or Director  To 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(s) this <i>private fund</i> .  No Information Filed  Perivate 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 of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  Imme of General Partner, Manager, Trustee, or Director  (T 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(s) this <i>private fund</i> .  No Information Filed  Perivate 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 of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
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  Perivate 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 of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
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  Perivate 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 of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
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  e 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 of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
No Information Filed  Perivate 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 of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
e 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 of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
of 1940
t the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.
t the hame and country, in English, or each foreign inflation regulatory authority with which the private rand is registered.
No Information Filed
Yes No
Is this a "master fund" in a master-feeder arrangement?
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
Is this a "feeder fund" in a master-feeder arrangement?
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 Section B.(1), for each of the feeder funds answer the following questions:
No Information Filed

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx? RefNum=\&viewChanges=N\&FLNG\_PK=1735257$ 

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) invessubstantially all of its assets in a single master fund.	sts	
		Yes	No
8.	(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 purposes.	<b>⊙</b> oooled	0
	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> ?	_	_
	(b) If yes, does the private fund invest in funds managed by you of by a related person:	0	⊙
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the	C	·
	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 <i>private fund</i> ?		
	$^{ m C}$ hedge fund $^{ m C}$ liquidity fund $^{ m C}$ private equity fund $^{ m C}$ real estate fund $^{ m C}$ securitized asset fund $^{ m C}$ venture capital f Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	und (	⊚
	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> :		
	\$ 201,005,049		
<u>Ow</u>	<u>vnership</u>		
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 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%		
		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.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
	99%		
You	ur Advisory Services		
100	di Advisory Services	Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	•
	(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		
	No Illiothlation Filed	Vaa	N.
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>	Yes	
10.	fund?	0	•

	No Information Filed		
		Ye	s M
€.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
١.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?  0%		
iv	vate Offering		
		Ye	s I
	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?	•	
	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
SE	ERVICE PROVIDERS		
ıd	<u>litors</u>	Va	_
		Ye	5
	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	~	
	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?  (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," are the financial statements prepared in accordance with U.S. 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 auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	0	
3.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses me 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	0	
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	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more 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:  Country:  ST PETERS PORT  Guernsey	Yes	N. C
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. 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 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 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  (d) Is the auditing firm an <i>independent public accountant</i> ?	€ Yes €	No.

(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> unqualified opinions?	contair	1
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your result when the report is available.	sponse	
Prime	<u>Broker</u>	Yes	No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	0	•
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>priv</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.		
	No Information Filed		
Custod	lian_	Yes	No
25. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets?	0	⊙
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for custodian.		
	No Information Filed		
	Does the <i>private fund</i> 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 <i>private fund</i> uses more administrator, you must complete questions (b) through (f) separately for each administrator.	<b>Yes</b> C than o	•
	No Information Filed		
adı 100 Inc obt	ring 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 ministrator, that is not your <i>related person</i> ?  0%  clude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distribute calculations (including allocations) was the valuation determined by such <i>person</i> .		
Market	<u>ters</u>		
28. (a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	Yes	
_2. (d)	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal adviother solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) beloeach such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete que through (g) separately for each marketer.	w for	(b)

#### No Information Filed

		No Information Filed	
A. P	RIVAT	E FUND	
Info	ormat	tion About the Private Fund	
1.		Name of the <i>private fund</i> : KVT, L.P.	
	. ,	Private fund identification number: (include the "805-" prefix also) 805-4089633764	
2.	Unde	er the laws of what state or country is the <i>private fund</i> organized:	
		State: Country:	
		Delaware United States	
3.		Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	
	_	ne of General Partner, Manager, Trustee, or Director	
	KVT	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(s) this <i>priva</i>	эte
		No Information Filed	
4.	Tho	private fund (check all that apply; you must check at least one):	
٦.	V	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940	
		(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company 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.		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	No
		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>private fund</i> invest Name of <i>private fund</i> :	:s?
		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.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"?  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.
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?
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.)?
10.	What type of fund is the <i>private fund</i> ?
	C hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital fund € Other <i>private fund</i> : 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 <i>private fund</i> : \$ 30,822,017
<u>Ow</u>	<u>rnership</u>
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 amount set forth in the organizational documents of the fund).
13.	Approximate number of the <i>private fund's</i> beneficial owners:
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 4%
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> ?
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 96%
You	<u>ur Advisory Services</u> Yes No

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx? RefNum=\&viewChanges=N\&FLNG\_PK=1735257$ 

L7.	(a)	Are you a subadviser to this <i>private fund</i> ?	О	•
	(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 f</i> the answer to question 17.(a) is "no," leave this question blank.	fund	. If
		No Information Filed		
			Yes	s N
3.		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	6
		If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the $p$ fund. If the answer to question 18.(a) is "no," leave this question blank.	oriva	te
		No Information Filed		
			Yes	s N
	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	6
	NO7	TE: For purposes of this question, do not consider feeder funds of the private fund.		
	App 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
iv	ate	Offering .	Vac	s N
		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	•	C
	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
	itor:		Yes	s N
ο.	(a)	<ul><li>(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?  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.	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:		
		CLEVELAND Ohio United States		
		(d) Is the auditing firm an <i>independent public accountant</i> ?	es •	No C
			er -	
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0

