# **FORM ADV**

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

Primary Business Name: TOWNSEND HOLDINGS LLC Other-Than-Annual Amendment - All Sections

5/30/2023 1:55:44 PM

CRD Number: 160006 Rev. 10/2021

WARNING: Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4. Item 1 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 (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 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** ZIP+4/Postal Code: Citv: State: Country: CLEVELAND **United States** Ohio 44113 If this address is a private residence, check this box: List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct

investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities,

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.

	completed fiscal year	G.							
	(2) Days of week that yo	ou normally conduct b	usiness at your <i>principal office</i>	and place of business:					
	<b>⊙</b> Monday - Friday C Other:								
	Normal business hours at this location:								
	8:30 AM - 5:30 PM (3) Telephone number at	t this location:							
	216-781-9090								
	(4) Facsimile number at 216-781-1407	this location, if any:							
		nber of offices, other t	han your <i>principal office and p</i>	place of business, at which you conduct invest	tment				
		of the end of your mo	ost recently completed fiscal y	ear?					
	5								
G.	Mailing address, if differe	nt from your <i>principal</i>	office and place of business a	ddress:					
	Number and Street 1:		Number and Street	t 2:					
	City:	State:	Country:	ZIP+4/Postal Code:					
	If this address is a prival	to residence, check th	is hov:						
	II tills address is a privat	e residence, check thi	is box.						
Н.	If you are a sole proprieto	or, state your full resid	lence address, if different fron	n your <i>principal office and place of business</i> a	ddress in				
	Item 1.F.:	,	,						
	Number and Street 1:		Number and Stree	t 2:					
	City:	State:	Country:	ZIP+4/Postal Code:					
					Yes No				
I.	Do you have one or more Twitter, Facebook and Lin		on publicly available social m	edia platforms (including, but not limited to,	⊙ ೧				
	If "ves " list all firm webs	ite addresses and the	address for each of the firm's	accounts on publicly available social media pl	latforms on				
				hich to access other information you have put					
				information. You may need to list more than					
		address. Do not provide the addresses of websites or accounts on publicly available social media platforms where you do not control the content. Do not provide the individual electronic mail (e-mail) addresses of employees or the addresses of employee accounts on							
	publicly available social m		rome man (e man) adaresees						
J.	Chief Compliance Officer								
				er. If you are an <i>exempt reporting adviser</i> , yo e one. If not, you must complete Item 1.K. be					
	Name:	, , , , , , , , , , , , , , , , , , , ,	Other titles, if any:						
	AIMEE B. MAY		CHIEF COMPLIANCE OF	FICER					
	Telephone number:		Facsimile number, if any	y:					
	2164304690		216-781-1407						
	Number and Street 1: 950 MAIN AVENUE		Number and Street 2: SUITE 1600						
	City:	State:	Country:	ZIP+4/Postal Code:					
	CLEVELAND	Ohio	United States	44113					
	Electronic mail (e-mail) a	address, if Chief Comr	liance Officer has one:						
	AIMEE.MAY@AON.COM	,							
				son other than you, a related person or an inv					
			lpany Act of 1940 that you additional design and the second section Number (if any):	vise for providing chief compliance officer serv	rices to you,				
	Name:	F 1, 21 2							
	IRS Employer Identification	on Number:							

K.		Person: If a person other than the s Form ADV, you may provide that		authorize	ed to receive information	and	
	Name: NATALIE DONOHUE BOESKEN		Titles: COMPLIANCE ASSOCIATE				
	Telephone number: 216-4304726	1	Facsimile number, if any:				
	Number and Street 1: 950 MAIN AVENUE	1	Number and Street 2: SUITE 1600				
	City: CLEVELAND		Country: Jnited States	ZIP+4/P 44113	Postal Code:		
	Electronic mail (e-mail) addre	•					
	Da von maintain anns an all a	C + h - h l	and the least warden Castin	204 -f	the Advisor Ast on	Yes	No
L.		f the books and records you are nother than your <i>principal office an</i>		)II 204 OI	the Advisers Act, or	•	0
	If "yes," complete Section 1.L.	of Schedule D.				Yes	No
М.	Are you registered with a forei	ign financial regulatory authority?				0	•
		istered with a foreign financial reg thority. If "yes," complete Section		ou have a	n affiliate that is register	ed wit	th a
	A constant the constant of	12 . 15(4)	of the Constitute Englished	N - 1 - C 1 O 3	143	Yes	No
N.	Are you a public reporting com	pany under Sections 12 or 15(d)	of the Securities Exchange A	Act of 193	34?	0	⊙
	Did have \$1 billion on many	- :t th- last day of				Yes	
0.	If yes, what is the approximate	e in assets on the last day of you e amount of your assets:	r most recent fiscal 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 ass al assets shown on the balance sh	•	_		eterm	nine
P.	Provide your Legal Entity Iden	tifier if you have one:					
	A legal entity identifier is a uni legal entity identifier.	que number that companies use	to identify each other in the	financial ı	marketplace. You may no	ot hav	e a
SEC	TION 1.B. Other Business Na						
JEC	TION 1.B. Other business Na						
	your other business names and the business name.	d the jurisdictions in which you us	e them. You must complete	a separat	e Schedule D Section 1.	В. for	
Nar	me: THE TOWNSEND GROUP						
Jur	isdictions						
_	AL	<b>☑</b> IL	<b>☑</b> NE		<b>☑</b> SC		
	AK	<b>☑</b> IN	<b>☑</b> NV		<b>☑</b> SD		
V	AZ	<b>☑</b> IA	<b>☑</b> NH		<b>☑</b> TN		

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)  $\square$  (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). Number and Street 2: Number and Street 1: https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG\_PK=1765820 4/163

TWO EXCHANGE SQUARE		SUITE 2903; 29TH FLO	OOR
City: CENTRAL	State:	Country: Hong Kong	ZIP+4/Postal Code:
If this address is a private residence, check the	nis box: 🗖		
Telephone Number: +852-3468-5900	Facsimile Numl +852-9022-06	•	
			uthority as a branch office location for a broker, please provide the <i>CRD</i> Branch Number here:
How many <i>employees</i> perform investment ad 9	visory functions fro	om this office location?	
Are other business activities conducted at this \( \bigcirc (1)\) Broker-dealer (registered or unregistered (2) Bank (including a separately identifiable \( \bigcirc (3)\) Insurance broker or agent \( \bigcirc (4)\) Commodity pool operator or commodity	ed) e department or di	vision of a bank)	xempt from registration)
$\square$ (5) Registered municipal advisor $\square$ (6) Accountant or accounting firm			
$\square$ (7) Lawyer or law firm			
Describe any other investment-related busine	ess activities condu	cted from this office loc	ation:
advisory business. You must complete a sepa	rate Schedule D Se	ection 1.F. for each locat	place of business, at which you conduct investment cion. If you are applying for SEC registration, if you a largest twenty-five offices (in terms of numbers of
Number and Street 1: 425 MARKET STREET		Number and Street 2 SUITE 2800	:
,	State: California	Country: United States	ZIP+4/Postal Code: 94105
If this address is a private residence, check the	nis box:		
Telephone Number: I	Facsimile Number,	if any:	
· -			uthority as a branch office location for a broker, please provide the <i>CRD</i> Branch Number here:
How many <i>employees</i> perform investment ad 10	visory functions fro	om this office location?	
Are other business activities conducted at this \( \bigcap \) (1) Broker-dealer (registered or unregistered \( \bigcap \) (2) Bank (including a separately identifiable)	ed)		
$\square$ (3) Insurance broker or agent			
☐ (4) Commodity pool operator or commodity ☐ (5) Registered municipal advisor	y trading advisor (\	vhether registered or ex	xempt from registration)

$\square$ (6) Accountant or accounting firm						
$\square$ (7) Lawyer or law firm						
Describe any other <i>investment-related</i> business activities conducted from this office location:						
advisory business. You must complete a separa	ate Schedule D S	ection 1.F. for each lo	d place of business, at which you conduct investment cation. If you are applying for SEC registration, if you the largest twenty-five offices (in terms of numbers of			
Number and Street 1: 200 E RANDOLPH	I	Number and Street 2:				
,		Country: United States	ZIP+4/Postal Code: 60601			
If this address is a private residence, check this	s box: □					
Telephone Number: 13123810350	Facsimile Numbe	er, if any:				
			authority as a branch office location for a broker- R), please provide the <i>CRD</i> Branch Number here:			
How many <i>employees</i> perform investment advi	isory 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 investment-related business activities conducted from this office location:						
advisory business. You must complete a separa	ate Schedule D S	ection 1.F. for each lo	d place of business, at which you conduct investment cation. If you are applying for SEC registration, if you the largest twenty-five offices (in terms of numbers of			
Number and Street 1: 20 BAY STREET		Number and Stre	et 2:			
City: TORONTO	State:	Country: Canada	ZIP+4/Postal Code: M5J 2N9			
If this address is a private residence, check this	s box: □					
Telephone Number: +14162275684	Facsimile Nu	mber, if any:				

			s authority as a branch office location for a broker-BR), please provide the <i>CRD</i> Branch Number here:					
How many <i>employees</i> perform investment ad 1	visory functions	from this office locatio	n?					
Are other business activities conducted at this		(check all that apply)						
$\square$ (1) Broker-dealer (registered or unregister								
(2) Bank (including a separately identifiable	e department or	division of a bank)						
(3) Insurance broker or agent	, tunding advise.	- (b.atb.au magistamad a	u avanat from vacietystica)					
(4) Commodity pool operator or commodity	(4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)							
(6) Accountant or accounting firm								
(7) Lawyer or law firm								
Describe any other investment-related busine	ess activities con	ducted from this office	location:					
SECTION 1.I. Website Addresses								
SECTION 1.1. Website Addresses								
	ok and/or Linked		ocial media platforms where you control the content e a separate Schedule D Section 1.I. for each website					
Address of Website/Account on Publicly Availa	able Social Media	a Platform: HTTP://W	WW.TOWNSENDGROUP.COM					
Address of Website/Account on Publicly Availa	ıble Social Media	a Platform: https://w	ww.linkedin.com/company/the-townsend-group/about/					
SECTION 1.L. Location of Books and Recor	ds							
Complete the following information for each lo of business. You must complete a separate So			and records, other than your <i>principal office and place</i> n.					
Name of entity where books and records are I ACCESS RECORDS MANAGEMENT	kept:							
Number and Street 1: ONE ANDREWS CIRCLE		Number and Street	2:					
City:	State:	Country:	ZIP+4/Postal Code:					
BRECKSVILLE	Ohio	United States	44141					
If this address is a private residence, check th	nis box:							
Telephone Number: 440-838-8611	Facsimile num	ber, if any:						
This is (check one):								
O one of your branch offices or affiliates.								
a third-party unaffiliated recordkeeper.								
O other.								
~ outer.								
Briefly describe the books and records kept at	t this location.							

SOME COMPANY RECORDS ARE MAINTAIN	NED AT THIS SE	CURE OFFSITE STORAGE FACILIT	Υ.	
Name of entity where books and records TOWNSEND GROUP ASIA LTD.	are kept:			
Number and Street 1: TWO EXCHANGE SQUARE		Number and Street 2: STE 2903; 29TH FLOOF	8	
City:	State:	Country:	ZIP+4/Postal Code:	
CENTRAL		Hong Kong		
If this address is a private residence, chec	ck this box:			
Telephone Number: +852-3468-5900		e number, if any: 022-0620		
This is (check one):				
$oldsymbol{\circ}$ one of your branch offices or affiliates				
C a third-party unaffiliated recordkeeper	r.			
C other.				
Briefly describe the books and records ke SOME INFORMATION RELATED TO INVEST				
Name of entity where books and records TOWNSEND HOLDINGS LLC	are kept:			
Number and Street 1: 425 MARKET STREET		Number and Street 2: SUITE 2800		
City: SAN FRANCISCO	State: California	Country: United States	ZIP+4/Postal Code: 94105	
If this address is a private residence, chec	ck this box:			
Telephone Number: 415-321-7156	Facsimile n	umber, if any:		
This is (check one):				
• one of your branch offices or affiliates				
C a third-party unaffiliated recordkeeper	r.			
C other.				
Briefly describe the books and records ke SOME INFORMATION RELATED TO INVEST			OF THIS OFFICE.	
Name of entity where books and records TOWNSEND GROUP EUROPE LTD.	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	

If this address is a private residence, check t	this box:		
Telephone Number: +207-495-7784	Facsimile number +207-317-0559	r, if any:	
This is (check one):			
<ul><li>one of your branch offices or affiliates.</li><li>a third-party unaffiliated recordkeeper.</li></ul>			
o other.			
outer.			
Briefly describe the books and records kept a SOME INFORMATION RELATED TO INVESTME		NDUCTED IN THIS OFFICE.	
Name of entity where books and records are PROOFPOINT, INC	kept:		
Number and Street 1: 892 ROSS DRIVE		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
SUNNYVALE	California	United States	94089
If this address is a private residence, check t	this box:		
Telephone Number: 408-517-4710	Facsimile number	r, 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 kept a EMAIL RETENTION	at this location.		
Name of entity where books and records are AON CHICAGO OFFICE	kept:		
Number and Street 1: 200 EAST RANDOLPH		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
CHICAGO	Illinois	United States	60601
If this address is a private residence, check t	this box:		
Telephone Number: 13123810350	Facsimile numb	er, if any:	
This is (check one):			
• one of your branch offices or affiliates.			

O a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept a SOME INFORMATION RELATED TO INVESTME		NDUCTED IN THIS O	FFICE.	
Name of entity where books and records are AON CANADA OFFICE	kept:			
Number and Street 1: 20 BAY STREET		Number and St	reet 2:	
City: TORONTO	State:	Country: Canada	ZIP+4/Postal Code: M5J 2N9	
If this address is a private residence, check t	this box:			
Telephone Number: +14162275684	Facsimile nu	mber, if any:		
This is (check one):				
$oldsymbol{\circ}$ one of your branch offices or affiliates.				
C a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept a SOME INFORMATION RELATED TO INVESTME Name of entity where books and records are GLOBAL RELAY	ENT RESEARCH CC	NDUCTED IN THIS O	FFICE.	
Number and Street 1: 22 CAMBIE STREET		Number and St	reet 2:	
City: VANCOUVER	State:	Country: Canada	ZIP+4/Postal Code: V68 2M9	
If this address is a private residence, check t	this box:			
Telephone Number: 866-484-6630	Facsimile nu	ımber, if any:		
This is (check one):				
${f C}$ one of your branch offices or affiliates.				
<ul><li>a third-party unaffiliated recordkeeper.</li></ul>				
C other.				
Briefly describe the books and records kept a EMAIL AND INSTANT MESSAGING RETENTION				

# 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

A.	To register (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 submitting an <i>annual updating amendment</i> to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you may affirmatively respond to each of these items.										
	You (the adviser):										
	V	(1)	are a large advisory firm that either:								
			(a) has regulatory assets under management of \$100 million (in U.S. dollars) or more; or								
			(b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent 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 <i>state securities authority</i> of the state where you maintain your <i>principal office and place of business</i> ; or								
			(b) not subject to examination by the <i>state securities authority</i> of the state where you maintain your <i>principal office and place of business</i> ;								
			Click <b>HERE</b> for a list of states in which an investment adviser, if registered, would not be subject to examination by 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 <b>Internet adviser</b> 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	to Si	· curit	ies Authority Notice Filings and State Penorting by Evemnt Penorting Advisers								

# State Securities 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

□ AL	□ IL	□ NE	□ sc
□ AK	□ IN	□ NV	□ SD
□ AZ	□ IA	□ NH	□ TN
□ AR	□ ks	□ NJ	□ тx
□ CA	□ KY	□ NM	□ шт
□ со	□ LA	□ NY	□ VT
□ ст	□ ме	□ NC	□ VI
□ DE	□ MD	□ ND	□ VA
□ DC	□ ма	□ он	□ wa
□ FL	□ мі	□ ок	□ wv
□ GA	□ MN	□ OR	∥ □ wɪ
□ GU	□ MS	□ PA	□ wy
□ ні	□ мо	□ PR	
□ ID	□ мт	□ RI	
	and Advisor		
e as that of the registere e of Registered Investm  Number of Registered In  Number of Registered In	nvestment Adviser		
e of Registered Investm	nvestment Adviser		
e of Registered Investm Number of Registered In Number of Registered In	nvestment Adviser nvestment Adviser	Eligible for Commission Regist	ration within 120 Days
Number of Registered Investment of Registered In Number of Registered In Number of Registered In Number of Registered In Investment of Registered In Investment of Registered Investment of Registered Investment of Registered Investment of Registered Investment Investment of Registered Investment I	nvestment Adviser  nvestment Adviser  ent Adviser Expecting to be  3A-2(c), the exemption from t  20 days, you are required to n  xes, you will be deemed to hav  quired to be registered with th	he prohibition on registration avail nake certain representations about we made the required representation e SEC or a state securities authori	able to an adviser that expects to be eligible your eligibility for SEC registration. By ons. You must make both of these  ty and I have a reasonable expectation that I
e of Registered Investment of Registered In Number of Registered In Number of Registered In Number of Registered In Investment of Registered In Investment of Registered In	nvestment Adviser  nvestment Adviser  ent Adviser Expecting to be 3A-2(c), the exemption from to 20 days, you are required to not exes, you will be deemed to have quired to be registered with the the with the SEC within 120 days from SEC registration if, on the	he prohibition on registration avail nake certain representations about we made the required representation e SEC or a state securities authori- after the date my registration with	able to an adviser that expects to be eligible your eligibility for SEC registration. By ons. You must make both of these  ty and I have a reasonable expectation that I
Number of Registered Investment of Registered	nvestment Adviser  nvestment Adviser  ent Adviser Expecting to be  3A-2(c), the exemption from to 20 days, you are required to no exes, you will be deemed to have  quired to be registered with the with the SEC within 120 days	he prohibition on registration avail nake certain representations about we made the required representation e SEC or a state securities authori- after the date my registration with	able to an adviser that expects to be eligible to your eligibility for SEC registration. By ons. You must make both of these  ty and I have a reasonable expectation that In the SEC becomes effective.
Number of Registered Investment Investment of Registered Investment Investmen	nvestment Adviser  nvestment Adviser  ent Adviser Expecting to be 3A-2(c), the exemption from to 20 days, you are required to not exes, you will be deemed to have quired to be registered with the the with the SEC within 120 days from SEC registration if, on the	he prohibition on registration avail nake certain representations about we made the required representation e SEC or a state securities authori- after the date my registration with	able to an adviser that expects to be eligible to your eligibility for SEC registration. By ons. You must make both of these  ty and I have a reasonable expectation that in the SEC becomes effective.

required representations.

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

 $\Box$  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)
  - 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.

  122
- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
  82
  - (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?
    0

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?
  54
  - (2) Approximately what percentage of your *clients* are non-*United States persons*? 57%
- 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	1 [	\$ 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	V	\$ 100,753,487
(i) State or municipal <i>government entities</i> (including government pension plans)	4	ᅜ	\$ 2,156,452,738
(j) Other investment advisers	0		\$ 0
(k) Insurance companies	1	V	\$ 218,151,227
(I) Sovereign wealth funds and foreign official institutions	3	V	\$ 3,669,244,159
(m) Corporations or other businesses not listed above	0		\$ 0
(n) Other:	0		\$ 0

**Regulatory Assets Under Management** 

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

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

Yes No ⊙ ⊜

- 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.
---	--------

_				
	(1)	Financial	planning	services
	( ± /	i iiiaiiciai	piuriirig	JCI VICCS

(2)	Portfolio	manage	ement fo	r individuals	and/or	small	businesses

	<ul> <li>□ (3) Portfolio management for investment companies (as well as "business development companies" that have man 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 <i>clients</i> (other than register investment companies and other pooled investment vehicles)</li> <li>□ (6) Pension consulting services</li> <li>□ (7) Selection of other advisers (including <i>private fund</i> managers)</li> <li>□ (8) Publication of periodicals or newsletters</li> <li>□ (9) Security ratings or pricing services</li> <li>□ (10) Market timing services</li> <li>□ (11) Educational seminars/workshops</li> <li>□ (12) Other(specify):</li> <li>Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an invest company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), red</li> </ul>	ed ment	e 81	11
	or 814 number of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Sc	hedule I	D.	
н.	If you provide financial planning services, to how many <i>clients</i> did you provide these services during your last fiscal year?  O  1 - 10  11 - 25  26 - 50  51 - 100  101 - 250  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 advisory relationship with those investors.		nrat	tte
		Yes	s N	No
I.	(1) Do you participate in a wrap fee program?	0	(	•
	(2) If you participate in a <i>wrap fee program</i> , what is the amount of your regulatory assets under management attributables:	e to act	ing	
	(a) sponsor to a wrap fee program \$			
	(b) portfolio manager for a wrap fee program?			
	(c) <i>sponsor</i> to and portfolio manager for the same <i>wrap fee program</i> ?  \$			
	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 informables $Section \ 5.I.(2)$ of Schedule D.	ation in		
	If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a fund that is offered through a wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.	(2).		
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	Yes t ⊙	-	No C
	to limited types of investments? (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 compute your regulatory assets under management?	to O	(	0
K.	Separately Managed Account <i>Clients</i>			

	Yes	Nο
(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> )?	•	0
If yes, complete Section 5.K.(1) of Schedule D.		
(2) Do you engage in borrowing transactions on behalf of any of the separately managed account <i>clients</i> that you advise?	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.		
 Marketing Activities		
(1) Do any of your advertisements include:	Yes	No
(a) Performance results?	•	o
(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	_

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.

