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

10/2/2023 2:16:12 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 B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A. **TOWNSEND HOLDINGS LLC** List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business. (2) If you are using this Form ADV to register more than one investment adviser under an *umbrella registration*, check this box \Box If you check this box, complete a Schedule R for each relying adviser. C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.(1)), enter the new name and specify whether the name change is of \square your legal name **or** \square your primary business name: D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: 801-72968 (2) If you report to the SEC as an exempt reporting adviser, your SEC file number: (3) If you have one or more Central Index Key numbers assigned by the SEC ("CIK Numbers"), all of your CIK numbers: No Information Filed E. (1) If you have a number ("CRD Number") assigned by the FINRA's CRD system or by the IARD system, your CRD number: 160006 If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates. (2) If you have additional CRD Numbers, your additional CRD numbers: No Information Filed F. Principal Office and Place of Business (1) Address (do not use a P.O. Box): Number and Street 1: Number and Street 2: 950 MAIN AVENUE **SUITE 1600** City: State: Country: ZIP+4/Postal Code: **CLEVELAND** Ohio **United States** 44113 If this address is a private residence, check this box: \Box

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

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 yea	= .	ve offices in terms of numbers	or employees as or the end of your most rec	zenciy
	(2) Days of week that ye	ou normally conduct bu	usiness at your <i>principal office</i>	and place of business:	
	• Monday - Friday Normal business hou				
	8:30 AM - 5:30 PM	t this leastion.			
	(3) Telephone number a 216-781-9090	t this location:			
	(4) Facsimile number at 216-781-1407	this location, if any:			
			han your <i>principal office and p</i> est recently completed fiscal ye	lace of business, at which you conduct investar?	tment
G.	Mailing address, if differe	ent from your <i>principal</i>	office and place of business ac	ldress:	
	Number and Street 1:		Number and Street	2:	
	City:	State:	Country:	ZIP+4/Postal Code:	
	If this address is a priva	te residence, check thi	s box: □		
Н.	If you are a sole propriet Item 1.F.:	or, state your full resid	ence address, if different from	your principal office and place of business a	nddress in
	Number and Street 1:		Number and Street	2:	
	City:	State:	Country:	ZIP+4/Postal Code:	
I.	Do you have one or more Twitter, Facebook and Lir		on publicly available social me	dia platforms (including, but not limited to,	Yes No
	Section 1.I. of Schedule the web, you may list the address. Do not provide	D. If a website address e portal without listing the addresses of websi ide the individual elect.	s serves as a portal through wl addresses for all of the other i tes or accounts on publicly ava	accounts on publicly available social media p nich to access other information you have pu nformation. You may need to list more than nilable social media platforms where you do of employees or the addresses of employee a	iblished on one portal not control
J.	Chief Compliance Officer				
				er. If you are an <i>exempt reporting adviser</i> , you one. If not, you must complete Item 1.K. be	
	Name: AIMEE B. MAY		Other titles, if any: CHIEF COMPLIANCE OF	FICER	
	Telephone number: 2164304690		Facsimile number, if any 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) AIMEE.MAY@AON.COM	address, if Chief Comp	liance Officer has one:		
	company registered under	er the Investment Com		on other than you, a related person or an invise for providing chief compliance officer ser	
	Name:		. ,,		

https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG_PK=1791155

IRS Employer Identification Number:

K			Person: If a person other tha s Form ADV, you may provide			zed to receive information	n and	
	Name NATAI	:: LIE DONOHUE BOESKEN		Titles: COMPLIANCE	ASSOCIATE			
	•	none number: 1304726		Facsimile num 216-781-140				
		er and Street 1: MAIN AVENUE		Number and S SUITE 1600	Street 2:			
	City: CLEVE	ELAND	State: Ohio	Country: United States		/Postal Code:		
		onic mail (e-mail) addre LIE.DONOHUE@AON.CO	ess, if contact person has one M	:				
							Yes	No
L			f the books and records you a other than your <i>principal offic</i>			f the Advisers Act, or	•	0
	If "yes	," complete Section 1.L.	of Schedule D.				Yes	No
M	1. Are yo	u registered with a <i>forei</i>	gn financial regulatory autho	rity?			О	•
		•	istered with a foreign financia thority. If "yes," complete Se	- '	• • •	an affiliate that is registe	red with	h a
							Yes	No
N	I. Are yo	u a public reporting com	pany under Sections 12 or 1	5(d) of the Securit	ties Exchange Act of 19	34?	0	•
С	If yes,		e in assets on the last day of e amount of your assets:) billion	your most recent	fiscal year?		Yes O	⊙
	~	10 billion to less than \$5						
		50 billion or more						
P	your to		r, "assets" refers to your total al assets shown on the baland tifier if you have one:				Determi	ine
		l entity identifier is a uni entity identifier.	que number that companies	use to identify ead	ch other in the financial	marketplace. You may n	iot have	e a
SI	ECTION 1	.B. Other Business Na	mes					
	_ist your o	ther business names and	d the jurisdictions in which yo	ou use them. You	must complete a separa	ate Schedule D Section 1	.B. for	
		ess name.	,		, and a second			
1	Name: THE	E TOWNSEND GROUP						
	lurisdictior	ns						
	☑ AL		☑ IL	☑ NE		☑ SC		
	☑ AK		☑ IN	☑ NV		☑ SD		
	▽ AZ		☑ IA	☑ NH		☑ TN		

If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a brokerdealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the CRD Branch Number here: How many employees perform investment advisory functions from this office location? 16 Are other business activities conducted at this office location? (check all that apply) (1) Broker-dealer (registered or unregistered) \square (2) Bank (including a separately identifiable department or division of a bank) (3) Insurance broker or agent \square (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm Describe any other investment-related business activities conducted from this office location: Complete the following information for each office, other than your principal office and place of business, at which you conduct investment

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

Number and Street 1: TWO EXCHANGE SQUARE		Number and Street 2: SUITE 2903; 29TH FLO	OR
City: CENTRAL	State:	Country: Hong Kong	ZIP+4/Postal Code:
If this address is a private residence, check this be	ох: 🗆		
Telephone Number: +852-3468-5900	Facsimile Number +852-9022-062	•	
If this office location is also required to be register dealer or investment adviser on the Uniform Branch			
How many <i>employees</i> perform investment advisor 9	ry functions from t	his office location?	
Are other business activities conducted at this official (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable depoint (3) Insurance broker or agent (4) Commodity pool operator or commodity transport (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm	partment or divisio	n of a bank)	t from registration)
Describe any other <i>investment-related</i> business a	ctivities conducted	from this office location:	
Complete the following information for each office advisory business. You must complete a separate are registered only with the SEC, or if you are an employees).	Schedule D Sectio	n 1.F. for each location. I	f you are applying for SEC registration, if you
advisory business. You must complete a separate are registered only with the SEC, or if you are an	Schedule D Sectio	n 1.F. for each location. I	f you are applying for SEC registration, if you est twenty-five offices (in terms of numbers of
advisory business. You must complete a separate are registered only with the SEC, or if you are an employees). Number and Street 1: 425 MARKET STREET City:	Schedule D Sectio	n 1.F. for each location. I adviser, list only the larg Number and Street 2	f you are applying for SEC registration, if you est twenty-five offices (in terms of numbers of
advisory business. You must complete a separate are registered only with the SEC, or if you are an employees). Number and Street 1: 425 MARKET STREET City:	Schedule D Section exempt reporting a state: alifornia	n 1.F. for each location. In adviser, list only the large Number and Street 2 SUITE 2800 Country:	If you are applying for SEC registration, if you est twenty-five offices (in terms of numbers of section of twenty-five offices): ZIP+4/Postal Code:
advisory business. You must complete a separate are registered only with the SEC, or if you are an employees). Number and Street 1: 425 MARKET STREET City: SAN FRANCISCO If this address is a private residence, check this both	Schedule D Section exempt reporting a state: alifornia	n 1.F. for each location. In adviser, list only the large Number and Street 2 SUITE 2800 Country: United States	If you are applying for SEC registration, if you est twenty-five offices (in terms of numbers of section of twenty-five offices): ZIP+4/Postal Code:
advisory business. You must complete a separate are registered only with the SEC, or if you are an employees). Number and Street 1: 425 MARKET STREET City: SAN FRANCISCO If this address is a private residence, check this between the second of the seco	schedule D Section exempt reporting a state: alifornia acsimile Number, it red with FINRA or a state.	n 1.F. for each location. In adviser, list only the large Number and Street 2 SUITE 2800 Country: United States	If you are applying for SEC registration, if you est twenty-five offices (in terms of numbers of set twenty-five offices): ZIP+4/Postal Code: 94105
advisory business. You must complete a separate are registered only with the SEC, or if you are an employees). Number and Street 1: 425 MARKET STREET City: SAN FRANCISCO If this address is a private residence, check this beautiful the service of the service	schedule D Section exempt reporting a state: tate: alifornia acsimile Number, it acsimile Registration of the Office Registration is section.	n 1.F. for each location. In adviser, list only the larger Number and Street 2 SUITE 2800 Country: United States	If you are applying for SEC registration, if you est twenty-five offices (in terms of numbers of set twenty-five offices): ZIP+4/Postal Code: 94105

(5) Registered municipal advisor			
\square (6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other <i>investment-related</i> busine	ss activities condu	cted from this office locat	ion:
Complete the following information for each o	ffice, other than vo	our <i>principal office and pl</i>	ace of business, at which you conduct investment
			on. If you are applying for SEC registration, if you
	an <i>exempt report</i>	ing adviser, list only the	argest twenty-five offices (in terms of numbers of
employees).			
Number and Street 1:		Number and Street 2	
200 E RANDOLPH		Number and Street 2	•
City:	State:	Country:	ZIP+4/Postal Code:
CHICAGO	Illinois	United States	60601
If this address is a private residence, check th	nis box: 🛘		
Telephone Number:	Facsimile Nun	nber, if any:	
13123810350			
If this office location is also required to be required	uistared with FIND/	\ or a state securities aut	hority as a branch office location for a broker-
dealer or investment adviser on the Uniform E			
How many <i>employees</i> perform investment adv	visory functions fro	om this office location?	
1			
Are other business activities conducted at this	-	heck all that apply)	
(1) Broker-dealer (registered or unregistered	•		
(2) Bank (including a separately identifiable	e department or di	vision of a bank)	
\square (3) Insurance broker or agent \square (4) Commodity pool operator or commodity	, trading advisor (whather registered or eve	ampt from registration)
\Box (4) Commodity poor operator or commodity \Box (5) Registered municipal advisor	r clauling advisor (whether registered or exe	impt from registration)
(6) Accountant or accounting firm			
\Box (7) Lawyer or law firm			
_ (,, = ,, , = , , , , , , , , , , , , ,			
Describe any other investment-related busine	ss activities condu	cted from this office locat	ion:
			ace of business, at which you conduct investment on. If you are applying for SEC registration, if you
			largest twenty-five offices (in terms of numbers of
employees).	, , , , , , , , , , , , , , , , , , , ,	3 , ,	. 5
Number and Street 1:		Number and Stree	et 2:
20 BAY STREET	a	_	
City: TORONTO	State:	Country: Canada	ZIP+4/Postal Code: M5J 2N9
IONONIO		Carraua	(133 ZN)
If this address is a private residence, check th	nis box:		
and and and an appropriate residence, check the			
Telephone Number:	Facsimile N	Number, if any:	
+14162275684		. ,	

If this office location is also required to be regi dealer or investment adviser on the Uniform Bi			•						
How many <i>employees</i> perform investment advisory functions from this office location?									
Are other business activities conducted at this \Box (1) Broker-dealer (registered or unregistere		(check all that apply)							
	(1) Broker-dealer (registered or difregistered) (2) Bank (including a separately identifiable department or division of a bank)								
(2) Bulk (including a separately identifiable	acparement of	division of a bank)							
(4) Commodity pool operator or commodity	trading advisor	(whether registered or exe	mpt from registration)						
(5) Registered municipal advisor	J	(,						
(6) Accountant or accounting firm									
(7) Lawyer or law firm									
Describe any other <i>investment-related</i> busines	s activities cond	ducted from this office locati	on:						
SECTION 1.I. Website Addresses									
List your website addresses, including addresses (including, but not limited to, Twitter, Facebook or account on a publicly available social media	and/or Linked		nedia platforms where you control the content parate Schedule D Section 1.I. for each website						
Address of Website/Account on Publicly Availab	ole Social Media	Platform: HTTP://WWW.T	OWNSENDGROUP.COM						
Address of Website/Account on Publicly Availab	ole Social Media	Platform: https://www.lir	kedin.com/company/the-townsend-group/about/						
SECTION 1.L. Location of Books and Record	ls								
Complete the following information for each loo of business. You must complete a separate Sch			cords, other than your <i>principal office and place</i>						
Name of entity where books and records are keep to the total TOWNSEND GROUP EUROPE LTD.	ept:								
Number and Street 1: 28-29 DOVER STREET		Number and Street 2: 4TH FLOOR							
City:	State:	Country:	ZIP+4/Postal Code:						
LONDON	State.	United Kingdom	W1S 4NA						
If this address is a private residence, check this box: $\ \Box$									
Telephone Number: +207-495-7784	Facsimile num +207-317-05	·							
This is (check one):									
• one of your branch offices or affiliates.									
C a third-party unaffiliated recordkeeper.									
C other.									

Briefly describe the books and re SOME INFORMATION RELATED TO			CE.
Name of entity where books and PROOFPOINT, INC	records are kept:		
Number and Street 1: 892 ROSS DRIVE		Number and Street 2	2:
City: SUNNYVALE	State: California	Country: United States	ZIP+4/Postal Code: 94089
If this address is a private reside	nce, check this box: $\ \square$		
Telephone Number: 408-517-4710	Facsimile num	ber, if any:	
This is (check one):			
${f C}$ one of your branch offices or	affiliates.		
a third-party unaffiliated reco	rdkeeper.		
O other.			
Briefly describe the books and re EMAIL RETENTION	cords kept at this location.		
Name of entity where books and AON CHICAGO OFFICE	records are 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 reside	nce, check this box: \Box		
Telephone Number: 13123810350	Facsimile nu	ımber, if any:	
This is (check one):			
• one of your branch offices or	affiliates.		
C a third-party unaffiliated reco	rdkeeper.		
C other.			
Briefly describe the books and re SOME INFORMATION RELATED TO			CE.
Name of entity where books and AON CANADA OFFICE	records are kept:		
Number and Street 1: 20 BAY STREET		Number and Street	2:

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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 r	number, if any:	
This is (check one): one of your branch offices or affiliates. a third-party unaffiliated recordkeeper. other.			
Briefly describe the books and records kept at t SOME INFORMATION RELATED TO INVESTMENT		ONDUCTED IN THIS OFFIC	CE.
Name of entity where books and records are ke GLOBAL RELAY	ept:		
Number and Street 1: 22 CAMBIE STREET		Number and Street	2:
City: VANCOUVER	State:	Country: Canada	ZIP+4/Postal Code: V68 2M9
If this address is a private residence, check this	box:		
Telephone Number: 866-484-6630	Facsimile r	number, if any:	
This is (check one):			
one of your branch offices or affiliates. a third-party unaffiliated recordkeeper.			
C other.			
Briefly describe the books and records kept at t EMAIL AND INSTANT MESSAGING RETENTION/			
Name of entity where books and records are ke ACCESS RECORDS MANAGEMENT	ept:		
Number and Street 1: ONE ANDREWS CIRCLE		Number and Street 2:	
City: BRECKSVILLE	State: Ohio	Country: United States	ZIP+4/Postal Code: 44141
If this address is a private residence, check this	box:		
Telephone Number: 440-838-8611	Facsimile num	ber, if any:	

This is (check one):									
O one of your branch offices or affiliates.									
C other.									
- Other.									
Briefly describe the books and records kept	Briefly describe the books and records kept at this location.								
	SOME COMPANY RECORDS ARE MAINTAINED AT THIS SECURE OFFSITE STORAGE FACILITY.								
Name of entity where books and records are	e kept:								
TOWNSEND GROUP ASIA LTD.									
Number and Street 1:		Number and Street 2:							
TWO EXCHANGE SQUARE	.	STE 2903; 29TH FLOOR							
City: CENTRAL	State:	Country: Hong Kong	ZIP+4/Postal Code:						
CENTRAL		riorig Korig							
If this address is a private residence, check	this box:								
Telephone Number: +852-3468-5900	Facsimile num +852-9022-06	•							
+632-3400-3900	+632-9022-00	520							
This is (check one):									
• one of your branch offices or affiliates.									
C a third-party unaffiliated recordkeeper.									
C other.									
outer.									
Briefly describe the books and records kept		JULICTED IN THIS OFFICE							
		IDUCTED IN THIS OFFICE.							
Briefly describe the books and records kept		IDUCTED IN THIS OFFICE.							
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTM	ENT RESEARCH CON	NDUCTED IN THIS OFFICE.							
Briefly describe the books and records kept	ENT RESEARCH CON	IDUCTED IN THIS OFFICE.							
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTM Name of entity where books and records are	ENT RESEARCH CON	IDUCTED IN THIS OFFICE.							
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTM Name of entity where books and records are	ENT RESEARCH CON	NUCTED IN THIS OFFICE.							
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT OF THE PROPERTY OF THE PROP	ENT RESEARCH CON								
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT OF TOWNSEND HOLDINGS LLC Number and Street 1: 425 MARKET STREET City:	e kept: State:	Number and Street 2: SUITE 2800 Country:	ZIP+4/Postal Code:						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT Name of entity where books and records are TOWNSEND HOLDINGS LLC Number and Street 1: 425 MARKET STREET	e kept:	Number and Street 2: SUITE 2800	ZIP+4/Postal Code: 94105						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT OF THE PROPERTY OF THE PROP	e kept: State: California	Number and Street 2: SUITE 2800 Country:	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT OF TOWNSEND HOLDINGS LLC Number and Street 1: 425 MARKET STREET City:	e kept: State: California	Number and Street 2: SUITE 2800 Country:	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT OF THE SOME INFORMATION RELATED TO INVESTMENT OF THE SOME INFORMATION RELATED TO INVESTMENT OF THE SOME INVESTMENT OF THE SOME INFORMATION INFORMA	e kept: State: California this box:	Number and Street 2: SUITE 2800 Country: United States	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT OF THE PROPERTY OF THE PROP	e kept: State: California	Number and Street 2: SUITE 2800 Country: United States	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT OF THE SOME INFORMATION RELATED TO INVESTMENT OF THE SOME INFORMATION RELATED TO INVESTMENT OF THE SOME INVESTMENT OF THE SOME INFORMATION INFORMA	e kept: State: California this box:	Number and Street 2: SUITE 2800 Country: United States	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT IN INTERPRETARIES IN INTERPRETA	e kept: State: California this box:	Number and Street 2: SUITE 2800 Country: United States	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT IN INTERPRETARIES IN INVESTMENT	e kept: State: California this box:	Number and Street 2: SUITE 2800 Country: United States	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT IN	e kept: State: California this box:	Number and Street 2: SUITE 2800 Country: United States	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT IN	e kept: State: California this box:	Number and Street 2: SUITE 2800 Country: United States	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT IN	e kept: State: California this box:	Number and Street 2: SUITE 2800 Country: United States	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT IN	State: California this box:	Number and Street 2: SUITE 2800 Country: United States	•						
Briefly describe the books and records kept SOME INFORMATION RELATED TO INVESTMENT IN	State: California this box: Facsimile number,	Number and Street 2: SUITE 2800 Country: United States	94105						