**Marketers** 

	Oversight Board in accordance with its rules?	•	
		<b>N</b>	
(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?	res ⊙	O O
(h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i> unqualified opinions?	t contai	n
	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 r when the report is available.	esponse	e
<u>Prime l</u>	<u>Broker</u>		
24 (5)	Does the private fund use one or more prime brokens?	Yes	No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	0	(⊙
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the privates. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate prime broker.		
	No Information Filed		
<u>Custod</u> 25. (a)	Does the <i>private fund</i> 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 <i>privat</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately focustodian.	C re fund	s No ⊙
	No Information Filed		
Admini	No Information Filed  strator		
Admini		Yes	s No
	Strator  Does the <i>private fund</i> use an administrator other than your firm?	0	•
	strator	0	•
	strator  Does the <i>private fund</i> 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 <i>private fund</i> uses more	0	•

			Yes	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?	0	•
		You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisc other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete quest through (g) separately for each marketer.	for	b)
		No Information Filed		
		1 2 3 >> Funds per Page: 15 V Total Funds: 39		

# 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		
A.	Doy	you or any related person:	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 <i>clients</i> ?	$\odot$	0
	(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))?	0	•
Sale	es In	terest in <i>Client</i> Transactions		
В.	Do	you or any related person:	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)?	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?	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	•
Inv	estm	nent or Brokerage Discretion		
C.	Do y	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?	$\odot$	$\circ$
	(2)	amount of securities to be bought or sold for a <i>client's</i> account?	$\odot$	$\circ$
	(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?	•	0
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	•
E.	Doy	you or any related person recommend brokers or dealers to clients?	О	•
F.	If yo	ou answer "yes" to E. above, are any of the brokers or dealers <i>related persons</i> ?	0	0
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	•
	(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?	О	0
н.	(1)	Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	•	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)?	0	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 a you or any <i>related person</i> ) for <i>client</i> referrals?	0	•
	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 b t in part, on the number or amount of client referrals.		_

J/20,	5.157	-tivi	IARD - All decitors [eser Name, amay 126, Orgib. 100000]		
Iter	n 9 C	ustody			
			related person has custody of client (other than clients that are investment companies (0) assets and about your custodial practices.	egiste	ered
A.	(1)	Do you have <i>custody</i> of any adv	isory clients':	Yes	No
		(a) cash or bank accounts?		•	0
		(b) securities?		•	O
	dedi advi	uct your advisory fees directly fro isory services you provide to clien	ith 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 connectits, but you have overcome the presumption that you are not operationally independent $-2(d)(5)$ ) from the related person.		
	(2)	If you checked "yes" to Item 9.A clients for which you have custo	$\lambda(1)$ (a) or (b), what is the approximate amount of <i>client</i> funds and securities and total r $dy$ :	umbe	r of
		U.S. Dollar Amount	Total Number of <i>Clients</i>		
		(a) \$ 8,512,109,977	(b) 38		
	you! you!	r clients' accounts, do not include r related person has custody of cl nose assets and number of those	ith the SEC and you have custody solely because you deduct your advisory fees directly the amount of those assets and the number of those clients in your response to Item 9. ient 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	A.(2). e amo	unt
В.	(1)	In connection with advisory servadvisory clients':	rices you provide to <i>clients</i> , do any of your <i>related persons</i> have <i>custody</i> of any of your	Yes	No
		(a) cash or bank accounts?		$\odot$	$\circ$
		(b) securities?		$\odot$	О
	You	are required to answer this item	regardless of how you answered Item 9.A.(1)(a) or (b).		
	(2)	If you checked "yes" to Item 9.E clients for which your related pe	3.(1)(a) or (b), what is the approximate amount of <i>client</i> funds and securities and total rrsons have <i>custody</i> :	umbe	r of
		U.S. Dollar Amount	Total Number of <i>Clients</i>		
		(a) \$ 8,512,109,977	(b) 38		
C.	-	ou or your <i>related persons</i> have <i>c</i> tk all the following that apply:	ustody of client funds or securities in connection with advisory services you provide to cl	ients,	
	(1)	A qualified custodian(s) sends ac vehicle(s) you manage.	ccount statements at least quarterly to the investors in the pooled investment	V	
	(2)	An <i>independent public accountai</i> financial statements are distribu	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 accountai	nt conducts an annual surprise examination of client funds and securities.		
	(4)		nt prepares an internal control report with respect to custodial services when you or dustodians for <i>client</i> funds and securities.		
	or e Sect	xamination or prepare an interna	C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the 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	in in	
D.		you or your related person(s) act lients?	as qualified custodians for your <i>clients</i> in connection with advisory services you provide	Yes	No
	(1)	you act as a qualified custodian		0	•
	(2)	your related person(s) act as qu	alified custodian(s)	0	0

 $\circ$ 

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*?