(a)	Asse	t 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)	(iv) U.S. State and Local Bonds		0 %
	(v)	Sovereign Bonds	0 %	0 %
	(vi)	Investment Grade Corporate Bonds	0 %	0 %
	(vii)	Non-Investment Grade Corporate Bonds	0 %	0 %
	(viii)	Derivatives	0 %	0 %
	(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	0 %	0 %
	(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)		100 %	100 %
	(xi)	Cash and Cash Equivalents	0 %	0 %
	(xii)	Other	0 %	0 %

Generally describe any assets included in "Other"

(b)	Asse	t Type	End of					
			year					
	(i)	Exchange-Traded Equity Securities	%					
	(ii)	ii) Non Exchange-Traded Equity Securities						
	(iii)	iii) U.S. Government/Agency Bonds						
	(iv)	iv) U.S. State and Local Bonds						
	(v)	(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) Derivativ	ve Exposure	s	
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative		(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$	\$	%	%	%	%	%	%
10-149%	\$	\$	%	%	%	%	%	%
150% or more	\$	\$	%	%	%	%	%	%

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

# (ii) End of Year

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

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

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

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

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

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

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

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

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

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

Complete a separate Schedule D Section 5.K.(3) for each custodian that holds ten percent or more of your aggregate separately manage	jed
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
- (a) Legal name of custodian:

BANK OF NEW YORK MELLON

(d) Is the custodian a related person of your firm?  (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?  \$ 3,740,664,438   (a) Legal name of custodian:  JP MORGAN CHASE  (b) Primary business name of custodian:  JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City:  State:  Country:  NEW YORK  New York  United States  Yes N  (d) Is the custodian a related person of your firm?	// <b>Z</b> J,	1.50 1 101	IAI OCCIO	is [escrivanc. analy 125, Orgib. 100000]	
(c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City: State: Country: EVERETT Massachusetts United States  Yes M  (d) Is the custodian a related person of your firm?  (e) If the custodian is a broker-dealer, provide its SEC registration number (if any)	(b)	Primary business name of custodi	ian:		
City: State: Country: EVERETT Massachusetts United States  Yes M  (d) Is the custodian a related person of your firm?  (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?  \$ 3,740,664,438   (a) Legal name of custodian: JP MORGAN CHASE  (b) Primary business name of custodian: JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets: City: State: Country: NEW YORK New York United States  Yes M  (d) Is the custodian a related person of your firm?  (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?		BANK OF NEW YORK MELLON			
Yes M  (d) Is the custodian a related person of your firm?  (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?  \$ 3,740,664,438   (a) Legal name of custodian:  JP MORGAN CHASE  (b) Primary business name of custodian:  JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City:  State:  Country:  NEW YORK  New York  United States  Yes M  (d) Is 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?	(c)	The location(s) of the custodian's	office(s) responsible for custod	dy of the assets :	
Yes N  (d) Is the custodian a related person of your firm?  (e) If the custodian is a broker-dealer, provide its SEC registration number (if any)		City:	State:	Country:	
(d) Is the custodian a related person of your firm?  (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?  § 3,740,664,438  (a) Legal name of custodian:  JP MORGAN CHASE  (b) Primary business name of custodian:  JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City:  State:  Country:  NEW YORK  New York  United States  Yes N  (d) Is the custodian a related person of your firm?  (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?		EVERETT	Massachusetts	United States	
(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?  \$ 3,740,664,438  (a) Legal name of custodian:  JP MORGAN CHASE  (b) Primary business name of custodian:  JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City:  State:  Country:  New York  New York  United States  Yes N  (d) Is the custodian a related person of your firm?  (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?				Yes No	
-  (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? \$ 3,740,664,438  (a) Legal name of custodian:  JP MORGAN CHASE  (b) Primary business name of custodian:  JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City:  NEW YORK  New York  United States  Yes Now York  (d) Is the custodian a related person of your firm?  (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?	(d)	Is the custodian a related person	of your firm?	○ ●	
identifier (if any)  (g) What amount of your regulatory assets under management attributable 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 custodian: JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets: City: NEW YORK  New York  United States  Yes N  (d) Is the custodian a related person of your firm?  (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?	(e)	If the custodian is a broker-deale	r, provide its SEC registration n	umber (if any)	
\$ 3,740,664,438  (a) Legal name of custodian: JP MORGAN CHASE  (b) Primary business name of custodian: JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets: City: NEW YORK  New York  Country: NEW YORK  New York  United States  Yes N  (d) Is the custodian a related person of your firm?  (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?	(f)		ealer, or is a broker-dealer but	does not have an SEC registration number, provide its legal entity	
(a) Legal name of custodian:  JP MORGAN CHASE  (b) Primary business name of custodian:  JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City:  State:  Country:  NEW YORK  New York  United States  Yes N  (d) Is the custodian a related person of your firm?  (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?	(g)	What amount of your regulatory a	assets under management attri	butable to separately managed accounts is held at the custodian?	
JP MORGAN CHASE  (b) Primary business name of custodian:  JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City: NEW YORK  New York  Country: United States  Yes N  (d) Is the custodian a related person of your firm?  (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?		\$ 3,740,664,438			
JP MORGAN CHASE  (b) Primary business name of custodian:  JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City: NEW YORK  New York  Country: United States  Yes N  (d) Is the custodian a related person of your firm?  (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?					
JP MORGAN CHASE  (b) Primary business name of custodian:  JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City: NEW YORK  New York  Country: United States  Yes N  (d) Is the custodian a related person of your firm?  (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?					
(b) Primary business name of custodian:  JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City: NEW YORK  New York  Country: United States  Yes N  (d) Is the custodian a related person of your firm?  (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?	(a)	Legal name of custodian:			
JP MORGAN CHASE  (c) The location(s) of the custodian's office(s) responsible for custody of the assets:  City: NEW YORK  New York  United States  Yes N  (d) Is the custodian a related person of your firm?  (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?		JP MORGAN CHASE			
(c) The location(s) of the custodian's office(s) responsible for <i>custody</i> of the assets:  City: NEW YORK  New York  United States  Yes N  (d) Is the custodian a <i>related person</i> of your firm?  (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 identifier</i> (if any)  (g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?	(b)	Primary business name of custodi	ian:		
City: NEW YORK New York United States  Yes N  (d) Is the custodian a related person of your firm?  (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?		JP MORGAN CHASE			
NEW YORK  New York  United States  Yes N  (d) Is the custodian a related person of your firm?  (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?	(c)	The location(s) of the custodian's	office(s) responsible for custod	dy of the assets :	
Yes N  (d) Is the custodian a related person of your firm?  (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?		City:	State:	Country:	
<ul> <li>(d) Is the custodian a related person of your firm?</li> <li>(e) If the custodian is a broker-dealer, provide its SEC registration number (if any) </li> <li>(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)</li> <li>(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?</li> </ul>		NEW YORK	New York	United States	
<ul> <li>(e) If the custodian is a broker-dealer, provide its SEC registration number (if any)         <ul> <li>(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 identifier</i> (if any)</li> </ul> </li> <li>(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?</li> </ul>				Yes No	
<ul> <li>(e) If the custodian is a broker-dealer, provide its SEC registration number (if any)         <ul> <li>(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 identifier</i> (if any)</li> </ul> </li> <li>(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?</li> </ul>	(d)	Is the custodian a related person	of your firm?	0.0	
<ul> <li>(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 identifier</i> (if any)</li> <li>(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?</li> </ul>	(e)	If the custodian is a broker-deale	r, provide its SEC registration n		
<ul><li>identifier (if any)</li><li>(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?</li></ul>		-			
	(f)		ealer, or is a broker-dealer but	does not have an SEC registration number, provide its legal entity	
	(g)		assets under management attri	butable to separately managed accounts is held at the custodian?	

0/20,	1.501	IAIN - All decitions [036] Marie: array 123, Orgib. 100000]		
Iten	n 6 O	Other Business Activities		
In t	his Ite	em, we request information about your firm's other business activities.		
A.	If ye	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):	<b>te</b> Section	
	6.A.	of Schedule D.		
В.	(1)	Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?	Yes	
Б.	(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 contained name, provide that name.	C different	0
			Yes	No
	(3)	Do you sell products or provide services other than investment advice to your advisory clients?	0	$\odot$
		If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a contained name, provide that name.	different	
SEC	TION	6.A. Names of Your Other Businesses		
		No Information Filed		
SEC	TION	l 6.B.(2) Description of Primary Business		
Des	cribe	your primary business (not your investment advisory business):		
If y	ou en	ngage 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 v	ou en	ngage 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
- $\square$  (11) lawyer or law firm
- ☐ (12) insurance company or agency
- (13) pension consultant
- (14) real estate broker or dealer
- $\square$  (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) (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 sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)		⁄es	No
6.	Do y	and control or are you controlled by the related paragraph		0
7.	Are y	you and the related person under common control?	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 as registered with the CEC and you have answered these the greation Q (a) shows 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: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: $\square$		
			⁄es	No
9.	` ,		O	О
	(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>relati person</i> is registered.	ted	
	_	No Information Filed		
11.	ро у	ou and the <i>related person</i> share any <i>supervised persons</i> ?	⊚	О
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	О
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.	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) Doroker-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>			
	<ul><li>(d) ☐ registered security-based swap dealer</li><li>(e) ☐ major security-based swap participant</li></ul>			
	<ul> <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> </ul>			
	<ul><li>(h) □ banking or thrift institution</li><li>(i) □ trust company</li></ul>			
	<ul><li>(i) ☐ trust company</li><li>(j) ☐ accountant or accounting firm</li></ul>			
	(k) lawyer or law firm			
	(I) ☐ 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) $oldsymbol{ abla}$ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles			
6.	Do you control or are you controlled by the related person?		s No	
0.	Do you control of the you controlled by the related person:	•	9 0	1
7.	Are you and the <i>related person</i> under common <i>control</i> ?	С	•	)
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you proclients?	ovide to C	•	)
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities the maintained at the related person?	he	0	,
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsibly your <i>clients'</i> assets:	le for <i>custod</i>	y of	
	Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:			
	If this address is a private residence, check this box: $\Box$			
0	(a) If the related person is an investment advisor is it exempt from registration?		s No	
9.	<ul><li>(a) If the related person is an investment adviser, is it exempt from registration?</li><li>(b) If the answer is yes, under what exemption?</li></ul>	С	0	1
	(b) If the answer is yes, under what exemption:			
10.	0. (a) Is the related person registered with a foreign financial regulatory authority?	c	•	)
	(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with whi person is registered. No Information Filed	ch the <i>related</i>	d	
11.	1. Do you and the related person share any supervised persons?	•	0	)
12.	2. Do you and the <i>related person</i> share the same physical location?	e	0	)

1.	_	Il Name of <i>Related Person</i> : IP ADVANTAGE FUND GP LLC		
2.		ary Business Name of <i>Related Person</i> : IP ADVANTAGE FUND GP LLC		
3.	Relation	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
4.	Rela	ted Person's  CRD Number (if any):		
	(b)	CIK Number(s) (if any):  No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (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 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?	C	©
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>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?	$\circ$	$\circ$
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	O	$\odot$
	(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	rou and the related person share any supervised persons?	$\circ$	$\odot$
12.	Do y	rou and the related person share the same physical location?	О	•
1.	_	al 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.		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) (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	rou control or are you controlled by the related person?	⊙	O
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 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?	О	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:		
			Ves	Nο

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	(2)	Is the related person registered with a foreign financial regulatory authority ?		
10.	(a) (b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rela	C ated	⊚
	(5)	person is registered.		
	Б.	No Information Filed		
11.	ро у	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.		al Name of <i>Related Person</i> : FRELD GENERAL PARTNER, LLC		
2.		nary Business Name of <i>Related Person</i> : FRELD 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		
	(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) (c)	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> </ul>		
	(c) (d)	registered security-based swap dealer		
	(e)			
	(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) (k)	□ accountant or accounting firm □ lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(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	Vac	No
6.	Do v	you control or are you controlled by the related person?		_
.	_ J y		⊙	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> ?	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	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>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 related person 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	0
		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.  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
1.	_	al Name of <i>Related Person</i> :  M&G IP CREDIT FUND GP LLC		
2.		ary Business Name of <i>Related Person</i> :  M&G IP CREDIT FUND GP LLC		
	AON	THRO IT CREDIT TOND OF LEC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	er		
4.	Rela	ted Person's		
		CRD Number (if any):		I
	(I- )			
	(b)	CIK Number(s) (if any):  No Information Filed		
5.	Dala	ted Person is: (check all that apply)		
٦.	(a)			
	(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)		
	(5)	futures commission merchant banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
		□ lawyer or law firm		
	(1)	$\square$ insurance company or agency		
	(m)	pension consultant		
	(n)	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		
	(p)	e sponsor, general partner, managing member (or equivalent) or pooled investment vehicles	Yes	No
6.	Do y	you control or are you controlled by the related person?	_	•
			-	~

7.	Are y	you and the related person under common control?	$\odot$	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <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: $\square$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	О	⊙
	(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>relative series</i> and the series of the series	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 <i>related person</i> share the same physical location?	$\circ$	⊙
1.		I Name of <i>Related Person</i> : TRUST COMPANY		
2.		ary Business Name of <i>Related Person</i> : TRUST COMPANY		
3.	Relai	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):		
	(5)	No Information Filed		
				1
5.	Rela	ted Person is: (check all that apply)		
	(a)			
	(b) (c)	□ other investment adviser (including financial planners) □ registered municipal advisor		
	. ,	registered security-based swap dealer		
	(e)	□ major security-based swap participant		
	` ,	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(3)	futures commission merchant  banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k) (l)	☐ lawyer or law firm ☐ insurance company or agency		

(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?  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?  (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 this are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person as a representation of the related person's office responsible for custody of your clients' assets:  Humber and Street 1:  City:  Country:  If you have answered "yes, it aquestion 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:  Humber and Street 1:  City:  Number and Street 2:  Country:  ZIP+4/Postal Code:  If this address is a private residence, check this box:  If the related person is an investment adviser, is it exempt from registration?  (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  1. Legal Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  2. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  3. Related Person's  (a) CRD Number (if any):  (b) CIK Number(s) (if any):  No Information Filed  5. Related Person's  C C C C C C C C C C C C C C C C C C C		(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?  C 6 C Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to C 6 clients?  (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the 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' saxests:  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?  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 any supervised persons?  C G  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Related Person's SEC File Number (if any):  (b) CIK Number(s) (if any):  No Information Filed  Filed  Related Person is: (check all that apply)  (a) □ broker-dealer, municipal securities dealer, or government securities broker or dealer		(n)	real estate broker or dealer		
Nes No  No 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 concentrate the related person act as a qualified custodian for your clients in connection with advisory services you provide to covercome the presumption that you are not operationally independent (pursuant to rule 2064/1-20/15)) from the covercome the presumption that you are not operationally independent (pursuant to rule 2064/1-20/15)) from the covercome the presumption that you are not operationally independent (pursuant to rule 2064/1-20/15)) from the covercome the presumption that you are not operationally independent (pursuant to rule 2064/1-20/15)) from the covercome the presumption that you are not operationally independent (pursuant to rule 2064/1-20/15)) from the covercome the presumption that you are not pursuant to rule 2064/1-20/15) 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 persons?  (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' funds or securities that are maintained at the related person is an investment adviser, is it exempt from registration?  Yes No  Yes No  Yes No  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.  In Information Filed  11. Do you and the related person share any supervised persons?  (c) G  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Related Person's  (a) CRD Number (if any):  (b) CIK Number(s) (if any):  No Information Filed  No		٠,	$\square$ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
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 (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(0)(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:  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 enswer is yes, under what exemption?  10. (a) Is the related person registered with a foreign financial regulatory authority?  C 6  (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 share the same physical location?  13. Related Person's  TOWNSEND ALPHA MANAGER I, LLC  24. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  25. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  26. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  27. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  28. Related Person's  (a) CRO Number (if any):  (b) CIK Number(s) (if any):  No Information Filed  59. Related Person is: (check all that apply)  (a) Divoker-dealer, municipal securities dealer, or government securities broker or dealer		(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 C clients?  (b) If you are registaring or registared 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 nite 206(4)-2(a)(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 C  (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 and country, in English of each foreign financial regulatory authority with which the related person is registered.  No Information Filed  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  Other  14. Related Person's  (a) CRO Number (if any):  (b) CIK Number(s) (if any):  No Information Filed  55. Related Person is: (check all that apply)  (a) □ broker-dealer, municipal securities dealer, or government securities broker or dealer				Yes	No
8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to C 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:  If this address is a private residence, check this box:  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?  Country:  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  Primary Business Name of Related Person:  Townserve dealer, municipal securities dealer, or government securities broker or dealer	6.	Do y	ou control or are you controlled by the related person?	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:  City:  State:  Country:  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 G  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  5. Related Person is: (check all that apply)  (a) broker-dealer, municipal securities dealer, or government securities broker or dealer	7.	Are y	you and the related person under common control?	•	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 related person's office responsible for custody of your clients' assests:  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:  Ves 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 ©  12. Do you and the related person share the same physical location?  C ©  14. Legal Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  25. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  26. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  27. Primary Business Name of Related Person:  TOWNSEND ALPHA MANAGER I, LLC  28. Related Person's SEC File Number (if any):  (b) CIK Number(s) (if any):  No Information Filed  57. Related Person is: (check all that apply)  (a) Proker-dealer, municipal securities dealer, or government securities broker or dealer	8.	(a)		0	•
your clients' assets: Number and Street 1: Clty: 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?  Coco  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER I, LLC  2. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER I, LLC  3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  - or Other  4. Related Person's (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)	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are	0	С
City: 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?  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) 6.  12. Do you and the related person share the same physical location?  (c) 6.  14. Legal Name of Related Person: TOWNSEND ALPHA MANAGER I, LLC  2. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER I, LLC  3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  -		(c)		ody	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?  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.  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. Related Person:  14. Legal Name of Related Person:  15. TOWNSEND ALPHA MANAGER I, LLC  16. Primary Business Name of Related Person:  17. TOWNSEND ALPHA MANAGER I, LLC  18. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  19. Or Other  10. Related Person's  11. (a) CRD Number (if any):  12. No Information Filed  13. Related Person is: (check all that apply)  14. Related Person is: (check all that apply)  15. Related Person is: (check all that apply)  16. (a) Deroker-dealer, municipal securities dealer, or government securities broker or dealer			Number and Street 1: Number and Street 2:		
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) 6.  12. Do you and the related person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER I, LLC  24. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER I, 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  57. Related Person is: (check all that apply)  (a) Droker-dealer, municipal securities dealer, or government securities broker or dealer					
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) 6  12. Do you and the related Person share the same physical location?  13. Legal Name of Related Person: TOWNSEND ALPHA MANAGER I, LLC  24. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER I, 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  57. Related Person is: (check all that apply)  (a) Droker-dealer, municipal securities dealer, or government securities broker or dealer					
(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) 6.  12. Do you and the related person share the same physical location?  (d) 12. Legal Name of Related Person: TOWNSEND ALPHA MANAGER I, LLC  2. Primary Business Name of Related Person: TOWNSEND ALPHA MANAGER I, LLC  3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  or Other  4. Related Person's (a) CRD Number (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				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) €  12. Do you and the related person share the same physical location?  (d) €  1. Legal Name of Related Person:     TOWNSEND ALPHA MANAGER I, LLC  2. Primary Business Name of Related Person:     TOWNSEND ALPHA MANAGER I, LLC  3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)     or     Other  4. Related Person's     (a) CRD Number (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	9.	(a)	If the related person is an investment adviser, is it exempt from registration?	$\circ$	$\circ$
(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		(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?  O					
person is registered.  No Information Filed  11. Do you and the related person share any supervised persons?  C 6  12. Do you and the related person share the same physical location?  C 6  13. Legal Name of Related Person:     TOWNSEND ALPHA MANAGER I, LLC  14. Primary Business Name of Related Person:     TOWNSEND ALPHA MANAGER I, LLC  15. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)     or     Other  16. Other  17. Contains the same physical location?  C 6. Other  C 7. Contains the same physical location?  C 8. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)     or     Other  C 8. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)     or     Other  C 8. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)     or     Other  C 9. Contains the same physical location?  C 9. Contains the same physical location?  C 16. Contains the same physical location?  C 17. Contains the same physical location?  C 18. Related Person's (e.g., 801-, 8-, 866-, 802-)  C 19. Contains the same physical location?  C 19. Contains the same physic	10.	(a)	Is the related person registered with a foreign financial regulatory authority?	$\circ$	$\odot$
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 I, LLC  14. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  15. Or Other  16. Related Person's  17. (a) CRD Number (if any): (b) CIK Number(s) (if any):  18. No Information Filed  19. Related Person is: (check all that apply) (a) Decker-dealer, municipal securities dealer, or government securities broker or dealer		(b)		ted	
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 I, LLC  2. Primary Business Name of <i>Related Person</i> :     TOWNSEND ALPHA MANAGER I, LLC  3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)     or     Other  4. <i>Related Person's</i> (a) <i>CRD</i> Number (if any):     (b) CIK Number(s) (if any):     No Information Filed  5. <i>Related Person</i> is: (check all that apply)     (a) □ broker-dealer, municipal securities dealer, or government securities broker or dealer			No Information Filed		
1. Legal Name of <i>Related Person</i> :    TOWNSEND ALPHA MANAGER I, LLC  2. Primary Business Name of <i>Related Person</i> :    TOWNSEND ALPHA MANAGER I, LLC  3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)      or    Other  4. <i>Related Person's</i> (a) <i>CRD</i> Number (if any):    (b) CIK Number(s) (if any):    No Information Filed  5. <i>Related Person</i> is: (check all that apply)    (a)	11.	Do y	ou and the related person share any supervised persons?	0	⊚
TOWNSEND ALPHA MANAGER I, LLC  2. Primary Business Name of <i>Related Person</i> :     TOWNSEND ALPHA MANAGER I, LLC  3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)     or     Other  4. <i>Related Person's</i> (a) <i>CRD</i> Number (if any):     (b) CIK Number(s) (if any):         No Information Filed  5. <i>Related Person</i> is: (check all that apply)     (a)	12.	Do y	ou and the <i>related person</i> share the same physical location?	0	•
TOWNSEND ALPHA MANAGER I, LLC  3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  or Other  4. Related Person's (a) CRD Number (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		TOW	NSEND ALPHA MANAGER I, LLC		
or Other  4. Related Person's (a) CRD Number (if any):  (b) CIK Number(s) (if any):  No Information Filed  5. Related Person is: (check all that apply)  (a) broker-dealer, municipal securities dealer, or government securities broker or dealer			,		
<ul> <li>Other</li> <li>4. Related Person's <ul> <li>(a) CRD Number (if any):</li> <li>(b) CIK Number(s) (if any):</li> <li>No Information Filed</li> </ul> </li> <li>5. Related Person is: (check all that apply) <ul> <li>(a) Droker-dealer, municipal securities dealer, or government securities broker or dealer</li> </ul> </li> </ul>	3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
<ul> <li>(a) CRD Number (if any):</li> <li>(b) CIK Number(s) (if any):         No Information Filed</li> <li>5. Related Person is: (check all that apply)     (a)</li></ul>			er -		
<ul> <li>(b) CIK Number(s) (if any): No Information Filed</li> <li>5. Related Person is: (check all that apply) (a)  broker-dealer, municipal securities dealer, or government securities broker or dealer</li> </ul>	4.				
No Information Filed  5. Related Person is: (check all that apply)  (a)		(a)	CRD Number (if any):		
<ul> <li>5. Related Person is: (check all that apply)</li> <li>(a)  broker-dealer, municipal securities dealer, or government securities broker or dealer</li> </ul>		(b)			
(a) Droker-dealer, municipal securities dealer, or government securities broker or dealer			No Information Filed		
(a) Droker-dealer, municipal securities dealer, or government securities broker or dealer					
(a) Droker-dealer, municipal securities dealer, or government securities broker or dealer	5	Rolai	ted Person is: (check all that apply)		
	J.				
(D) I OTHER INVESTMENT ADVISER (INCIDING TINANCIAL NIANNERS)			other investment adviser (including financial planners)		
(c) registered municipal advisor		` ,			
(d) registered mulicipal 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	rou control or are you controlled by the related person?	$\odot$	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:	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	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>re person</i> is registered.	lated	
		No Information Filed		
11	Do y	you and the related person share any supervised persons?	•	0
	,		٠	_
12	Do y	rou and the related person share the same physical location?	•	0
1.		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 e		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	<i>.</i>			
	(b)	CIK Number(s) (if any):		
		No Information Filed		
11				