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

No Information Filed

Item 2 SEC Registration/Reporting

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

A.	To register (or remain registered) with the SEC, you must check at least one 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 mid-sized advisory firm 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 HERE 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 an investment adviser (or subadviser) to an investment company registered under the Investment Company Act of 1940;					
		(6)	are an investment adviser to a company which has elected to be a business development company 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 pension consultant 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 related adviser 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 multi-state adviser that is required to register in 15 or more states and is relying on rule 203A-2(d);					
			If you check this box, complete Section 2.A.(10) of Schedule D.					
		(11)	are an Internet adviser relying on rule 203A-2(e);					
		(12)	have received an SEC order exempting you from the prohibition against registration with the SEC;					
			If you check this box, complete Section 2.A.(12) of Schedule D.					
		(13)	are no longer eligible to remain registered with the SEC.					
Sta	te S	ecurit	ties Authority Notice Filings and State Reporting by Exempt Reporting Advisers					

C. Under state laws, SEC-registered advisers may be required to provide to state securities authorities a copy of the Form ADV and any amendments they file with the SEC. These are called notice filings. In addition, exempt reporting advisers may be required to provide state securities authorities with a copy of reports and any amendments they file with the SEC. If this is an initial application or report, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to direct your notice filings or reports to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to

	am not registered or required to be registered with the SEC or a <i>state securities authority</i> and I have a reasonable expectation that I vill be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective. undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be rohibited by Section 203A(a) of the Advisers Act from registering with the SEC.					
EC registration within 120	days, you are required to m s, you will be deemed to have	ne prohibition on registration available certain representations about the made the required representation as state securities authorized.	your eligibility for SEC registrations. You must make both of these	n. By		
		Eligible for Commission Regist				
Number of Registered Inv	estment Adviser					
Number of Registered Inv	estment Adviser					
e of Registered Investmer	t Adviser					
r common <i>control</i> with an		the prohibition on registration bedegistered with the SEC and your p g information:				
ION 2.A.(8) Related Ad	viser					
If you are amending your registration to stop your notice filings or reports from going to a state that currently receives them and you do not want to pay that state's notice filing or report filing fee for the coming year, your amendment must be filed before the end of the year (December 31).						
□ ID	□ мт	□ RI				
□ ні	□ MO	□ PR	VV T			
□ GA □ GU	□ MN □ MS	□ OR □ PA	□ WI □ WY			
□ FL	□ MI	□ ок	□ wv			
□ DC	□ ма	□ он	□ WA			
□ DE	□ MD	□ ND	□ VA			
□ ст	□ ME	□ NC	□ vi			
□ co	□ LA	□ NY	□ VT			
□ AR □ CA	□ KY	□ NM	□ IX □ UT			
□ AZ	∏ IA ∏ KS	□ NH	□ TN □ TX			
	IN	NIV/	CD			
☐ AL ☐ AK	□ IL □ IN	□ NE □ NV	□ sc □ sp			

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

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

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

 □ I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the <i>state securities authorities</i> in those states. □ I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the <i>state securities authorities</i> of those states.
If you are submitting your annual updating amendment, you must make this representation:
☐ Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the <i>state securities authorities</i> in those states.
SECTION 2.A.(12) SEC Exemptive Order
If you are relying upon an SEC <i>order</i> exempting you from the prohibition on registration, provide the following information:
Application Number:
803-
Date of <i>order</i> :

Item 3 Form of Organization

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

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

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

- B. In what month does your fiscal year end each year? DECEMBER
- C. Under the laws of what state or country are you organized?

State Country

Delaware United States

If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.

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

Item 4 Successions

Yes No

A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)?

•

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

B. Date of Succession: (MM/DD/YYYY)

If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.

SECTION 4 Successions

No Information Filed

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

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

Employees

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

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

 122
- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
 - (2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?
 - (3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?
 - 2
 (4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as
 - investment adviser representatives for an investment adviser other than you?
 0
 (5) Approximately how many of the employees reported in 5.A. are licensed agents of an insurance company or agency?
 - (6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?

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

Clients

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

- C. (1) To approximately how many *clients* for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?
 - (2) Approximately what percentage of your *clients* are non-*United States persons*?
- D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, do not answer (1)(d) or (3)(d) below.

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

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

If a client fits into more than one category, select one category that most accurately represents the client to avoid double counting

clients and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

Type of <i>Client</i>	(1) Number of Client(s)	(2) Fewer than 5 <i>Clients</i>	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)	0		\$ 0
(b) High net worth individuals	0		\$ 0
(c) Banking or thrift institutions	0		\$ 0
(d) Investment companies	0		\$ 0
(e) Business development companies	0		\$ 0
(f) Pooled investment vehicles (other than investment companies and business development companies)	39		\$ 9,236,924,950
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	20		\$ 8,526,891,978
(h) Charitable organizations	1	P	\$ 100,753,487
(i) State or municipal <i>government entities</i> (including government pension plans)	4	Ø	\$ 2,156,452,738
(j) Other investment advisers	0		\$ 0
(k) Insurance companies	1	P	\$ 218,151,227
(I) Sovereign wealth funds and foreign official institutions	3	P	\$ 3,669,244,159
(m) Corporations or other businesses not listed above	0		\$ 0
(n) Other:	0		\$ 0

Compensation Arrangements

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

(1) A percentage of assets under your manager	men	าเ
---	-----	----

☑ (2) Hourly charges

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

(4) Fixed fees (other than subscription fees)

 \Box (5) Commissions

(6) Performance-based fees

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

Regulatory Assets Under Management

Yes No

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		
	 (2) Portfolio management for individuals and/or small businesses (3) Portfolio management for investment companies (as well as "business development companies" that have made a 	an	
	election pursuant to section 54 of the Investment Company Act of 1940)	J. 1	
	(4) Portfolio management for pooled investment vehicles (other than investment companies)		
	(5) Portfolio management for businesses (other than small businesses) or institutional <i>clients</i> (other than registered		
	investment companies and other pooled investment vehicles)		
	 ☐ (6) Pension consulting services ☑ (7) Selection of other advisers (including private fund managers) 		
	 (7) Selection of other advisers (including private fund managers) (8) Publication of periodicals or newsletters 		
	(9) Security ratings or pricing services		
	(10) Market timing services		
	[(11) Educational seminars/workshops		
	[(12) Other(specify):		
	Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report or 814 number of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Scheen	rt the 8	
Н.	If you provide financial planning services, to how many <i>clients</i> did you provide these services during your last fiscal year?		
	C 0		
	C 1-10		
	O 11 - 25		
	© 26 - 50		
	C 51 - 100		
	O 101 - 250 O 251 - 500		
	Mayor their 500		
	If more than 500, how many?		
	(round to the nearest 500)		
	In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a advisory relationship with those investors.	separa	ate
		Yes	No
I.	(1) Do you participate in a wrap fee program?	0	\odot
	(2) If you participate in a <i>wrap fee program</i> , what is the amount of your regulatory assets under management attributable t as:	o actin	ıg
	(a) sponsor to a wrap fee program \$		
	(b) portfolio manager for a <i>wrap fee program</i> ?		
	(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 information Section 5.I.(2) of Schedule D.	on in	
	If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a m 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).	utual f	fund
		Yes	No
J.	(1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?	•	О
	(2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management?	0	•

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

SECTION 5.I.(2) Wrap Fee Programs

No Information Filed

SECTION 5.K.(1) Separately Managed Accounts

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

regulatory assets under management, complete Question (b).

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

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

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

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

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

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

Generally describe any assets included in "Other"

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

Generally describe any assets included in "Other"

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

☑ No information is required to be reported in this Section 5.K.(2) per the instructions of this Section 5.K.(2)

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

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

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

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

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

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

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

(i) Mid-Year

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

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

(ii) End of Year

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

10-149%	\$ \$	%	%	%	%	%	%
150% or more	\$ \$	%	%	%	%	%	%

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

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

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

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

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

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

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

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

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

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

(a) Legal name of custodian:

NORTHERN TRUST COMPANY

(b) Primary business name of custodian:

NORTHERN TRUST COMPANY

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

City: State: Country: CHICAGO Illinois United States

Yes No

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

 \circ

(e) If the custodian is a broker-dealer, provide its SEC registration number (if any)

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

(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? \$6,391,226,514

,				,g <u>-</u>				
(a)	Legal name of custodian:							
	BANK OF NEW YORK MELLON							
(b)	Primary business name of custod	ian:						
	BANK OF NEW YORK MELLON							
(c)	The location(s) of the custodian's	office(s) responsible for cust	ody of the assets :					
	City:	State:		Country:				
	EVERETT	Massachusetts		United States				
				Ye	es No			
(d)	Is the custodian a related person	of your firm?			0.0			
(e)	If the custodian is a broker-deale	r, 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 at	tributable to separately	y managed accounts is held at the custodia	in?			
	\$ 3,740,664,438							
(a)	Legal name of custodian:							
	JP MORGAN CHASE							
(b)	Primary business name of custod	ian:						
	JP MORGAN CHASE							
(c)	The location(s) of the custodian's	office(s) responsible for cust	ody of the assets :					
	City:	State:	Co	untry:				
	NEW YORK	New York	Un	ited States				
				Ye	es No			
(d)	Is the custodian a related person	of your firm?			0 0			
(e)	If the custodian is a broker-deale	r, provide its SEC registration	number (if any)					
	-							
(f)	If the custodian is not a broker-d identifier (if any)	ealer, or is a broker-dealer bu	it does not have an SE	C registration number, provide its legal ent	tity			
(g)	What amount of your regulatory	assets under management at	tributable to separately	y managed accounts is held at the custodia	in?			
	\$ 3,167,909,516							

		NIL BUTTON AND THE						
		Other Business Activities						
In t	his It	em, we request information about your firm's other business activities.						
A.	[are actively engaged in business as a (check all that apply): (1) broker-dealer (registered or unregistered) (2) registered representative of a broker-dealer (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (4) futures commission merchant (5) real estate broker, dealer, or agent (6) insurance broker or agent (7) bank (including a separately identifiable department or division of a bank) (8) trust company (9) registered municipal advisor (10) registered security-based swap dealer (11) major security-based swap participant (12) accountant or accounting firm (13) lawyer or law firm (14) other financial product salesperson (specify):						
	6.A.	of Schedule D. Yes	No					
B.	(1)	Are you actively engaged in any other business not listed in Item 6. A. (other than giving investment advice)?	_					
	(2)	If yes, is this other business your primary business?	0					
		If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.						
		Yes	No					
	(3)	Do you sell products or provide services other than investment advice to your advisory <i>clients</i> ?	•					
		If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.						
SECTION 6.A. Names of Your Other Businesses								
		No Information Filed						
SEC	TION	6.B.(2) Description of Primary Business						
Des	cribe	your primary business (not your investment advisory business):						
If y	ou er	ngage in that business under a different name, provide that name:						
SEC	TION	I 6.B.(3) Description of Other Products and Services						
		other products or services you sell to your <i>client</i> . You may omit products and services that you listed in Section 6.B.(2) above.						
If y	ou er	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
- (11) lawyer or law firm
- (12) insurance company or agency
- (13) pension consultant
- ☐ (14) real estate broker or dealer
- (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- 🗹 (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

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

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

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

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

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

SECTION 7.A. Financial Industry Affiliations

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

1. Legal Name of Related Person:

TTG CORE PLUS INVESTMENTS, LLC

2. Primary Business Name of Related Person:

TTG CORE PLUS INVESTMENTS, 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):		
	(5)	No Information Filed		
_	Doloi	tod Parson io. (about all that apply)		
5.	(a)	$\stackrel{\text{red Person}}{\Box}$ broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)			
	. ,	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		
	• •	trust company		
		accountant or accounting firm		
	(k)			
	(l) (m)	insurance company or agency		
	(m) (n)			
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
		sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(-)		Yes	No
6.	Do y	ou control or are you controlled by the related person?	•	0
			~	~
7.	Are y	ou and the related person under common control?	0	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	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	\circ	\circ
		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 customers.	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	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
.			0	О
	(b)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority?	_	_
10.	` ,	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela</i>	C ted	⊚
	(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 <i>related person</i> share the same physical location?	\odot	O
1.	Lega	I Name of <i>Related Person</i> :		
	_	SEA GP, LLC		
2.		ary Business Name of Related Person:		
	EAST	SEA GP, LLC		

3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	ur — — — — — — — — — — — — — — — — — — —		
4.		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
		No Information Fried		
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		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
6.	Do y	ou control or are you controlled by the related person?	•	0
7.	Are y	you and the related person under common control?	0	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	o	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cust</i> your <i>clients'</i> assets:	ody	of
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
		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	_
۶.		If the answer is yes, under what exemption?	О	О
10	(2)	To the valeted never verictored with a feweign financial very letter a cuthority 2		
10.		Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relative person</i> is presistented.	C ited	•
		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?	•	0

1.		Il Name of <i>Related Person</i> : F MANAGER I, LLC		
2.		ary Business Name of <i>Related Person</i> : F MANAGER I, LLC		
3.	Relai	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.		ted Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
		No Information Fried		
5.	(a) (b) (c) (d) (e) (f) (g) (h)	 □ 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 		
	(j) (k) (l) (m) (n)	accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
6.	Do y	ou control or are you controlled by the related person?	0	
7.	Are y	you and the <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?	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>cust</i> your <i>clients'</i> assets:	tody	of
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	О
	(b)	If the answer is yes, under what exemption?		
10.		Is the related person registered with a foreign financial regulatory authority?	0	⊙
	(D)	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.	пеа	

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

9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority ?	_	
10.	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rel	O lated	⊚
	(5)	person is registered.	acca	
		No Information Filed		
11.	Doy	you and the related person share any supervised persons?	\circ	⊙
12.	Doy	you and the <i>related person</i> share the same physical location?	О	•
1.	Lega	al Name of <i>Related Person</i> :		
	TOV	VNSEND OPPORTUNITY ZONE FUND GP, LLC		
2.	Prim	nary Business Name of Related Person:		
		VNSEND OPPORTUNITY ZONE FUND GP, LLC		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- 0r			
	or Oth	er er		
	0			
4.	Rela	ated Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
		No Information Fried		
5.	Rela	ated Person is: (check all that apply)		
	(a)	\square broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	\square other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(l)	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		
	(P)	oponosity general paranety managing monitor (or equivalently or pooled introduction remained	Yes	No
6.	Do v	you control or are you controlled by the related person?	•	_
	- 1		٠	О
7.	Are	you and the related person under common control?	0	•
	(-\ <u>`</u>	Does the related names act as a qualified quated in foreign disate in constitute 11 and 12 and 13 and 14 and 15 an		
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	О

		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custod</i> your <i>clients'</i> assets:	dy o	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \Box		
9.	(a)	To the related account is an investment advisor in the country from a printership.		No ⊙
	(b)	If the answer is yes, under what exemption?		
10.			٥,	⊙
	(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.	ea	
		No Information Filed		
11.	Do y	rou and the related person share any supervised persons?	•	0
12.	Do y	rou and the <i>related person</i> share the same physical location?	•	0
1.	Lega	Il Name of <i>Related Person</i> :		
		E TAHOE IV GP, LLC		
2.		ary Business Name of <i>Related Person</i> :		
	LAKI	E TAHOE IV GP, LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe			
4.	Rela	ted Person's		
		CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)	\square broker-dealer, municipal securities dealer, or government securities broker or dealer		
	` ,	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d) (e)	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)	\square banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	☐ lawyer or law firm ☐ insurance company or agency		
	(l) (m)			
	(n)	real estate broker or dealer		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	_		es	No
6.	Do y	ou control or are you controlled by the related person?	•	0

7.	Are	you and the related person under common control?	0	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?	0	О
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	tody	of
		Number and Street 1: 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, theth this box.	Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	•
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.	ated	
		No Information Filed		
11.	Do y	rou and the related person share any supervised persons?	•	О
12.	Do y	you and the related person share the same physical location?	•	o
	GPE Prim	IN Name of Related Person: IV KOREA FEEDER GENERAL PARTNER, LLC Pary Business Name of Related Person:		
		IV KOREA FEEDER GENERAL PARTNER, LLC		
3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)	\square broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c) (d)	registered municipal advisor registered security-based swap dealer		
		major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution trust company		
	(i) (j)	☐ trust company ☐ accountant or accounting firm		
	(k)	□ lawyer or law firm		
	(1)	insurance company or agency		

	(m)			
	(n)			
	` ,	 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 partier, managing member (or equivalent) or pooled investment venicles	Yes	No
6.	Do y	you control or are you controlled by the related person?	•	0
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	o
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	tody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: \square		
		If this address is a private residence, theta this box.	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		~
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	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	you and the related person share any supervised persons?	_	_
	20,	and the related person shall any supermode persons.	⊚	О
12.	Do y	ou and the related person share the same physical location?	0	0
	TTG	al Name of <i>Related Person</i> : FRELD GENERAL PARTNER, LLC hary Business Name of <i>Related Person</i> :		
	TTG	FRELD GENERAL PARTNER, LLC		
3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
	Dala	tod Domon's		
4.		ted Person's CRD Number (if any):		
	(-)			
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5	Dala	ated Person is: (check all that apply)		
5.	(a)	ted Person is: (check all that apply) Description broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)			
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	□ major security-based swap participant		

	(f) (g)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant		
	(h)	-		
	(i) (j)	trust company accountant or accounting firm		
		lawyer or law firm		
	(K) (I)	insurance company or agency		
	(m)			
		real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)			
			Yes	No
6.	Do y	rou control or are you controlled by the related person?	⊙	О
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:	tody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \Box	Voc	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
		If the answer is yes, under what exemption?	0	0
	(D)	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?	•	\circ
12	Dov	you and the <i>related person</i> share the same physical location?	_	_
12.	БО у	and the related person share the same physical location:	⊚	0
1.	Lega	al Name of <i>Related Person</i> :		
	TG \	/OLTESSO GP S.A.R.L.		
2.		ary Business Name of <i>Related Person</i> :		
	TG \	OLTESSO GP S.A.R.L.		
3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	er er		
4.	Rela	ted Person's		
''		CRD Number (if any):		
	/			
	(b)	CIK Number(s) (if any):		
		No Information Filed		

_	Dolo	tod Parson is (shock all that apply)		
5.		ted Person is: (check all that apply)		
	` ,	broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)		
	` '			
		_		
	` ,	registered 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		
	(i)	accountant or accounting firm		
		□ lawyer or law firm		
	(K) (I)	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		
	(P)		⁄es	No
6.	Do v	ou control or are you controlled by the related person?		_
0.	БО у	ou control of are you controlled by the related person:	⊚	О
_		and the state to a second consequence of a 12		
/.	Are	you and the related person under common control?	\circ	⊙
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	\circ	⊙
	(h)			
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	\circ	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 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>	ndv	of
	(0)	your clients' assets:	Juy	
		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?	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>relat</i>		٠
	(D)	person is registered.	.eu	
		No Information Filed		
11.	Do v	ou and the related person share any supervised persons?	_	_
	_,		⊙	О
12	Do v	ou and the <i>related person</i> share the same physical location?	_	_
12.	D0 у	ou and the related person share the same physical location:	⊚	О
1	Lega	l Name of <i>Related Person</i> :		
1.		GP, LLC		
2.	Prim	ary Business Name of <i>Related Person</i> :		
		GP, LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe	er en		