  6

# 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

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

 $\circ$ 

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:

**AON PLC** 

(2) The public reporting company's CIK number (Central Index Key number that the SEC assigns to each reporting company):

315293

#### **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 <i>supervised persons</i> ?	0	⊙
For	"yes" answers to the following questions, complete a Criminal Action DRP:		
۹.	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 felony?	$\circ$	$\odot$
	(2) been <i>charged</i> with any <i>felony</i> ?	О	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your reto Item 11.A.(2) to charges that are currently pending.	espor	ise
3.	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 <i>misdemeanor</i> involving: investments or an <i>investment-related</i> 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	•
	(2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)?	О	$\odot$
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your reto Item 11.B.(2) to charges that are currently pending.	espor	ise
For	"yes" answers to the following questions, complete a Regulatory Action DRP:		
С.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	No
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	•
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	0	•
	(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?	O	•
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	0	•
	(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	•
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	0	$\odot$
	unethical?		
	<ul><li>unethical?</li><li>(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?</li></ul>	0	•

(4) in the past ten years, entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with an <i>investment-related</i> activity?									
	(5)	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?	0	•					
E.	Has	any self-regulatory organization or commodities exchange ever:							
	(1)	found you or any advisory affiliate to have made a false statement or omission?	0	•					
	(2)	found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	0	•					
	(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?	O	•					
	(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?	0	•					
F.		an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever n revoked or suspended?	0	•					
G.		you or any <i>advisory affiliate</i> now the subject of any regulatory <i>proceeding</i> that could result in a "yes" answer to any part em 11.C., 11.D., or 11.E.?	0	•					
For	"yes'	answers to the following questions, complete a Civil Judicial Action DRP:							
н.	(1)	Has any domestic or foreign court:	Yes	No					
		(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	0	$\odot$					
		(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?	O	•					
		(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> ?	O	•					
		,							

#### **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*.

		Yes	No	
A.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	0	$\circ$	
If "yes," you do not need to answer Items 12.B. and 12.C.				
В.	Do you:			
	(1) control another investment adviser that had regulatory assets under management (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 fiscal year?	O	О	
	(2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	О	
C.	Are you:			
	(1) controlled by or under common control with another investment adviser that had regulatory assets under management (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 fiscal year?	0	О	
	(2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	О	

#### 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	DE/FE/I	Title or Status	Date Title or	Ownership	Control	PR	CRD No. If None: S.S. No.
(Individuals: Last Name, First Name, Middle Name)			Status Acquired MM/YYYY	Code	Person		and Date of Birth, IRS Tax 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	Υ	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)		Entity in Which Interest is Owned	Status	Date Status Acquired MM/YYYY	Ownership Code	Control Person	PR	CRD 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	Е	Υ	N	22-2232264
AON PLC	FE	AON US INTERNATIONAL HOLDINGS LIMITED	OWNER	08/1986	Е	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	N	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	Е	Υ	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, 2022 VALUATIONS. TOWNSEND HAS CALCULATED ITS RESPONSE TO ITEM 7.B. USING SEPTEMBER 30, 2022 VALUATIONS. IF FIGURES CHANGE MATERIALLY FROM SEPTEMBER 30, 2022 TO DECEMBER 31, 2022, 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 ACQUIRE 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.

Schedule R
No Information Filed

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)
N. 7.C. seeks Filed
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.

Yes No

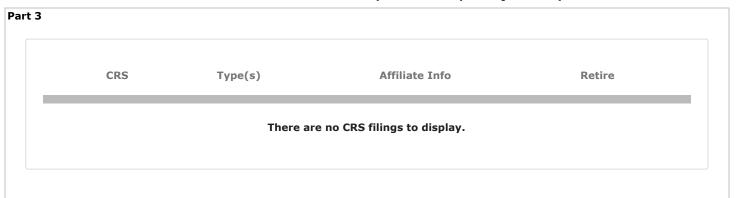
Are you exempt from delivering a brochure to all of your clients under these rules?

 $\circ$ 

If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	<b>Brochure Name</b>	Brochure Type(s)
373945	2022 TOWNSEND ADV PART II	Pension plans/profit sharing plans, Pension consulting, Foundations/charities, Government/municipal, Other institutional, Private funds or pools, Selection of Other Advisers/Solicitors
381543	2023 TOWNSEND ADV PART II	Pension plans/profit sharing plans, Foundations/charities, Government/municipal, Other institutional, Private funds or pools, Selection of Other Advisers/Solicitors



#### **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: Date: MM/DD/YYYY

AIMEE MAY 03/30/2023

Printed Name: Title:

AIMEE MAY CHIEF COMPLIANCE OFFICER

Adviser CRD Number:

160006

### **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.

# 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: Date: MM/DD/YYYY

Printed Name: Title:

Adviser CRD Number:

160006

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