	(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?	•	0
				~
7.	Are v	you and the related person under common control?	_	_
, .	,	you and the relation person under control.	0	⊚
0	(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		
8.	(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	_	_
	(5)	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	О	$\circ$
		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 cust	tody	of
	. ,	your <i>clients'</i> assets:	•	
		Number and Street 1: Number and Street 2:		
		Number and Street 1:Number and Street 2:City:State:Country:ZIP+4/Postal Code:		
		City: State:Country: ZIP+4/Postal Code:	Yes	No
9.	(a)	City: State:Country: ZIP+4/Postal Code:	Yes O	No C
9.	` ,	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: $\square$		_
9.	` ,	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
	` ,	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption?	o	0
	(b)	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   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)	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   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)	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   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> registered.	0	0
10.	(b) (a) (b)	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   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.	C C ated	0
10.	(b) (a) (b)	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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	0	0
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C c ated	0
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 ated	0
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C c ated	0
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C c ated	0
10. 11. 12.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C c ated	0
10. 11. 12.	(b) (a) (b) Do y  Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 c ated	0
10. 11. 12.	(b) (a) (b) Do y  Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 c ated	0
10. 11. 12.	(b) (a) (b) Do y  Lega	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 c ated	0
10. 11. 12.	(b) (a) (b) Do y  Do y  Lega  Prim	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?  The value of Related Person is an investment adviser, is it exempt from registration?	C c ated	0
10. 11. 12.	(b) (a) (b) Do y  Do y  Lega  Prim	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 relaperson is registered.  No Information Filed rou and the related person share any supervised persons?  The person is an investment adviser, is it exempt from registration?  No Information Filed rou and the related person share any supervised persons?  The person is registered.  No Information Filed rou and the related person share the same physical location?	C c ated	0
10. 11. 12.	(b) (a) (b) Do y Do y Lega TTG Prim	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 relaperson is registered.  No Information Filed rou and the related person share any supervised persons?  The person is an investment adviser, is it exempt from registration?  No Information Filed rou and the related person share any supervised persons?  The person is registered.  No Information Filed rou and the related person share the same physical location?	C c ated	0
10. 11. 12.	(b) (a) (b) Do y Do y Lega TTG Prim	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 ou and the related person share any supervised persons?  You and the related person share the same physical location?  If Name of Related Person: GERMAN INVESTMENTS I LLC  ary Business Name of Related Person: GERMAN INVESTMENTS I LLC	C c ated	0
10. 11. 12.	(b) (a) (b) Do y Do y Lega TTG Prim TTG Rela - or	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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:  GERMAN INVESTMENTS I LLC  The person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C c ated	0
10. 11. 12.	(b) (a) (b) Do y Do y Lega TTG Prim TTG Rela	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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:  GERMAN INVESTMENTS I LLC  The person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C c ated	0
10. 11. 12.	(b) (a) (b) Do y Do y  Lega TTG Prim TTG Rela - or Othe	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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:  GERMAN INVESTMENTS I LLC  The person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C c ated	0

	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):  No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (k) (l) (m) (n) (o)	<ul> <li>□ other investment adviser (including financial planners)</li> <li>□ registered municipal advisor</li> <li>□ registered security-based swap dealer</li> <li>□ major security-based swap participant</li> <li>☑ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>□ futures commission merchant</li> <li>□ banking or thrift institution</li> <li>□ trust company</li> <li>□ accountant or accounting firm</li> <li>□ lawyer or law firm</li> <li>□ insurance company or agency</li> <li>□ pension consultant</li> <li>□ real estate broker or dealer</li> <li>□ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		Na
6.	Do v	you control or are you controlled by the related person?	_	No
	20,	and solution of the year 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	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:	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: $\square$	'es	No
9.	(a)	If the related person is an investment advisor is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		_
10	. (a)		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		
11	. Во у	you and the <i>related person</i> share any <i>supervised persons</i> ?	⊚	0
12	. Do y	you and the <i>related person</i> share the same physical location?	•	o
1.	AON Prim	al Name of <i>Related Person</i> :  N ADVANTAGE FUNDS LLC  hary Business Name of <i>Related Person</i> :  N ADVANTAGE FUNDS LLC		
	AUN	ADVANTAGE FUNDS LEG		

3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 120405 or Other		
4.	Related Person's  (a) CRD Number (if any): 310335  (b) CIK Number(s) (if any):		
	No Information Filed		
5.	Related Person is: (check all that apply)  (a) □ broker-dealer, municipal securities dealer, or government securities broker or dealer  (b) ▼ other investment adviser (including financial planners)  (c) □ registered municipal advisor  (d) □ registered security-based swap dealer  (e) □ major security-based swap participant  (f) □ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  (g) □ futures commission merchant  (h) □ banking or thrift institution  (i) □ trust company  (j) □ accountant or accounting firm  (k) □ lawyer or law firm  (l) □ insurance company or agency  (m) □ pension consultant  (n) □ real estate broker or dealer  (o) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p) □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6.	Do you control or are you controlled by the related person?	Ye:	s No ⊙
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 pro <i>clients</i> ?	vide to C	•
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities the maintained at the related person?	e	0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsib 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:	le for <i>custod</i> y	y of
		Ye	s No
9.	<ul><li>(a) If the related person is an investment adviser, is it exempt from registration?</li><li>(b) If the answer is yes, under what exemption?</li></ul>	0	•
10.	<ul> <li>(a) Is the related person registered with a foreign financial regulatory authority?</li> <li>(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with whice person is registered.</li> <li>No Information Filed</li> </ul>	O th the <i>related</i>	o ⊙ d
11.	1. Do you and the related person share any supervised persons?	0	•
12.	2. Do you and the <i>related person</i> share the same physical location?	0	•

2. Primary Business Name of Related Person: AON INVESTMENTS CANADA INC.  3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	1.	_	al Name of <i>Related Person</i> : INVESTMENTS CANADA INC.		
or Other  4. Related Person's (a) CRD Number (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 adviser (d)   registered security-based swap participant (e)   major security-based swap participant (f)   commodity pool person or commodity trading advisor (whether registered or exempt from registration) (g)   futures commission merchant (f)   commodity pool person or commodity trading advisor (whether registered or exempt from registration) (g)   futures commission merchant (f)   commodity pool person or counting firm (g)   accountant or accounting firm (g)   associated to recompany (g)   associated to recompany (g)   associated to recompany (g)   associated to recompany (g)   spanson consultant (g)   real estate broker or dealer (g)   spanson or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p)   spanson, general partner, managing member (or equivalent), of pooled investment vehicles (p)   spanson, general partner, managing member (or equivalent) of pooled investment vehicles (p)   spanson, general partner, managing member (or equivalent) of pooled investment vehicles (p)   spanson, general partner, managing member (or equivalent) of pooled investment vehicles (p)   vou control or are you controlled by the related person?  O	2.		•		
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)   broken-dealer, municipal securities dealer, or government securities broker or dealer (b)   or done investment adviser (including financial planners) (c)   registered municipal advisor (d)   registered municipal securities dealer, or government securities broker or dealer (e)   major 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 (i)   insurance company or agency (m)   persolon consultant (n)   real estate broker or dealer (o)   sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (p)   sponsor, general partner, managling member (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 (p)   sponsor, general partner, managling member (or equivalent) of pooled investment vehicles  Yes No  5. Do you control or are you controlled by the related person? (C) & (C) & (E) On the related person act as a qualified custodian for your clients in connection with advisory services you provide to C & (clients?  (B) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you 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:   Ves No  (I) If the related person is an investment adviser, is it exempt from registration?  (E)	3.	Rela -	ted 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. 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 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  Yes No  6. Do you control or are you controlled by the related person?  7. Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to C declients?  (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, 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' sassets:  Number and Street 1:  City: State:  Country: ZIP+4/Postal Code:  If this address is a private residence, check this b			er		
S. Related Person is: (check all that apply)	4.				
(a)		(b)			
(a)					
(d)	5.	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
(e)		` ,			
(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?  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:  Clty: 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?  FOREIGN ENTITY		. ,			
(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   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor, general partner, managing member (or equivalent) of pooled investment vehicles   (F)   Sponsor or syndicator of leafled person is an investment adviser, is it exempt from registration?   (F)   Sponsor or equivalent or sealent vehicles   (F)   Sponsor or equivalent or sealent vehicles   (F)   Sponsor or equivalent or sealent vehicles   (F)   Sponsor or		٠,			
(i)   trust company   accountant or accounting firm   lawyer or law firm   lawyer or lawyer or lawyer or lawyer or lawyer   lawyer or lawyer lawyer   lawyer or lawyer or lawyer   lawyer or lawyer lawyer   lawyer lawyer lawyer   lawyer lawyer lawyer   lawyer lawyer lawyer lawyer   lawyer lawyer lawyer lawyer   lawyer					
(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?  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:    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?  FOREIGN ENTITY					
(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? 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?  Yes No 10. (b) If the answer is yes, under what exemption?  FOREIGN ENTITY		٠,			
(i)   insurance company or agency   m   pension consultant   in 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 you control or are you controlled by the related person?					
(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?  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 cilents? (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?  FOREIGN ENTITY		٠,	_		
(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?  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:   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?  FOREIGN ENTITY		(m)			
(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?  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?  (b) If the answer is yes, under what exemption?  FOREIGN ENTITY		(n)			
See No. 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 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? FOREIGN ENTITY		` '			
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 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:  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?  FOREIGN ENTITY		(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Vac	No
<ul> <li>7. Are you and the related person under common control?</li> <li>6. C</li> <li>8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?</li> <li>(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?</li> <li>(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody 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</li> <li>9. (a) If the related person is an investment adviser, is it exempt from registration?  (b) If the answer is yes, under what exemption?  FOREIGN ENTITY</li> <li>10. (a) Is the related person registered with a foreign financial regulatory authority?</li> </ul>	6.	Do y	you control or are you controlled by the related person?	_	_
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?  (b) If the answer is yes, under what exemption?  FOREIGN ENTITY		,			٠
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:  9. (a) If the related person is an investment adviser, is it exempt from registration?  (b) If the answer is yes, under what exemption?  FOREIGN ENTITY  10. (a) Is the related person registered with a foreign financial regulatory authority?	7.	Are	you and the <i>related person</i> under common <i>control</i> ?	•	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' 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?  FOREIGN ENTITY	8.	(a)		0	•
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? FOREIGN ENTITY  10. (a) Is the related person registered with a foreign financial regulatory authority?		(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	0	O
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?  FOREIGN ENTITY  10. (a) Is the related person registered with a foreign financial regulatory authority?		(c)		stody	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?  FOREIGN ENTITY  10. (a) Is the related person registered with a foreign financial regulatory authority?					
<ul> <li>9. (a) If the related person is an investment adviser, is it exempt from registration?</li> <li>(b) If the answer is yes, under what exemption? FOREIGN ENTITY</li> <li>10. (a) Is the related person registered with a foreign financial regulatory authority?</li> </ul>					
(b) If the answer is yes, under what exemption? FOREIGN ENTITY  10. (a) Is the related person registered with a foreign financial regulatory authority?				Yes	No
FOREIGN ENTITY  10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	•	0
		(b)			
	10	(a)	Is the related person registered with a foreign financial regulatory authority?	_	
1 1 27 2. S. Sanotter to year need the heart end country, in English of each foreign matheur regulatory dutiforty with which the related	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>re</i>		О

	person is registered.		
	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Canada - Alberta Securities Commission		
	Canada - British Columbia Securities Commission		
	Canada - Manitoba Securities Commission		
	Canada - New Brunswick Securities Commission		
	Canada - Newfoundland and Labrador, Financial Services Regulation Division		
	Canada - Nova Scotia Securities Commission		
	Canada - Ontario Securities Commission		
	Canada - Quebec, Financial Markets Authority		—
	Canada - Saskatchewan Financial Services Commission		
	Canada - Yukon Territories, Registrar of Securities		
11.	Do you and the <i>related person</i> share any <i>supervised persons</i> ?	О	⊙
12.	Do you and the <i>related person</i> share the same physical location?	0	•
1.	Legal Name of Related Person: AON INVESTMENTS LIMITED  Primary Business Name of Related Person: AON INVESTMENTS LIMITED		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or		
4.	Other  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	_
6.	Do you 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 adviso <i>clients</i> ?	ry services you provide to	О	⊙
	(b)	) 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	О
	(c)	) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> your <i>clients'</i> assets:	n's office responsible for custo	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: $\square$		<b>V</b>	No
9.	(a)	) If the <i>related person</i> is an investment adviser, is it exempt from registration?	_		
٦.	. ,			⊙	0
	(b)	) If the answer is yes, under what exemption? FOREIGN ENTITY			
10.	(a)	, , , , , , , , , , , , , , , , , , , ,		•	0
	(b)	person is registered.	authority with which the relat	ted —	
		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.	_	gal Name of <i>Related Person</i> : KT GP, LLC			
_		imary Business Name of <i>Related Person</i> :			
2.		KT GP, LLC			
3.	Rela	elated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	or Othe				
1	Dolo	elated Person's			
4.		) CRD Number (if any):			
	(b)	) CIK Number(s) (if any):			
	(5)	No Information Filed			
					1
_	D-1:	Nated Pages in Johan all that apply			
5.		elated Person is: (check all that apply)  Delated Person is: (check all that apply)  Delated Person is: (check all that apply)			
	` ,	,, ,, ,, ,			
		)			
	` ,	´ _ ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `			
	. ,	, <u> </u>			
	( - )	,	om registration)		
	. ,	,			
	(3)	´ _			
	(i)	, <u> </u>			
	(i)				
	(1)				

	(m)	pension consultant		
	(n)	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		
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?	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	•
	(b)	clients?  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>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: $\Box$		
	(2)		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?	_	_
	(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.	C 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
1.	_	al Name of <i>Related Person</i> : SPECIAL SITUATIONS GENERAL PARTNER, LLC		
2.		nary Business Name of <i>Related Person</i> : SPECIAL SITUATIONS 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.	Rela	ted Person is: (check all that apply)		
		broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)			
	(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)		

	(g)	futures commission merchant			
	(h)	-			
		trust company			
		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	Vaa	. RI	
6.	Do v	ou control or are you controlled by the related person?	Yes		
0.	υ,	ou control of the you controlled by the related person.	⊙	(	2
7.	Are	you and the related person under common control?	0	6	ð
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	Ø	5
	(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	5
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <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	N	o
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	C	5
	(b)	If the answer is yes, under what exemption?			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	G	5
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>reperson</i> is registered.			
		No Information Filed			
11.	Do y	ou and the related person share any supervised persons?	•	C	5
10	Б.	and the state of a second second by a second state of the second second by a second se			
12.	ро у	ou and the <i>related person</i> share the same physical location?	•	_	)
1.		Il Name of <i>Related Person</i> : E TAHOE II GP, LLC			
2.		ary Business Name of <i>Related Person</i> : E TAHOE II GP, 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			
-		CRD Number (if any):			I
	(h)	CIV Number(c) (if any):			ı
	(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)	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 v	you and the related person under common control?	_	_
	,	you and the relation person under control.	0	⊚
0	(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	_	_
8.	(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	_	_
	(5)	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 <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 cust	tody	of
		your <i>clients'</i> assets:	-	
		Number and Street 1: Number and Street 2:		
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
		City: State:Country: ZIP+4/Postal Code:	Yes	No
9.	(a)	City: State:Country: ZIP+4/Postal Code:	Yes O	No C
9.	` ,	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: $\square$		_
9.	` ,	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
	` ,	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
	(b)	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   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	o
	(b)	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   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)	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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	o
10.	(b) (a) (b)	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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.	C C ated	o
10.	(b) (a) (b)	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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	0	o
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C C ated	o
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 ated	o
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C C ated	o
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C C ated	o
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C C ated	o
11.	(b) (a) (b) Do y Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 C ated	o
11.	(b) (a) (b) Do y Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 C ated	o
11.	(b) (a) (b) Do y  Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 C ated	o
10. 11. 12.	(b) (a) (b) Do y  Do y  Lega NJM	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 ou and the related person share any supervised persons?  You and the related person share the same physical location?	C C ated	o
10. 11. 12.	(b) (a) (b) Do y  Do y  Lega NJM	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?  Tou and the related person share the same physical location?  If Name of Related Person:  FUND GP LLC  ary Business Name of Related Person:	C C ated	o
10. 11. 12.	(b) (a) (b) Do y  Do y  Lega NJM  Prim	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?  Tou and the related person share the same physical location?  If Name of Related Person:  FUND GP LLC  ary Business Name of Related Person:	C C ated	o
10. 11. 12.	(b) (a) (b) Do y  Do y  Lega NJM  Prim	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 ou and the related person share any supervised persons?  You and the related person share the same physical location?  If Name of Related Person:  FUND GP LLC  ary Business Name of Related Person:  FUND GP LLC	C C ated	o
10. 11. 12.	(b) (a) (b) Do y Do y Lega NJM Prim NJM Rela - or	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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:  FUND GP LLC  ary Business Name of Related Person:  FUND GP LLC  ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C C ated	o
10. 11. 12.	(b) (a) (b) Do y Do y Lega NJM Prim NJM Rela -	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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:  FUND GP LLC  ary Business Name of Related Person:  FUND GP LLC  ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C C ated	o
10. 11. 12.	(b) (a) (b) Do y  Do y  Lega NJM  Prim NJM  Rela  - or Othe	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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:  FUND GP LLC  ary Business Name of Related Person:  FUND GP LLC  ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C C ated	o

	(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)	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							
	(p)		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> ?	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:  City:  State:  Country:  ZIP+4/Postal Code:  If this address is a private residence, check this box:							
9.	(2)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	_					
).	(a) (b)	If the answer is yes, under what exemption?	0	•					
10.	(a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?  If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.  No Information Filed	C ted	•					
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?	•	0					
1.	WEST LAKE GENERAL PARTNER, LLC								

3.	Rela	nted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.		oted Person's  CRD Number (if any):		
	(b)	CIK Number(s) (if any):  No Information Filed		
5.	Rela (a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (o) (p)	<ul> <li>□ other investment adviser (including financial planners)</li> <li>□ registered municipal advisor</li> <li>□ registered security-based swap dealer</li> <li>□ major security-based swap participant</li> <li>☑ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>□ futures commission merchant</li> <li>□ banking or thrift institution</li> <li>□ trust company</li> <li>□ accountant or accounting firm</li> <li>□ lawyer or law firm</li> <li>□ insurance company or agency</li> <li>□ pension consultant</li> <li>□ real estate broker or dealer</li> </ul>	Maa	
6.	Do y	you control or are you controlled by the related person?	Yes ⊙	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	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:  Number and Street 1:  City:  State:  Number and Street 2:  Country:  ZIP+4/Postal Code:	stody	of
		If this address is a private residence, check this box:	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	
	(b)	If the answer is yes, under what exemption?		
10.	(a) (b)	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 reperson is registered.	C lated	•
11.	Do y	No Information Filed you and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
12.	Do y	you and the related person share the same physical location?	•	0

1.	_	Il Name of <i>Related Person</i> : INSEND STRATEGIC VENTURES GP, LLC		
2.		ary Business Name of <i>Related Person</i> :  NSEND STRATEGIC VENTURES GP, 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		
5.	(a) (b) (c) (d) (e)	other investment adviser (including financial planners)		
	(g) (h) (i) (j)	futures commission merchant banking or thrift institution trust company accountant or accounting firm		
	(k) (l)	☐ lawyer or law firm ☐ insurance company or agency		
	(m)	. , , , , , , , , , , , , , , , , , , ,		
	` ,	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		
	(1)		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> ?	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:	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?	$\circ$	$\circ$
	(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	ou and the related person share any supervised persons?	•	O
12.	Do y	rou and the <i>related person</i> share the same physical location?	•	0
1.		Il Name of <i>Related Person</i> : H GP, LLC		
2.		ary Business Name of <i>Related Person</i> : H 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) (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	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 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:  City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:		
			Ves	Nο

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	(2)	Is the related person registered with a foreign financial regulatory sythetity?		
10.	(a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?  If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relative</i>	C sted	⊚
	(D)	person is registered.	iteu	
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	$\odot$	$\circ$
12	Do v	rou and the <i>related person</i> share the same physical location?	_	_
12.	Б0 у	ou and the related person share the same physical location.	⊚	О
1.		ol Name of <i>Related Person</i> : SG REAL ESTATE PARTNERS I, LLC		
2.	Prim	ary Business Name of <i>Related Person</i> :		
		GG REAL ESTATE PARTNERS I, LLC		
3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	er en		
	D - /-			
4.		ted Person's  CRD Number (if any):		
	(u)	CAD Number (ii dily).		
	(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)		
	(c)	registered municipal advisor		
	(d)	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)	☐ trust company ☐ accountant or accounting firm		
	(j) (k)			
		insurance company or agency		
	(n)			
		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	you and the related person under common control?	O	$\odot$
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	_	_
J.	(4)	clients?	0	⊚
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	0	0
1				

		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 related person 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	•
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the re-	-	
		person is registered.  No Information Filed		
11.	Do y	you and the related person share any supervised persons?	•	0
12.	Do y	you and the <i>related person</i> share the same physical location?	⊙	0
1.	Lena	al Name of <i>Related Person</i> :		
1.	_	SECURITIES LLC		
	Б.			
2.		nary Business Name of <i>Related Person</i> : I SECURITIES LLC		
3.		ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 106546		
	or			
	Othe	er		
4.	Rela	ited Person's		
	(a)	CRD Number (if any):		1
	(h)	4138 CIK Number(s) (if any):		
	(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) (g)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  futures commission merchant		
	(5)	banking or thrift institution		
	(i)	□ trust company		
	(j)	accountant or accounting firm		
		☐ lawyer or law firm		
	(I)	insurance company or agency		
	(m)	_		
	(n)	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>		
	(4)	- Sponson, general paranel, managing member (or equivalent) or posica 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?	•	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> ?	o	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	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>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.		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>relative</i>	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 <i>related person</i> share the same physical location?	$\circ$	⊚
		I Name of Delated Demand		
1.	_	Il Name of <i>Related Person</i> : INVESTMENTS USA INC.		
2.		ary Business Name of <i>Related Person</i> :  INVESTMENTS USA INC.		
3.		ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 17219		
	or	- 1/219		
	Othe	er en		
4.	Rela	ted Person's		
т.		CRD Number (if any):		
		105596		
	(b)	CIK Number(s) (if any):  No Information Filed		
_	Dolo	tod Davison in Johann all that apply)		
5.	(a)	ted Person is: (check all that apply)  Description 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		
	(e) (f)	<ul> <li>□ major security-based swap participant</li> <li>□ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>		
	` '	futures commission merchant		
	(3)	banking or thrift institution		
	(i)	trust company		
	(3)	accountant or accounting firm		
	(k) (l)	☐ lawyer or law firm ☐ insurance company or agency		

	(m)	pension consultant		
	(n)	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		
6.	Do y	you control or are you controlled by the related person?	Yes O	No ⊙
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	•
	(b)	clients?  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: $\square$		
	<b>(-)</b>	If the related games is an investment advisor is it assumed from a related in 2	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 foreign financial regulatory authority with which the rela	C ated	⊙
		person is registered.  No Information Filed		
11.	Do y	you and the related person share any supervised persons?	•	_
	,		e	О
12.	Do y	you and the related person share the same physical location?	0	•
1.	_	al Name of <i>Related Person</i> : E TAHOE III GP, LLC		
2.		nary Business Name of <i>Related Person</i> : E TAHOE III GP, LLC		
3.	Rela -	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.		created Person's  CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(5)	No Information Filed		
5.	Rela	nted Person is: (check all that apply)		
	` ,			
	(b)			
		registered municipal advisor		
	` '	registered security-based swap dealer major security-based swap participant		
	(e) (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)			
	(0)			
	(p)			
	(P)	position, gaineral paraties, managing monitor (or equivalent, or position introduction remained	Ves	. 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>	stody	of
		your <i>clients</i> ' assets:  Number and Street 1:  Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: $\square$		
		If this address is a private residence, theta this box.	Voc	. No
0	(2)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
9.	(a)		0	0
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	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>resperson</i> is registered.	lated	
		No Information Filed		
11.	Do v	ou and the related person share any supervised persons?		_
	,	ou and the related person that any supervised persons.	⊚	О
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	0
1.		Il Name of <i>Related Person</i> : SG REAL ESTATE PARTNERS II, LLC		
2.		ary Business Name of <i>Related Person</i> : SG REAL ESTATE PARTNERS II, LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	ur		
$\ $	D - /-	ted Demonstra		
4.		CRD Number (if any):		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
	Pola	ted Person is: (check all that apply)		
5.	VC10			