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)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles			
6.	Do v	you control or are you controlled by the related person?	Yes	_	
0.	БО у	ou control of the you controlled by the related person:	⊚	0	
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	⊙	
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•	
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0	
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>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?	O	0	
	(b)	If the answer is yes, under what exemption?			
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•	
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.	ted		
		No Information Filed			
11.	Do y	you and the related person share any supervised persons?	\odot	0	
12.	Do y	you and the related person share the same physical location?	•	0	
				=	
1.		al Name of <i>Related Person</i> : GERMAN INVESTMENTS I LLC			

2.	Primary Business Name of <i>Related Person</i> : TTG GERMAN INVESTMENTS 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) □ other investment adviser (including financial planners) (c) □ registered municipal advisor (d) □ registered security-based swap dealer (e) □ major security-based swap participant (f) ▼ commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) □ futures commission merchant (h) □ banking or thrift institution (i) □ trust company (j) □ accountant or accounting firm (k) □ lawyer or law firm (l) □ insurance company or agency (m) □ pension consultant (n) □ real estate broker or dealer (o) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) ▼ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
6. 7.	Do you control or are you controlled by the related person? Are you and the related person under common control?	•	
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide t	0 0	⊙ ⊙
	clients?(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?		0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for your <i>clients'</i> assets: Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: □	custody (of
0	(a) If the related person is an investment advicer is it exempt from registration?	Yes	
9.	(a) If the related person is an investment adviser, is it exempt from registration?(b) If the answer is yes, under what exemption?	О	0
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 person is registered. No Information Filed 	C related	•
11.	. Do you 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. 2.	TOW Prim TOW	al Name of <i>Related Person</i> : //NSEND STRATEGIC VENTURES GP, LLC hary Business Name of <i>Related Person</i> : //NSEND STRATEGIC VENTURES GP, LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe			
4.	(a)	ted Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	(a) (b) (c) (d) (e) (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 		
	(n)	real estate broker or dealer		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
6.	Do y	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: Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:	tody	of
		I and dadress is a private residence, eneck tills 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.	` ,	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 person</i> is registered.	C ted	•
11.	Do v	No Information Filed vou and the <i>related person</i> share any <i>supervised persons</i> ?	_	_
	,	and the related person that any super research.	⊚	U
12.	Do y	ou and the related person share the same physical location?	•	0
1.	_	al Name of <i>Related Person</i> : H GP, LLC		
2.		nary 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			
4.		ted Person's CRD Number (if any):		
	(a)	CRD Nulliber (ii aliy).		
	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (o) (p)	other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	
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	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 t	his address is	s a private residence, chec	ck this box:		V	
9.	(a)	If th	ne related ner	rson is an investment adv	viser, is it exempt from registration?		Yes	
.			•				0	0
	(D)	11 (1	ie aliswer is y	es, under what exemption	on?			
10	(a)	Is th	he <i>related pei</i>	rson registered with a for	reign financial regulatory authority?		0	•
			•	_		ncial regulatory authority with which the re		
	` ,		son is register		., -	- , ,		
					No Information Filed			
11.	Do y	ou a	nd the <i>related</i>	d person share any super	vised persons?		⊙	\circ
1.	D			d	nhi.al la sation2			
12	ро у	ou a	nu the related	d person share the same	physical location?		⊚	0
1.	_		me of <i>Related</i>					
	CFS	SG RI	EAL ESTATE P	PARTNERS I, LLC				
2.	Prim	arv F	Business Nam	e of <i>Related Person</i> :				
		-		PARTNERS I, LLC				
3.	Rela	ted P	Person's SEC I	File Number (if any) (e.g.	., 801-, 8-, 866-, 802-)			
	- or							
	Othe	er						
4.			Person's					
	(a)	CRE	O Number (if a	any):				
	(b)	CIK	Number(s) (i	if anv):				
	` ,		() (,,	No Information Filed			
5.	Dala	tad D	Parson is: (ch	eck all that apply)				
٦.					ealer, or government securities broke	er or dealer		
	(b)			ment adviser (including fi				
	(c)		registered m	nunicipal advisor				
	(d)			ecurity-based swap deale				
	(e)			ity-based swap participan				
	(f) (g)			pool operator or commodi mission merchant	ity trading advisor (whether register	ed or exempt from registration)		
	(9) (h)			hrift institution				
	(i)		trust compa					
	(j)		accountant of	or accounting firm				
	(k)		lawyer or lav	w firm				
	(1)			ompany or agency				
	(m)		pension cons					
	(n) (o)			oroker or dealer syndicator of limited partn	nerships (or equivalent), excluding p	ooled investment vehicles		
	(b)	✓	•		nember (or equivalent) of pooled inv			
	(1)		, , , ,	, , , , ,	, , , ,		Yes	No
6.	Do y	ou c	ontrol or are	you <i>controlled</i> by the <i>rela</i>	ated person?		•	0
7.	Are	you a	and the <i>relate</i>	ed person under common	control?		O	\odot
8.	(a)	Doe clier		person act as a qualified	custodian for your <i>clients</i> in connect	tion with advisory services you provide to	\circ	\odot

	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	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:		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	О
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	o	•
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela person</i> is registered.	ted	
		No Information Filed		
11.	Do y	rou and the related person share any supervised persons?	\odot	О
12.	Do y	rou and the <i>related person</i> share the same physical location?	•	0
1.		Name of <i>Related Person</i> : SECURITIES LLC		
2.		ary Business Name of <i>Related Person</i> : SECURITIES LLC		
3.		ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 106546		
	or Othe	er en		
4.	Relat	ted Person's		
	(a)	CRD Number (if any): 4138		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Relat (a)	ted Person is: (check all that apply) I broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)			
	(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		
		trust company		
	` ,	accountant or accounting firm		
	(k)	lawyer or law firm		
	` '	insurance company or agency		
	(m)			
		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		
	(٢)		Vec	No

https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG_PK=1791155

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
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	⊙
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	O
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	stody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: \square		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	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>reliperson</i> is registered.	lated	
		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?	0	•
	AON Prim	I Name of Related Person: INVESTMENTS USA INC. ary Business Name of Related Person: INVESTMENTS USA INC.		
3.	801	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 17219		
	or Othe	er .		
4.	Rela	ted Person's		
	(a)	CRD Number (if any): 105596		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.		ted Person is: (check all that apply)		
	(a) (b)			
		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		
	(b)	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		
	` ,	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	you control or are you controlled by the related person?	\circ	⊙
7.	Are	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	0	•
	(h)	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?	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:	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	Voc	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
J.	. ,		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>rela person</i> is registered.		e
		No Information Filed		
11.	Do y	rou and the related person share any supervised persons?	•	0
			~	~
12.	Do y	you and the related person share the same physical location?	О	•
1	Lega	al Name of <i>Related Person</i> :		
		E TAHOE III GP, LLC		
2.		ary Business Name of <i>Related Person</i> : E TAHOE III 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):		
	(5)	No Information Filed		
5.		ted Person is: (check all that apply)		
	(2)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	` ,			
	(b)	other investment adviser (including financial planners) registered municipal advisor		

	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	□ trust company		
	(j)	accountant or accounting firm		
	(k)	□ lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	\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		
		Y	es/	No
6.	Do y	ou control or are you controlled by the related person?	⊚	\circ
7.	Are y	ou and the <i>related person</i> under common <i>control</i> ?	0	\odot
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(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	O
		related person and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are		
		maintained at the related person?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custom	dy o	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		
			_	
	(-)	Y	es/	No
9.		If the <i>related person</i> is an investment adviser, is it exempt from registration?		No C
9.		Y		
	(b)	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 the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	0	
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related</i>	0	0
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relate person</i> is registered.	0	0
10.	(b) (a) (b)	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	O ed	⊙
10.	(b) (a) (b)	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	0	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? 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?	C ced	⊙
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? 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?	O ed	⊙
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? 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?	C ced	0 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? 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?	C ced	0 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? 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?	C ced	0 0
10. 11. 12.	(b) (a) (b) Do y Lega	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 but and the related person share any supervised persons? but and the related person share the same physical location?	C ced	0 0
10. 11. 12.	(b) (a) (b) Do y Lega	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? Ou and the related person share the same physical location?	C ced	0 0
11.	(b) (a) (b) Do y Do y Lega AON	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed ou and the related person share any supervised persons? Ou and the related person share the same physical location? I Name of Related Person: SOLUTIONS IRELAND LIMITED	C ced	0 0
11.	(b) (a) (b) Do y Do y Lega AON	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed ou and the related person share any supervised persons? Ou and the related person share the same physical location? Name of Related Person: SOLUTIONS IRELAND LIMITED	C ced	0 0
10. 11. 12. 1.	(b) (a) (b) Do y Do y Lega AON	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the 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: SOLUTIONS IRELAND LIMITED	C ced	0 0
10. 11. 12. 1.	(b) (a) (b) Do y Do y Lega AON	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the 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? Name of Related Person: SOLUTIONS IRELAND LIMITED ary Business Name of Related Person: SOLUTIONS IRELAND LIMITED	C ced	0 0
10. 11. 12. 1.	(b) (a) (b) Do y Do y Lega AON	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the 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? Name of Related Person: SOLUTIONS IRELAND LIMITED ary Business Name of Related Person: SOLUTIONS IRELAND LIMITED	C ced	0
10. 11. 12. 1.	(b) (a) (b) Do y Do y Lega AON Prim AON Rela	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed ou and the related person share any supervised persons? Ou and the related person share the same physical location? Name of Related Person: SOLUTIONS IRELAND LIMITED ary Business Name of Related Person: SOLUTIONS IRELAND LIMITED and Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C ced	0
10. 11. 12. 1.	(b) (a) (b) Do y Lega AON Prim AON Rela - Or Othe	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relate person is registered. No Information Filed but and the related person share any supervised persons? but and the related person share the same physical location? In Name of Related Person: SOLUTIONS IRELAND LIMITED Bary Business Name of Related Person: SOLUTIONS IRELAND LIMITED Bed Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C ced	0
10. 11. 12.	(b) (a) (b) Do y Do y Lega AON Prim AON Rela - or Othee	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 but and the related person share any supervised persons? but and the related person share the same physical location? Name of Related Person: SOLUTIONS IRELAND LIMITED ary Business Name of Related Person: SOLUTIONS IRELAND LIMITED and Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C ced	0 0
10. 11. 12. 1. 2.	(b) (a) (b) Do y Do y Lega AON Prim AON Rela - or Othee	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relate person is registered. No Information Filed but and the related person share any supervised persons? but and the related person share the same physical location? In Name of Related Person: SOLUTIONS IRELAND LIMITED Bary Business Name of Related Person: SOLUTIONS IRELAND LIMITED Bed Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C ced	0
10. 11. 12. 2.	(b) (a) (b) Do y Do y Lega AON Prim AON Rela - or Othee	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 but and the related person share any supervised persons? but and the related person share the same physical location? Name of Related Person: SOLUTIONS IRELAND LIMITED ary Business Name of Related Person: SOLUTIONS IRELAND LIMITED and Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C ced	0 0

No Information Filed

5.	Rela	ted Person is: (check all that apply)		
		broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	☐ trust company		
	(j)	accountant or accounting firm		
	(k)	☐ lawyer or law firm		
	(1)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	\circ	⊙
7.	Are	you and the related person under common control?	•	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	0	•
	(h)	clients?		
	(D)	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	
		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are		
		maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cus	tody	of
	. ,	your <i>clients</i> ' assets:	•	
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \square		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	\odot	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>rel</i>	ated	
		person is registered. Name of Country/English Name of Foreign Financial Regulatory Authority		
		Ireland - Central Bank of Ireland		
	Day			
11.	ро у	ou and the <i>related person</i> share any <i>supervised persons</i> ?	0	⊙
	_			
12.	ро у	ou and the <i>related person</i> share the same physical location?	0	⊙
1.		Name of Related Person:		
	CFS	SG REAL ESTATE PARTNERS II, LLC		
	ъ.	Desire North of Deleted Desire		
2.		ary Business Name of <i>Related Person</i> :		
	CI-33	SG REAL ESTATE PARTNERS II, LLC		

3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
or		
Other		
4. Related Person's		
(a) CRD Number (if any):		
(b) CIV Number(c) (if any):		
(b) CIK Number(s) (if any): No Information Filed		
5. Related Person is: (check all that apply)		
(a) broker-dealer, municipal securities dealer, or government securities broker or dealer		
(b) □ other investment adviser (including financial planners) (c) □ registered municipal advisor		
(c) □ registered municipal advisor (d) □ registered security-based swap dealer		
(e) \square major security-based swap participant		
(f) ✓ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
(g) futures commission merchant		
(h) \square banking or thrift institution		
(i) ☐ trust company		
(j) \square accountant or accounting firm		
(k) 🔲 lawyer or law firm		
(I) \square 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 		
(p) Sponsor, general partner, managing member (or equivalent) or pooled investment venicles	Yes I	Nο
6. Do you control or are you controlled by the related person?		0
		΄.
7. Are you and the <i>related person</i> under common <i>control</i> ?	0	•
	~	
8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you pr	ovide to	⊙
clients?		
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have y	*	О
overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from t related person and thus are not required to obtain a surprise examination for your clients' funds or securities the		
maintained at the <i>related person</i> ?	ide di e	
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsi	ble for <i>custody</i> o	f
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	Yes I	Na
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
	0	0
(b) If the answer is yes, under what exemption?		
10. (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 wh	_	⊚
person is registered.	are related	
No Information Filed		
11. Do you and the related person share any supervised persons?	•	o
	_	
12. Do you and the related person share the same physical location?	•	O

1.		l Name of <i>Related Person</i> : NSEND GROUP EUROPE LIMITED				
2.	Primary Business Name of <i>Related Person</i> : TOWNSEND GROUP EUROPE LIMITED Related Person's SEC File Number (if any.) (e.g., 801-, 8-, 866-, 802-)					
3.	Relai	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)				
	or Othe	ur en				
4.		ted Person's CRD Number (if any):				
	(b)	CIK Number(s) (if any): No Information Filed				
5.	(a) (b)	ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor				
	(e) (f) (g)	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				
	(j) (k) (l)	 □ trust company □ accountant or accounting firm □ lawyer or law firm □ insurance company or agency 				
	(o)	real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles				
6.	(p) Do y	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?		No C		
7.	Are y	you and the related person under common control?	•	0		
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•		
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?	0	0		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets: Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:	stody	of		
		If this address is a private residence, check this box: \Box	Yes	. No		
9.		If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption?	•	0		
10.	(a)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	e	0		
			137	•_/		

	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel person</i> is registered.	ated	
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		United Kingdom - Financial Conduct Authority		
11.	Do y	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.	_	I Name of <i>Related Person</i> : SOLUTIONS UK LIMITED		
2.		ary Business Name of <i>Related Person</i> : SOLUTIONS UK LIMITED		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	or		
4.		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
		No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m)	other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency	Yes	: No
6.	Do v	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	•
		If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>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		Yes	N.
9.	(a)	If the <i>related person</i> is an investmen	nt advisor is it exempt from registration?		
		If the answer is yes, under what exe		⊙	0
	(5)	FOREIGN ENTITY	imption:		
10.	(a)	Is the <i>related person</i> registered with	n a foreign financial regulatory authority ?	\odot	\circ
	(b)		nd country, in English of each foreign financial regulatory authority with which the relat	ted	
		person is registered. Name of Country/English Name	of Foreign Financial Regulatory Authority	—	\neg
		United Kingdom - Financial Conduct			\neg
11.	Do v	ou and the <i>related person</i> share any	aunam daad namana?	•	_
	,	,		٠	О
12.	Do y	ou and the <i>related person</i> share the	same physical location?	0	0
					•
				_	
	Laga	I Name of Delated Persons			
1.		I Name of <i>Related Person</i> : MANAGER, LLC			
		,			
2.	Prim	ary Business Name of <i>Related Person</i>):		
	TTG	MANAGER, LLC			
,	Dolo	tod Darsonia CEC File Number (if any)	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		
3.	-	ted Person's SEC File Number (if any)	(e.g., 601-, 6-, 600-, 602-)		
	or				
	Othe	r			
	D - /-	and December			
4.		ted Person's CRD Number (if any):			
	(a)	CAD Number (ii dily).			
	(b)	CIK Number(s) (if any):			
			No Information Filed		
5.	Rela	ted Person is: (check all that apply)			
	(a)		ties dealer, or government securities broker or dealer		
	(b)	$\hfill\Box$ other investment adviser (inclu	ding financial planners)		
	(c)				
	(d)	-			
	(e)	-			
	. ,	futures commission merchant	mmodity trading advisor (whether registered or exempt from registration)		
	(b)				
	(i)	☐ trust company			
	(j)	\square accountant or accounting firm			
		lawyer or law firm			
	(l)	insurance company or agency			
	(m)				
	. ,	real estate broker or dealer sponsor or syndicator of limited	I partnerships (or equivalent), excluding pooled investment vehicles		
	` ,		ging member (or equivalent) of pooled investment vehicles		
	AF /	, , , , , , , , , , , , , , , , , , , ,		Yes	No
6.	Do y	ou <i>control</i> or are you <i>controlled</i> by th	ne related person?	⊙	0
7.	Are	ou and the <i>related person</i> under con	nmon 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	О
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custo</i> your <i>clients'</i> assets:	ody	of
		Number and Street 1: Number and Street 2:		
		City: State:Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \Box		
			es/	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	\circ	0
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	•
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relativeson</i> is registered.	ted	
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	•	0
	-		•	\sim
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	О
1. 2.	PENN	I Name of Related Person: I SQUARE MANAGER II, LLC ary Business Name of Related Person:		
	PENI	N SQUARE MANAGER II, LLC		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	r		
_	Doloi	ted Develope		
4.		ced Person's CRD Number (if any):		
	(a)	CND Number (ii dily).		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
F	Do!-	tod Parcan icu (chack all that apply)		
5.	<i>кеіа</i> і (а)	$\stackrel{\text{red }Person}{\square}$ is: (check all that apply) $\stackrel{\square}{\square}$ broker-dealer, municipal securities dealer, or government securities broker or dealer		
		other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	. ,	registered municipal davisor 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		
		□ banking or thrift institution		
	(i)	□ trust company		
	(j)	□ accountant or accounting firm		
	(k)	☐ lawyer or law firm		
	(1)	insurance company or agency		
	` ,	pension consultant		
	(n)	real estate broker or dealer		