	(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?	•	0
			•	
7.	Are v	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.	(u)	clients?	0	⊙
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	_	0
	(-)	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	0	U
		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 cust	tody	of
		your <i>clients</i> ' assets:		
		Number and Street 1: Number and Street 2:		
		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: $\square$	Yes	No
9.	(a)	City: State:Country: ZIP+4/Postal Code:	Yes O	No C
9.	` ,	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: $\square$		_
9.	` ,	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
	` ,	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?		_
	(b)	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   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)	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   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	o
	(b)	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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	o
10.	(b) (a) (b)	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:   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.	0	o
10.	(b) (a) (b)	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 ated	o
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 ated	o
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C C ated	o
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C ated	o
10.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C ated	o
10. 11. 12.	(b) (a) (b) Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?	C ated	o
10. 11. 12.	(b) (a) (b) Do y  Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 ated	o
10. 11. 12.	(b) (a) (b) Do y  Do y	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 ated	o
10. 11. 12.	(b) (a) (b) Do y Do y  Lega TOW	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?  To u and the related person share the same physical location?  INSEND GROUP EUROPE LIMITED ary Business Name of Related Person:	C ated	o
10. 11. 12.	(b) (a) (b) Do y Do y  Lega TOW	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?  TO Use the state of the s	C ated	o
10. 11. 12.	(b) (a) (b) Do y Do y  Lega TOW	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?  To u and the related person share the same physical location?  INSEND GROUP EUROPE LIMITED ary Business Name of Related Person:	C ated	o
10. 11. 12.	(b) (a) (b) Do y Do y Lega TOW Prim	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?  To u and the related person share the same physical location?  INSEND GROUP EUROPE LIMITED ary Business Name of Related Person:	C ated	o
10. 11. 12.	(b) (a) (b) Do y Do y Lega TOW Relaa-	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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 out and the related person share any supervised persons?  You and the related Person:  INSEND GROUP EUROPE LIMITED  AND INSEND GROUP EUROPE LIMITED  AND INSEND GROUP EUROPE LIMITED	C ated	o
10. 11. 12.	(b) (a) (b) Do y Do y Lega TOW Prim TOW Rela - or	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?  YOU and the related Person: YOU SEND GROUP EUROPE LIMITED	C ated	o
10. 11. 12.	(b) (a) (b) Do y Do y Lega TOW Relaa-	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?  YOU and the related Person: YOU SEND GROUP EUROPE LIMITED	C ated	o
10. 11. 12.	(b) (a) (b) Do y  Do y  Lega TOW  Prim TOW  Rela - or Othe	City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:   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?  YOU and the related Person: YOU SEND GROUP EUROPE LIMITED	C ated	o

	(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)	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		
	(p)	$\square$ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
_	Dov			No
6.	ро у	ou control or are you controlled by the related person?	⊚	0
7.	Are	you and the related person under common control?	•	c
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	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	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>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?	•	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 <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.	ited	
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		United Kingdom - Financial Conduct Authority		
11.	Do y	rou and the related person share any supervised persons?	$\odot$	О
12.	Do y	rou and the related person share the same physical location?	•	0
				=
1.		al Name of <i>Related Person</i> : SOLUTIONS UK LIMITED		

2.		ary Business Name of <i>Related Person</i> : SOLUTIONS UK LIMITED		
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		
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 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?		©
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> ?	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?	О	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>customyour clients'</i> assets:  Number and Street 1:  City:  State:  Country:  ZIP+4/Postal Code:  If this address is a private residence, check this box:	tody	of
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	No
9.	. ,	If the answer is yes, under what exemption?  FOREIGN ENTITY	•	С
10.	(a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?  If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.  Name of Country/English Name of Foreign Financial Regulatory Authority  United Kingdom - Financial Conduct Authority	<b>⊙</b> ated	0

11.	Do y	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.		Il Name of <i>Related Person</i> : 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.	Rela (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		
6.		you control or are you controlled by the related person?	Yes	No ⊙
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 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:  Number and Street 1:  Number and Street 2:	tody	of
		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 ⊙	No C

	(b)	If the answer is yes, under what exemption? FOREIGN ENTITY		
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>	• • lated	0
	(5)	person is registered.		
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		Ireland - Central Bank of Ireland		
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?	0	•
1.	_	Il Name of <i>Related Person</i> : MANAGER, LLC		
2.		ary Business Name of <i>Related Person</i> : MANAGER, LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	ır		
	5 /			
4.		ted Person's  CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(6)	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		
		lawyer or law firm		
		insurance company or agency		
	(m)			
	(n)			
	(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)	sponsor, general partitle, managing member (or equivalent) or pooled investment venicles	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	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>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?		0
	(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.	tea	
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	$\odot$	0
	_			
12.	Do y	you and the <i>related person</i> share the same physical location?	⊙	0
1.	_	al Name of Related Person:		
	PENI	N SQUARE MANAGER II, LLC		
2.	Prim	nary Business Name of <i>Related Person</i> :		
		N SQUARE MANAGER II, LLC		
_				
3.	Relai	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	er		
	0.4	ted December		
4.		ted Person's  CRD Number (if any):		
	(4)			
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)			
	` ,	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)		
	,,,	futures commission merchant		
		banking or thrift institution		
	(i) (j)	☐ trust company ☐ accountant or accounting firm		
		lawyer or law firm		
	(I)	$\Box$ insurance company or agency		
	(m)	<u> </u>		
	. ,	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		
	(4)		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	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: $\square$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	О	$\circ$
	(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>relative series</i> are the series of the series	ated	
		person is registered.  No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	•	0
12	D	and the valetad gaves show the same physical leasting?		
12.	ро у	ou and the <i>related person</i> share the same physical location?	⊚	0
1.	Lega	Il Name of <i>Related Person</i> :		
	_	SECURITIES INVESTMENT MANAGEMENT INC.		
2.	Prim	ary Business Name of <i>Related Person</i> :		
		SECURITIES INVESTMENT MANAGEMENT INC.		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or Othe	er en		
4.		ted Person's  CRD Number (if any):		
	(a)	CAD Number (ii dity).		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Relai	ted Person is: (check all that apply)  Description 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		
	( - )	<ul> <li>□ major security-based swap participant</li> <li>□ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>		
	. ,	futures commission merchant		
		banking or thrift institution		
	(i)	trust company		
	(j) (k)	□ accountant or accounting firm □ lawyer or law firm		
	(N) (I)	insurance company or agency		

	(m)	pension consultant		
	(n)	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		
6.	Do y	ou control or are you controlled by the related person?	Yes O	No ⊙
7.	Are y	ou and the related person under common control?	•	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 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: $\Box$	V	N
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	_
J.			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>rel person</i> 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		$\exists$
11.	Do y	ou and the related person share any supervised persons?	0	•
	,		0	٠
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	•
1.	Lega	I Name of <i>Related Person</i> :		
		NSEND RE GLOBAL GP LIMITED		
2.		ary Business Name of <i>Related Person</i> : NSEND RE GLOBAL GP LIMITED		
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.	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		
		banking or thrift institution		
		☐ trust company		
		accountant or accounting firm		
		lawyer or law firm		
		insurance company or agency		
	(m)	· · · · · · · · · · · · · · · · · · ·		
		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		
	(P)	opensor, general paranel, managing member (er equivalent, er peerson interestinate	Yes	. No
6.	Do v	ou control or are you controlled by the related person?		_
0.	БО у	ou control of the you controlled by the related person:	⊚	0
_		and the stated as a second second at 12		
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	_	_
		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 <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	stoay	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?		~
	(5)	a the another to you, amount of emptions		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	•
-0.		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the re-	•	***
	(D)	person is registered.	iateu	
		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.	ро у	ou and the <i>related person</i> share the same physical location?	⊚	0
1.	_	Name of Related Person:		
	JDPI	MANAGER, LLC		
2.		ary Business Name of <i>Related Person</i> :		
	JUPT	MANAGER, LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or Other			
	Othe			
.				
⊥ <b>/</b> 1		ted Person's		
4.		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)			
		registered municipal advisor		
	(d)			
	(e)			
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
		futures commission merchant		
	(h)			
		trust company		
		accountant or accounting firm		
	(k)			
	(l)	insurance company or agency		
	(m)			
	(n)	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 v	you control or are you controlled by the related person?		_
0.	БО у	du control of are you controlled by the related person!	⊚	
,	Λ	vey and the related never under common central?		
7.	Ale	you and the <i>related person</i> under common <i>control</i> ?	0	•
8.	(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?	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		~
		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are		
		maintained at the related person?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i>	tody	of
		your <i>clients'</i> assets:		
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: $\Box$		
		I this dudress is a private residence, check this box.	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
-	. ,		0	
	(b)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority?	_	
10.			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>relaperson</i> is registered.	неа	
		No Information Filed		
11	Do v	you and the related person share any supervised persons?	_	
	20,	and the related person shall any supervised persons.	⊚	
12	Do v	you and the <i>related person</i> share the same physical location?	_	
12.	υ,	and the related person share the same physical location.	⊚	
1.	Lega	al Name of Related Person:		
	TOW	/NSEND ALPHA MANAGER II, LLC		
2.		nary Business Name of <i>Related Person</i> :		
	ľOW	/NSEND ALPHA MANAGER II, LLC		

12.	Doy	you and the <i>related person</i> share the same physical location?	•	0
11.	Doy	you and the related person share any supervised persons?	•	0
		<i>person</i> is registered.  No Information Filed		
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the respective sections of the section of the secti	lated	
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	•
	(b)	If the answer is yes, under what exemption?		
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	0
		If this address is a private residence, check this box: $\Box$	Yes	. No
		City: State: Country: ZIP+4/Postal Code:		
		your <i>clients</i> ' assets:  Number and Street 1:  Number and Street 2:		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i>	tody	of
	(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?	О	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	⊙
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	•
6.	Do y	you control or are you controlled by the related person?	⊚	0
			Yes	: No
		sponsor or syndicator of finited partnerships (or equivalent), excluding pooled investment vehicles  sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(n) (o)	real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(m)			
	(K) (I)	insurance company or agency		
	(j) (k)	□ accountant or accounting firm □ lawyer or law firm		
	(i)	trust company		
	(h)	banking or thrift institution		
	(f) (g)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  futures commission merchant		
	. ,	major security-based swap participant		
	٠,	registered security-based swap dealer		
	(c)	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> </ul>		
	(a) (b)			
5.		ted Person is: (check all that apply)		
		No Information Filed		
	(b)	CIK Number(s) (if any):		
	(a)	CRD Number (if any):		
4.	Rela	ted Person's		
	Oth	er		
	or			
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		

1.	_	Name of <i>Related Person</i> :		
2.		ary Business Name of <i>Related Person</i> : INSEND REF GP, LLC		
3.	Relation	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
4.		ted 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) (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. 7.		ou control or are you controlled by the related person?  you and the related person under common control?	•	0
			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	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?	O	О
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	O	$_{\odot}$
	(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 y	rou and the related person share any supervised persons?	⊚	$\circ$
12.	Do y	rou and the <i>related person</i> share the same physical location?	•	0
1.		al Name of <i>Related Person</i> : ET LAKE II GENERAL PARTNER, LLC		
2.		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) (l) (m) (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?	•	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?	О	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:		
			Ves	No

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		related person and thus are not required to obtain a surprise exammaintained at the related person?	ination for your <i>clients</i> ' funds or securities that are	
	(c)	If you have answered "yes" to question 8.(a) above, provide the lo your <i>clients'</i> assets:	cation of the <i>related person's</i> office responsible for <i>custody</i> o	f
		•	nd Street 2:	
		City: State: Country:	ZIP+4/Postal Code:	
		If this address is a private residence, check this box: $\Box$	Yes I	املا
9.	(a)	If the related person is an investment adviser, is it exempt from re	nictration?	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 a person is registered.	oreign financial regulatory authority with which the related	
		No Informati	ion Filed	
11.	Do y	you and the related person share any supervised persons?	⊙ (	
12.	Do y	you and the <i>related person</i> share the same physical location?	•	0
1.	Lega	al Name of <i>Related Person</i> :		
	LAKE	E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
2.	Prim	nary Business Name of <i>Related Person</i> :		
	LAKE	E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	er		
4.	Rela	ated Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Informati	ion Filed	
5.	Dolo	nted Person is (sheek all that apply)		
٥.	(a)	ated Person is: (check all that apply)  Description broker-dealer, municipal securities dealer, or government secu	rities broker or dealer	
		other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whet	ner registered or exempt from registration)	
	,	futures commission merchant		
		banking or thrift institution trust company		
	(i) (j)	<ul><li>☐ trust company</li><li>☐ accountant or accounting firm</li></ul>		
		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),		
	(p)	sponsor, general partner, managing member (or equivalent) o	pooled investment vehicles  Yes I	اما
6.	Do v	you control or are you controlled by the related person?		_
	- 1	, ,	•	

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>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, effect 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 ?	0	•
	(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	ou and the related person share any supervised persons?	_	_
	υ,	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	⊙
	TOW	I Name of Related Person: INSEND GROUP ASIA LTD.  ary Business Name of Related Person:		
	IOW	NSEND GROUP ASIA LTD.		
3.	Relai	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):		
	(5)	No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)			
		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)		
	(3)	futures commission merchant		
	(h) (i)	banking or thrift institution trust company		
	(i)	accountant or accounting firm		
		lawyer or law firm		
	(1)	insurance company or agency		

	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(0)			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	V	N.
6.	Do y	ou control or are you controlled by the related person?	ves ⊙	No C
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>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: $\square$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	•	0
	(b)	If the answer is yes, under what exemption? FOREIGN ENTITY		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	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	ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	О
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	0
1.	THE Prim	Il Name of <i>Related Person</i> : KEY WEST SAXON GROUP, LLC ary Business Name of <i>Related Person</i> : KEY WEST SAXON GROUP, 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)	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)	banking or thrift institution		
	(i)	☐ trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
		insurance company or agency		
	(m)	<u> </u>		
	(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		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	⊙	$\circ$
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	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	•
	(b)	clients?  If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	_	_
	(2)	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	O	O
		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>	stody	of
		your <i>clients'</i> assets:  Number and Street 1:  Number and Street 2:		
		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?		
	(5)	If the diswel 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		
1.1	D			
11.	ро у	rou and the related person share any supervised persons?	⊚	$\circ$
12.	Do y	rou and the <i>related person</i> share the same physical location?		0
	•		٠	
1.	Lega	al Name of <i>Related Person</i> :		
	THE	TOWNSEND GROUP LLC		
2.	Prim	ary Business Name of <i>Related Person</i> :		
	THE	TOWNSEND GROUP 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)		
	(a)	$\square$ broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)			
	(d)			
	(e)	_		
	(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		
	(k)	<u> </u>		
	(l) (m)			
	(n)	·		
	(o)			
		sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(P)	sponsor, general partier, managing member (or equivalent) or pooled investment venicles	Yes	No
6.	Do v	you control or are you controlled by the related person?		
0.	D0 y	ou control of the you controlled by the related person:	⊙	0
,	۸ro	you and the related person under common control?	_	
7.	Ale	you and the related person under common controls	0	⊙
	(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		
8.	(a)	clients?	$\circ$	⊙
	(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: $\Box$	V	
9.	(2)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	NO
9.	(a)		О	⊙
	(b)	If the answer is yes, under what exemption?		
10	(-)	To the related names assistant with a foreign financial mondeton, authority 2		
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 rel	ated	
		person is registered.  No Information Filed		
	Davi			
11.	ро у	you and the related person share any supervised persons?	⊚	0
	Б.	and the related as an about the course the start beauty at		
12.	ро у	you and the <i>related person</i> share the same physical location?	⊚	О
1.	Lena	al Name of <i>Related Person</i> :		
1.		CORE PLUS INVESTMENTS , LLC		
2.	Prim	nary Business Name of <i>Related Person</i> :		
		CORE PLUS INVESTMENTS , LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe	er e		

4.	Relat	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Relat	red Person is: (check all that apply)		
	(a)			
	(b)			
		registered municipal advisor		
	(d)			
	(e)	-		
		commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(r) (g)			
	(h)			
		□ trust company		
		accountant or accounting firm		
		☐ lawyer or law firm		
		insurance company or agency		
	(m)			
	(n)	·		
	(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		
		· ·	⁄es	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	$\odot$
8.	(a)		О	$\odot$
	(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	O	0
		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 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: $\Box$		
	, ,		es (	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	•
	` ,	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relation</i>		٠
	(5)	person is registered.	icu	
		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
1.	Lega	I Name of <i>Related Person</i> :		
	_	TEGIC MANAGER III, LLC		
2.	Prima	ary Business Name of Related Person:		

	STR	ATEGIC MANAGER III, 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):		
	(D)	No Information Filed		
				'
5.	(a) (b)	$\square$ other investment adviser (including financial planners)		
	(c)	-		
	(d) (e)	registered security-based swap dealer major security-based swap participant		
	(f) (g) (h)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  futures commission merchant		
	(i)	trust company		
	(j) (k)	□ accountant or accounting firm □ 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		
			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 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:	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	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>rel</i>	lated	
		person is registered.  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?	$\odot$	О

					_
1.	TOWN Prima	Name of <i>Related Person</i> : ISEND OPPORTUNITY ZONE FUND GP, LLC  ry Business Name of <i>Related Person</i> : ISEND OPPORTUNITY ZONE FUND GP, LLC			
3.		ed Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
٥.	-	Ru Person's SEC File Nulliber (II ally) (e.g., 601-, 6-, 600-, 602-)			
	or Other				
4.		ed Person's CRD Number (if any):			
	(b)	CIK Number(s) (if any):			
		No Information Filed			
5.	(a)   (b)   (c)   (d)   (e)   (f)   (f)	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	N	0
6.	Do yo	u control or are you controlled by the related person?	•	С	)
7.	Are yo	ou and the <i>related person</i> under common <i>control</i> ?	0	•	ð
8.		Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•	5
	(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	С	,
		If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cusyour clients' assets:	tody	of	
		Number and Street 1: Number and Street 2:			
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: $\square$			
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	_	
		If the answer is yes, under what exemption?	0	•	2
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	_		

	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relativesson</i> is registered.	ted	
		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?	•	o
1.		I Name of <i>Related Person</i> : E TAHOE IV GP, LLC		
2.		ary Business Name of <i>Related Person</i> : E TAHOE IV GP, LLC		
3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	ır		
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) (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 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	Was	No
	_		Yes	No
6.			⊙	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>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?	О	О
	(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>		٠
		person is registered.		
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	⊙	0
12.	Do v	ou and the <i>related person</i> share the same physical location?	•	
	,	, , , , , , , , , , , , , , , , , , ,	·	0
				=
1.	Lega	I Name of <i>Related Person</i> :		
	_	IV KOREA FEEDER GENERAL PARTNER, LLC		
		ary Business Name of <i>Related Person</i> :  IV KOREA FEEDER GENERAL PARTNER, LLC		
	GFL	IV NOREAT LEDEN GENERAL FARTNER, LEC		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or Othe	r		
	00			
4.	Relat	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(-)	No Information Filed		
				ı
5.	Relai	ted Person is: (check all that apply)		
٥.	(a)			
	(b)	other investment adviser (including financial planners)		
	(c)	☐ registered municipal advisor		
		registered security-based swap dealer		
		major security-based swap participant		
	. ,	<ul> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> </ul>		
		banking or thrift institution		
		□ trust company		
	(j)	$\square$ accountant or accounting firm		
		lawyer or law firm		
	` '	insurance company or agency		
	(m) (n)	<ul> <li>pension consultant</li> <li>real estate broker or dealer</li> </ul>		
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
		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?	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	_	
٥.	(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	o	0

		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)	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.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	No
	(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 foreign financial regulatory authority with which the rel	ated	⊙
		person is registered.  No Information Filed		
11.	Do y	you and the related person share any supervised persons?	•	0
			~	~
12.	Do y	you and the <i>related person</i> share the same physical location?	⊙	0
1.	Logs	al Name of <i>Related Person</i> :		
1.		VOLTESSO GP S.A.R.L.		
	Б.:	De Charac Marco of Bulliand Barrary		
2.		nary Business Name of <i>Related Person</i> : VOLTESSO GP S.A.R.L.		
	5 /			
3.	reia -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	er		
4.	Rela	ated Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.		ated Person is: (check all that apply)		
	(a) (b)	, , ,		
	(c)	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> </ul>		
	(c) (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) (m)	insurance company or agency		
	(m) (n)	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		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	•	0

7.	Are y	e 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 clients?	you provide to	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5) related person and thus are not required to obtain a surprise examination for your clients' funds or secumaintained at the related person?	) from the	0	О
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office region your clients' assets:	esponsible for <i>cus</i>	tody	of
		Number and Street 1: Number and Street 2:			
		City: State:Country: ZIP+4/Postal Code:			
		If this address is a private residence, check this box: $\Box$			
0	(2)	If the related person is an investment advisor is it exempt from registration?			No
9.	(a)			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)	, , , , , , , , , , , , , , , , , , , ,	with which the <i>rel</i> a	ated	
		<i>person</i> is registered.  No Information Filed			
11.	Do v	you and the related person share any supervised persons?		_	_
	υ,	you and the related person share any supervised persons.		•	О
12.	Do y	you and the related person share the same physical location?		•	0
	KVT Prim	gal Name of <i>Related Person</i> : T GP, LLC mary Business Name of <i>Related Person</i> : T GP, LLC			
3.	Rela	lated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	- or				
	or Othe	her			
	D - / -	lated Person's			
4.		on CRD Number (if any):			
	. ,				
	(b)	) CIK Number(s) (if any):  No Information Filed			
		NO INIOMIATION FIRED			
_					
5.		lated Person is: (check all that apply) $\square$ broker-dealer, municipal securities dealer, or government securities broker or dealer			
		_			
	` ,	registered municipal advisor			
		) $\square$ registered security-based swap dealer			
	(f)	$oldsymbol{arphi}$ commodity pool operator or commodity trading advisor (whether registered or exempt from registr	ation)		
	(3)				
	` ,				
	(i)	trust company			
	(j) (k)				
	(K) (I)	insurance company or agency			

	(m)	pension consultant		
	(n)	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		
6.	Do y	you control or are you controlled by the related person?	Yes ⊙	No C
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	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 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>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: $\Box$	V	Na
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		No
J.	. ,		0	О
	(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.		٠
		No Information 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?	0	0
			_	
1.		al Name of <i>Related Person</i> : N SQUARE MANAGER I, LLC		
2.		nary Business Name of <i>Related Person</i> : N SQUARE MANAGER I, LLC		
3.	Rela -	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.		oted Person's  CRD Number (if any):		
	(h)	CIV Number(a) (if any)		1
	(b)	CIK Number(s) (if any):  No Information Filed		
5.	Rela	ated Person is: (check all that apply)		
	(a)			
	(b)			
	(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)		

	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	Trust company		
		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		
_	D	and a section of the control of the section of the	Yes	No
6.	ро у	ou control or are you controlled by the related person?	⊙	0
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	O	•
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?	$\circ$	$\circ$
	(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 re		-
		person is registered.		
	_	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.		l Name of <i>Related Person</i> : HEWITT INC.		
2.		ary Business Name of <i>Related Person</i> : HEWITT INC.		
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)			
	(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)	☐ registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	$\square$ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)			
	(h)			
	. ,	trust company		
	(3)	accountant or accounting firm		
	. ,	lawyer or law firm		
		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.	ро у	ou control or are you controlled by the related person?	$\circ$	⊚
7.	Are y	ou 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	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?		
	(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:		
		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, check this box: $\Box$	Yes	No
9.	(a)	If this address is a private residence, check this box: $\Box$	Yes ⊙	_
9.		If this address is a private residence, check this box: $\Box$ If the <i>related person</i> is an investment adviser, is it exempt from registration?	_	No C
9.	. ,	If this address is a private residence, check this box: $\Box$	_	_
9.		If this address is a private residence, check this box:   If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?	_	_
	(b)	If this address is a private residence, check this box:   If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY	_	0
	(b)	If this address is a private residence, check this box:   If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY  Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	<ul><li>⊙</li><li>○</li></ul>	_
	(b)	If this address is a private residence, check this box: □  If the <i>related person</i> is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY	<ul><li>⊙</li><li>○</li></ul>	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?  FOREIGN ENTITY  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>	<ul><li>⊙</li><li>○</li></ul>	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?  FOREIGN ENTITY  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.	<ul><li>⊙</li><li>○</li></ul>	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?  FOREIGN ENTITY  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	<ul><li>⊙</li><li>○</li></ul>	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?  FOREIGN ENTITY  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	<ul><li>⊙</li><li>○</li></ul>	0
10.	(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?  FOREIGN ENTITY  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 ou and the related person share any supervised persons?	<ul><li>⊙</li><li>○</li></ul>	0
10.	(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?  FOREIGN ENTITY  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 ou and the related person share any supervised persons?	<ul><li>⊙</li><li>○</li></ul>	0
10.	(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?  FOREIGN ENTITY  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 ou and the related person share any supervised persons?	<ul><li>⊙</li><li>○</li></ul>	0
10. 11. 12.	(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?  FOREIGN ENTITY  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 ou and the related person share any supervised persons?	<ul><li>⊙</li><li>○</li></ul>	0
10. 11. 12.	(b)  (a) (b)  Do y  Do y	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY  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 ou and the related person share any supervised persons?  ou and the related person share the same physical location?	<ul><li>⊙</li><li>○</li></ul>	0
10. 11. 12.	(b)  (a) (b)  Do y  Do y	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY  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 ou and the related person share any supervised persons?  ou and the related person share the same physical location?	<ul><li>⊙</li><li>○</li></ul>	0
11. 12.	(b)  (a) (b)  Do y  Do y  Lega TOW	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY  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 ou and the related person share any supervised persons?  ou and the related person share the same physical location?  I Name of Related Person:  NSEND GREAT LAKES AND PLAINS GP, LLC  ary Business Name of Related Person:	<ul><li>⊙</li><li>○</li></ul>	0
11. 12.	(b)  (a) (b)  Do y  Do y  Lega TOW	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY  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 ou and the related person share any supervised persons?  Ou and the related person share the same physical location?  I Name of Related Person:  NSEND GREAT LAKES AND PLAINS GP, LLC	<ul><li>⊙</li><li>○</li></ul>	0
10. 11. 12.	(b)  (a) (b)  Do y  Do y  Lega TOW	If the related person is an investment adviser, is it exempt from registration?  If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY  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  but and the related person share any supervised persons?  but and the related person share the same physical location?  I Name of Related Person:  NSEND GREAT LAKES AND PLAINS GP, LLC  ary Business Name of Related Person:  NSEND GREAT LAKES AND PLAINS GP, LLC	<ul><li>⊙</li><li>○</li></ul>	0
11. 12.	(b)  (a) (b)  Do y  Do y  Lega TOW	If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY  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 ou and the related person share any supervised persons?  ou and the related person share the same physical location?  I Name of Related Person:  NSEND GREAT LAKES AND PLAINS GP, LLC  ary Business Name of Related Person:	<ul><li>⊙</li><li>○</li></ul>	0
10. 11. 12.	(b)  (a) (b)  Do y  Do y  Lega TOW  Prima TOW  Relate	If the related person is an investment adviser, is it exempt from registration?  If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY  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  but and the related person share any supervised persons?  but and the related person share the same physical location?  I Name of Related Person:  NSEND GREAT LAKES AND PLAINS GP, LLC  ary Business Name of Related Person:  NSEND GREAT LAKES AND PLAINS GP, LLC	<ul><li>⊙</li><li>○</li></ul>	0
10. 11. 12.	(b)  (a) (b)  Do y  Do y  Lega TOW  Prima TOW  Relate - or	If this address is a private residence, check this box:   If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY  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  but and the related person share any supervised persons?  but and the related person share the same physical location?  I Name of Related Person:  INSEND GREAT LAKES AND PLAINS GP, LLC  ary Business Name of Related Person:  INSEND GREAT LAKES AND PLAINS GP, LLC  are Business Name of Related Person:  INSEND GREAT LAKES AND PLAINS GP, LLC  Therefore the same of the	<ul><li>⊙</li><li>○</li></ul>	0
10. 11. 12.	(b)  (a) (b)  Do y  Do y  Lega TOW  Prima TOW  Relate	If this address is a private residence, check this box:   If the related person is an investment adviser, is it exempt from registration?  If the answer is yes, under what exemption?  FOREIGN ENTITY  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  but and the related person share any supervised persons?  but and the related person share the same physical location?  I Name of Related Person:  INSEND GREAT LAKES AND PLAINS GP, LLC  ary Business Name of Related Person:  INSEND GREAT LAKES AND PLAINS GP, LLC  are Business Name of Related Person:  INSEND GREAT LAKES AND PLAINS GP, LLC  Therefore the same of the	<ul><li>⊙</li><li>○</li></ul>	0

4.	Rela	nted Person's			
	(a)	CRD Number (if any):			
	(b)	CIK Number(s) (if any):			I
	. ,	No Information Filed			
5.	Dela	nted Person is: (check all that apply)			
٦.	(a)				
	(b)				
	(d)				
	(e)	-			
		commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			
	(r) (g)				
	(y) (h)				
		trust company			
	(i)				
	(j)				
		·			
	(l) (m)	insurance company or agency			
	(n)				
	(o) (p)				
	(P)	sponsor, general partner, managing member (or equivalent) or pooled investment vehicles	Yes	Na	
6.	Do v	you control or are you controlled by the related person?		_	
0.	БО у	you control of 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	_	_	
	(0)	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>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 ?	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?	⊙	0	
12.	Do y	you and the <i>related person</i> share the same physical location?	•	0	
					-
Ite	n 7 P	Private Fund Reporting			
			Yes	No	
В	Δτο να	ou 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.

	1 2 3 >>	Funds per Page: 15 V Total Funds: 39
Λ D	RIVATE FUND	
4. P	AVAIE FUND	
<u>[nfc</u>	ormation About the Private Fund	
1.	(a) Name of the <i>private fund</i> :	
	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 <i>private</i>	
	State: Delaware	Country: United States
	Delaware	Officer 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, o	r Director
	CIF-H GP, LLC	
	(b) If filing an <i>umbrella registration</i> , identify the <i>fili</i> fund.	ing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private
		No Information Filed
4.	The <i>private fund</i> (check all that apply; you must che	eck at least one):
	lacksquare (1) qualifies for the exclusion from the definition Act of 1940	n of investment company under section 3(c)(1) of the Investment Company
	(2) qualifies for the exclusion from the definition Act of 1940	n of investment company under section 3(c)(7) of the Investment Company
5.	List the name and country, in English, of each <i>foreig</i>	an 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 arran	ngement?
	(b) If yes, what is the name and private fund identify	ification number (if any) of the feeder funds investing in this private fund?
		No Information Filed
	(c) Is this a "feeder fund" in a master-feeder arrange	Yes No
	(c) is this a recuer rund in a master-recuer arrang	gement?

	(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund. Name of private fund:	d inves	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 SD, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	Schedu	ule
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:	is Sec	tion
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest al substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investibles all of its assets in a single master fund.	ster fu	nd"
•		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 investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	<b>⊙</b> poole	o d
	(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> ?		
	$^{ m C}$ 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 Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	fund	•
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 77,734,043		
<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 an forth in the organizational documents of the fund).	nount	set
13.	Approximate number of the <i>private fund's</i> beneficial owners:		
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 <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.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
<u>You</u>	ur Ad	dvisory Services	Yes	No
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	O	•
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.		
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the $private$ $fund$ ?	O	•
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the $\mu$ fund. If the answer to question 18.(a) is "no," leave this question blank.	orivat	e
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$
	NOT	TE: For purposes of this question, do not consider feeder funds of the private fund.		
	Has	Offering the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	Yes ⊙	No C
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
	For	rm D file number		
	02:	1-8924889		
	ERVI ditor	CE PROVIDERS		
22	(e)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?		No
23.	(a)	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.	⊙ ⊙	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 moone 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 audi	ting firm's office responsible for	r 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 i	independent public accountant?		•	0
	(e)	Is the auditing firm regi	stered with the Public Compan	y Accounting Oversight Board?	•	0
		If yes, Public Company 42	Accounting Oversight Board-As	ssigned Number:		
	(f)	If "yes" to (e) above, is Oversight Board in acco		gular inspection by the Public Company Accounting	•	o
					Ye	s No
(g)		ne <i>private fund's</i> audited ne <i>fund's</i> investors?	financial statements for the mo	ost recently completed fiscal year distributed to the	•	0
(h)		of the reports prepared alified opinions?	by the auditing firm for the <i>pri</i>	vate fund since your last annual updating amendme	<i>nt</i> conta	iin
	<b>⊙</b> Ye	s C No C Report Not Y	et Received			
		check "Report Not Yet R the report is available.	Received," you must promptly fi	ile an amendment to your Form ADV to update your	respons	se
Prime B	roker				Vo	s No
24. (a)	Does	the <i>private fund</i> use one	or more prime brokers?			. O
	uses.			ns (b) through (e) below for each prime broker the $p$ ou must complete questions (b) through (e) separat		
			No Infor	rmation Filed		
Custodi						
Custour	<u>aii</u>				Ye	s No
25. (a)	Does assets	•	custodians (including the prim	e brokers listed above) to hold some or all of its	С	•
		If the <i>private fund</i> uses	, , , , , , , , , , , , , , , , , , , ,	ns (b) through (g) below for each custodian the <i>prive</i> must complete questions (b) through (g) separately		
			No Infor	rmation Filed		
Admini-	trate					
<u>Adminis</u>	oti dtol	<u>L</u>			٧-	s No
					YP	
26. (a)	Does	the <i>private fund</i> use an a	administrator other than your fi	irm?	Ye	

No Information Filed

27.	During your last fiscal year, what percentage of the private fund's assets (by value) was valued by a person, such as a	ın
	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*:

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

(b) Private fund identification number:

(include the "805-" prefix also)

805-9392525412

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

State: Country:
Delaware United States

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

# Name of General Partner, Manager, Trustee, or Director

CFSSG REAL ESTATE PARTNERS I, 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

6.	(a) Is this a "master fund" in a master-feeder arrangement?		-
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>	C) ind2	⊙
	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 <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> Name of <i>private fund</i> :	inves	ts?
	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 So D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	:hedu	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	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 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 the substantially all of its assets in a single master fund.	er fur sts	
8.	(a) Is this <i>private fund</i> a "fund of funds"?	Yes	_
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other privestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ooled	C
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	О	•
		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> :		
	\$ 48,202,132		
<u>Ow</u>	<u>nership</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 in the organizational documents of the fund).	ount s	set

13.	Арр 37	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</i>	persons:		
15.		What is the approximate percentage of the <i>private fund</i> benefi	cially owned (in the aggregate) l	by funds of funds:		
	0%				Yes	Nο
	(b)	If the private fund qualifies for the exclusion from the definitio Investment Company Act of 1940, are sales of the fund limited		section 3(c)(1) of the		0
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially	owned by non- <i>United States pe</i>	ersons:		
<u>You</u>	r Ad	visory Services			Yes	No
17.	(a)	Are you a subadviser to this <i>private fund</i> ?			0	(O
		If the answer to question 17.(a) is "yes," provide the name and the answer to question 17.(a) is "no," leave this question blank		adviser of the <i>private</i>		
		No Inform	nation Filed			
					Yes	No
18.	(a)	Do any investment advisers (other than the investment advise	rs listed in Section 7.B.(1).A.3.(I	o)) advise the <i>private</i>	•	О
<ul><li>fund?</li><li>(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the privafund. If the answer to question 18.(a) is "no," leave this question blank.</li></ul>						
		Name of Other Adviser to private fund	SEC file number	CRD number		
		COMMONFUND OCIO, INC.	801-56548	110689		
					Yes	No
.9.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?			$\circ$	•
	NOT	E: For purposes of this question, do not consider feeder funds	of the private fund.			
20.	App 0%	roximately what percentage of your <i>clients</i> has invested in the	private fund?			
Priv	ate	<u>Offering</u>			Yes	No
21.		the <i>private fund</i> ever relied on an exemption from registration of 1933?	of its securities under Regulation	n D of the Securities	•	0
22.		es, provide the <i>private fund's</i> Form D file number (if any):				
	<u> </u>	m D file number				
	021	-167003				
3. SE	RVI	CE PROVIDERS				
Aud	litor	<u>s</u>			Yes	N
22					1 63	
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an ar	nnual audit?		6	
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an ar (2) If the answer to question 23.(a)(1) is "yes," are the financ GAAP?		dance with U.S.	⊙ ⊙	0

one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

		e answer to question 23.(a)(1) is "yes," respet than one auditing firm, you must complete				
	b)	Name of the auditing firm:				
		ERNST & YOUNG LLP				
(	c)	The location of the auditing firm's office resp	nsible for the <i>private f</i>	und's audit (city, state and country):		
		City: Stat CLEVELAND Ohio		ntry: ed States		
	q)	Is the auditing firm an independent public ac	countant?		Yes	_
	u,	is the dudicing in in an independent public de	ountaine.		⊚	О
(	e)	Is the auditing firm registered with the Public	Company Accounting (	Oversight Board?	•	0
		If yes, Public Company Accounting Oversight 42	Board-Assigned Numbe	er:		
(	f)	If "yes" to (e) above, is the auditing firm sub Oversight Board in accordance with its rules?	ect to regular inspectio	on by the Public Company Accounting	•	0
If y	ou	SO No O Report Not Yet Received check "Report Not Yet Received," you must puthe report is available.	omptly file an amendn	nent to your Form ADV to update your re	spons	se
e Brok	er					
(a) Doe	es t	he <i>private fund</i> use one or more prime broke	·s?		Ye	s I
Ift	he s. :	answer to question 24.(a) is "yes," respond to find the private fund uses more than one prime broker.	questions (b) through			
prir			No Information Filed			
prii						
odian	ac +	he private fund use any custodians (including	the prime brokers lists	ed above) to hold some or all of its	Yes	
odian		he <i>private fund</i> use any custodians (includin <u>c</u> ?	the prime brokers liste	ed above) to hold some or all of its	Ye:	s I

Adı	minis	<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 the administrator, you must complete questions (b) through (f) separately for each administrator.	nan or	ıe
		No Information Filed		
27.		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> ?		
	Incl	lude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, incliaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributicalculations (including allocations) was the valuation determined by such <i>person</i> .	_	ınd
Ma	rkete	<u>ers</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?	$\circ$	$\odot$
		You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advise 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.	v for	b)
		No Information Filed		
A. P	RIVAT	TE FUND		
Info	rma	tion About the Private Fund		
1.	(a)	Name of the <i>private fund</i> :		
		COMMONFUND STRATEGIC SOLUTIONS REAL ESTATE OPPORTUNITY FUND 2014, L.P.		
	(b)	Private fund identification number: (include the "805-" prefix also)		
		805-5029596966		
2.	Und	der 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):		
	Naı	me of General Partner, Manager, Trustee, or Director		
	CFS	SSG REAL ESTATE PARTNERS II, 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> .	s priva	ate
		No Information Filed		

<ul> <li>4. The private fund (check all that apply; you must check at least one):</li> <li>✓ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company</li> </ul>	mpan	у
Act of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (C)(7) of the Investment (C) o	mnan	v
Act of 1940	лпрап	,
5. List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registed.	ered.	
No Information Filed		
	Yes	No
6. (a) Is this a "master fund" in a master-feeder arrangement?	0	•
(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?	0	•
<ul><li>(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund</li><li>Name of private fund:</li></ul>	d inves	
Private fund identification number: (include the "805-" prefix also)		
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	Schedu	ıle
7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th 7.B.(1), for each of the feeder funds answer the following questions:	is Sec	tion
No Information Filed		
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing all of its assets in a single master fund.	ster fu	
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 investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	<b>⊙</b> poole	d d
(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> ?		
$^{\circ}$ hedge fund $^{\circ}$ liquidity fund $^{\circ}$ private equity fund $^{\circ}$ real estate fund $^{\circ}$ securitized asset fund $^{\circ}$ venture capital Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	fund	•
NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		

\$ 55,635,570

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

\$ 250,000

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

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

49

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

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to qualified clients?

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

4%

# **Your Advisory Services**

17. (a) Are you a subadviser to this *private fund*?

Yes No

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

No Information Filed

Yes No

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

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

Yes No

19. Are your *clients* solicited to invest in the *private fund*?

NOTE: For purposes of this question, do not consider feeder funds of the private fund.

 $\circ$ 

20. Approximately what percentage of your *clients* has invested in the *private fund*? 0%

#### **Private Offering**

Yes No

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

(•)	- (

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

## Form D file number

021-167003

R	SER\	/ICF	DR ()\	/IDFRS

<u>Auditor</u>							
23 (a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?		s No				
23. (u)	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	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 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> use 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:						
	CLEVELAND Ohio United States	Yes	No				
	(d) Is the auditing firm an independent public accountant?	<b>⊙</b>	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				
		Ve	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					
(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?	nt conta	in				
	€ Yes C No C Report Not Yet Received						
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your when the report is available.	respons	e				
<u>Prime E</u>	<u>roker</u>						
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	_	s No				
(u)	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>p</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate prime broker.						
	No Information Filed						

Custod	<u>an</u>		<b>3</b> 7	
25. (a)	Does the <i>private fund</i> use any custodians (incli	uding the prime brokers listed above) to hold some or all of its	Yes	No ①
	assets?			•
		ond to questions (b) through (g) below for each custodian the <i>private</i> ustodian, you must complete questions (b) through (g) separately fo		
		No Information Filed		
Admini	strator		Yes	No
26. (a)	Does the <i>private fund</i> use an administrator oth	er than your firm?		•
		ond to questions (b) through (f) below. If the <i>private fund</i> uses more ) through (f) separately for each administrator.	than o	
		No Information Filed		
obt fee <u>Market</u>	ude only those assets where (i) such <i>person</i> caraining any relevant quotes, and (ii) the valuatio calculations (including allocations) was the valuers  Does the <i>private fund</i> use the services of some You must answer "yes" whether the <i>person</i> act other solicitor, or similar <i>person</i> . If the answer	rried out the valuation procedure established for that asset, if any, in used for purposes of investor subscriptions, redemptions or distribution determined by such <i>person</i> .  Some other than you or your <i>employees</i> for marketing purposes?  It is as a placement agent, consultant, finder, introducer, municipal advect to question 28.(a) is "yes," respond to questions (b) through (g) below the private fund uses more than one marketer you must complete questions.	Yes C visor or low for	No ©
		No Information Filed		
A. PRIVA	TE FUND			
Informa	tion About the <i>Private Fund</i>			
1. (a)	Name of the <i>private fund</i> :			
1. (a)	DEERE & COMPANY WELFARE BENEFIT FUND,	P		
(h)	Private fund identification number:	-r		
(5)	(include the "805-" prefix also)			
	805-5461955365			
2. Und	ler the laws of what state or country is the <i>priva</i>	ate fund organized:		
	State:	Country:		
	Delaware	United States		

ŀ	Name of General Partner, Manager, Trustee, or Director		
	JDPT MANAGER, 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) t <i>fund</i> .	his <i>pri</i>	ivat
	No Information Filed		
	The <i>private fund</i> (check all that apply; you must check at least one):		
	$\square$ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Co Act of 1940	ompar	ıy
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Co Act of 1940	ompar	ıy
	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is regist	ered.	
	No Information Filed		
		Yes	s N
	(a) Is this a "master fund" in a master-feeder arrangement?	0	(
(	(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	s N
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	
	Name of <i>private fund</i> :		
	Private fund identification number:  (include the "805-" prefix also)		
	Private fund identification number:	Sched	lule
]	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		
1	Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the section of the section of the section of the instructions to the section of the sect		
	Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:	ll or ster fu	und
	Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv	II or ster fu	und
	Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv substantially all of its assets in a single master fund.	II or ster fu ests Yes	unc
	Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other	II or ster fu ests Yes	unc
	Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also private funds or registered investment companies.	Il or ster fuests  Yes	und

3, 1:	56 PN	M IARD - All Sections [User Name: amay123, OrgID: 160006]		
	the	Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?		
10.	Wha	at type of fund is the <i>private fund</i> ?		
		hedge fund $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital for private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	und	•
	ПОИ	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> : 41,205,405		
<u>Ow</u>	ners	<u>ship</u>		
12.	Mini \$ 0	imum investment commitment required of an investor in the private fund:		
		TE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount in the organizational documents of the fund).	ount	set
13.	App 2	proximate 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 ①	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 Ad	<u>lvisory Services</u>		
			Yes	No
17.	` ,	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.	Ιt
		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.	orivat	e
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$
	NOT	TE: For purposes of this question, do not consider feeder funds of the private fund.		