	(o) (p)	 □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles 		
			Yes	No
6.	Do y	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?	С	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	Voc	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
J 9.	• ,		0	0
	(b)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority ?	_	_
		If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela</i>	C ted	⊙
		person is registered. No Information Filed		
11	Do v	you and the related person share any supervised persons?	_	_
	,	and the related person that carry super rised personic.	⊙	О
12.	Do y	you and the related person share the same physical location?	•	0
1.	THE	al Name of <i>Related Person</i> : TOWNSEND GROUP LLC hary 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		
	Dele	ated Person's		
4.		ted Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(6)	No Information Filed		
5.		ted Person is: (check all that apply)		
	(a)			
	(b)			
	(c)			
	(d)	_		
	(e)			
	(f)	 commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant 		
H	(g)	La tatales continues to interest the continues to the con		

	(h)			
		☐ trust company ☐ accountant or accounting firm		
		□ lawyer or law firm		
		insurance company or agency		
	(m)			
	(n) (o)	_		
	(b)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(- 7		Yes	No
6.	Do y	ou control or are you controlled by the related person?	\odot	O
7.	Are y	you and the related person under common control?	0	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	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: \square		
		If this dudices 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	•
	(b)	If the answer is yes, under what exemption?		
10.		Is the related person registered with a foreign financial regulatory authority ?	0	\odot
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>reliperson</i> is registered.	lated	
		No Information Filed		
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> : KEY WEST SAXON GROUP, LLC		
	1111	KET WEST SAXON GROOT, EEC		
2.		ary Business Name of <i>Related Person</i> : KEY WEST SAXON GROUP, LLC		
3.	Relai	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe			
4.		ted Person's CRD Number (if any):		
		CIK Number(s) (if any):		
	(~)	No Information Filed		
5.	Rela	ted Person is: (check all that apply)		

	(a) (b) (c)	□ other investment adviser (including financial planners)□ registered municipal advisor			
	(d) (e)				
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			
		☐ 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 pension consultant			
	(III) (n)	_ `			
	(o)	_			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles			
	,		Yes	N	2
6.	Do y	ou control or are you controlled by the related person?	•	С	Л
				_	
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	0)
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•	
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?	0	С	1
	(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 hox: \Box			
		If this address is a private residence, check this box: \square	Yes	N	,
9.	(a)	If this address is a private residence, check this box: \square If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	No C	
9.	• ,			_	
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	0	_	
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel</i>	0	c	
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.	0	c)
10.	(b) (a) (b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>releptorson</i> is registered. No Information Filed	C C lated	0	,
10.	(b) (a) (b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.	0	c	,
10.	(b) (a) (b) Do y	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>releptorson</i> is registered. No Information Filed	C C lated	0	
11.	(b) (a) (b) Do y	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the releperson is registered. No Information Filed you and the related person share any supervised persons? You and the related person share the same physical location?	○ Clated	0	,
11.	(b) (a) (b) Do y	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel person</i> is registered. No Information Filed	○ Clated	0)
11.	(b) (a) (b) Do y Do y Legator	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?	○ Clated	0)
10.	(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? 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 releptson is registered. No Information Filed rou and the related person share any supervised persons? You and the related person share the same physical location? INSEND GREAT LAKES AND PLAINS GP, LLC hary Business Name of Related Person:	○ Clated	0	
10. 11. 12. 1.	(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? 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: YOSEND GREAT LAKES AND PLAINS GP, LLC TAYSEND GREAT LAKES AND PLAINS GP, LLC THE RELATED SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	○ Clated	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) (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)	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?	Yes ⊙	O
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	0	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?	С	С
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custo</i> your <i>clients'</i> assets:	ody	of
		Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	O	O
	(b)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority ?	_	_
10.		If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela person</i> is registered.	C ted	•
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	\odot	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	o
1.	AON	Il Name of <i>Related Person</i> : INVESTMENTS CANADA INC. ary Business Name of <i>Related Person</i> :		
		INVESTMENTS CANADA INC.		

3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	er en		
4.		CRD Number (if any)		
	(a)	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)			
	(c)			
	(d)			
	(e) (f)	 major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) 		
	(i) (g)	futures commission merchant		
		banking or thrift institution		
	(i)	☐ trust company		
	(j)	accountant or accounting firm		
	` '	lawyer or law firm		
	(l)	insurance company or agency		
	(m) (n)	pension consultant real estate broker or dealer		
	. ,	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	\circ	\odot
7.	Are '	you and the <i>related person</i> under common <i>control</i> ?	•	0
				~
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i>	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: \square		
		If this address is a private residence, theth 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? FOREIGN ENTITY		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	6	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	~
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		Canada - Alberta Securities Commission		
		Canada - British Columbia Securities Commission		\neg
		Canada - Manitoba Securities Commission		

		Name of Country/English Name of Foreign Financial Regulatory Authority		
		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	L. Do yo	ou and the <i>related person</i> share any <i>supervised persons</i> ?	0	•
12	2. Do yo	ou and the <i>related person</i> share the same physical location?	0	•
1.		l Name of <i>Related Person</i> : ADVANTAGE FUNDS LLC		
2.		ary Business Name of <i>Related Person</i> : ADVANTAGE FUNDS LLC		
3.		ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 120405 r		
4.	(a)	ted Person's CRD Number (if any): 310335		
	(b)	CIK Number(s) (if any): No Information Filed		
5.	<i>Relat</i> (a)	ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
		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)		
	٠,	futures commission merchant		
		\square banking or thrift institution		
		□ trust company		
		accountant or accounting firm		
		lawyer or law firm		
	(l) (m)	☐ insurance company or agency ☐ pension consultant		
		real estate broker or dealer		
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
		sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.		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>custo</i> your <i>clients'</i> 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 <i>related person</i> is an investment adviser, is it exempt from registration?		No
.	. ,	If the answer is yes, under what exemption?	О	⊚
	(6)	If the diswer is yes, dider what exemption:		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	O	•
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela person</i> is registered.	ted	~
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	O	\odot
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	•
1.		l Name of <i>Related Person</i> : INVESTMENTS LIMITED		
2.		ary Business Name of <i>Related Person</i> : INVESTMENTS 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	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 ☐ banking or thrift institution		
	` ,	□ banking or thrift institution □ trust company		
	. ,	accountant or accounting firm		
	` ,	☐ lawyer or law firm		
	• •	insurance company or agency		
	(m)	pension consultant real estate broker or dealer		
	` ,	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?	О	•
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 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: \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
		If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rela</i>	ted	
		person is registered.		
		Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority		
11.	Do v	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.		l Name of <i>Related Person</i> : GP, LLC		
2.		ary Business Name of <i>Related Person</i> : GP, 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		
	(a)	CRD Number (if any):		
	(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)		
	(c) (d)	registered municipal advisor registered security-based swap dealer		
	` ,	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		

(d) □ accountant or accounting firm (k) □ Insurance company or agency (m) □ pension consultant (n) □ real estate trader or dealer (o) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (g) □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles (g) □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles Yes No 5. Do you control or are you controlled by the related person? (c) □ C (d) C		(i)	□ trust company		
(i) □ insurance company or agency (iii) □ persion consultant (i) □ real estate braker or dealer (i) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (i) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (ii) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (iii) □ real estate braker or dealer (iii) □ real estate braker or dealer (iii) □ values or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (iiii) □ values or expected person act as a qualified custodian for your clients in connection with advisory services you provide to clients? (iv) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4).2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person as an experiment of the location of the related person's office responsible for custody of your clients' assets: Number and Street 1: City: State: City: State: Country: If the assed person is an investment advise, is it exempt from registration? (ii) If the related person is an investment advise, is it exempt from registration? (iv) If the answer is yes, under what exemption? (iv) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed 1. Legal Name of Related Person share the same physical location? (iv) 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 5. Related Person is City Related Person share the same physical location? (iv) CIX Number (if any): (iv) CIX Numb		(j)	accountant or accounting firm		
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(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 (p) □ sponsor, general partner, managing member (or equivalent), excluding 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 □ 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 2064)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients funds or securities that are maintained at the related person? (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 Yes No Yes No 10: (a) 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. Legal Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 3. Related Person's SEC File Number (if any): (c) CIK Number(s) (if any): No Information Filed 5. Related Person is: (check all that apply)		(1)	insurance company or agency		
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(p)		(n)	real estate broker or dealer		
New No. Do you control or are you controlled by the related person? 6. Do you control or are you controlled by the related person? 6. C C 7. Are you and the related person under common control? 6. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to C Geners? (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(a)-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? 7. (a) If the answer is yes, under what exemption? 10. (a) Is the related person registered with a foreign financial regulatory authority with which the related person is registered. No Information Filed 11. Do you and the related person share any supervised persons? 7. (a) 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 12. Do you and the related Person share the same physical location? 8. (a) CRD Number (if any): 9. (b) CIK Number(s) (if any): 10. (c) CIK Number(s) (if any): 10. (d) CIK Number(s) (if any): 10. (e) CIK Number(s) (if any):		(o)	\square sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
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(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 26(4)-2(6)(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: Outry: ZIP+4/Postal Code: If this address is a private residence, check this box: Wes No 9. (a) If the related person is an investment adviser, is it exempt from registration? (b) If the answer is yes, under what exemption? 10. (a) Is the related person registered with a foreign financial regulatory authority? (b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed 11. Do you and the related person share any supervised persons? C C 12. Do you and the related person share the same physical location? C C Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC Related Person's (a) CRD Number (if any): (b) CIK Number(s) (if any): No Information Filed	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	•
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(b) If the answer is yes, under what exemption? 10. (a) Is the related person registered with a foreign financial regulatory authority? (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 1. Legal Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, 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)	9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	•
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 1. Legal Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, 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)		(b)	If the answer is yes, under what exemption?		
(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed 11. Do you and the related person share any supervised persons? © C 12. Do you and the related person share the same physical location? © C 1. Legal Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, 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)		. ,			
(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 1. Legal Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, 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)	10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
No Information Filed 11. Do you and the related person share any supervised persons? 12. Do you and the related person share the same physical location? 13. Legal Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 14. Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 15. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or Other 16. C 17. Other 18. Related Person's SEC File Number (if any): (a) CRD Number (if any): (b) CIK Number(s) (if any): No Information Filed		(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rel	ated	
11. Do you and the related person share any supervised persons? 12. Do you and the related person share the same physical location? 13. Legal Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 14. Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 15. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or Other 16. Co			person is registered.		
12. Do you and the <i>related person</i> share the same physical location? 1. Legal Name of <i>Related Person</i> : SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of <i>Related Person</i> : SA SPECIAL SITUATIONS GENERAL PARTNER, 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)			No Information Filed		
1. Legal Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, 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)	11.	Do y	ou and the related person share any supervised persons?	\odot	\circ
1. Legal Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, 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)					
SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of <i>Related Person</i> : SA SPECIAL SITUATIONS GENERAL PARTNER, 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	12.	Do y	ou and the <i>related person</i> share the same physical location?	\odot	\circ
SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of <i>Related Person</i> : SA SPECIAL SITUATIONS GENERAL PARTNER, 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					
SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of <i>Related Person</i> : SA SPECIAL SITUATIONS GENERAL PARTNER, 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					
SA SPECIAL SITUATIONS GENERAL PARTNER, LLC 2. Primary Business Name of <i>Related Person</i> : SA SPECIAL SITUATIONS GENERAL PARTNER, 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	1	l ena	Il Name of Related Person:		
 Primary Business Name of Related Person: SA SPECIAL SITUATIONS GENERAL PARTNER, LLC Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or Other Related Person's (a) CRD Number (if any):	1.				
SA SPECIAL SITUATIONS GENERAL PARTNER, 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)					
 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) 	2.	Prim	ary Business Name of Related Person:		
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)		SA S	PECIAL SITUATIONS GENERAL PARTNER, 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)					
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)	3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
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)		-			
 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) CRD Number (if any): (b) CIK Number(s) (if any): No Information Filed 5. Related Person is: (check all that apply)		Otne			
(a) CRD Number (if any): (b) CIK Number(s) (if any): No Information Filed 5. Related Person is: (check all that apply)		Dal-	tod Parsania		
(b) CIK Number(s) (if any): No Information Filed 5. Related Person is: (check all that apply)	4.				
No Information Filed 5. Related Person is: (check all that apply)		(a)	end number (ii dity).		
No Information Filed 5. Related Person is: (check all that apply)		(b)	CIK Number(s) (if any):		
11 //		(-)			
11 //					
11 //					
(a) Droker-dealer, municipal securities dealer, or government securities broker or dealer	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		
	(0)	\square sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	\odot	\circ
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	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 related person's office responsible for cust	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:		
			Vac	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
٦.			0	О
	(b)	If the answer is yes, under what exemption?		
10	(-)	To the melated assessment with a few in financial manufature authority 2		
10.	` ,	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>relative</i>	ted	
		person is registered. No Information Filed		
	D			
11.	ро у	ou and the related person share any supervised persons?	⊚	\circ
	_			
12.	Do y	ou and the <i>related person</i> share the same physical location?	⊙	\circ
1.	Loga	Il Name of <i>Related Person</i> :		
1.		E TAHOE II GP, LLC		
	L) ((\)	Thirds II di, the		
2.	Prim	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 en		
4.	Rela	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) (l) (m) (n)	other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	_		Yes	No
6.	ро у	ou control or are you controlled by the related person?	⊙	0
7.	Are y	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> ?	O	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custo</i> your <i>clients'</i> assets:	ody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \Box	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0
		If the answer is yes, under what exemption?	~	v
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	\circ	⊙
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.	ted	
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	•	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	О
		I Name of Delated Danier		
1.	_	I Name of <i>Related Person</i> : FUND GP LLC		
2.		ary Business Name of <i>Related Person</i> : FUND GP LLC		

3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	ur — — — — — — — — — — — — — — — — — — —		
4.		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
		No Illiothlation 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 		
6.			Yes ⓒ	No C
			~	~
7.	Are y	you and the related person under common control?	0	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cust</i> your <i>clients'</i> assets:	ody	of
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \Box		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	_
		If the answer is yes, under what exemption?		•
10	(a)	Is the related person registered with a foreign financial regulatory authority ?	_	_
		If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.	ited	•
		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?	•	О

1.	_	Il Name of <i>Related Person</i> : SECURITIES INVESTMENT MANAGEMENT INC.		
2.		ary Business Name of <i>Related Person</i> : SECURITIES INVESTMENT MANAGEMENT INC.		
3.	Relat	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 pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
6.	Do y	ou control or are you controlled by the related person?	0	•
7.	Are y	you and the related person under common control?	⊚	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 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	\odot
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	\odot	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>rela person</i> is registered.	ated	

	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Canada - British Columbia Securities Commission		
	Canada - Manitoba Securities Commission		
	Canada - Ontario Securities Commission		
	Canada - Quebec, Financial Markets Authority		
11.	Do you and the related person share any supervised persons?	0	•
12.	Do you and the <i>related person</i> share the same physical location?	0	•
1.	Legal Name of <i>Related Person</i> : TOWNSEND RE GLOBAL GP LIMITED		
2.	Primary Business Name of <i>Related Person</i> : TOWNSEND RE GLOBAL GP LIMITED		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) -		
	or Other		
4.	Related Person's (a) CRD Number (if any):		
	(b) CIK Number(s) (if any):		
	No Information Filed		
5.	Related Person is: (check all that apply) (a)	Yes	; No
6.	Do you control or are you controlled by the related person?	⊙	0
7.	Are you and the related person under common control?	0	•
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	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>cu</i> your <i>clients'</i> assets:	ıstody	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	V		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		S No	
.	` ,		0	⊚	
	(D)	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 foreign financial regulatory authority with which the re	elated	-	
		person is registered.			
		No Information Filed			
11.	Do y	you and the <i>related person</i> share any <i>supervised persons</i> ?	⊙	С	
12.	Do y	you and the <i>related person</i> share the same physical location?	•	С	
					=
1.	Lega	al Name of <i>Related Person</i> :			
	JDPT	T MANAGER, LLC			
	Dutan	Distinct Name of Deleted Deven			
2.		nary Business Name of <i>Related Person</i> : T MANAGER, LLC			
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	-				
	or Othe	er er			
4.	Rela	ated Person's			
	(a)	CRD Number (if any):			
	(b)	CIK Number(s) (if any):			
	(5)	No Information Filed			
5.	Rela	ated Person is: (check all that apply)			
.	(a)				
	(b)	other investment adviser (including financial planners)			
	(c)				
	(d)	_			
	(e)	major security-based swap participant			
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant			
	(g) (h)				
	(i)	□ trust company			
	(j)	accountant or accounting firm			
	(k)	□ lawyer or law firm			
	(1)	☐ insurance company or agency			
	(m)	`			
	` ,	_			
	(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	۷eq	. No	
6.	Do v	you control or are you controlled by the related person?	· ·	_	
	- 1		•	С	
7.	Are	you and the related person under common control?	0	œ	

8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <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>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?	\circ	0
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	•
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relativesson</i> is registered.	ted	
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	•	0
			•	\sim
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	О
1.		Name of Related Person:		
	IOW	NSEND ALPHA MANAGER II, LLC		
2.	Prima	ary Business Name of Related Person:		
		NSEND ALPHA MANAGER II, LLC		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
٥.	-	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1		
	or			
	Othe	r		
4.	Relat	ted Person's		
		CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Relat	ted Person is: (check all that apply)		
	(a)			
		other investment adviser (including financial planners)		
	` ,	☐ registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	,	futures commission merchant		
		banking or thrift institution		
	. ,	trust company		
	,	accountant or accounting firm		
	` ,	lawyer or law firm		
	` '	☐ insurance company or agency ☐ pension consultant		
	(n)	real estate broker or dealer		

	(o) (p)	 □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles 		
6.	Do v	you control or are you controlled by the related person?	Yes	No C
	,		٠	
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?	O	С
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	tody	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \square	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
9.	. ,		0	0
	(b)	If the answer is yes, under what exemption?		
10	. (a)	Is the related person registered with a foreign financial regulatory authority ?	0	•
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.		
		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?	\odot	О
1.	_	al Name of <i>Related Person</i> : VNSEND REF GP, LLC		
2.	Prim	nary Business Name of Related Person:		
		VNSEND REF GP, LLC		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or Othe	er		
4.	Rola	ated Person's		
		CRD Number (if any):		
	(h)	CIK Number(s) (if any):		
	(6)	No Information Filed		
5.		nted Person is: (check all that apply)		
	(a)			
	(b)			
	(c) (d)	registered municipal advisor registered security-based swap dealer		
	(a) (e)	□ 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)		
	(ı) (g)	futures commission merchant		
-	(3)			

	(h)	banking or thrift institution		
	(i)	□ trust company		
	(j)	accountant or accounting firm		
		lawyer or law firm		
		insurance company or agency		
	(m)	· · · · · · · · · · · · · · · · · · ·		
	(n)			
		_		
	. ,			
	(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	you and the related person under common control?	\circ	\odot
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	0	•
		clients?	~	~
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	0	0
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the		~
		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are		
		maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cus	tody	of
		your <i>clients'</i> assets:		
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \Box		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		~
	(-)			
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rela		· ·
	(5)	person is registered.	accu	
		No Information Filed		
11	Do v	ou and the related person share any supervised persons?	_	_
	DO y	ou and the related person share any supervised persons.	⊚	О
		and the related account has a the country by the Landing		
12.	ро у	ou and the <i>related person</i> share the same physical location?	⊙	\circ
		I Marroy of Deleted Decree		
1.		I Name of Related Person:		
	WES	T LAKE II GENERAL PARTNER, LLC		
2.		ary Business Name of Related Person:		
	WES	T LAKE II GENERAL PARTNER, LLC		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe	er en		
.				
4.		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.		ted Person is: (check all that apply)		

	(a)	\square broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	\square other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	☐ lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do 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	0	0
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	~	~
		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are		
		maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <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	V	N.
9.	(2)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	
9.	(a)		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 foreign financial regulatory authority with which the rel	ated	
		person is registered.		
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	\odot	0
12.	Do y	ou and the related person share the same physical location?	⊙	0
II .	Leas	al Name of <i>Related Person</i> :		
1.				
1.		E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
	LAKI	E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
2.	LAKI	E ERIE REAL ESTATE GENERAL PARTNER LIMITED nary Business Name of <i>Related Person</i> :		
	LAKI	E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
2.	Prim LAKI	E ERIE REAL ESTATE GENERAL PARTNER LIMITED nary Business Name of <i>Related Person</i> : E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
	Prim LAKI	E ERIE REAL ESTATE GENERAL PARTNER LIMITED nary Business Name of <i>Related Person</i> :		
2.	Prim LAKI	E ERIE REAL ESTATE GENERAL PARTNER LIMITED nary Business Name of <i>Related Person</i> : E ERIE REAL ESTATE GENERAL PARTNER LIMITED		
2.	Prim LAKI Rela	E ERIE REAL ESTATE GENERAL PARTNER LIMITED hary Business Name of <i>Related Person</i> : E ERIE REAL ESTATE GENERAL PARTNER LIMITED ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
2.	Prim LAKI Rela	E ERIE REAL ESTATE GENERAL PARTNER LIMITED hary Business Name of <i>Related Person</i> : E ERIE REAL ESTATE GENERAL PARTNER LIMITED 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.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (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 		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	•	О
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 <i>clients</i> ?	О	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?	0	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	Voc	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
	, ,	If the answer is yes, under what exemption?	0	О
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>rela person</i> is registered.	ited	
		No Information Filed		
11.	. Do y	ou and the related person share any supervised persons?	o	•
12	D	and the related groups above the same above the same above and		
12.	ъо у	ou and the <i>related person</i> share the same physical location?	0	⊚
1.	_	nl Name of <i>Related Person</i> : VNSEND GROUP ASIA LTD.		
2.		ary Business Name of <i>Related Person</i> :		

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):		
	(h)	CTIC Number of (a) (if a mu)		
	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b)	other investment adviser (including financial planners)		
	(c)	_		
	(d) (e)	registered security-based swap dealer major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h) (i)	banking or thrift institution trust company		
	(i) (j)	accountant or accounting firm		
	` '	lawyer or law firm		
	(l) (m)	insurance company or agency		
		pension consultant real estate broker or dealer		
	. ,	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	\square sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6.	Do v	you control or are you controlled by the related person?	Yes	_
0.	БО у	ou control of are you controlled by the related person:	⊚	О
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	0	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for cus	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:		
		If this address is a private residence, check this box: \Box		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		No
	` ,	If the answer is yes, under what exemption?	٠	
	(-)	FOREIGN ENTITY		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel</i> .	ated	
		person is registered. No Information Filed		
11.	Do y	rou and the related person share any supervised persons?	•	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	\odot	\circ

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	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Oth	er		
4.		ted Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (o) (p)	 □ other investment adviser (including financial planners) □ registered municipal advisor □ registered security-based swap dealer □ major security-based swap participant ☑ commodity pool operator or commodity trading advisor (whether registered or exempt from registration) □ futures commission merchant □ banking or thrift institution □ trust company □ accountant or accounting firm □ lawyer or law firm □ insurance company or agency 	_	· 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:	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.	BI -
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		No C
	(b)	If the answer is yes, under what exemption?	~	~
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	•

.,20,	Z. 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>relate person</i> is registered.	tea	
		No Information Filed		
11.	Do y	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?	•	0
1.	_	l Name of <i>Related Person</i> : HEWITT INC.		
2.		ary Business Name of <i>Related Person</i> : HEWITT INC.		
3.	Rela -	red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	r		
4.		red Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b)	□ 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		
_	_		es/	No
6.	Do y	ou control or are you controlled by the related person?	0	⊙
7.	Are	rou and the related person under common control?	•	0
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 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: Number and Street 1: Number 2:	ody	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?		No
.		If the answer is yes, under what exemption?	⊙	0
	. ,	FOREIGN ENTITY		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	_	•
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rel	lated	
		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	⊚
	Logo	I Name of Polated Person		
1.	_	l 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		
3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe			
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.		ted Person is: (check all that apply)		
	(a) (b)	broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)		
	(c)			
	` '	registered security-based swap dealer		
	(e) (f)	major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
		banking or thrift institution		
	(i) (j)	☐ trust company ☐ accountant or accounting firm		
		□ lawyer or law firm		
		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	_	_
6.	Do v	ou control or are you controlled by the related person?	Yes	_
0.	<i>5</i> 0 y	ou contains of the folder of the related person.	0	⊙
7.	Are	you and the related person under common control?	•	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	0	•
		clients?	~	***

	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	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>customatic policy</i> 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:		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		No
	. ,	If the answer is yes, under what exemption?	0	⊙
	()			
10	. (a)	Is the related person registered with a foreign financial regulatory authority?	\circ	⊙
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relationship</i> registered.	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 related person share the same physical location?	\circ	\odot
L				
1.		al Name of <i>Related Person</i> : I TRUST COMPANY		
2.		nary Business Name of <i>Related Person</i> : I TRUST COMPANY		
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):		
	()	No Information Filed		
5.	Rela	nted Person is: (check all that apply)		
	(a)			
	(b)			
	(c)	registered municipal advisor		
	(d) (e)	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		
	(j)	accountant or accounting firm		
	(k) (l)	☐ lawyer or law firm ☐ insurance company or agency		
	(i) (m)			
	(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		
11			Yes	: No

6.	Do y	ou control or are you controlled by the related person?	0	⊙
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	•	o
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>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: □		
9.	(2)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		No
9.	(a) (b)	If the answer is yes, under what exemption?	0	0
	(6)	If the diswell is yes, under what exemption.		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	\circ	⊚
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>rel person</i> is registered.	lated	
		No Information Filed		
11.	Do y	rou and the related person share any supervised persons?	\circ	⊚
12.	Do y	rou and the related person share the same physical location?	0	•
	TOW	Name of <i>Related Person</i> : INSEND LAKE CONSTANCE GP, LTD. Inary Business Name of <i>Related Person</i> : INSEND LAKE CONSTANCE GP, LTD.		
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):		
	(b)	CIK Number(s) (if any):		
	. ,	No Information Filed		
5.	Rela (a) (b) (c) (d) (e)	other investment adviser (including financial planners) registered municipal advisor		
	(f) (g) (h) (i)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company		
	(j)	accountant or accounting firm		

	(k)	□ lawyer or law firm		
	(1)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	\odot	О
7.	Are y	you and the related person under common control?	\circ	\odot
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	⊙
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you 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: \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 ?	\circ	\odot
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.	ited	
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	\odot	О
12.	Do y	ou and the related person share the same physical location?	•	0
		LNI- con of Deleted Decree		
1.	_	il Name of <i>Related Person</i> : /NSEND ALPHA MANAGER I, LLC		
	IOW	INSEND ALPHA MANAGER I, LLC		
2.	Drim	ary Business Name of Related Person:		
۷.		INSEND ALPHA MANAGER I, LLC		
	1011	NOTIFICATION OF THE PROPERTY O		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
-	-			
	or			
	Othe	er		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
11				
F	Do!-	ted Person is (check all that apply)		
5.		ted Person is: (check all that apply)		
5.	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
5.	(a)	_		

	(d)			
	(e) (f)	 □ major security-based swap participant ☑ commodity pool operator or commodity trading advisor (whether registered or exempt from registration) 		
	` ,	futures commission merchant		
	(h)	\square banking or thrift institution		
		trust company		
		accountant or accounting firm		
		□ lawyer or law firm □ insurance company or agency		
	(l) (m)			
		real estate broker or dealer		
	(o)	\square sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	_		Yes	No
6.	Do y	ou control or are you controlled by the related person?	⊙	О
7.	Ara v	you and the related person under common control?	_	_
′ ·	AIC	and the related person dider common controls	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> ?	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 <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cust</i>	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:		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes O	No C
9.				
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption?	0	0
	(b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related</i> .	0	0
10.	(b) (a) (b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relaperson</i> is registered.	C C oted	0
10.	(b) (a) (b) Do y	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	C C oted	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? 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?	C cated ⊙	0 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? 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?	C cated ⊙	0 0
10. 11. 12.	(b) (a) (b) Do y Do y Legator TOW	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? ou and the related person share the same physical location?	C cated ⊙	0 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 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? ou and the related person share the same physical location? I Name of Related Person: NSEND ALPHA MANAGER III, L.P. ary Business Name of Related Person:	C cated ⊙	0
10. 11. 12. 1.	(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? 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 ALPHA MANAGER III, L.P. ary Business Name of Related Person: NSEND ALPHA MANAGER III, L.P. red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C cated ⊙	0
10. 11. 12. 1.	(b) (a) (b) Do y Do y Lega TOW Prim TOW Rela or Other	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption? Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed 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 ALPHA MANAGER III, L.P. ary Business Name of Related Person: NSEND ALPHA MANAGER III, L.P. red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	C cated ⊙	0 0

No Information Filed

5.	Rela	ted Person is: (check all that apply)		
	(a)			
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	□ trust company		
	(j)	accountant or accounting firm		
	(k)	☐ lawyer or law firm		
	(1)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	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?	_	
	7 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	_	_
0.	(4)	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	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 cus	tody	of
		your <i>clients'</i> assets:		
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \Box		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	\circ	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		
		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?	•	
	,	, , , , , , , , , , , , , , , , , , ,	٠	О
1.	Lega	l Name of <i>Related Person</i> :		
		T LAKE GENERAL PARTNER, LLC		
2.	Prim	ary Business Name of Related Person:		
	WES	T LAKE GENERAL PARTNER, LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			

	or			
	Othe			
_	Dolo	tod Domonia		
4.		ted Person's CRD Number (if any):		
	(a)	CRD Number (ii dity).		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
_	5 /			
5.		ted Person is: (check all that apply)		
	` ,	 broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) 		
	(c)	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) (l)	☐ lawyer or law firm ☐ insurance company or agency		
	(i) (m)	· · · · · · · · · · · · · · · · · · ·		
	(n)	real estate broker or dealer		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	✓ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	\odot	О
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	\circ	⊙
	(-)			
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	⊚
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	0	0
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the		~
		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are		
	(-)	maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	toay	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	0
	(b)	If the answer is yes, under what exemption?		
10	(5)	In the valeted never registered with a fereign financial regulatory, sutherity 2		
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>rel person</i> is registered.	atea	
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	•	0
			•	~
12.	Do y	ou and the related person share the same physical location?	•	0
				=

1.	_	Il 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.	<i>Rela</i> - or	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	Othe	er		
4.		ted Person's CRD Number (if any):		
		CIK Number(s) (if any):		
	(-)	No Information Filed		
5.	(a)(b)(c)(d)(e)(f)(g)	· · · · · · · · · · · · · · · · · · ·		
	(j)	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?	.es	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 <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cus</i> your <i>clients'</i> assets:	tody	of
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
		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	О
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	-0
		person is registered. No Information Filed		

11.	Do y	rou and the related person share any supervised persons?	•	0
12.	Do y	rou and the related person share the same physical location?	•	0
	STR	al Name of <i>Related Person</i> : ATEGIC MANAGER III, LLC Harry Business Name of <i>Related Person</i> :		
۷.		ATEGIC MANAGER III, LLC		
3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.		ted Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k)	 □ other investment adviser (including financial planners) □ registered municipal advisor □ registered security-based swap dealer □ major security-based swap participant ☑ commodity pool operator or commodity trading advisor (whether registered or exempt from registration) □ futures commission merchant □ banking or thrift institution □ trust company □ accountant or accounting firm □ lawyer or law firm □ insurance company or agency □ pension consultant 		
6.	Do y	ou 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 <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: 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 O	No C

_	723,	2.10	TAIND - All Sections [Oser Name, amay 125, Orgid. 100000]		
		(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</i> person is registered.	ed	
			No Information Filed		
	11.	Do y	ou and the related person share any supervised persons?	•	O
	12.	Do y	ou and the <i>related person</i> share the same physical location?	•	0
П					
:	Iten	n 7 <i>P</i>	rivate Fund Reporting		

Item 7 Private Fund Reporting Yes No B. Are you an adviser to any private fund? If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in

numerical or alphabetical code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designation in place of the fund's name.

SECTION 7.B.(1) Private Fund Reporting

		1 2 3 >> Funds per Page: 15 V Total Funds: 39	
Α. Ι	PRIVATE FUND		
<u>Inf</u>	formation About the <i>Private Ful</i>	<u>1d</u>	
1.	` '		
	CAYUGA LAKE FUND, L.P.		
	(b) Private fund identification n		
	(include the "805-" prefix al	so)	
	805-4163269793		
2.	Under the laws of what state or	country is the <i>private fund</i> organized:	
	State:	Country:	
	Delaware	United States	
	Belaware	Sinited States	
3.	(a) Name(s) of General Partner,	Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	
	Name of General Partner, Manager, Trustee, or Director		
	CIF-H GP, LLC		
	1		
	(b) If filing an <i>umbrella registra</i> fund.	tion, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private	
		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 Compar Act of 1940	ıy				
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compar Act of 1940	es No of Prests? es No of Prests? es No of Prests of				
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.					
	No Information Filed					
	Ye	es No ests? dule ection und" es No ests No				
6.	(a) Is this a "master fund" in a master-feeder arrangement?	•				
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?					
6.	No Information Filed					
		s No				
	(c) Is this a "feeder fund" in a master-feeder arrangement?	which the private fund is registered. Yes No Guesting in this private fund? Yes No Guesting in this private fund invests? Yes no Fund in which this private fund invests? Yes no Funds ("feeder funds") invest all or eleder fund" investing in a "master fund" and each class (or series) invests Yes No Yes No				
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invented Name of <i>private fund</i> :	sts?				
	Private fund identification number: (include the "805-" prefix also)					
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sched D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	ule				
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Sec 7.B.(1), for each of the feeder funds answer the following questions:	ction				
	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 fur 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. Ye					
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0				
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poole investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ed				
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	•				
	Ye	s No				
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	•				
10.	What type of fund is the <i>private fund</i> ?					
	$^{ m C}$ hedge fund $^{ m C}$ liquidity fund $^{ m C}$ private equity fund $^{ m C}$ real estate fund $^{ m C}$ securitized asset fund $^{ m C}$ venture capital fund Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	0				
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.					
11.	Current gross asset value of the <i>private fund</i> :					

\$ 77,734,043

<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount forth in the organizational documents of the fund).	ount s	et
13.	Approximate number of the <i>private fund's</i> 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 <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> : 0%		
<u> Υοι</u>	ur Advisory Services	Yes	No
17	(a) Are you a subadviser to this <i>private fund</i> ?		
17.	(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> is the answer to question 17.(a) is "no," leave this question blank.	C fund.	⊙ If
	No Information Filed		
	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 <i>p</i> fund. If the answer to question 18.(a) is "no," leave this question blank.	rivate	9
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	•
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
Priv	vate Offering	Yes	No
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-8924889		

18 PM ERVICE P	PROVIDERS	www.b. / w cookene to	Jser Name: amay123, OrgID: 160006]		
<u>litors</u>					
(a) (1)	Are the private fund's fina	ancial statements subject to an a	nnual audit?		s N
	If the answer to question	-	cial statements prepared in accordance with U.S.	• •	
If th	he answer to question 23.		ions (b) through (h) below. If the <i>private fund</i> uses n	nore th	an
Ad	lditional Auditor Inform	nation: 1 Record(s) Filed.			
- 11			stions (b) through (h) below. If the <i>private fund</i> uses (b) through (f) separately for each auditing firm.	5	
(1	b) Name of the auditing fi	irm:			
	ERNST & YOUNG LLP				
(0	c) The location of the aud	diting firm's office responsible for	the private fund's audit (city, state and country):		
	City:	State:	Country:		
	CLEVELAND	Ohio	United States	Yes	Nο
(0	d) Is the auditing firm an	independent public accountant?		•	0
(6	e) Is the auditing firm reg	gistered with the Public Company	Accounting Oversight Board?	•	0
	If yes, Public Company	/ Accounting Oversight Board-Ass	signed Number:		
	42				
(f	f) If "yes" to (e) above, is Oversight Board in acc		ular inspection by the Public Company Accounting	•	0
(a) Are	the private fund's audited	d financial statements for the mo	st recently completed fiscal year distributed to the	Ye:	_
	vate fund's investors?	a infancial statements for the mo	st recently completed fiscal year distributed to the	•	
` '	all of the reports prepared qualified opinions?	d by the auditing firm for the <i>priv</i>	rate fund since your last annual updating amendment	t contai	in
•	Yes C No C Report Not	Yet Received			
•	ou check "Report Not Yet en the report is available.	Received," you must promptly file	e an amendment to your Form ADV to update your r	espons	e

Yes I	۷c
-------	----

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

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

No	Information	Filed

Custodian

25. (a)	Does the <i>private fund</i> use any custodians (includassets?	ling the prime brokers listed above) to hold some or all of its	O	•
		d to questions (b) through (g) below for each custodian the <i>private</i> stodian, you must complete questions (b) through (g) separately for		
		No Information Filed		
<u>Admin</u>	<u>istrator</u>		Yes	No
26. (a)	Does the <i>private fund</i> use an administrator othe	r than your firm?	0	•
	If the answer to question 26.(a) is "yes," responsion administrator, you must complete questions (b)	d to questions (b) through (f) below. If the <i>private fund</i> uses more through (f) separately for each administrator.	than o	ne
		No Information Filed		
27. Du	ring your last fiscal year, what percentage of the μ	private fund's assets (by value) was valued by a person, such as an		
ad	ministrator, that is not your related person?	, , , , , , , , , , , , , , , , , , ,		
Ind ob	taining any relevant quotes, and (ii) the valuation	ied out the valuation procedure established for that asset, if any, incused for purposes of investor subscriptions, redemptions or distribu		
fee	calculations (including allocations) was the valua	tion determined by such <i>person</i> .		
Marke	<u>cers</u>			
29 (2)	Does the private fund use the convices of compa	no other than you or your ampleyees for marketing purposes?	Yes	_
20. (a)	You must answer "yes" whether the <i>person</i> acts other solicitor, or similar <i>person</i> . If the answer to	ne other than you or your <i>employees</i> for marketing purposes? as a placement agent, consultant, finder, introducer, municipal advice question 28.(a) is "yes," respond to questions (b) through (g) below private fund uses more than one marketer you must complete que	ow for	(b)
		No Information Filed		
A. PRIV	ATE FUND			
<u>Inform</u>	ation About the <i>Private Fund</i>			
1. (a)	Name of the <i>private fund</i> :			
	COMMONFUND STRATEGIC SOLUTIONS REAL ES	STATE OPPORTUNITY FUND 2011, L.P.		
(b)	Private fund identification number:			
	(include the "805-" prefix also) 805-9392525412			
2. Un	der the laws of what state or country is the <i>privat</i>	e fund organized:		
	State:	Country:		
	Delaware	United States		