20. Approximately what percentage of your  ${\it clients}$  has invested in the  ${\it private fund}$ ?

0%

FIII	vale	<u>oriering</u>			<b>V</b>	N-
21.		the <i>private fund</i> ever relied on an ex of 1933?	emption from registratio	n of its securities under Regulation D of the Securities	Yes ⊙	C
22.	If ye	s, provide the <i>private fund's</i> Form D	file number (if any):			
			No Informa	ation Filed		
B. SI	ERVIO	CE PROVIDERS				
Aud	ditors	1				
23.	(a)	(1) Are the <i>private fund's</i> financial s	tatements subject to an a	annual audit?		No
	(-)		-	ncial statements prepared in accordance with U.S.	⊙ ⊙	0
				tions (b) through (h) below. If the <i>private fund</i> uses m (f) separately for each auditing firm.	ore tha	an
		Additional Auditor Information :	1 Record(s) Filed.			
				estions (b) through (h) below. If the <i>private fund</i> uses (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm: ERNST & YOUNG				
		(c) The location of the auditing fi	rm's office responsible for State:	r the <i>private fund's</i> audit (city, state and country):  Country:		
		CLEVELAND	Ohio	United States		
		(d) Is the auditing firm an <i>indepe</i>	ndent public accountant?	,	Yes I	10 0
		(e) Is the auditing firm registered	l with the Public Compan	y Accounting Oversight Board?	<b>©</b>	0
		If yes, Public Company Accou	nting Oversight Board-As	ssigned Number:		
		(f) If "yes" to (e) above, is the au Oversight Board in accordance		gular inspection by the Public Company Accounting	© (	
		Are the <i>private fund's</i> audited financ private fund's investors?	ial statements for the mo	ost recently completed fiscal year distributed to the	Yes ⊙	No C
		Do all of the reports prepared by the unqualified opinions?	e auditing firm for the <i>pri</i>	vate fund since your last annual updating amendment	contai	า
		⊙ Yes ○ No ○ Report Not Yet Rec	ceived			
		If you check "Report Not Yet Receive when the report is available.	ed," you must promptly fi	ile an amendment to your Form ADV to update your re	sponse	ė
<u>Pri</u> i	me B	<u>roker</u>				
					Yes	No
24.	(a)	Does the <i>private fund</i> use one or mo	ore prime brokers?		0	•

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=\&viewChanges=N\&FLNG\_PK=1765820$ 

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* 

	No Information Filed		
Custod	<u>ian</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?	Yes O	œ.
	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.		
	No Information Filed		
<u>Admini</u>	<u>strator</u>	Yes	No
26. (a)	Does the <i>private fund</i> use an administrator other than your firm?	0	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		
	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> ? 19%	n	
obt	lude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, ir aining 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> .		
<u>Market</u>	<u>ers</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 advother solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) be each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (g) separately for each marketer.	low for	(b)
	No Information Filed		

EAST SEA MAIN FUND, LP
(b) *Private fund* identification number:

1. (a) Name of the private fund:

3, 1:	56 PM	IARD - All Sections [User Name: amay123, OrgID: 160006]	
	(include the "805-" prefix 805-2610111090	also)	
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 Partn	ner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	
	Name of General Partner,	Manager, Trustee, or Director	
	EAST SEA GP, LLC		
	(b) If filing an umbrella regis fund.	tration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or managements.	ge(s) this <i>private</i>
		No Information Filed	
5.	Act of 1940  (2) qualifies for the exclusion Act of 1940	sion from the definition of investment company under section 3(c)(1) of the Investment from the definition of investment company under section 3(c)(7) of the Investment from the definition of investment company under section 3(c)(7) of the Investment from the definition of the Investment from the Investme	nent Company
		No Information Filed	
			Yes No
6.	(a) Is this a "master fund" in	a master-feeder arrangement?	0 0
	(b) If yes, what is the name	and $\it private fund$ identification number (if any) of the feeder funds investing in this $\it p$	private fund?
		No Information Filed	
	(c) Is this a "feeder fund" in	a master-feeder arrangement?	Yes No
		and <i>private fund</i> identification number (if any) of the master fund in which this <i>priv</i> a	C
	Name of <i>private fund</i> :	, , , , , , , , , , , , , , , , , , ,	
	Private fund identification (include the "805-" prefix		
		estion 6 for each master-feeder arrangement regardless of whether you are filing a ster-feeder arrangement or reporting on the funds separately.	single Schedule

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

No Information Filed

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

Yes No

8.	(a)	Is this <i>private fund</i> a "fund of funds"?	⊙	$\circ$
		E: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other part of states of whether they are also private funds or registered investment companies.	ooole	d
	(b)	If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	O	•
			Yes	No
9.		ing your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	0
10.	Wha	at type of fund is the <i>private fund</i> ?		
		nedge fund $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital for private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	und	⊚
	NOT	E: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Curr	rent gross asset value of the <i>private fund</i> :		
	\$ 1,	010,000,000		
<u>Ow</u>	ners	<u>hip</u>		
12.	Mini \$ 0	mum investment commitment required of an investor in the private fund:		
	NOT	E: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amn in the organizational documents of the fund).	ount	set
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:		
			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	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
<u>You</u>	ur Ad	visory Services		
17	(2)	Are you a subadviser to this <i>private fund</i> ?	Yes	No
17.	. ,	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i>	C fund.	If
		the answer to question 17.(a) is "no," leave this question blank.		
		No Information Filed		
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <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.	orivat	e

		Ye	
9.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	С	6
	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> ?  0%		
iv	ate Offering		
1	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securiti	0.0	s N
	Act of 1933?	<sup>25</sup>	(
2.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
SE	RVICE PROVIDERS		
ıd	itors		
uu		Ye	s N
١.	(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?		
	If the angular to question 22 (a)(1) is "use " regressed to questions (b) through (b) below. If the private fund uses		
	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	nan
		more t	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 private fund us more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		nan
	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 us		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 private fund us 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 private fund's audit (city, state and country):		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 private fund us 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 private fund's audit (city, state and country):  City: State: Country:		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 private fund us 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 private fund's audit (city, state and country):  City: State: Country:		
	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 us 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 private fund's audit (city, state and country):  City: State: Country:	es	
	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 us 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 private fund's audit (city, state and country):  City:  State:  Country:  CLEVELAND  Ohio  United States	Yes	No
	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 us 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 private fund's audit (city, state and country):  City:  State:  Country:  CLEVELAND  Ohio  United States  (d) Is the auditing firm an independent public accountant?	Yes	No C
	Additional Auditor Information: 1 Record(s) Filed.  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund us 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 private fund's audit (city, state and country):  City:  State:  Country:  CLEVELAND  Ohio  United States  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  If yes, Public Company Accounting Oversight Board-Assigned Number:	Yes	No C
	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 us 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 private fund's audit (city, state and country):  City: State: Country:  CLEVELAND Ohio United States  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  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	Yes ©	<b>No</b> C C
	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 us 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 private fund's audit (city, state and country):  City: State: Country:  CLEVELAND Ohio United States  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  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	Yes ©	No C C

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 <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 uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) so 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 assets?	
If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian th uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) sepa custodian.	•
No Information Filed	
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> us administrator, you must complete questions (b) through (f) separately for each administrator.	Yes No C © ses more than one
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>, su 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, obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions of fee calculations (including allocations) was the valuation determined by such <i>person</i>.</li> </ul>	if any, including
<u>Marketers</u>	Vaa Na
28. (a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purpos	Yes No
You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municother 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.	cipal advisor or h (g) below for
No Information Filed	

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?
  - (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 *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of private fund:

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

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

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

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Yes No 8. (a) Is this *private fund* a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person? • Yes No 9. During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? 10. What type of fund is the *private fund*? C hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital fund C 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*: \$ 505,000,000 **Ownership** 12. Minimum investment commitment required of an investor in the private fund: NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund). 13. Approximate number of the *private fund's* beneficial owners: 2 14. What is the approximate percentage of the private fund beneficially owned by you and your related persons: 1% 15. (a) What is the approximate percentage of the private fund beneficially owned (in the aggregate) by funds of funds: 0% (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to qualified clients? 16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*: 99% **Your Advisory Services** Yes No 17. (a) Are you a subadviser to this *private fund*?

No Information Filed

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If

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

18.	(a	a) Do an fund?	ly investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i>		. №
	(b		answer to question $18.(a)$ is "yes," provide the name and SEC file number, if any, of the other advisers to the If the answer to question $18.(a)$ is "no," leave this question blank.	priva	te
			No Information Filed		
				Ye	s No
19.	Ar	re your a	lients solicited to invest in the private fund?	0	•
	N	OTE: Foi	purposes of this question, do not consider feeder funds of the private fund.		
20.	O <sup>q</sup>		ately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	vat	e Offer	i <u>ng</u>		
21.		as the <i>pi</i> ct of 193	rivate fund ever relied on an exemption from registration of its securities under Regulation D of the Securities 3?	Ye: ⊙	S No
22.	If	yes, pro	vide the <i>private fund's</i> Form D file number (if any):		
			No Information Filed		
B. SI			OVIDERS	W.	
22	(-	·\ (1\ Λ.	to the private funds financial statements subject to an appual audit?	Ye	s No
23.	(а		the private fund's financial statements subject to an annual audit? the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.	⊚	0
		GAAP If the		ore th	
		Addi	tional Auditor Information: 1 Record(s) Filed.		
		11	ne answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses re 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

	Ye	es I	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?	9	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> cont unqualified opinions?	ain	
	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 responsible when the report is available.	se	
Prime I			
24 (a)	Does the private fund use one or more prime brokers?	es I	_
(u)	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private</i> is uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for prime broker.	una	
	No Information Filed		
	•		
Custod		es I	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?		•
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.		
	No Information Filed		
Admini	istrator		
Admini		s I	No
26. (a)	Does the <i>private fund</i> use an administrator other than your firm?	5	•
	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.	on	e
	No Information Filed		
adr 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, includitatining 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> .	-	nd
Market	<u>cers</u>		
20 (-)		es l	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 of the person acts as a placement agent, consultant, finder, introducer, municipal advisor of the person acts as a placement agent, consultant, finder, introducer, municipal advisor of the person acts as a placement agent, consultant, finder, introducer, municipal advisor of the person acts as a placement agent, consultant, finder, introducer, municipal advisor of the person acts as a placement agent, consultant, finder, introducer, municipal advisor of the person acts as a placement agent, consultant, finder, introducer, municipal advisor of the person acts as a placement agent, consultant, finder, introducer, municipal advisor of the person acts are person acts as a placement agent, consultant, finder, introducer, municipal advisor of the person acts are person acts as a placement agent, consultant, finder, introducer, municipal advisor of the person acts are person acts as a placement agent, and the person acts are person acts and the person acts are person acts are person acts and the person acts are person acts are person acts and the person acts are person acts and the person acts are person acts and the person acts are person acts are person acts and the person acts are pe		•
	other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for		

		No Information Filed
)	RIVATE FUND	
c	ormation About the Private Fund	
	(a) Name of the <i>private fund</i> :	
	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 pr	
	State:	Country: Guernsey
	(a) Name(c) of Coneral Partner Manager Tructo	ee, or Directors (or <i>persons</i> serving in a similar capacity):
	Name of General Partner, Manager, Trustee LAKE ERIE REAL ESTATE GENERAL PARTNER LIN	
	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must	MITED  e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private  No Information Filed  check at least one):
	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must  (1) qualifies for the exclusion from the defining Act of 1940	MITED  e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this privat  No Information Filed  check at least one): ition of investment company under section 3(c)(1) of the Investment Company
	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must  (1) qualifies for the exclusion from the defining Act of 1940	MITED  e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private  No Information Filed  check at least one):
	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must  (1) qualifies for the exclusion from the defining Act of 1940  (2) qualifies for the exclusion from the defining Act of 1940	e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private.  No Information Filed  check at least one): ition of investment company under section 3(c)(1) of the Investment Company ition of investment company under section 3(c)(7) of the Investment Company ireign financial regulatory authority with which the private fund is registered.
-	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must  (1) qualifies for the exclusion from the defining Act of 1940  (2) qualifies for the exclusion from the defining Act of 1940	e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private.  No Information Filed  check at least one): ition of investment company under section 3(c)(1) of the Investment Company ition of investment company under section 3(c)(7) of the Investment Company areign financial regulatory authority with which the private fund is registered.  No Information Filed
-	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must  (1) qualifies for the exclusion from the defining Act of 1940  (2) qualifies for the exclusion from the defining Act of 1940	MITED  e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private  No Information Filed  check at least one): ition of investment company under section 3(c)(1) of the Investment Company ition of investment company under section 3(c)(7) of the Investment Company  reign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes N
	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must  (1) qualifies for the exclusion from the defining Act of 1940  (2) qualifies for the exclusion from the defining Act of 1940  List the name and country, in English, of each form the name and country, in English, of each form the defining Act of 1940	MITED  e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private  No Information Filed  c check at least one): ition of investment company under section 3(c)(1) of the Investment Company ition of investment company under section 3(c)(7) of the Investment Company  reign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes N
	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must  (1) qualifies for the exclusion from the defining Act of 1940  (2) qualifies for the exclusion from the defining Act of 1940  List the name and country, in English, of each form the name and country, in English, of each form the defining Act of 1940	MITED  e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private  No Information Filed  c check at least one): ition of investment company under section 3(c)(1) of the Investment Company ition of investment company under section 3(c)(7) of the Investment Company  reign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes N  rrangement?
	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must  (1) qualifies for the exclusion from the defining Act of 1940  (2) qualifies for the exclusion from the defining Act of 1940  List the name and country, in English, of each form the name and country, in English, of each form the defining Act of 1940	MITED  e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private  No Information Filed  c check at least one): ition of investment company under section 3(c)(1) of the Investment Company ition of investment company under section 3(c)(7) of the Investment Company  reign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes N  rrangement?  c G  entification number (if any) of the feeder funds investing in this private fund?  No Information Filed
	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must  (1) qualifies for the exclusion from the defining Act of 1940  (2) qualifies for the exclusion from the defining Act of 1940  List the name and country, in English, of each form the late of 1940  (a) Is this a "master fund" in a master-feeder and identify the fund identifies the fund	MITED  e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private  No Information Filed  c check at least one): ition of investment company under section 3(c)(1) of the Investment Company ition of investment company under section 3(c)(7) of the Investment Company  reign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes N  rrangement?  O G  entification number (if any) of the feeder funds investing in this private fund?  No Information Filed
	Name of General Partner, Manager, Trustee  LAKE ERIE REAL ESTATE GENERAL PARTNER LIN  (b) If filing an umbrella registration, identify the fund.  The private fund (check all that apply; you must  (1) qualifies for the exclusion from the defining Act of 1940  (2) qualifies for the exclusion from the defining Act of 1940  List the name and country, in English, of each form the late of 1940  (a) Is this a "master fund" in a master-feeder and identify the fund identifies the fund	MITED  e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private  No Information Filed  c check at least one): ition of investment company under section 3(c)(1) of the Investment Company ition of investment company under section 3(c)(7) of the Investment Company  reign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes N  rrangement?  O G  entification number (if any) of the feeder funds investing in this private fund?  No Information Filed

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	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 al 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) investibles the substantially all of its assets in a single master fund.	ster fund" ests
8.	(a) Is this <i>private fund</i> a "fund of funds"?	Yes No
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	
	(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 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 Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	fund 🌀
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	
11.	Current gross asset value of the <i>private fund</i> : \$ 473,183,182	
<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 antiforth in the organizational documents of the fund).	nount 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
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 100%	

	, ,		Yes	N
/.		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</i> the answer to question 17.(a) is "no," leave this question blank.	fund	. If
		No Information Filed		
			Yes	1
3.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the $private$ fund?	0	1
	(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.	priva	te
		No Information Filed		
			Yes	
9.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	(
	NO7	E: For purposes of this question, do not consider feeder funds of the private fund.		
).	App	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
riv		Offering		
		<del></del>	Yes	. 1
1.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	•	ı
2.	τ£	es, provide the <i>private fund's</i> Form D file number (if any):		
	TL A	es, provide the <i>private rand's</i> Form of the number (if any).		
SI		No Information Filed  CE PROVIDERS		
		No Information Filed  CE PROVIDERS	Va	
uc	ERVIO	No Information Filed  CE PROVIDERS	Yes	
uc	ERVIO	No Information Filed  CE PROVIDERS  (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.	Ye:	
uc	ERVIO	No Information Filed  CE PROVIDERS  (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	0	
uc	ERVIO	No Information Filed  CE PROVIDERS  (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 more	0	
uc	ERVIO	No Information Filed  CE PROVIDERS  (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 more auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	0	
uc	ERVIO	No Information Filed  CE PROVIDERS  (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 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	0	
uc	ERVIO	No Information Filed  CE PROVIDERS  (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 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:	0	
uc	ERVIO	No Information Filed  (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 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	0	
uc	ERVIO	No Information Filed  CE PROVIDERS  (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 mone auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information: 1 Record(s) Filed.  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:  ERNST & YOUNG  (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):  City:  State:  Country:  ST. PETERS PORT  Guernsey	0	an
uc	ERVIO	No Information Filed  (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 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  (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:  State:  Country:  Guernsey	⊙ C	ar

	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?
	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> 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 B	<u>roker</u> Yes No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.
	No Information Filed
	Yes No  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 fund</i>
	uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.
	No Information Filed
Adminis	itrator
	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 one administrator, you must complete questions (b) through (f) separately for each administrator.
	Additional Administrator Information : 1 Record(s) Filed.
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.
	(b) Name of administrator:  NORTHERN TRUST
	(c) Location of administrator (city, state and country):

Country:

State:

City:

	ST. PETERS PORT		Guernsey			
				Yes	No	
	(d) Is the administrator a re	lated person of your firm?		0	$\odot$	
	(e) Does the administrator p	repare and send investor account staten	nents to the <i>private fund's</i> investors?			
	• Yes (provided to all in investors)	vestors) ${f C}$ Some (provided to some but	not all investors) $\ ^{ extstyle  $			
		n 26.(e) is "no" or "some," who sends the If investor account statements are not s			-	
adn 100	ministrator, that is not your <i>relat</i> 0%					
obt	taining any relevant quotes, and	such <i>person</i> carried out the valuation pr (ii) the valuation used for purposes of in is) was the valuation determined by such	vestor subscriptions, redemptions or dis			
larket	eer <u>s</u>					
0 /->	Door the private for door the	services of someone other than you or yo	our amployage for more chine		Yes	N
	other solicitor, or similar person	r the <i>person</i> acts as a placement agent, n. If the answer to question 28.(a) is "ye fund uses. If the <i>private fund</i> uses more marketer.	s," respond to questions (b) through (g	) below	for	(b
	(3), (1), (1)					
		No Information File	ed			
	ATE FUND	No Information File	ed			
nforma	ATE FUND	No Information File	ed			
nforma	ATE FUND  ation About the Private Fund		ed			
nforma	ATE FUND  ation About the Private Fund  Name of the private fund:	ESTMENT L.P.	ed			
. (a) (b)	Name of the <i>private fund</i> :  GRE PARTNERSHIP IIA CO-INV  Private fund identification num (include the "805-" prefix also) 805-2672609085	ESTMENT L.P.	ed			
(a) (b)	Name of the <i>private fund</i> :  GRE PARTNERSHIP IIA CO-INV  Private fund identification num (include the "805-" prefix also) 805-2672609085	ESTMENT L.P.	ed			
(b)	Name of the <i>private fund</i> :  GRE PARTNERSHIP IIA CO-INV Private fund identification num (include the "805-" prefix also) 805-2672609085  der the laws of what state or cou	ESTMENT L.P.  per:  ntry is the <i>private fund</i> organized:  Country:				
. (a) (b) 2. Unc	Name of the <i>private fund</i> :  GRE PARTNERSHIP IIA CO-INV Private fund identification num (include the "805-" prefix also) 805-2672609085  der the laws of what state or cou	ESTMENT L.P.  per:  ntry is the <i>private fund</i> organized:				

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fund.		
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 Co Act of 1940	mpan	у
(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Co Act of 1940	mpan	у
List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registed	ered.	
No Information Filed		
	Yes	N
(a) Is this a "master fund" in a master-feeder arrangement?	0	Œ
(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private</i>	fund?	
No Information Filed		
	Yes	No
(c) Is this a "feeder fund" in a master-feeder arrangement?	0	e
(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> Name of <i>private fund</i> :	<i>d</i> inve	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 SD, 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 S		
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single SD, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the		
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single SD, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:	is Sec I or ster fu	tior
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single SD, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investions.	is Sec I or ster fu	nd"
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single SD, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invesubstantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?	I or ster fuests  Yes	nd"
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single SD, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investigationally all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also private funds or registered investment companies.	I or ster fuests  Yes	nd"
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single SD, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  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) investibles assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other	I or ster fuests  Yes	nd"  No
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single SD, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investigationally all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also private funds or registered investment companies.	I or ster fuests  Yes poole	nd"  No
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single SD, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investigationally all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also private funds or registered investment companies.	I or ster fuests  Yes poole	nd"  No
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single SD, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  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 "mastor purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invesubstantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other 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?  During your last fiscal year, did the private fund invest in securities issued by investment companies registered under	I or ster fuests  Yes poole  Yes	nd"  No c d

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>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 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%		
You	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.		
	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 <i>p</i> fund. If the answer to question 18.(a) is "no," leave this question blank.	orivat	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	Voc	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?	Yes ©	O
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		

**Auditors** 

B. SERVICE PF	ROVI	DERS
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(2)	(1) Are the private fund's financial statements subject to an appual audit?	_	S
(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>	•	
	GAAP?	C	)
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses mone auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	nore t	nar
	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		
		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: 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
		Υe	s
(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?	•	)
(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?	conta	iin
	⊙ Yes C No C Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your rewhen the report is available.	espon	se
<u>1e B</u>	<u>roker</u>		
(a)	Does the <i>private fund</i> use one or more prime brokers?		S
(=)	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>pri</i> queses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately		unc
	prime broker.		

Custo	<u>ian</u>		
		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>privat</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>Admi</u>	<u>istrator</u>	Vo	N.
26. (a	Does the <i>private fund</i> use an administrator other than your firm?	es (e)	No O
	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
	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 me than one administrator, you must complete questions (b) through (f) separately for each administrator.	ore	
	(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		
	(d) Is the administrator a <i>related person</i> of your firm?	es No	•
	(d) is the administrator a related person or your mini:	0 0	
	(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?		
	(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of private fund's investors? If investor account statements are not sent to the (rest of the) private fund's investor account "not applicable."		
	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	1	
	ministrator, that is not your <i>related person</i> ? 0%		
o	clude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, in caining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributed calculations (including allocations) was the valuation determined by such <i>person</i> .		
Marke	<u>ters</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 person acts as a placement agent, consultant, finder, introducer, municipal adv	/isor or	

other solicitor, or similar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for