C	PERCO DEAL ESTATE DADTNEDG I LLC		
	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 fund. 	priv	ate
	No Information Filed		
	ne <i>private fund</i> (check all that apply; you must check at least one):		
	$\cline{1}$ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Comct of 1940	pany	′
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Com ct of 1940	pany	′
Lis	st the name and country, in English, of each foreign financial regulatory authority with which the private fund is registere	ed.	
	No Information Filed		
		Yes	No
(a	a) Is this a "master fund" in a master-feeder arrangement?	\circ	⊙
(b	o) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> .	nd?	
	No Information Filed		
		 -	
<i>(</i>	:) Is this a "feeder fund" in a master-feeder arrangement?	Yes	No
		О	⊚
(u	I) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund in Name of private fund:	iives	LSf
	Private fund identification number:		
	Private fund identification number: (include the "805-" prefix also)		
		hedu	le
D, If	(include the "805-" prefix also) OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sc		
D, If	(include the "805-" prefix also) OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sc, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this		
D, If 7. No su fo	(include the "805-" prefix also) OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sc, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions:	Sect or er fur	ion
D, If 7. No su fo	(include the "805-" prefix also) OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sc, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all cubstantially 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.	Sect or er fur	ion
N(su fo su	(include the "805-" prefix also) OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sc, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all cubstantially 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.	Sect or er fur	nd"
D, If 7. No su fo su (a No	(include the "805-" prefix also) OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sc, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all outstantially 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) investibility all of its assets in a single master fund.	Sector Se	nd"
N(su fo su (a N(in	OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sc, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all outstantially 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) invest substantially all of its assets in a single master fund. Is this private fund a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other parts.	Sector Se	nd"
N(su fo su (a	OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sc., Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all cubstantially 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) invest abstantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other provestment vehicles, regardless of whether they are also private funds or registered investment companies.	Sector Sec	nd" No
N(su fo su (a N(b)	OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sc., Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all cubstantially 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) invest abstantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other provestment vehicles, regardless of whether they are also private funds or registered investment companies.	Sector or er fur ss	nd"

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 es Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN			nd 🧐	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> : \$ 48,202,132				
<u>Ow</u>	<u>rnership</u>				
12.	Minimum investment commitment required of an investor in the p \$ 250,000	private fund:			
	NOTE: Report the amount routinely required of investors who are forth in the organizational documents of the fund).	not your related persons (even if o	lifferent from the amou	unt s	et
13.	Approximate number of the <i>private fund's</i> beneficial owners: 37				
14.	What is the approximate percentage of the $\emph{private fund}$ beneficia 0%	lly owned by you and your <i>related</i> ,	persons:		
15.	(a) What is the approximate percentage of the <i>private fund</i> bene 0%	eficially owned (in the aggregate) b	/ funds of funds:		
	(b) If the private fund qualifies for the exclusion from the definition Investment Company Act of 1940, are sales of the fund limited			Yes ⊙	No C
16.	What is the approximate percentage of the <i>private fund</i> beneficia 4%	lly owned by non- <i>United States per</i>	sons:		
You	ur Advisory Services				
4.7	() .		`	Yes	No
1/.	(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 a the answer to question 17.(a) is "no," leave this question bla		dviser of the <i>private fu</i>	ınd. I	[f
		mation Filed			
				Yes	No.
18.	(a) Do any investment advisers (other than the investment advisers) fund?	sers listed in Section 7.B.(1).A.3.(b		res ⊙	C
	(b) If the answer to question 18.(a) is "yes," provide the name a fund. If the answer to question 18.(a) is "no," leave this question 18.(b) is "no," leave this question 18.(c) is "no," leave this question 18.(c) is "no," leave this question 18.(c) is "yes," provide the name a fund.		ther advisers to the <i>pr</i>	rivate	;
	Name of Other Adviser to private fund	SEC file number	CRD number		
	COMMONFUND OCIO, INC.	801-56548	110689		
			,	Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?			0	•
	NOTE: For purposes of this question, do not consider feeder funds	s of the private fund.		_	
20.	Approximately what percentage of your $\emph{clients}$ has invested in the 0%	e private fund?			

Private Offering		
21. Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities	Yes No tatements subject to an annual audit? (1) is "yes," are the financial statements prepared in accordance with U.S. (2) is "yes," respond to questions (b) through (h) below. If the private fund uses more than the questions (b) through (f) separately for each auditing firm. 1 Record(s) Filed. (2) is "yes," respond to questions (b) through (h) below. If the private fund uses more than the questions (b) through (f) separately for each auditing firm. (3) is "yes," respond to questions (b) through (h) below. If the private fund uses must complete questions (b) through (f) separately for each auditing firm. (5) State: Country: Ohio United States (6) C (7) I with the Public Company Accounting Oversight Board? (8) C (9) I with the Public Company Accounting Oversight Board? (9) C (1) I with its rules? (1) I with its rules? (2) Yes No I with its rules?	
Act of 1933?	•	O
22. If yes, provide the <i>private fund's</i> Form D file number (if any): Form D file number		
021-167003		
021-107003		
B. SERVICE PROVIDERS		
B. SERVICE PROVIDERS		
<u>Auditors</u>		
	Yes	: No
23. (a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	⊚	\circ
(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	⊚	0
If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses mor	e th	an
one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
Additional Auditor Information: 1 Record(s) Filed.		
If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses		
more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ed in accordance with U.S. elow. If the <i>private fund</i> uses more than auditing firm. below. If the <i>private fund</i> uses tely for each auditing firm. Yes No O Public Company Accounting Yes No Fiscal year distributed to the	
(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):		
	'es	No
(d) Is the auditing firm an independent public accountant?	_	_
	-	
(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
If you Dublic Company Assounting 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
	Yes	. No
(g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?	•	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> counqualified opinions?	ontai	n
Yes □ No □ Report Not Yet Received		
If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your resp when the report is available.	onse)
Prime Broker	Yes	s No

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

	prime broker.		
	No Information Filed		
ustod	<u>ian</u>	Yes	N
5. (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	e
	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		
<u>ıdmini</u>	strator		
6 (a)	Does the <i>private fund</i> use an administrator other than your firm?	Yes	
o. (a)	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more administrator, you must complete questions (b) through (f) separately for each administrator.	than o	ne
	No Information Filed		
adr	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%		
100	lude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, in		
Inc	aining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions (including allocations) was the valuation determined by such <i>person</i> .	,	
Inc obt fee	calculations (including allocations) was the valuation determined by such <i>person</i> .	,	
Inc obt fee larket	calculations (including allocations) was the valuation determined by such <i>person</i> .	Yes	
Inc obt fee larket	calculations (including allocations) was the valuation determined by such <i>person</i> .	Yes C isor or ow for	(
Inc obt fee	Calculations (including allocations) was the valuation determined by such <i>person</i> . Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal adv other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) beleach such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete que	Yes C isor or ow for	(

Information About the Private Fund

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

COMMONFUND STRATEGIC SOLUTIONS REAL ESTATE OPPORTUNITY FUND 2014, L.P.

(b) <i>Private fund</i> identification no (include the "805-" prefix al		
805-5029596966		
Under the laws of what state or	country is the <i>private fund</i> organized:	
State:	Country:	
Delaware	United States	
	, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar ca	pacity):
Name of General Partner, Ma		
CFSSG REAL ESTATE PARTNERS	GII, LLC	
(b) If filing an <i>umbrella registra</i> fund.	ation, identify the filing adviser and/or relying adviser(s) that spons	sor(s) or manage(s) this <i>priva</i>
	No Information Filed	
The private fund (check all that	apply; you must check at least one):	
·	n from the definition of investment company under section 3(c)(1)) of the Investment Company
(2) qualifies for the exclusio Act of 1940	n from the definition of investment company under section 3(c)(7)) of the Investment Company
List the name and country, in En	nglish, of each foreign financial regulatory authority with which the	private fund is registered.
	No Information Filed	
(a) Is this a "master fund" in a	master-feeder arrangement?	Yes M
(b) If yes, what is the name and	d <i>private fund</i> identification number (if any) of the feeder funds in	
	No Information Filed	<u> </u>
		Yes I
(c) Is this a "feeder fund" in a r	naster-feeder arrangement?	c
(d) If yes, what is the name and Name of <i>private fund</i> :	d <i>private fund</i> identification number (if any) of the master fund in	
Private fund identification no (include the "805-" prefix al		
	tion 6 for each master-feeder arrangement regardless of whether yer-feeder arrangement or reporting on the funds separately.	ou are filing a single Schedule
	le D, Section 7.B.(1) for a master-feeder arrangement according to unds answer the following questions:	o the instructions to this Section
	No Information Filed	

||| https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG_PK=1791155

substantially all of its assets in a single master fund.

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

8. (a) Is this private fund a "fund of funds"? OTT: 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? C 6 Ves No During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the rivestment 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. S securitized asset fund C venture capital fund 6 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: \$ 350,000 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% Ves 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 qualified clients? Yes No (c) 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 "yes," provide the name and SEC file number, if any, of the other edviser to the private fund. If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other edvisers to the private fund. If it he a			163	110
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? 7	8.	(a) Is this <i>private fund</i> a "fund of funds"?	\odot	\circ
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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				
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(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	18.			_
		(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the p	orivate	е

	Name of Other Adviser to <i>privat</i>	e fund	SEC file number	CRD number	
	COMMONFUND OCIO, INC.		801-56548	110689	
				Υ	es l
19.	Are your <i>clients</i> solicited to invest in the	private fund?			0
	NOTE: For purposes of this question, do		s of the private fund.	,	
	4				
20.	Approximately what percentage of your	clients has invested in the	e private fund?		
	0%				
Priv	vate Offering				
				Y	es l
21.	Has the <i>private fund</i> ever relied on an ex	xemption from registratio	n of its securities under Regulation D of t	he Securities	•
	Act of 1933?				
22	If yes, provide the <i>private fund's</i> Form D	file number (if any):			
۷۷.	Form D file number	Tille Hulliber (II ally).			
	021-167003				
	021 107003				
. S	ERVICE PROVIDERS				
Auc	<u>litors</u>				
				Y	es l
23.	(a) (1) Are the <i>private fund's</i> financial s	tatements subject to an a	annuai audit?		⊙ :
23.	(2) If the answer to question 23.(a) GAAP? If the answer to question 23.(a)(1)	(1) is "yes," are the finan	cial statements prepared in accordance w tions (b) through (h) below. If the <i>private</i>	vith U.S.	0
23.	(2) If the answer to question 23.(a) GAAP?	(1) is "yes," are the financis "yes," respond to queste questions (b) through	cial statements prepared in accordance w tions (b) through (h) below. If the <i>private</i>	vith U.S.	0
23.	(2) If the answer to question 23.(a) GAAP? If the answer to question 23.(a)(1) one auditing firm, you must complet Additional Auditor Information	(1) is "yes," are the financis "yes," respond to queste questions (b) through the cord(s) Filed.	cial statements prepared in accordance we tions (b) through (h) below. If the <i>private</i> (f) separately for each auditing firm.	vith U.S.	0
23.	(2) If the answer to question 23.(a) GAAP? If the answer to question 23.(a)(1) one auditing firm, you must complet Additional Auditor Information If the answer to question 23.(a)(1)	(1) is "yes," are the financis "yes," respond to queste questions (b) through the questions (b) Filed. (2) is "yes," respond to questions (b) through the questions (b) through the questions (c) is "yes," respond to que	cial statements prepared in accordance we tions (b) through (h) below. If the <i>private</i> (f) separately for each auditing firm.	e fund uses more	0
23.	(2) If the answer to question 23.(a) GAAP? If the answer to question 23.(a)(1) one auditing firm, you must complet Additional Auditor Information If the answer to question 23.(a)(1)	(1) is "yes," are the financis "yes," respond to queste questions (b) through the questions (b) Filed. (2) is "yes," respond to questions (b) through the questions (b) through the questions (c) is "yes," respond to que	cial statements prepared in accordance we tions (b) through (h) below. If the <i>private</i> (f) separately for each auditing firm.	e fund uses more	0
23.	(2) If the answer to question 23.(a)(GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complete Additional Auditor Information If the answer to question 23.(a)(1) more than one auditing firm, you	(1) is "yes," are the financis "yes," respond to queste questions (b) through the questions (b) Filed. (2) is "yes," respond to questions (b) through the questions (b) through the questions (c) is "yes," respond to que	cial statements prepared in accordance we tions (b) through (h) below. If the <i>private</i> (f) separately for each auditing firm.	e fund uses more	0
23.	(2) If the answer to question 23.(a)(GAAP? If the answer to question 23.(a)(1) one auditing firm, you must complet Additional Auditor Information If the answer to question 23.(a)(1) more than one auditing firm, you (b) Name of the auditing firm:	(1) is "yes," are the financis "yes," respond to queste questions (b) through the questions (b) Filed. (2) is "yes," respond to questions (b) through the questions (b) through the questions (c) is "yes," respond to que	cial statements prepared in accordance we tions (b) through (h) below. If the <i>private</i> (f) separately for each auditing firm.	e fund uses more	0
23.	(2) If the answer to question 23.(a)(GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complete Additional Auditor Information If the answer to question 23.(a)(1) more than one auditing firm, you	(1) is "yes," are the financis "yes," respond to queste questions (b) through the questions (b) Filed. (2) is "yes," respond to questions (b) through the questions (b) through the questions (c) is "yes," respond to que	cial statements prepared in accordance we tions (b) through (h) below. If the <i>private</i> (f) separately for each auditing firm.	e fund uses more	0
23.	(2) If the answer to question 23.(a)(GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complet Additional Auditor Information: If the answer to question 23.(a)(1 more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP	(1) is "yes," are the financis "yes," respond to questite questions (b) through the financial state of the financi	cial statements prepared in accordance we tions (b) through (h) below. If the <i>private</i> (f) separately for each auditing firm.	e fund uses more ate fund uses ing firm.	0
23.	(2) If the answer to question 23.(a)(GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complet Additional Auditor Information: If the answer to question 23.(a)(1 more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP	(1) is "yes," are the financis "yes," respond to questite questions (b) through the financial state of the financi	cial statements prepared in accordance we tions (b) through (h) below. If the <i>private</i> (f) separately for each auditing firm. estions (b) through (h) below. If the <i>priva</i> (b) through (f) separately for each audit	e fund uses more ate fund uses ing firm.	0
23.	(2) If the answer to question 23.(a)(a)(GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complet Additional Auditor Information: If the answer to question 23.(a)(1 more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm	(1) is "yes," are the financis "yes," respond to quest te questions (b) through the questions (b) through the questions (c) is "yes," respond to questions (tions (b) through (h) below. If the <i>private</i> (f) separately for each auditing firm. estions (b) through (h) below. If the <i>priva</i> (b) through (f) separately for each audit	e fund uses more ate fund uses ing firm.	0
23.	(2) If the answer to question 23.(a)(a)(GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complet Additional Auditor Information: If the answer to question 23.(a)(1 more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm City:	(1) is "yes," are the financis "yes," respond to quest te questions (b) through the questions (b) through the questions (c) is "yes," respond to questions (tions (b) through (h) below. If the <i>private</i> (f) separately for each auditing firm. estions (b) through (h) below. If the <i>private</i> (b) through (f) separately for each audit	with U.S. e fund uses more ate fund uses ing firm.	0
23.	(2) If the answer to question 23.(a)(a)(GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complet Additional Auditor Information: If the answer to question 23.(a)(1 more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm City:	(1) is "yes," are the financis "yes," respond to questie questions (b) through the questions (b) through the questions (c) is "yes," respond to questions (c	cial statements prepared in accordance we tions (b) through (h) below. If the private (f) separately for each auditing firm. estions (b) through (h) below. If the private (b) through (f) separately for each audition of the private fund's audit (city, state and country: United States	with U.S. e fund uses more ate fund uses ing firm.	tthan
23.	(2) If the answer to question 23.(a)(GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complet Additional Auditor Information: If the answer to question 23.(a)(1) more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm City: CLEVELAND	(1) is "yes," are the financis "yes," respond to questie questions (b) through the questions (b) through the questions (c) is "yes," respond to questions (c	cial statements prepared in accordance we tions (b) through (h) below. If the private (f) separately for each auditing firm. estions (b) through (h) below. If the private (b) through (f) separately for each audition of the private fund's audit (city, state and country: United States	e fund uses more ate fund uses ing firm. country):	© tthan
23.	(2) If the answer to question 23.(a)(GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complet Additional Auditor Information: If the answer to question 23.(a)(1) more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm City: CLEVELAND	(1) is "yes," are the financis "yes," respond to questie questions (b) through the questions (b) through the questions (c) is "yes," respond to questions (c	cial statements prepared in accordance we tions (b) through (h) below. If the private (f) separately for each auditing firm. estions (b) through (h) below. If the private (b) through (f) separately for each audition of the private fund's audit (city, state and country: United States	e fund uses more ate fund uses ing firm. country):	© tthan
23.	(2) If the answer to question 23.(a)(a)(a)(b) GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complet Additional Auditor Information: If the answer to question 23.(a)(1) more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm: City: CLEVELAND (d) Is the auditing firm an independent of the auditing firm and independent of the auditing firm an independent of the auditing firm and i	(1) is "yes," are the financis "yes," respond to questie questions (b) through the questions (b) through the questions (c) is "yes," respond to questions (c	cial statements prepared in accordance we tions (b) through (h) below. If the private (f) separately for each auditing firm. estions (b) through (h) below. If the private (b) through (f) separately for each audition of the private fund's audit (city, state and country: United States	vith U.S. e fund uses more ate fund uses ing firm. country):	
23.	(2) If the answer to question 23.(a)(a)(a)(b) GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complet Additional Auditor Information: If the answer to question 23.(a)(1) more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm: City: CLEVELAND (d) Is the auditing firm an independent of the auditing firm and independent of the auditing firm an independent of the auditing firm and i	(1) is "yes," are the financis "yes," respond to questite questions (b) through the questions (b) through the questions (c) is "yes," respond to questions (cial statements prepared in accordance we tions (b) through (h) below. If the private (f) separately for each auditing firm. estions (b) through (h) below. If the private (b) through (f) separately for each audition of the private fund's audit (city, state and country: United States	vith U.S. e fund uses more ate fund uses ing firm. country):	
23.	(2) If the answer to question 23.(a)(a)(a)(a)(b) GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must completed additional Auditor Information in the answer to question 23.(a)(1) more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm: City: CLEVELAND (d) Is the auditing firm an independent of the auditing firm and independent in the auditing firm registered in the audit	(1) is "yes," are the financis "yes," respond to questite questions (b) through the questions (b) through the questions (c) is "yes," respond to questions (cial statements prepared in accordance we tions (b) through (h) below. If the private (f) separately for each auditing firm. estions (b) through (h) below. If the private (b) through (f) separately for each audition of the private fund's audit (city, state and country: United States	vith U.S. e fund uses more ate fund uses ing firm. country):	
23.	(2) If the answer to question 23.(a)(GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must complet Additional Auditor Information: If the answer to question 23.(a)(1) more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm City: CLEVELAND (d) Is the auditing firm an independent of the auditing firm registered firms.	(1) is "yes," are the financis "yes," respond to questite questions (b) through the questions (b) through the questions (c) is "yes," respond to questions (cial statements prepared in accordance we tions (b) through (h) below. If the private (f) separately for each auditing firm. estions (b) through (h) below. If the private (b) through (f) separately for each audition of the private fund's audit (city, state and country: United States	vith U.S. e fund uses more ate fund uses ing firm. country):	
23.	(2) If the answer to question 23.(a)(a)(a)(a)(b) GAAP? If the answer to question 23.(a)(1) is one auditing firm, you must completed additional Auditor Information: If the answer to question 23.(a)(1) more than one auditing firm, you (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm: City: CLEVELAND (d) Is the auditing firm an independent of the auditing firm registered auditing firm auditing firm auditing firm auditing firm a	(1) is "yes," are the financis "yes," respond to questite questions (b) through the questions (b) through the questions (c) is "yes," respond to questions (cial statements prepared in accordance we tions (b) through (h) below. If the private (f) separately for each auditing firm. estions (b) through (h) below. If the private (b) through (f) separately for each audition of the private fund's audit (city, state and country: United States	vith U.S. e fund uses more eate fund uses ing firm. Country): Yes	