		No Information Filed	
_			
PF	RIVATE FUND		
fo	rmation About the Private Fund		
	(a) Name of the <i>private fund</i> :		
	GRE PARTNERSHIP IIA L.P.		
	(b) Private fund identification number:		
	(include the "805-" prefix also) 805-4828541054		
	003-4020341034		
	Under the laws of what state or country is the <i>priv</i>	vate fund organized:	
	State:	Country:	
		Guernsey	
	(a) Name(s) of General Partner, Manager, Trustee	e, 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		_
	LAKE ERIE REAL ESTATE GP LTD		
		filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this priv	/ai
	(b) If filing an <i>umbrella registration</i> , identify the <i>t</i>	filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this priv No Information Filed	/a
	(b) If filing an <i>umbrella registration</i> , identify the <i>t</i>		/a 
	(b) If filing an <i>umbrella registration</i> , identify the <i>t</i>	No Information Filed	/a 
	(b) If filing an <i>umbrella registration</i> , identify the <i>fund</i> .  The <i>private fund</i> (check all that apply; you must contains the fund).	No Information Filed	
	<ul> <li>(b) If filing an umbrella registration, identify the refund.</li> <li>The private fund (check all that apply; you must compared to the fund (check all that apply).</li> <li>✓ (1) qualifies for the exclusion from the definition Act of 1940</li> </ul>	No Information Filed check at least one):	у
	<ul> <li>(b) If filing an umbrella registration, identify the refund.</li> <li>The private fund (check all that apply; you must of the fund)</li> <li>(1) qualifies for the exclusion from the definition Act of 1940</li> <li>✓ (2) qualifies for the exclusion from the definition Act of 1940</li> </ul>	No Information Filed  Check at least one):  ion of investment company under section 3(c)(1) of the Investment Company	у
	<ul> <li>(b) If filing an umbrella registration, identify the refund.</li> <li>The private fund (check all that apply; you must of the fund)</li> <li>(1) qualifies for the exclusion from the definition Act of 1940</li> <li>✓ (2) qualifies for the exclusion from the definition Act of 1940</li> </ul>	No Information Filed  Check at least one):  ion of investment company under section 3(c)(1) of the Investment Company  ion of investment company under section 3(c)(7) of the Investment Company	у
	<ul> <li>(b) If filing an umbrella registration, identify the refund.</li> <li>The private fund (check all that apply; you must of the fund)</li> <li>(1) qualifies for the exclusion from the definition Act of 1940</li> <li>✓ (2) qualifies for the exclusion from the definition Act of 1940</li> </ul>	No Information Filed  Check at least one): ion of investment company under section 3(c)(1) of the Investment Company ion of investment company under section 3(c)(7) of the Investment Company eign financial regulatory authority with which the private fund is registered.	у
	<ul> <li>(b) If filing an umbrella registration, identify the refund.</li> <li>The private fund (check all that apply; you must of the fund)</li> <li>(1) qualifies for the exclusion from the definition Act of 1940</li> <li>✓ (2) qualifies for the exclusion from the definition Act of 1940</li> </ul>	No Information Filed  check at least one): ion of investment company under section 3(c)(1) of the Investment Company ion of investment company under section 3(c)(7) of the Investment Company eign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes	y
	<ul> <li>(b) If filing an umbrella registration, identify the fund.</li> <li>The private fund (check all that apply; you must of 1940</li> <li>✓ (1) qualifies for the exclusion from the definition Act of 1940</li> <li>✓ (2) qualifies for the exclusion from the definition Act of 1940</li> <li>List the name and country, in English, of each foreman form the definition of 1940</li> <li>(a) Is this a "master fund" in a master-feeder arm</li> </ul>	No Information Filed  check at least one): ion of investment company under section 3(c)(1) of the Investment Company ion of investment company under section 3(c)(7) of the Investment Company eign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes	y
	<ul> <li>(b) If filing an umbrella registration, identify the fund.</li> <li>The private fund (check all that apply; you must of 1940</li> <li>✓ (1) qualifies for the exclusion from the definition Act of 1940</li> <li>✓ (2) qualifies for the exclusion from the definition Act of 1940</li> <li>List the name and country, in English, of each foreman form the definition of 1940</li> <li>(a) Is this a "master fund" in a master-feeder arm</li> </ul>	No Information Filed  Check at least one): ion of investment company under section 3(c)(1) of the Investment Company ion of investment company under section 3(c)(7) of the Investment Company eign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes rangement?	y
	<ul> <li>(b) If filing an umbrella registration, identify the fund.</li> <li>The private fund (check all that apply; you must of 1940</li> <li>✓ (1) qualifies for the exclusion from the definition Act of 1940</li> <li>✓ (2) qualifies for the exclusion from the definition Act of 1940</li> <li>List the name and country, in English, of each foreman form the definition of 1940</li> <li>(a) Is this a "master fund" in a master-feeder arm</li> </ul>	No Information Filed  check at least one): ion of investment company under section 3(c)(1) of the Investment Company ion of investment company under section 3(c)(7) of the Investment Company eign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes rangement?  ntification number (if any) of the feeder funds investing in this private fund?  No Information Filed	y y
	(b) If filing an <i>umbrella registration</i> , identify the <i>fund</i> .  The <i>private fund</i> (check all that apply; you must correctly (1) qualifies for the exclusion from the definition Act of 1940  (2) qualifies for the exclusion from the definition Act of 1940  List the name and country, in English, of each <i>fore</i> (a) Is this a "master fund" in a master-feeder arm (b) If yes, what is the name and <i>private fund</i> identified (b) If yes, what is the name and <i>private fund</i> identified (c)	No Information Filed  check at least one): ion of investment company under section 3(c)(1) of the Investment Company ion of investment company under section 3(c)(7) of the Investment Company eign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes rangement?  No Information Filed  Yes Programation Filed  Yes	y
	<ul> <li>(b) If filing an umbrella registration, identify the fund.</li> <li>The private fund (check all that apply; you must of the private fund (check all that apply; you must of the control of 1940.</li> <li>✓ (1) qualifies for the exclusion from the definition Act of 1940.</li> <li>✓ (2) qualifies for the exclusion from the definition Act of 1940.</li> <li>List the name and country, in English, of each fore.</li> <li>(a) Is this a "master fund" in a master-feeder arm (b) If yes, what is the name and private fund identified (c).</li> <li>(c) Is this a "feeder fund" in a master-feeder arm (c).</li> </ul>	No Information Filed  check at least one): ion of investment company under section 3(c)(1) of the Investment Company ion of investment company under section 3(c)(7) of the Investment Company eign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes rangement?  No Information Filed  Yes angement?  Yes angement?  Yes angement?	Y
	(b) If filing an <i>umbrella registration</i> , identify the <i>fund</i> .  The <i>private fund</i> (check all that apply; you must correctly (1) qualifies for the exclusion from the definition Act of 1940  (2) qualifies for the exclusion from the definition Act of 1940  List the name and country, in English, of each <i>fore</i> (a) Is this a "master fund" in a master-feeder arm (b) If yes, what is the name and <i>private fund</i> identified (c) Is this a "feeder fund" in a master-feeder arm (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private</i>	No Information Filed  check at least one): ion of investment company under section 3(c)(1) of the Investment Company ion of investment company under section 3(c)(7) of the Investment Company eign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes rangement?  No Information Filed  Yes Programation Filed  Yes	yy
	<ul> <li>(b) If filing an umbrella registration, identify the fund.</li> <li>The private fund (check all that apply; you must of the private fund (check all that apply; you must of the control of 1940.</li> <li>✓ (1) qualifies for the exclusion from the definition Act of 1940.</li> <li>✓ (2) qualifies for the exclusion from the definition Act of 1940.</li> <li>List the name and country, in English, of each fore.</li> <li>(a) Is this a "master fund" in a master-feeder arm (b) If yes, what is the name and private fund identified (c).</li> <li>(c) Is this a "feeder fund" in a master-feeder arm (c).</li> </ul>	No Information Filed  check at least one): ion of investment company under section 3(c)(1) of the Investment Company ion of investment company under section 3(c)(7) of the Investment Company eign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes rangement?  No Information Filed  Yes angement?  Yes angement?  Yes angement?	yy
	(b) If filing an <i>umbrella registration</i> , identify the <i>fund</i> .  The <i>private fund</i> (check all that apply; you must correctly (1) qualifies for the exclusion from the definition Act of 1940  (2) qualifies for the exclusion from the definition Act of 1940  List the name and country, in English, of each <i>fore</i> (a) Is this a "master fund" in a master-feeder arm (b) If yes, what is the name and <i>private fund</i> identified (c) Is this a "feeder fund" in a master-feeder arm (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private fund</i> identified (d) If yes, what is the name and <i>private</i>	No Information Filed  check at least one): ion of investment company under section 3(c)(1) of the Investment Company ion of investment company under section 3(c)(7) of the Investment Company eign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes rangement?  No Information Filed  Yes angement?  Yes angement?  Yes angement?	yy Y

	7.B.(1), for each of the feeder funds answer the following questions:		
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv substantially all of its assets in a single master fund.	ster fu	ınd"
		Yes	No.
8.	(a) Is this <i>private fund</i> a "fund of funds"?	⊙	$\circ$
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	r poole	ed
	(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> ?		
	$^{ m C}$ hedge fund $^{ m C}$ liquidity fund $^{ m C}$ private equity fund $^{ m C}$ real estate fund $^{ m C}$ securitized asset fund $^{ m C}$ venture capita Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	l 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> : \$ 85,117,062		
<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 argorith in the organizational documents of the fund).	mount	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%	Voc	s No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of th 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%		

100	л А	dvisory Services	Yes	s 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.	priva	te
		No Information Filed		
			Yes	No.
19.	Are	your clients solicited to invest in the private fund?	0	⊙
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Priv	vate	Offering		
			Yes	. No
21.		s the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	•	0
22.	If y	res, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
Aud	ditor	r <u>s</u>	Υe	s No
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?	0	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 more auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re th	an
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm: ERNST & YOUNG LLP		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
		City: State: Country: ST PETERS PORT Guernsey		
			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:  1438
	1450
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?
	Yes No
	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> 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 B	<u>roker</u> Yes No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.
	No Information Filed
	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 fund</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.
	No Information Filed
Adminis	
26. (a)	Yes No  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 one administrator, you must complete questions (b) through (f) separately for each administrator.
	Additional Administrator Information : 1 Record(s) Filed.
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <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: ST PETERS PORT	State:	Country: Guernsey		
		31 PETERS FOR		duciniscy	Yes	No
		(d) Is the administrator a related person	on of your firm?		0	•
		(e) Does the administrator prepare and	d send investor account statements	s to the <i>private fund's</i> investors	s?	
		Yes (provided to all investors)    investors)	Some (provided to some but not a	all investors) $^{ extsf{C}}$ No (provided t	o no	
		(f) If the answer to question 26.(e) is private fund's investors? If investor respond "not applicable."	"no" or "some," who sends the inverse raccount statements are not sent t			
27.	adm 100 Incl obta	ing your last fiscal year, what percentage on inistrator, that is not your related person?  Which was a same of the control of	on carried out the valuation procedous for purposes of investors	ure established for that asset, or subscriptions, redemptions o	if any, inclu	_
	100	calculations (including allocations) was the	e valuation determined by Sacri per-	5077.		
Ma	rkete	er <u>s</u>				
						Yes No
28.	(a)	Does the <i>private fund</i> use the services of				$\circ$
		You must answer "yes" whether the <i>perso</i> other solicitor, or similar <i>person</i> . If the an each such marketer the <i>private fund</i> uses through (g) separately for each marketer.	nswer to question 28.(a) is "yes," res. If the <i>private fund</i> uses more tha	espond to questions (b) throug	h (g) below	for
			No Information Filed			
A. P	RIVA	TE FUND				
Info	orma	tion About the Private Fund				
1.	(a)	Name of the <i>private fund</i> : GRE PARTNERSHIP IIB L.P.				
	(b)	Private fund identification number: (include the "805-" prefix also) 805-7034996319				
2.	Und	ler the laws of what state or country is the	e private fund organized:			
		State:	Country:			
			Guernsey			
3.	(a)	Name(s) of General Partner, Manager, Tru	istee, or Directors (or <i>persons</i> servi	ing in a similar capacity):		
	Na	me of General Partner, Manager, Trus	tee, or Director			
	LA	KE ERIE REAL ESTATE GP LTD				

No	Inforn	aation	Filod
171(1)	TITLE	namon	FIIECI

	Act of 1940		
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Co Act of 1940	mpan	ıy
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registed	ered.	
	No Information Filed		
		Yes	No
ō.	(a) Is this a "master fund" in a master-feeder arrangement?	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</i>	fund?	
	No Information Filed		
		Yes	. No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	<u> </u>
	(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>	d inve	sts?
	Name of private fund:		
	Private fund identification number: (include the "805-" prefix also)		
	(medade die eest preink diest)		
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th 7.B.(1), for each of the feeder funds answer the following questions:	is Sec	ction
·.		is Sec	ction
7.	7.B.(1), for each of the feeder funds answer the following questions:	l or ster fu	
	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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investibles all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?	l or ster fu ests Yes ∙	ind" : <b>No</b>
7. 3.	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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investibles all of its assets in a single master fund.	l or ster fu ests Yes ∙	ind" : <b>No</b>
	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 al 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) invesubstantially 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	l or ster fu ests Yes ∙	ind"
	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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invesubstantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	I or ster fu ests Yes • poole	nnd"  No  C  cd
	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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invesubstantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	I or ster fuests  Yes poole	ıınd" :: No C:d
	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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invesubstantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	I or ster fuests  Yes poole	ıınd" :: No C:d
3.	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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invesubstantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.  (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	I or ster fuests  Yes poole  Yes	nnd"  No  cd  • No
-	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest al substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mast for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invesubstantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.  (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.)?	I or ster fuests  Yes poole  Yes	nnd"  No  C  ed  No  T

11.	Current gross asset value of the <i>private fund</i> : \$ 127,369,871		
<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 amount 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	O
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	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.		
	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 <i>p</i> fund. If the answer to question 18.(a) is "no," leave this question blank.	rivat	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	N.a
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?	•	C
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		

•	CEDI	/ICE	DD O	VIDERS
_	>FK	/ 11	PKU	$v \cap r \times \gamma$

Auditor			
)3 (a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?		No.
.o. (u)	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	o •
	If the answer to question $23.(a)(1)$ is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses m one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ore th	an
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm:		
	ERNST & YOUNG LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country:		
	ST PETERS PORT Guernsey	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: 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	. 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
(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?	contai	n
	€ Yes C No C Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your rewhen the report is available.	spons	e
Prime B	<u>roker</u>		
24 (a)	Does the <i>private fund</i> use one or more prime brokers?		No.
- 1. (u)	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		

Custo	<u>dian</u>				
<b>3</b> 5 (-)	<b>.</b>		Y	'es	No
25. (a <sub>.</sub>	) Does asset	the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its s?		O	⊚
		answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>pri</i> If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separate dian.			
		No Information Filed			
Admin	istrato	<u>r</u>			
26 (5)	) Doos	the private find use an administrator other than your firm?	Y	'es	No
26. (a	-	the <i>private fund</i> use an administrator other than your firm?		⊙	0
		answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses no instrator, you must complete questions (b) through (f) separately for each administrator.	iore tha	n or	ie
	Addi	tional Administrator Information : 1 Record(s) Filed.			
		he answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses n one administrator, you must complete questions (b) through (f) separately for each administrator.	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	No	
	(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?			
		$^{f \odot}$ Yes (provided to all investors) $^{f \Box}$ Some (provided to some but not all investors) $^{f \Box}$ 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 (re private fund's investors? If investor account statements are not sent to the (rest of the) private fund's in respond "not applicable."			
ad	uring yo	private fund's investors? If investor account statements are not sent to the (rest of the) private fund's in	vestors,		
ob fee	taining e calcula	nly those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if an any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or disations (including allocations) was the valuation determined by such <i>person</i> .			ın
<u>Marke</u>	ters		,	'es	Νr
28. (a	) Does	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?		_	o No

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for

		No Information Filed
		NO IIIOIIIIauoii Fileu
PI	RIVATE FUND	
fo	ormation About the Private Fund	
•	(a) Name of the <i>private fund</i> :	
	GREAT PLAINS NDT, LP  (b) <i>Private fund</i> identification number:   (include the "805-" prefix also)	
	805-9146736410	
	Under the laws of what state or country is	the <i>private fund</i> organized:
	State:	Country:
	Delaware	United States
	(a) Name (a) of Constant Posters Manager	Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
	Name of General Partner, Manager, Townsend Great Lakes and Plains G	P, LLC
	Name of General Partner, Manager, Townsend Great Lakes and Plains Gr	P, LLC  Fify 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
	Name of General Partner, Manager, Townsend Great Lakes and Plains Gr	P, LLC  cify 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  must check at least one):
-	Name of General Partner, Manager, Townsend Great Lakes and Plains G	P, LLC  ify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private No Information Filed  must check at least one): 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 ach foreign financial regulatory authority with which the private fund is registered.
-	Name of General Partner, Manager, Townsend Great Lakes and Plains G	P, LLC  ify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private  No Information Filed  must check at least one): 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
	Name of General Partner, Manager, Townsend Great Lakes and Plains G	P, LLC  ify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund is replaced.  No Information Filed  Yes No Information Filed
-	Name of General Partner, Manager, Townsend Great Lakes and Plains Gr	P, LLC  ify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private No Information Filed  must check at least one): 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 ach foreign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes No
	Name of General Partner, Manager, Townsend Great Lakes and Plains Gr	P, LLC  lify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund is reliable to manage(s) this private fund is private fund in the filing filing adviser and foreign filing adviser and foreign filing fi
	Name of General Partner, Manager, Townsend Great Lakes and Plains Gr	P, LLC  ify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private number that sponsor(s) or manage(s) this private number to manage(s) this priv
-	Name of General Partner, Manager, Townsend Great Lakes and Plains Great Lakes and Lakes and Lakes And Plains Great Lakes and Lakes and Lakes and Lakes And Plains Great Lakes and Lakes and Lakes And Plains Great Lakes And P	P, LLC  iffy the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this privation of Information Filed  It must check at least one): It definition of investment company under section 3(c)(1) of the Investment Company It definition of investment company under section 3(c)(7) of the Investment Company It definition of investment company under section 3(c)(7) of the Investment Company It definition of investment regulatory authority with which the private fund is registered.  No Information Filed  Yes It are the following in this private fund?  No Information Filed  Yes It are the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund in the private fund?
-	Name of General Partner, Manager, Townsend Great Lakes and Plains Great Lakes and Lakes	P, LLC  iffy the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this privation of Information Filed  It must check at least one): It definition of investment company under section 3(c)(1) of the Investment Company It definition of investment company under section 3(c)(7) of the Investment Company It definition of investment company under section 3(c)(7) of the Investment Company It definition of investment regulatory authority with which the private fund is registered.  No Information Filed  Yes It are the following in this private fund?  No Information Filed  Yes It are the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund in the private fund?

	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 "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing all of its assets in a single master fund.	ster fun ests	
8.	(a) Is this <i>private fund</i> a "fund of funds"?	Yes	No C
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.		
	(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> ?		
	$^{\circ}$ hedge fund $^{\circ}$ liquidity fund $^{\circ}$ private equity fund $^{\circ}$ real estate fund $^{\circ}$ securitized asset fund $^{\circ}$ venture capital Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	fund 🤄	ð
	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>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 an forth in the organizational documents of the fund).	nount s	et
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> :		

4 -			Yes	N
/.		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	N
3.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	0	0
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the fund. If the answer to question 18.(a) is "no," leave this question blank.	priva	te
		No Information Filed		
			Yes	N
9.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	0
	NOT	TE: For purposes of this question, do not consider feeder funds of the private fund.		
Э.	App	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
riv		Offering		
	vace	<del>One mg</del>	Yes	N
1.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	•	(
2.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
. S		No Information Filed  CE PROVIDERS		
		CE PROVIDERS	Vas	
u	ERVI ditor	CE PROVIDERS	Yes	
u	ERVI ditor	CE PROVIDERS	Yes	•
u	ERVI ditor	CE PROVIDERS  (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.	© ©	,
u	ERVI ditor	CE PROVIDERS  (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 mo	©	,
uc	ERVI ditor	CE PROVIDERS  (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 mo one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	©	
u	ERVI ditor	(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 mo one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information: 1 Record(s) Filed.  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses	©	
uc	ERVI ditor	(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 mo one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information: 1 Record(s) Filed.  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:  ERNST & YOUNG LLP  (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):	©	,
u	ERVI ditor	(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.  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:	©	(
u	ERVI ditor	(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.  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	⊙ orre th	an
۱uc	ERVI ditor	(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 mo one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information: 1 Record(s) Filed.  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:  ERNST & YOUNG 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	⊙ orre th	an

	17 yes, Public Company Accounting Oversight Board-Assigned Number: 42
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?
	Yes No
	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> contain unqualified opinions?
	Yes ○ No ○ Report Not Yet Received
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.
Prime B	
24 (-)	Yes No
. ,	Does the <i>private fund</i> use one or more prime brokers?
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.
	No Information Filed
	Yes No  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 fund</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.
	No Information Filed
Adminis	<u>trator</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 one administrator, you must complete questions (b) through (f) separately for each administrator.
	No Information Filed
	ng 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 inistrator, that is not your <i>related person</i> ? %
	ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including ining 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*.

		Y	es
8. (a)	) Does the <i>private fund</i> use the service	es of someone other than you or your <i>employees</i> for marketing purposes?	0
	other solicitor, or similar person. If the	person acts as a placement agent, consultant, finder, introducer, municipal advisor he answer to question 28.(a) is "yes," respond to questions (b) through (g) below for uses. If the private fund uses more than one marketer you must complete question keter.	or
		No Information Filed	
DDT\//	ATE FUND		
	nation About the Private Fund		
11101111	action About the Private Fund		
L. (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. Un	nder the laws of what state or country i	s the <i>private fund</i> organized:	
	State:	Country:	
	Delaware	United States	
3. (a)	) Name(s) of General Partner, Manage	r, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	
Na	ame of General Partner, Manager,	Frustee, or Director	
TO	OWNSEND GREAT LAKES AND PLAINS	GP, LLC	
(b)	) If filing an <i>umbrella registration</i> , idea fund.	ntify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>p</i>	oriv
(b)	, ,	ntify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>p</i> No Information Filed	priva
	fund.	No Information Filed	priva
	fund.  ne private fund (check all that apply; yo	No Information Filed ou must check at least one):	
1. Th	fund.  ne private fund (check all that apply; yo	No Information Filed	
4. Th	fund.  ne private fund (check all that apply; you (1) qualifies for the exclusion from that of 1940	No Information Filed ou must check at least one):	any
1. Th	fund.  the private fund (check all that apply; you  (1) qualifies for the exclusion from the  that of 1940  (2) qualifies for the exclusion from the  that of 1940	No Information Filed  ou must check at least one):  ne definition of investment company under section 3(c)(1) of the Investment Compa	any
1. Th	fund.  the private fund (check all that apply; you  (1) qualifies for the exclusion from the  that of 1940  (2) qualifies for the exclusion from the  that of 1940	No Information Filed  ou must check at least one):  ne definition of investment company under section 3(c)(1) of the Investment Compane definition of investment company under section 3(c)(7) of the Investment Compane	any
1. Th	fund.  the private fund (check all that apply; you  (1) qualifies for the exclusion from the  that of 1940  (2) qualifies for the exclusion from the  that of 1940	No Information Filed  ou must check at least one):  ne definition of investment company under section 3(c)(1) of the Investment Compane definition of investment company under section 3(c)(7) of the Investment Compane definition of investment company under section 3(c)(7) of the Investment Compane deach foreign financial regulatory authority with which the private fund is registered.  No Information Filed	any
Acconst.	fund.  the private fund (check all that apply; you  (1) qualifies for the exclusion from the  that of 1940  (2) qualifies for the exclusion from the  that of 1940	No Information Filed  ou must check at least one):  ne definition of investment company under section 3(c)(1) of the Investment Compane definition of investment company under section 3(c)(7) of the Investment Compane definition of investment company under section 3(c)(7) of the Investment Compane deach foreign financial regulatory authority with which the private fund is registered.  No Information Filed	any any
4. Th	fund.  ne private fund (check all that apply; you (1) qualifies for the exclusion from that of 1940 (2) qualifies for the exclusion from that of 1940  st the name and country, in English, of (1) Is this a "master fund" in a master-form	No Information Filed  ou must check at least one): ne definition of investment company under section 3(c)(1) of the Investment Compane definition of investment company under section 3(c)(7) of the Investment Compane each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  Your didentification number (if any) of the feeder funds investing in this private fund.	any . es
4. Th	fund.  ne private fund (check all that apply; you (1) qualifies for the exclusion from that of 1940 (2) qualifies for the exclusion from that of 1940  st the name and country, in English, of (1) Is this a "master fund" in a master-form	No Information Filed  ou must check at least one):  ne definition of investment company under section 3(c)(1) of the Investment Compane definition of investment company under section 3(c)(7) of the Investment Compane each foreign financial regulatory authority with which the private fund is registered  No Information Filed  Yeeder arrangement?	any . es
4. Th	fund.  ne private fund (check all that apply; you (1) qualifies for the exclusion from that of 1940 (2) qualifies for the exclusion from that of 1940  st the name and country, in English, of (1) Is this a "master fund" in a master-form	No Information Filed  Ou must check at least one):  The definition of investment company under section 3(c)(1) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment C	any . es
4. Th Ac Ac 5. Lis (b)	fund.  ne private fund (check all that apply; you (1) qualifies for the exclusion from that of 1940 (2) qualifies for the exclusion from that of 1940  st the name and country, in English, of (1) Is this a "master fund" in a master-form	No Information Filed  Ou must check at least one):  The definition of investment company under section 3(c)(1) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment company under section 3(c)(7) of the Investment Company  The definition of investment C	any . es

Name of *private fund*:

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

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

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

No Information Filed

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

Yes No

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

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

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

0 0

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*:

\$ 265,072,037

## <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:

1

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

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds: 0%

Yes No

	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	•	0
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
You	ur Ac	lvisory Services		
17	(2)	Are you a subadvisor to this private fund?	Yes	No
17.		Are you a subadviser to this <i>private fund</i> ?  If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	C 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 $private fund$ ?	0	⊙
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the fund. If the answer to question 18.(a) is "no," leave this question blank.	orivat	e
		No Information Filed		
			Yes	No
19.		your <i>clients</i> solicited to invest in the <i>private fund</i> ?	О	$\odot$
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Pri</u>	vate	Offering.		
			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 y	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
	ERVI ditor	CE PROVIDERS		
			Yes	No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	⊙	О
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	0
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses moone auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re tha	ın
		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:		

	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	o
If yes, Public Company Accounting Oversight Board-Assigned Number: 42		
(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
	Ye	s No
	•	0
	nt conta	ain
● Yes ○ No ○ Report Not Yet Received		
	respon	se
roker_	Ye	s No
Does the <i>private fund</i> use one or more prime brokers?	0	
uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate		
No Information Filed		
<u>ın</u>	Ye	s No
	С	•
If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>priva</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately		
No Information Filed		
<u>trator</u>	Ye	s No
trator  Does the <i>private fund</i> use an administrator other than your firm?	Ye C	s No
	c	•
31	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?  Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?  Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment unqualified opinions?  Yes C No C Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your when the report is available.  Broker  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 prime broker.  No Information Filed  Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?  If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private sassets?  If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the privates. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately custodian.	(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?  Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?  Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment containing unqualified opinions?  Yes O 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 responsive the report is available.  Iroker  Yes  Does the private fund use one or more prime brokers?  If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for exprime broker.  No Information Filed  Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?  If the answer to question 25.(a) is "yes," respond to questions (b) through (q) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

27.		ng 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 instrator, that is not your <i>related person</i> ?	
	100%		
	Inclu obtai	de only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including ning any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, a alculations (including allocations) was the valuation determined by such <i>person</i> .	nd
<u>Ma</u>	rketer	<u>Yes</u>	N.a
28	(a) [	Poss the private funduce the convices of company other than you or your ampleyees 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 (labrough (g) separately for each marketer.	<b>6</b> b)
		No Information Filed	
A. P	RIVATE	E FUND	
Info	<u>rmati</u>	on About the Private Fund	
1.	(a) N	Name of the <i>private fund</i> :	
	J	DPT FUND, L.P.	
	. ,	Private fund identification number: include the "805-" prefix also)	
	8	805-4728834775	
2.	Unde	r the laws of what state or country is the <i>private fund</i> organized:	
		State: Country:	
	[	Delaware United States	
3.	(a) N	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	4
	JDPT	MANAGER, LLC	
		f 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> iund.	ite
		No Information Filed	
4.	The r	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 f 1940	
		2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company f 1940	
5.	List t	he name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.	
		No Information Filed	
		Yes I	No
6.	(a) I	s 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?