0 0

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

(11)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> co- unqualified opinions?	ontain
	Yes	
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your respondent the report is available.	oonse
Prime B	<u>Broker</u>	Voc No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	Yes No
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>privat</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for prime broker.	te fund
	No Information Filed	
<u>Custodi</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 0
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fa</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for a custodian.	
	No Information Filed	
	istrator 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 the administrator, you must complete questions (b) through (f) separately for each administrator.	Yes No
	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 an ministrator, that is not your <i>related person</i> ? O%	
obta	clude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, included any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributive calculations (including allocations) was the valuation determined by such <i>person</i> .	
Markete	<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?	O O
	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 quest through (g) separately for each marketer.	or or v for

No	Inform	mation	Filad
INO	1111011	nauon	

 RIVA	 	1110	

Information About the Private Fund

1. (a) Name of the private fund:

DEERE & COMPANY WELFARE BENEFIT FUND, LP

(b) *Private fund* identification number: (include the "805-" prefix also) 805-5461955365

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

State: Country:
Delaware United States

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

Name of General Partner, Manager, Trustee, or Director

JDPT MANAGER, LLC

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

No Information Filed

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

 \odot

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

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

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

	7.B.(1), for each of the feeder funds answer the following questions:							
	No Information Filed							
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.							
	Yes No							
8.	(a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled							
	investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.							
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?							
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?							
10.	What type of fund is the <i>private fund</i> ?							
	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 <i>private fund</i> : \$ 141,205,405							
<u>Ow</u>	<u>vnership</u>							
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0							
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).							
13.	Approximate number of the <i>private fund's</i> beneficial owners:							
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%							
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%							
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?							
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%							
You	ur Advisory Services Yes No							

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx? RefNum=\&viewChanges=N\&FLNG_PK=1791155$

17.	(a)	Are you a subadviser to this private fund?	c	Œ
		If the answer to question 17.(a) is "yes," provide the the answer to question 17.(a) is "no," leave this question $\frac{17}{3}$	name and SEC file number, if any, of the adviser of the <i>private fund</i> stion blank.	. If
			No Information Filed	
			Ye	s No
3.		Do any investment advisers (other than the investme fund?	ent advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i>	•
		If the answer to question $18.(a)$ is "yes," provide the fund. If the answer to question $18.(a)$ is "no," leave t	name and SEC file number, if any, of the other advisers to the <i>priva</i> this question blank.	te
			No Information Filed	
			Ye	s No
	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	c	œ
	NOT	TE: For purposes of this question, do not consider feed	der funds of the private fund.	
١.	Appi 0%	roximately what percentage of your <i>clients</i> has invest	ed in the <i>private fund</i> ?	
ì	ate	<u>Offering</u>	Ye	s No
		the <i>private fund</i> ever relied on an exemption from reg of 1933?	gistration of its securities under Regulation D of the Securities	C
	If ye	es, provide the <i>private fund's</i> Form D file number (if a	ny):	
		No	Information Filed	
3	(a)	(1) Are the <i>private fund's</i> financial statements subjec		s No
•			the financial statements prepared in accordance with U.S.	C
			to questions (b) through (h) below. If the <i>private fund</i> uses more th	an
		Additional Auditor Information : 1 Record(s) Fi		
			nd to questions (b) through (h) below. If the <i>private fund</i> uses uestions (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 respor	nsible for the <i>private fund's</i> audit (city, state and country): Country:	
		CLEVELAND Ohio	United States	
			Yes	No
		(d) Is the auditing firm an independent public acco	ountant?	О
		(d) Is the auditing firm an independent public accordance(e) Is the auditing firm registered with the Public Control		0
			Company Accounting Oversight Board?	

Marketers

	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	0 0	
		Yes	No
(g)	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	•	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?	contain	I
	⊙ 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 results when the report is available.	sponse	
Prime I	<u>Broker</u>		
		Yes	No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	0	\odot
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <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		
25. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for custodian.		•
	No Information Filed		
Admini	istrator		
		Yes	No
26. (a)	Does the <i>private fund</i> use an administrator other than your firm?	0	\odot
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more administrator, you must complete questions (b) through (f) separately for each administrator.	than oi	ne
	No Information Filed		
adr 100			
obt	clude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, inc 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> .	_	

		Yes No
28.	28. (a) Does the <i>private fund</i> use the services of someone other than you or yo	ur <i>employees</i> for marketing purposes?
	You must answer "yes" whether the <i>person</i> acts as a placement agent, of other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more through (g) separately for each marketer.	s," respond to questions (b) through (g) below for
	No Information File	ed
A. P	. PRIVATE FUND	
Info	nformation About the <i>Private Fund</i>	
1.	. (a) Name of the <i>private fund</i> :	
	EAST SEA MAIN FUND, LP	
	(b) Private fund identification number:	
	(include the "805-" prefix also) 805-2610111090	
	003-2010111090	
2.	2. Under the laws of what state or country is the <i>private fund</i> organized:	
۷.	State: Country:	
	Delaware United States	
3.	, , , , , , , , , , , , , , , , , , , ,	serving in a similar capacity):
	Name of General Partner, Manager, Trustee, or Director EAST SEA GP, LLC	
	LAST SEA OF, LEC	
	(b) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying fund</i> .	g adviser(s) that sponsor(s) or manage(s) this private
	No Information Filed	
4.		
	(1) qualifies for the exclusion from the definition of investment company Act of 1940	under section 3(c)(1) of the Investment Company
	(2) qualifies for the exclusion from the definition of investment company Act of 1940	under section 3(c)(7) of the Investment Company
5.	5. List the name and country, in English, of each foreign financial regulatory au	thority with which the private fund is registered.
	No Information Filed	
		Yes No
6.	5. (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	
		West Ma
	(c) Is this a "feeder fund" in a master-feeder arrangement?	Yes No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	of the macter fund in which this private fund invested
	(d) If yes, what is the name and private fund identification number (if any)Name of private fund:	or the master fund in which this <i>private runa</i> invests?

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"?

0

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*?

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

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

11. Current gross asset value of the private fund:

\$ 1,010,000,000

<u>Ownership</u>

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

\$ 0

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

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

2

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

1%

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

Yes No

	(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> ?	•	О
16.	Wh	nat is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : %		
You	ur A	dvisory Services		
17	(a)	Are you a subadviser to this <i>private fund</i> ?	Yes	_
-7.		If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	C fund.	If
		No Information Filed		
			Yes	No
18.	(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 p fund. If the answer to question 18.(a) is "no," leave this question blank.	rivate	9
		No Information Filed		
			Yes	No
19.	Are	e your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	\odot
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	vate	e 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 to f 1933?	•	0
22.	If y	ves, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
B. S	ERV]	ICE PROVIDERS		
Aud	dito	r <u>s</u>	Yes	Nο
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 more auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re tha	n
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm: ERNST & YOUNG		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		

		City: CLEVELAND	State: Ohio	Country: United States		
		CLL VLD IIID	01110	omica states	Yes	No
	(d)	Is the auditing firm an i	ndependent public accountant?		•	0
	(e)	Is the auditing firm regi	stered with the Public Company	Accounting Oversight Board?	•	0
		If yes, Public Company 42	Accounting Oversight Board-Assi	igned Number:		
	(f)	If "yes" to (e) above, is Oversight Board in acco		ular inspection by the Public Company Accounting	⊙	0
					Ye	s No
(g)		ne private fund's audited re fund's investors?	financial statements for the mos	t recently completed fiscal year distributed to the	œ	0
(h)		of the reports prepared alified opinions?	by the auditing firm for the <i>priva</i>	ate fund since your last annual updating amendme	<i>nt</i> conta	in
	⊙ Ye	s C No C Report Not Y	et Received			
		check "Report Not Yet R the report is available.	eceived," you must promptly file	e an amendment to your Form ADV to update your	respons	ie
rime E	Broker				Va	s No
4. (a)	Does	the <i>private fund</i> use one	or more prime brokers?		0	
	uses.			(b) through (e) below for each prime broker the μ must complete questions (b) through (e) separat		
			No Inform	nation Filed		
<u>ustod</u> i	an_				V.	s No
5. (a)	Does		custodians (including the prime	brokers listed above) to hold some or all of its	C	
		If the <i>private fund</i> uses		(b) through (g) below for each custodian the <i>priv</i> oust complete questions (b) through (g) separately		
			No Inform	nation Filed		
<u>dmini</u>	strato	<u>r</u>			Ye	s No
6. (a)	Does	the <i>private fund</i> use an a	administrator other than your firm	m?	C	•
			a) is "yes," respond to questions ete questions (b) through (f) se	(b) through (f) below. If the <i>private fund</i> uses mo	ore than	one
			No Inform	nation Filed		
	1					

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

100%

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

Marketers

Yes No

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

3 6

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

۱۱۵	Inform	:	T:Iad
NO.	Inform	iarion	FIIEO

A. PRIVATE FUND

Information About the Private Fund

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

EAST SEA SIDECAR, LP

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-3486451095

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

State: Country:
Delaware United States

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

Name of General Partner, Manager, Trustee, or Director

EAST SEA GP, LLC

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

No Information Filed

- 4. The private fund (check all that apply; you must check at least one):
 - (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940
 - (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940
- 5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.

No Information Filed

Yes No

6.	(a) Is this a "master fund" in a master-feeder arrangement?	\circ	\odot
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund	ınd?	
	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>	inves	ts?
	Name of <i>private fund</i> :		
	Private fund identification number: (include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single 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	ion
	No Information Filed		
8.	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) inves substantially all of its assets in a single master fund. (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 private investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ooled	I
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	\odot
0	De transport for Construction of the Control of the	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 ⁽	9
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 505,000,000		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount forth in the organizational documents of the fund).	ount s	et

13. Approximate number of the $\it private fund's$ beneficial owners:

	2		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?		No C
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 99%		
You	Advisory Services	Vac	. No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	_	_
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>prive</i> the answer to question 17.(a) is "no," leave this question blank.	C ate fund.	⊙ If
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>prive fund</i> ?	ate C	•
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to t fund. If the answer to question 18.(a) is "no," leave this question blank.	ne <i>privat</i>	e
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	\odot
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	ate Offering	Vaa	. No
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securitie Act of 1933?		O
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. S	RVICE PROVIDERS		
Aud	<u>tors</u>		
22	(a) (1) Are the private fundle financial statements subject to an appual audit?	Yes	No -
۷۵.	(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 one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	more tha	эn
	Additional Auditor Information: 1 Record(s) Filed.		

	he answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses re than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	5	
(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	V	
(d)	Is the auditing firm an independent public accountant?	res ⊙	C
(e)	Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 42		
(f)	If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	c
			s No
Do al	of the reports prepared by the auditing firm for the private fund since your last annual updating amendment	t conta	iin
⊙ Ye	es C No C Report Not Yet Received		
		espons	se
Brokei		Vo	s No
Does	the <i>private fund</i> use one or more prime brokers?		_
uses.	If the private fund uses more than one prime broker, you must complete questions (b) through (e) separatel	vate f	und
	No Information Filed		
<u>lian</u>			
	the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its s?	Ye	s No
Does asset	answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>privat</i> . If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for	c e fund	•
)	(b) (c) (d) (e) (f) Are the private Do all unquate Year If you when Broker Broker Company to the private of	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: Country: CIEVELAND 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 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. You must promptly file an amendment to your Form ADV to update your number 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.	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: CLEVELAND Ohio United States Yes (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? Yes Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors? Ob all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contaunqualified opinions? Yes Yes Yes Yes Yes Ob 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 responsiven the report is available. Broker 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 answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

Administrator

	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 on administrator, you must complete questions (b) through (f) separately for each administrator.
	No Information Filed
adn 100	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> ? 10% 104 104 105 106 107 108 109 109 109 109 109 109 109
	caining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, a calculations (including allocations) was the valuation determined by such <i>person</i> .
arket	<u>vers</u> Yes
3. (a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (through (g) separately for each marketer.
	No Information Filed
PRIVA	TE FUND
<u>forma</u>	ation About the <i>Private Fund</i>
	All of the control of
(2)	
. (a)	Name of the <i>private fund</i> :
	Name of the <i>private fund</i> : GPF REAL ESTATE LP
	Name of the <i>private fund</i> :
	Name of the <i>private fund</i> : GPF REAL ESTATE LP Private fund identification number:
	Name of the <i>private fund</i> : GPF REAL ESTATE LP Private fund identification number: (include the "805-" prefix also)
(b)	Name of the <i>private fund</i> : GPF REAL ESTATE LP Private fund identification number: (include the "805-" prefix also) 805-4365747713 der the laws of what state or country is the <i>private fund</i> organized:
(b)	Name of the <i>private fund</i> : GPF REAL ESTATE LP Private fund identification number: (include the "805-" prefix also) 805-4365747713
(b)	Name of the <i>private fund</i> : GPF REAL ESTATE LP Private fund identification number: (include the "805-" prefix also) 805-4365747713 der the laws of what state or country is the <i>private fund</i> organized: State: Country:
(b) Und	Name of the <i>private fund</i> : GPF REAL ESTATE LP Private fund identification number: (include the "805-" prefix also) 805-4365747713 der the laws of what state or country is the <i>private fund</i> organized: State: Country: Guernsey
(b) Und (a) Na	Name of the private fund: GPF REAL ESTATE LP Private fund identification number: (include the "805-" prefix also) 805-4365747713 der the laws of what state or country is the private fund organized: State: Country: Guernsey Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):
(b) Und (a) Na LA	Name of the private fund: GPF REAL ESTATE LP Private fund identification number: (include the "805-" prefix also) 805-4365747713 der the laws of what state or country is the private fund organized: State: Country: Guernsey Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity): Inne of General Partner, Manager, Trustee, or Director KE ERIE REAL ESTATE GENERAL PARTNER LIMITED
(b) Und (a) Na	Name of the private fund: GPF REAL ESTATE LP Private fund identification number: (include the "805-" prefix also) 805-4365747713 der the laws of what state or country is the private fund organized: State: Country: Guernsey Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity): Inne of General Partner, Manager, Trustee, or Director KE ERIE REAL ESTATE GENERAL PARTNER LIMITED If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private private in the private fund or the private

	(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 <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?	
	No Information Filed	
	Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	⊙
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> inves Name of <i>private fund</i> :	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 Schedu D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	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 Sect 7.B.(1), for each of the feeder funds answer the following questions:	ion:
	No Information Filed	
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fur 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.	nd" No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	140
0.	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	1
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	•
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	NO ⊙
10.	What type of fund is the <i>private fund</i> ?	
	C hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital fund C other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	⊙
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	
11.	Current gross asset value of the <i>private fund</i> : \$ 473,183,182	
Ow	<u>vnership</u>	

12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the am forth in the organizational documents of the fund).	ount 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%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 100%		
Voi	ur Advisory Services		
100	IT AUVISORY 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 fund. If the answer to question 18.(a) is "no," leave this question blank.	orivate	9
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	•
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
Priv	vate Offering	Yes	No
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	· • • • • • • • • • • • • • • • • • • •	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
	ERVICE PROVIDERS ditors		

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx? RefNum=\&viewChanges=N\&FLNG_PK=1791155$

	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	•)
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	С)
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses moon one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ore th	nan
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm: ERNST & YOUNG		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country: ST. PETERS PORT Guernsey		
	(d) Is the auditing firm an independent public accountant?	Yes ⊙	No.
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	c
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1438		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	C
		Ye	s
	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	0)
	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> unqualified opinions?	conta	in
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your res when the report is available.	spons	se
ne B	<u>roker</u>	Ye	s
(a)	Does the <i>private fund</i> use one or more prime brokers?	С	,
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>priv</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.		
	No Information Filed		
todia			
		Ye	s

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

No Information Filed	
<u>strator</u>	
Does the private fund use an administrator other than your firm?	Yes No
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>priv</i> administrator, you must complete questions (b) through (f) separately for each administrator.	● C ate fund uses more than one
Additional Administrator Information : 1 Record(s) Filed.	
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the properties than one administrator, you must complete questions (b) through (f) separately for each administrator.	
(b) Name of administrator: NORTHERN TRUST	
(c) Location of administrator (city, state and country):	
City: State: Country: ST. PETERS PORT Guernsey	
(d) Is the administrator a <i>related person</i> of your firm?	Yes No
(e) Does the administrator prepare and send investor account statements to the <i>private fund</i>	's investors?
	(provided to no
(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account staten private fund's investors? If investor account statements are not sent to the (rest of the) p respond "not applicable." NOT APPLICABLE	
ing your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a ninistrator, that is not your <i>related person</i> ?	person, such as an
ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for taining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, red calculations (including allocations) was the valuation determined by such <i>person</i> .	
<u>ers</u>	Yes No
Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for market	
You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introd other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you through (g) separately for each marketer.	ucer, municipal advisor or (b) through (g) below for
i n a La C	Does the private fund use an administrator other than your firm? If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the privadministrator, you must complete questions (b) through (f) separately for each administrator. Additional Administrator Information: 1 Record(s) Filed. If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private none administrator, you must complete questions (b) through (f) separately for each administrator, you must complete questions (b) through (f) separately for each administrator of administrator: NORTHERN TRUST (c) Location of administrator (city, state and country): City: State: Country: State: Country: Guernsey (d) Is the administrator a related person of your firm? (e) Does the administrator prepare and send investor account statements to the private fund G Yes (provided to all investors) C Some (provided to some but not all investors) C No investors) (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements fund's investors? If investor account statements are not sent to the (rest of the) private fund's investors? If investor account statements are not sent to the (rest of the) private fund's investors, and (ii) the valuation used for purposes of investor subscriptions, redicalculations (including allocations) was the valuation determined by such person.

Α.	PR	ΙV	AΤΕ	ΞF	U١	٧D
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Information About the Private Fund

1. (a) Name of the private fund:

GRE PARTNERSHIP IIA CO-INVESTMENT L.P.