2

	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 <i>private fund</i> identification number (if any) of the master fund in which this <i>private fun</i> Name of <i>private fund</i> :	
	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 5 D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	Schedule
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to th 7.B.(1), for each of the feeder funds answer the following questions:	is 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 substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing all of its assets in a single master fund.	ster fund" ests
8.	(a) Is this <i>private fund</i> a "fund of funds"?	Yes No
0.	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	<b>⊙</b> C pooled
	(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 Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	fund 🗿
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	
11.	Current gross asset value of the <i>private fund</i> : \$ 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 art forth in the organizational documents of the fund).	nount set
13.	Approximate 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:		
			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.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
You	ur Ac	visory Services		
			Yes	No
17.		Are you a subadviser to this <i>private fund</i> ?	$\circ$	$\odot$
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	fund.	If
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the $private$ fund?	0	⊚
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the $\mu$ fund. If the answer to question 18.(a) is "no," leave this question blank.	privat	e
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	•
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.	•	
20.	App	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Pri</u>	vate	<u>Offering</u>		
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	Yes ⊙	No C
22.	If v	es, provide the <i>private fund's</i> Form D file number (if any):		
	_	m D file number		
	-	L-203229		
B. S	ERVI	CE PROVIDERS		
Aud	ditor	<u>s</u>	Vec	No
23	(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.	•	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 mo one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re tha	an
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses		

<u>Administrator</u>

		ERNST & YOUNG			
	(c)	The location of the auditing firm's office responsible for the <i>private</i>	fund's audit (city state and country):		
		- · · · · · · · · · · · · · · · · · · ·	untry:		
		CLEVELAND Ohio Un	ted States		
	(d)	Is the auditing firm an independent public accountant?		Yes ①	N <sub>1</sub>
	(e)	Is the auditing firm registered with the Public Company Accounting	Oversight Board?	_	_
	(-)			⊚	C
		If yes, Public Company Accounting Oversight Board-Assigned Num 42	per:		
(		If "yes" to (e) above, is the auditing firm subject to regular inspect Oversight Board in accordance with its rules?	ion by the Public Company Accounting	0	С
				Υe	s
		he <i>private fund's</i> audited financial statements for the most recently te fund's investors?	completed fiscal year distributed to the	•	5
Pii	vacc	te rana s investors.			
) Do	all	I of the reports prepared by the auditing firm for the private fund sin	nce your last <i>annual updating amendmer</i>	nt conta	ain
und	qua	alified opinions?	nce your last annual updating amendmer	nt conta	ain
und ©	qua Yes	alified opinions? es O No O Report Not Yet Received			
und © If y	Yes <i>you</i>	alified opinions?			
und © If y	Yes you nen t	alified opinions?  es O No O Report Not Yet Received  u check "Report Not Yet Received," you must promptly file an amend the report is available.			
If y wh	Yes you nen t	alified opinions?  es O No O Report Not Yet Received  u check "Report Not Yet Received," you must promptly file an amend the report is available.		respon.	
If y wh  Broke	Yes  you nen t  ker	alified opinions?  es O No O Report Not Yet Received  u check "Report Not Yet Received," you must promptly file an amend the report is available.  The private fund use one or more prime brokers?	lment to your Form ADV to update your	respon Ye	se ss
und  If y wh  Brok  If t use	Yes  Yes  you  nen  ker  oes t  the ses. 1	alified opinions?  es O No O Report Not Yet Received  u check "Report Not Yet Received," you must promptly file an amend the report is available.	lment to your Form ADV to update your h (e) below for each prime broker the pi	respon <b>Ye</b> Crivate f	se <b>:s</b>
und  If y wh  Brok  If t use	Yes  Yes  you  nen  ker  oes t  the ses. 1	alified opinions?  es O No O Report Not Yet Received  u check "Report Not Yet Received," you must promptly file an amend to the report is available.  the private fund use one or more prime brokers?  e answer to question 24.(a) is "yes," respond to questions (b) through If the private fund uses more than one prime broker, you must com	ment to your Form ADV to update your he was a second of the possible of the po	respon <b>Ye</b> Crivate f	se S
und  If y wh  Brok  If t use	Yes  Yes  you  nen  ker  oes t  the ses. 1	alified opinions?  es O No O Report Not Yet Received  u check "Report Not Yet Received," you must promptly file an amend to the report is available.  The private fund use one or more prime brokers?  e answer to question 24.(a) is "yes," respond to questions (b) through if the private fund uses more than one prime broker, you must come broker.	ment to your Form ADV to update your he was a second of the possible of the po	respon <b>Ye</b> Crivate f	se S
If y wh  Brok  Brok  If t use prin	Yes  Yes  you  nen  ker  oes t  the ses. 1	alified opinions?  es O No O Report Not Yet Received  u check "Report Not Yet Received," you must promptly file an amend to the report is available.  The private fund use one or more prime brokers?  e answer to question 24.(a) is "yes," respond to questions (b) through if the private fund uses more than one prime broker, you must come broker.	ment to your Form ADV to update your he was a second of the possible of the po	respon <b>Ye</b> Crivate f	se Siund Peac
If y wh  Broke  Broke  If t use print  If t us	Yes  you  ker  nes t  the s  es. I  ime	alified opinions?  es O No O Report Not Yet Received  u check "Report Not Yet Received," you must promptly file an amend to the report is available.  the private fund use one or more prime brokers? e answer to question 24.(a) is "yes," respond to questions (b) through If the private fund uses more than one prime broker, you must come broker.  No Information Filed  the private fund use any custodians (including the prime brokers list	ment to your Form ADV to update your with the polyneme broker the polynete questions (b) through (e) separate	Ye Crivate f	se Sun Seac
If y wh  Brok  Brok  If t use prin  If t use If t use If t use If t use	Yes  you nen t  ker  best the a es. I ime	alified opinions?  es O No O Report Not Yet Received  u check "Report Not Yet Received," you must promptly file an amend to the report is available.  the private fund use one or more prime brokers? e answer to question 24.(a) is "yes," respond to questions (b) through If the private fund uses more than one prime broker, you must come broker.  No Information Filed  the private fund use any custodians (including the prime brokers list	ment to your Form ADV to update your  h (e) below for each prime broker the properties of the questions (b) through (e) separate the december of the properties of the december of the private of the pri	Ye Crivate f ely for e	se is iun ead

https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG\_PK=1765820

Yes No

		No Todawaskian Filed
		No Information Filed
		ng 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 inistrator, that is not your <i>related person</i> ?
	obtai	ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including ining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, an calculations (including allocations) was the valuation determined by such <i>person</i> .
Marl	kete	<u>ers</u> Yes N
28.	(a) 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 advisor or other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b through (g) separately for each marketer.
		No Information Filed
		No Illiothiation Filed
. PR	IVATI	TE FUND
nfor	<b>mat</b> i	TE FUND  tion About the Private Fund  Name of the private fund:
nfor	(a)   (b) /	TE FUND  Lion About the Private Fund  Name of the private fund:  KKT, L.P.  Private fund identification number:
nfor	(a)   (b) /	TE FUND  Lion About the Private Fund  Name of the private fund:  KKT, L.P.
nfor	(a)     (b)     (a)	TE FUND  Lion About the Private Fund  Name of the private fund:  KKT, L.P.  Private fund identification number:  (include the "805-" prefix also)
nfor	(a)     (b)     (c)	TE FUND  Stion About the Private Fund  Name of the private fund:  KKT, L.P.  Private fund identification number:  (include the "805-" prefix also)  805-1766052441
1.	(a)   (b) // (c)   (a)   (b)	TE FUND  Stion About the Private Fund  Name of the private fund:  KKT, L.P.  Private fund identification number:  (include the "805-" prefix also)  805-1766052441  er 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):
1.	(a)   (b)   (b)   (c)   (a)   (a)   Nan	TE FUND  Stion About the Private Fund  Name of the private fund:  KKT, L.P.  Private fund identification number:  (include the "805-" prefix also)  805-1766052441  er 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):  me of General Partner, Manager, Trustee, or Director
nfor 1.	(a)   (b)   (b)   (a)   Name   KKT	TE FUND  Sion About the Private Fund  Name of the private fund:  KKT, L.P.  Private fund identification number:  (include the "805-" prefix also)  805-1766052441  er 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):  me of General Partner, Manager, Trustee, or Director  TGP, LLC
nfor 11.	(a)   (b)   (b)   (a)   Name   KKT	TE FUND  Tion About the Private Fund  Name of the private fund:  KKT, L.P.  Private fund identification number:  (include the "805-" prefix also)  805-1766052441  er 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):  me of General Partner, Manager, Trustee, or Director  GP, LLC  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private
nfor 1.	(a)   (b) // (a)   (a)   (a)   (a)   (b)   (b)   (b)   (c)   (c)   (c)   (d)   (d)	EFUND  Stion About the Private Fund  Name of the private fund:  KKT, L.P.  Private fund identification number: (include the "805-" prefix also)  805-1766052441  er 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):  me of General Partner, Manager, Trustee, or Director  GP, LLC  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this privatend.

Act of 1940

	No Information Filed		
		Yes	No
	(a) Is this a "master fund" in a master-feeder arrangement?	$\circ$	$\odot$
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private</i>	fund?	
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	•
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fun</i> Name of <i>private fund</i> :	nd inve	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 D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	Sched	ule
	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to t 7.B.(1), for each of the feeder funds answer the following questions:	his Sec	tion
	No Information Filed		
ļ			
1	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mater for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investantially all of its assets in a single master fund.	ester fu ests	
1	substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv substantially all of its assets in a single master fund.	ester fu ests	
: :	substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mater purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in othe	ester fu rests Yes	No O
:	substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mater fund" purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?	ester fu rests Yes	No O
:	substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investions and each class (or series) investions and each class (or series) investions all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in othe investment vehicles, regardless of whether they are also private funds or registered investment companies.	rester fu rests Yes • r poole	No o d
; 1	substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investions and each class (or series) investions and each class (or series) investions all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in othe investment vehicles, regardless of whether they are also private funds or registered investment companies.	Yes  r poole	No C d
: : : : : : : : : : : : : : : : : : : :	substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master 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.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in othe 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?  During your last fiscal year, did the private fund invest in securities issued by investment companies registered under	Yes  r poole  Yes	No d •
	substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investigations assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in othe 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?  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  r poole  Yes  Yes	No C d •
: : : : : : : : : : : : : : : : : : : :	substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mater purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invisubstantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in othe 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?  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.)?  What type of fund is the private fund?  O hedge fund O liquidity fund O private equity fund C real estate fund C securitized asset fund V venture capital	Yes  r poole  Yes  Yes	No C d •
	substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mater 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 single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in othe 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?  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.)?  What type of fund is the private fund?  C hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital Other private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	Yes  r poole  Yes  Yes	No cd o No o

12.	Min	imum investment commitment required of an investor in the private fund:		
	\$ 0			
		TE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the am h in the organizational documents of the fund).	ount :	set
13.	App 2	proximate 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> :		
<u>Yοι</u>	ur Ac	<u>Ivisory Services</u>	Yes	No
17	(2)	Are you a subadvisor to this private fund?	165	_
17.		Are you a subadviser to this <i>private fund</i> ?  If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	C 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>private fund</i> ?	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 the fund. If the answer to question 18.(a) is "no," leave this question blank.	orivat	е
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	0
		TE: For purposes of this question, do not consider feeder funds of the private fund.		٠
20.	App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	vate	<u>Offering</u>	Yes	No
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	©	0
22.	If y	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
B. S	ERVI	CE PROVIDERS		
Aud	ditor	<u>s</u>		
			Yes	No
23.	(a)	(1) Are the <i>private fund's</i> 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?	•	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 mone auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ore t	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 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?	⊙	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1438		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
(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?	Ye	s N
(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?	conta	iin
	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.	spon.	se
ne B	<u>roker</u>	Va	s N
(a)	Does the <i>private fund</i> use one or more prime brokers?	16	S 140
(-)	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>pri</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		
todi	a <u>n</u>		
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its	Ye	s N
	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 fo custodian.		

No Information Filed

Adı	minis	strator
		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 one administrator, you must complete questions (b) through (f) separately for each administrator.
		No Information Filed
27.		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> ?
	Incl obta	ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including aining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and calculations (including allocations) was the valuation determined by such <i>person</i> .
Ма	rkete	<u>ers</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 (b) through (g) separately for each marketer.
		No Information Filed
		TE FUND tion About the Private Fund
1.	(a)	Name of the <i>private fund</i> :
	(b)	KVT, L.P.  Private fund identification number: (include the "805-" prefix also)
		805-4089633764
2.	Und	ler 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):
		me of General Partner, Manager, Trustee, or Director
	KV	T GP, LLC

| fund.

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

No Information Filed

	$\mathbf{V}$ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Co	ompan	у
	Act of 1940		
	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is regist	ered.	
	No Information Filed		
		Yes	No
(	(a) Is this a "master fund" in a master-feeder arrangement?	$\circ$	⊚
(	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private</i>	fund?	
	No Information Filed		
		Ves	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 fun</i>	id inve	
•	Name of <i>private fund</i> :		
	Private fund identification number:		
	(include the "805-" prefix also)		
		his Sec	tion
		his Sec	tion
		his Sec	tion
	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investantially all of its assets in a single master fund.	ll or ster fu	nd"
	7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invisubstantially all of its assets in a single master fund.	ll or ster fu ests	nd"
	No Information Filed  NoTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invested substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other	II or ster fu ests <b>Yes</b>	nd" No
1 :	No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invisubstantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also private funds or registered investment companies.	II or ster fu ests <b>Yes</b>	nd" No
	7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) inv	Ill or ster furests  Yes  r poole	nd" No C
	No Information Filed  No Information Filed  NoTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invisubstantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other 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?  During your last fiscal year, did the private fund invest in securities issued by investment companies registered under	Ill or ster furests  Yes  r poole	nd" No O d
	No Information Filed  NoTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invisubstantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also private funds or registered investment companies.	Ill or ester fur ests  Yes  r poole  C  Yes	nd" No O d
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invisubstantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.  (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.)?	Ill or ster fu ests  Yes  r poole  Yes  C	nd" ○ O d ○ No

11.	Current gross asset value of the <i>private fund</i> : \$ 30,822,017		
<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 amount in the organizational documents of the fund).	ount :	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> : 4%		
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> : 96%		
You	<u>ır Advisory Services</u>	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.		
	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 <i>p</i> fund. If the answer to question 18.(a) is "no," leave this question blank.	orivat	e 
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	О	$\odot$
	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?	res ⊙	C
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		

R	SER\	/ICF	DR ()\	/IDFRS

<u>Auditor</u>			
23 (a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?		s No
23. (u)	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	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 th	ian
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> use 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:		
	CLEVELAND Ohio United States	Yes	No
	(d) Is the auditing firm an independent public accountant?	<b>⊙</b>	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
		Ve	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	
(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?	nt conta	in
	€ Yes C No C Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your when the report is available.	respons	e
<u>Prime E</u>	<u>roker</u>		
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	_	s No
(u)	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>p</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate prime broker.		
	No Information Filed		

Custodian		
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 C	No ©
If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fun</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each 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 the administrator, you must complete questions (b) through (f) separately for each administrator.	an or	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, include obtaining 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?	$\circ$	⊙
You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor 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 question 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.	Do y	you or any <i>related person</i> :	Yes	No	
	(1)	buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?	0	$\odot$	
	(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	•	
Sal	es In	terest in <i>Client</i> Transactions			
В.	Do y	you or any <i>related person</i> :	Yes	No	
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	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	ent 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?				
	(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?	$\odot$	O	
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	•	О	
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	•	
E.	Do y	you or any related person recommend brokers or dealers to clients?	0	•	
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?	0	0	
Н.	(1)	Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	$\odot$	0	
	(2)	Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)?	•	0	
I.	-	you or any <i>related person</i> , including any <i>employee</i> , directly or indirectly, receive compensation from any <i>person</i> (other n you or any <i>related person</i> ) for <i>client</i> referrals?	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 t t in part, on the number or amount of client referrals.			

0/23, 1:56 PM			IARD - All Sections [User Name: amay123, OrgID: 160006]							
Ite	m 9 C	ustody								
		· · · · · · · · · · · · · · · · · · ·	ted person has custody of client (other than clients that are investment companies regis ssets and about your custodial practices.	iter	-ed					
Α.	(1)	Do you have <i>custody</i> of any advisory	v clients':	s i	No					
		(a) cash or bank accounts?	6	,	o					
		(b) securities?	6	,	0					
	ded	uct your advisory fees directly from yo	the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) your clients' accounts, or (ii) a related person has custody of client assets in connection volution that you have overcome the presumption that you are not operationally independent							

(pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.

(2) If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of client funds and securities and total number of clients for which you have custody:

U.S. Dollar Amount

Total Number of Clients

(a) \$ 8,512,109,977

(b) 38

If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2).

B. (1) In connection with advisory services you provide to clients, do any of your related persons have custody of any of your Yes No advisory clients':

(a) cash or bank accounts?

⊚ - 0

(b) securities?

 $\odot$   $\circ$ 

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.B.(1)(a) or (b), what is the approximate amount of client funds and securities and total number of clients for which your related persons have custody:

U.S. Dollar Amount

Total Number of Clients

(a) \$8,512,109,977

(b) 38

C. If you or your related persons have custody of client funds or securities in connection with advisory services you provide to clients, check all the following that apply:

(1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage.

 $\nabla$ 

(2) An independent public accountant audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools.

 $\overline{\mathbf{v}}$ 

(3) An independent public accountant conducts an annual surprise examination of client funds and securities.

(4) An independent public accountant prepares an internal control report with respect to custodial services when you or your related persons are qualified custodians for client funds and securities.

If you checked Item 9.C.(2), C.(3) or C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the private funds you advise in Section 7.B.(1) of Schedule D).

D. Do you or your related person(s) act as qualified custodians for your clients in connection with advisory services you provide Yes No to clients?

(1) you act as a qualified custodian

•

(2) your related person(s) act as qualified custodian(s)

**(** 

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.

You	must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.		
		Yes	No
Do	any of the events below involve you or any of your supervised persons?	О	⊙
For	"yes" answers to the following questions, complete a Criminal Action DRP:		
A.	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?	0	$\odot$
	(2) been charged with any felony?	0	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your r to Item 11.A.(2) to charges that are currently pending.	respoi	nse
В.	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <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?	c	⊙
	(2) been charged with a misdemeanor listed in Item 11.B.(1)?	0	•
For	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your into Item 11.B.(2) to charges that are currently pending.  "yes" answers to the following questions, complete a Regulatory Action DRP:	respoi	nse 
C.	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?	0	•
	(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 <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission, or been dishonest, unfair, or unethical?	0	•
	(2) ever <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of <i>investment-related</i> regulations or statutes?	0	•
	(3) ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) in the past ten years, entered an order against you or any advisory affiliate in connection with an investment-related	О	•

		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)?								
	(3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?							
	(4) disciplined you or any <i>advisory affiliate</i> by expelling or suspending you or the <i>advisory affiliate</i> from membership, barring or suspending you or the <i>advisory affiliate</i> from association with other members, or otherwise restricting your or the <i>advisory affiliate's</i> activities?							
F. Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any <i>advisory affiliate</i> ever been revoked or suspended?								
G. Are 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 of Item 11.C., 11.D., or 11.E.?								
For	<u>"yes"</u>	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?	0	•				
		(c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any <i>advisory affiliate</i> by a state or <i>foreign financial regulatory authority</i> ?	0	•				
	(2)	Are you or any <i>advisory affiliate</i> now the subject of any civil <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.H.(1)?	0	•				

### **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
Α.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	0	0
If "y	yes," you do not need to answer Items 12.B. and 12.C.		
В.	Do you:		
	(1) <i>control</i> 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) 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	0
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?	O	0

#### Schedule A

### **Direct Owners and Executive Officers**

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

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Status	Date Title or Status Acquired MM/YYYY	•	Control Person		CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
WHITE, BRIAN, MICHAEL	I	CHIEF FINANCIAL OFFICER	01/2015	NA	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)	DE/FE/I	Entity in Which Interest is Owned	Status	Date Status Acquired MM/YYYY		Control Person		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	E	Υ	N	22-2232264
AON PLC	FE	AON US INTERNATIONAL HOLDINGS LIMITED	OWNER	08/1986	E	Y	Y	36-3051915
AON GROUP, INC	DE	AON CONSULTING, INC.	OWNER	12/2018	E	Υ	N	52-0969822
AON CORPORATION	DE	AON GROUP, INC	OWNER	12/2018	Е	Υ	N	36-3051915
AON GLOBAL HOLDINGS LIMITED	FE	AON CORPORATION	OWNER	01/2015	E	Υ	N	98-1199820
AON US INTERNATIONAL HOLDINGS LIMITED	FE	AON GLOBAL HOLDINGS LIMITED	OWNER	12/2018	Е	Υ	N	98-1117371

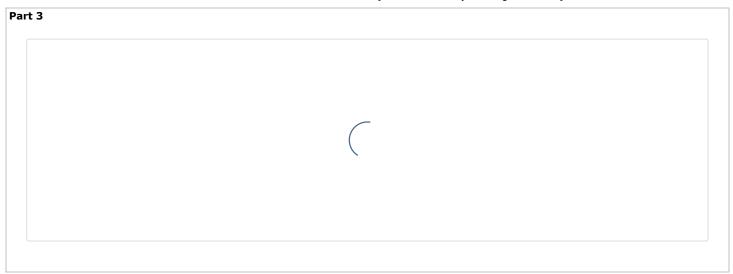
### Schedule D - Miscellaneous

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

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 delivering a brochure to <i>all</i> of your advisory clients, you do not have to prepare a brochure.	ı fro	mc
Ye	es	No
Are you exempt from delivering a brochure to all of your clients under these rules?	5	$\odot$
If no, complete the ADV Part 2 filing below.		
	_	
Amend, retire or file new brochures:		



#### **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 05/30/2023

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:

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