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

805-2672609085

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

State:

Country: Guernsey

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

Name of General Partner, Manager, Trustee, or Director

LAKE ERIE REAL ESTATE GP LTD

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

No Information Filed

- 4. The *private fund* (check all that apply; you must check at least one):
 - (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940
 - (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940
- 5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.

No Information Filed

Yes No \circ

(

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

No Information Filed

Yes No

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- (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:

3, Z.	2. TO PIVI IARD - AII	Sections [User Name, amay 125, Orgio. 100000]	
	substantially all of their assets in a single fund ("master	eeder arrangement, one or more funds ("feeder funds") invest all or fund"). A fund would also be a "feeder fund" investing in a "master fun- (or series) of shares or interests, and each class (or series) invests	ı d"
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	•	\circ
	NOTE: For purposes of this question only, answer "yes" investment vehicles, regardless of whether they are also	f the fund invests 10 percent or more of its total assets in other pooled private funds or registered investment companies.	
	(b) If yes, does the <i>private fund</i> invest in funds manage	ed by you or by a related person?	•
		Yes	No
9.		n securities issued by investment companies registered under the parket funds," to the extent provided in Instruction 6.e.)?	⊙
10.). What type of fund is the <i>private fund</i> ?		
		$^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital fund $^{f C}$ SETING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	Đ
	NOTE: For definitions of these fund types, please see Ins	struction 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>wnership</u>		
12.	2. Minimum investment commitment required of an investor \$ 0	or in the <i>private fund</i> :	
	NOTE: Report the amount routinely required of investors forth in the organizational documents of the fund).	s who are not your <i>related persons</i> (even if different from the amount so	et
13.	 Approximate number of the <i>private fund's</i> beneficial owr 	iers:	
14.	1. What is the approximate percentage of the <i>private fund</i> 0%	beneficially owned by you and your related persons:	
15.	(a) What is the approximate percentage of the <i>private f</i>0%	fund beneficially owned (in the aggregate) by funds of funds:	Na
	(b) If the private fund qualifies for the exclusion from the Investment Company Act of 1940, are sales of the form	ne definition of investment company under section 3(c)(1) of the	C
16.	5. What is the approximate percentage of the <i>private fund</i> 100%	beneficially owned by non-United States persons:	

Your Advisory Services

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

.)	(•)
_	

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

			Yе	SNO
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.	priva	te
		No Information Filed		
			Va	s No
19	Δr	e your <i>clients</i> solicited to invest in the <i>private fund</i> ?		
10.		OTE: For purposes of this question, do not consider feeder funds of the private fund.	С	•
	740	or the purposes of this question, do not consider recall runds of the private fund.		
20.	Ар 0%	oproximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	/at	e Offering		
			Ye	s No
21.		as the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities at of 1933?	•	0
22.	If	yes, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
B. S	ERV	/ICE PROVIDERS		
Auc	lito	ors and the second seco		
			Ye	s No
23.	(a) (1) Are the private fund's financial statements subject to an annual audit?	•	0
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	С	•
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses me one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ore th	nan
		Additional Auditor Information: 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm:		
		ERNST & YOUNG 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

			C3 14
(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?	cont	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 rewhen the report is available.	spor	ıse
Prime I	<u>Broker</u>	v	/ B l
24. (a)	Does the <i>private fund</i> use one or more prime brokers?		es N
()	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>print</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.	/ate	fund
	No Information Filed		
Custod	ian		
custou		Υ	es N
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 6
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for custodian.		
	No Information Filed		
<u>Admini</u>	<u>strator</u>	v	/a.a. Bi
26. (a)	Does the <i>private fund</i> use an administrator other than your firm?	Y	esN ⊙ (
()	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.	thai	
	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 mo than one administrator, you must complete questions (b) through (f) separately for each administrator.	re	
	(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		
		'es	No
	(d) Is the administrator a <i>related person</i> of your firm?	0	•
	(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?		

 \odot Yes (provided to all investors) \bigcirc Some (provided to some but not all investors) \bigcirc No (provided to no investors)

- (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable."
- 27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

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

Marketers

Yes No

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

0 0

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

Nο	Information	Filed

A. PRIVATE FUND

Information About the Private Fund

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

GRE PARTNERSHIP IIA L.P.

(b) *Private fund* identification number: (include the "805-" prefix also) 805-4828541054

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

State: Country: Guernsey

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

Name of General Partner, Manager, Trustee, or Director

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

No Information Filed

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

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

	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compan Act of 1940	Ý
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 <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?	
	No Information Filed	
		No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	⊙
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> investorable. Name of <i>private fund</i> :	its?
	name of private rand.	
	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 Schede D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	ale
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Sec 7.B.(1), for each of the feeder funds answer the following questions:	tion
	No Information Filed	
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fur 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.	nd"
8.	(a) Is this <i>private fund</i> a "fund of funds"?	
٥.	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poole investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	d
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	•
	Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	⊙
10.	What type of fund is the <i>private fund</i> ?	
	$^{ m C}$ hedge fund $^{ m C}$ liquidity fund $^{ m C}$ private equity fund $^{ m C}$ real estate fund $^{ m C}$ securitized asset fund $^{ m C}$ venture capital fund Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	•
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	
11.	Current gross asset value of the <i>private fund</i> : \$ 85,117,062	
<u>Ow</u>	<u>vnership</u>	

12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the am forth in the organizational documents of the fund).	ount s	et
13.	Approximate number of the <i>private fund's</i> beneficial owners: 2		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%	Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	• •	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 100%		
<u> Υοι</u>	ur Advisory Services		
17.	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	NO ©
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.		
	No Information Filed		
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.	private	9
	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?	•	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. SI	ERVICE PROVIDERS		
Aud	ditors .	Yes	No

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx? RefNum=\&viewChanges=N\&FLNG_PK=1791155$

	1) Are the <i>private fund's</i> financial statements subject to an annual audit?		9
	2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	C	
	f the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ore t	har
	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		
	ST PETERS PORT Guernsey	Yes	N
	(d) Is the auditing firm an independent public accountant?	•	C
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	C
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1438		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	C
		٧	٠.
	are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?	Ye G	
<i>pi</i> (h) D		G	9
(h) D	private fund's investors? On all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment	G	9
(h) D ui G	private fund's investors? On all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment inqualified opinions?	conta	ain
pi (h) D ui 6	orivate fund's investors? On all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment inqualified 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 resultent the report is available.	conta spon	ain se
pi (h) D ui 6 If w	orivate fund's investors? On all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment inqualified 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 resultent the report is available.	conta spon	ain se
professional profe	Private fund's investors? To all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment inqualified opinions? Yes O No O Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your resultent the report is available.	Contact of the second of the s	ain se
professional profe	The answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund since your last annual updating amendment and unqualified opinions? The answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses more than one prime broker, you must complete questions (b) through (e) separately	Contact of the second of the s	ain se
professional profe	The private fund's investors? To all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment inqualified opinions? Yes O No O Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your resultent the report is available. Toolean 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 privates. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately rime broker. No Information Filed	Contact of the second of the s	ain se
(a) D If us todiar	The private fund's investors? To all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment inqualified opinions? Yes O No O Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your resultent the report is available. Toolean 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 privates. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately rime broker. No Information Filed	Year of for e	ain se

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

	custodian.
	No Information Filed
Adminis	
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 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?
	(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 the) private fund's investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable."
adm 100 Incli obta	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 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 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> .
Markete	<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

A. P	RIVATE FUND
Info	ormation About the <i>Private Fund</i>
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.	Under the laws of what state or country is the <i>private fund</i> organized:
	State: Country: Guernsey
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
	Name of General Partner, Manager, Trustee, or Director
	LAKE ERIE REAL ESTATE GP LTD
	(b) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> .
	No Information Filed
4.	The <i>private fund</i> (check all that apply; you must check at least one): ☐ (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 <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed
	No Information Flied
	Yes No
	(c) Is this a "feeder fund" in a master-feeder arrangement?
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :
	Private fund identification number: (include the "805-" prefix also)
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:
	No Information Filed

	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mast for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invessubstantially all of its assets in a single master fund.	er fur	nd"
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	\odot	О
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other private investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ooled	I
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	•
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type of fund is the <i>private fund</i> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital for other private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	und (•
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 127,369,871		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount forth in the organizational documents of the fund).	ount s	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 O	No C
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 100%		
You	ur Advisory Services	3.5	
17.	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	
•	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private i</i>	fund.	If

			Ye	es r	40
18.	(ā	a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>priva</i> fund?	te (,	•
	(t	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.	e <i>priv</i>	ate	
		No Information Filed			_
			Y	es N	No.
19.	Α	re your <i>clients</i> solicited to invest in the <i>private fund</i> ?			_
15.		OTE: For purposes of this question, do not consider feeder funds of the private fund.	C) (⊚
20.		pproximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?			
Priv	vai	te Offering	Ye	es M	No
21.		as the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities ct of 1933?	5 6	•	0
22.	If	yes, provide the <i>private fund's</i> Form D file number (if any):			
		No Information Filed			
Aud	lit	<u>ors</u>	Ye	es M	No
23.	(a	a) (1) Are the private fund's financial statements subject to an annual audit?	a		0
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.			ດ ⊚
		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 one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	nore t	han	
		Additional Auditor Information: 1 Record(s) Filed.			
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	5		
		(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			

			. 63	110
(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?	ıe	•	0
(h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendr</i> unqualified opinions?	nent con	tain	
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update yo when the report is available.	ur respo	nse	
Prime I	<u>Broker</u>	,	Yes	No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?		C .	•
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separ prime broker.			
	No Information Filed			
Custod	ian			
		•	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 pruses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separate custodian.			
	No Information Filed			
<u>Admini</u>	<u>strator</u>	,	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 administrator, you must complete questions (b) through (f) separately for each administrator.	more tha	in on	е
	Additional Administrator Information : 1 Record(s) Filed.			
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> use than one administrator, you must complete questions (b) through (f) separately for each administrator.	s more		
	(b) Name of administrator:			
	NORTHERN TRUST INTERNATIONAL FUND ADMINISTRATION SERVICES			
	(c) Location of administrator (city, state and country):			
	City: State: Country: Guernsey			
	Such Services	Yes	No	
	(d) Is the administrator a <i>related person</i> of your firm?	0	•	
	(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?			

 \odot Yes (provided to all investors) \bigcirc Some (provided to some but not all investors) \bigcirc No (provided to no investors)

- (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable."
- 27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

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

Marketers

Yes No

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

 \circ

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

INO	1111	OI	mat	IUII	 ıeı

A. PRIVATE FUND

Information About the Private Fund

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

GREAT PLAINS NDT, LP

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

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

State: Country:
Delaware United States

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

Name of General Partner, Manager, Trustee, or Director

TOWNSEND GREAT LAKES AND PLAINS GP, LLC

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

No Information Filed

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

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

	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compan Act of 1940	У
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.	
	No Information Filed	
	Yes	s No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	•
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?	•
	No Information Filed	
	Yes	s No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	\odot
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invented Name of <i>private fund</i> :	sts?
	Private fund identification number: (include the "805-" prefix also)	
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sched D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	ule
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Sec 7.B.(1), for each of the feeder funds answer the following questions:	tion
	No Information Filed	
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master furd" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	
_		s No
8.	(a) Is this private fund a "fund of funds"?	္ဝ
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poole investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	a
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	•
	· · · · · · · · · · · · · · · · · · ·	
	Yes	s No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	•
10.	What type of fund is the <i>private fund</i> ?	
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund Other <i>private fund</i> : REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	0
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	
11.	Current gross asset value of the <i>private fund</i> : \$ 342,478,071	
<u>Ow</u>	<u>vnership</u>	

12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the am forth in the organizational documents of the fund).	ount s	set
13.	Approximate number of the <i>private fund's</i> beneficial owners: 3		
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> : 0%		
<u> Υοι</u>	ur Advisory Services		
17.	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	C fund.	⊙ If
	No Information Filed		
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.	private	e
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	⊙
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
<u>Priv</u>	vate Offering	Yes	No
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. SI	ERVICE PROVIDERS		
Aud	<u>ditors</u>	Yes	No

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx? RefNum=\&viewChanges=N\&FLNG_PK=1791155$

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below.	• • • • • • • • • • • • • • • • • • •	
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	+b	
one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ore ti	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:		
	.,	
	Yes	NO
(d) is the additing firm an <i>independent public accountant?</i>	⊚	0
(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
If yes, Public Company Accounting Oversight Board-Assigned Number: 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	0
	Ye	s I
	•	
	conta	in
	spons	е
<u>roker</u>	٧٠	_
Does the private fund use one or more prime brokers?	Ye	5 1
If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>priva</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately		
No Information Filed		
<u>an</u>	V«	
		s I
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: State: Country: CLEVELAND Ohio United States (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 of the private fund's investors? Or 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 reswhen the report is available. Toker Does the private fund use one or more prime brokers? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the privates. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: CLEVELAND Ohio United States Yes (d) Is the auditing firm an independent public accountant? G (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? Yea 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 contaunqualified opinions? G Yes C No C Report Not Yet Received." you must promptly file an amendment to your Form ADV to update your response when the report is available. Toket Ye 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 funder. No Information Filed

		custodian.	
			No Information Filed
Ad	mini	<u>strator</u>	Yes No
26.	(a)	Does the <i>private fund</i> use an administrator other	r than your firm?
		If the answer to question 26.(a) is "yes," responsion administrator, you must complete questions (b)	nd to questions (b) through (f) below. If the <i>private fund</i> uses more than one through (f) separately for each administrator.
			No Information Filed
27.		ninistrator, that is not your related person?	private fund's assets (by value) was valued by a person, such as an
	obt		ied out the valuation procedure established for that asset, if any, including used for purposes of investor subscriptions, redemptions or distributions, and tion determined by such <i>person</i> .
Ma	rket	er <u>s</u>	Yes No
28.	(a)	You must answer "yes" whether the <i>person</i> acts other solicitor, or similar <i>person</i> . If the answer t	as a placement agent, consultant, finder, introducer, municipal advisor or o question 28.(a) is "yes," respond to questions (b) through (g) below for a private fund uses more than one marketer you must complete questions (b)
			No Information Filed
A. P	RIVA	TE FUND	
Info	orma	tion About the Private Fund	
1.	(a)	Name of the <i>private fund</i> :	
		GREAT PLAINS PENSION, LP	
	(b)	Private fund identification number: (include the "805-" prefix also)	
		805-7672207471	
2.	Unc	der the laws of what state or country is the <i>priva</i> l	to fund organized.
۷.	JIIC	State:	Country:
		Delaware	United States
3.	(a)	Name(s) of General Partner, Manager, Trustee, o	or Directors (or <i>persons</i> serving in a similar capacity):
	Na	me of General Partner, Manager, Trustee, o	Director
	ТО	WNSEND GREAT LAKES AND PLAINS GP, LLC	

	No Information Filed	
	No Information Filed	
Th	ne <i>private fund</i> (check all that apply; you must check at least one):	
V	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Cont of 1940	pan
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Cont of 1940	pan
Lis	st the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is register	d.
	No Information Filed	
		Yes
(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 fu</i>	nd?
	No Information Filed	
		Ye
(c) Is this a "feeder fund" in a master-feeder arrangement?	O
(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund	างe
	Name of private fund:	
	Private fund identification number: (include the "805-" prefix also)	
	DTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sc	nec
D,	Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	
D, If		
D, If	Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this	
D, If 7. NO su for	Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions:	se r r fu s
NC su for su	Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all bistantially 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) invest bistantially all of its assets in a single master fund.	See r r fu s
D, If 7. No su for su (a	Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all a bstantially 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) investibationally all of its assets in a single master fund.) Is this private fund a "fund of funds"?	Seo r rfo s Ye :
NC su for su (a NC inv	Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all obstantially 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) investigating all of its assets in a single master fund. OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other prestment vehicles, regardless of whether they are also private funds or registered investment companies.	r r fi
NC su for su (a NC inv	Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all obstantially 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) investigation and its assets in a single master fund. OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other parts.	r r fu s Ye
NC su for su (a NC inv	Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all obstantially 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) investigating all of its assets in a single master fund. OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other prestment vehicles, regardless of whether they are also private funds or registered investment companies.	r r fus
NC su for su (a NC in (b	Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all obstantially 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) investigating all of its assets in a single master fund. OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other prestment vehicles, regardless of whether they are also private funds or registered investment companies.	r rrfu s Ye .
NC su foi su (a NC in (b	Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this B.(1), for each of the feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all bistantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mast ripurposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest bistantially all of its assets in a single master fund. Is this private fund a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other prestment vehicles, regardless of whether they are also private funds or registered investment companies. If yes, does the private fund invest in funds managed by you or by a related person?	r r r fu s Ye O

3, 2:	18 P i	M IARD - All Sections [User Name: amay123, OrgID: 160006]		
	NOT	TE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.		rent gross asset value of the <i>private fund</i> : 55,072,037		
<u>Ow</u>	ners	<u>ship</u>		
12.	Mini	imum investment commitment required of an investor in the private fund:		
	NOT	TE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount had been assumed to the fund).	ount s	et
13.	App 1	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:		
	0 70		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> :		
<u> Υοι</u>	ır Ac	lvisory Services		
			Yes	No
17.		Are you a subadviser to this <i>private fund</i> ?	\circ	⊙
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private f</i> the answer to question 17.(a) is "no," leave this question blank.	und. 1	If
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	0	⊙
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the p fund. If the answer to question 18.(a) is "no," leave this question blank.	rivate	
		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.	App	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Driv	vate	<u>Offering</u>		
FIII	wale	<u>Oriening</u>		

<u>Pr</u>

Yes No

 \circ

- 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):

No	Infor	mation	Filod
171()	11111111	manon	

В.	SER	VICE	PRO	VIDERS
----	-----	------	-----	--------

GAAP?

	Au	d	it	or	S
--	----	---	----	----	---

Yes 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.

O

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

Additional Auditor Information: 1 Record(s) Filed.

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

(b) Name of the auditing firm:

ERNST & YOUNG LLP

(c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):

City: State: Country:

CLEVELAND Ohio United States

Yes No

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

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

⊙ ○

If yes, Public Company Accounting Oversight Board-Assigned Number:

42

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

Yes No

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

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

Prime Broker

Yes No

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

 \circ

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

Cus	todi	<u>an</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>private</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for custodian.		
		No Information Filed		
<u>Adn</u>	ninis	<u>strator</u>		
			Yes	No
26.	(a)	Does the <i>private fund</i> use an administrator other than your firm?	0	\odot
		If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more administrator, you must complete questions (b) through (f) separately for each administrator.	than c	ne
		No Information Filed		
	obta	% ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, incapaciting any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distribut calculations (including allocations) was the valuation determined by such <i>person</i> .		
Mar	kete	<u>ers</u>	Vos	No
28.	(a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	0	⊙
		You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal 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 questionuph (g) separately for each marketer.	sor or w for	
		No Information Filed		
		No Information Fried		
A. PF	RIVA	TE FUND		
<u>Info</u>	<u>rma</u>	tion About the <i>Private Fund</i>		
1.	(a)	Name of the <i>private fund</i> :		
	. ,	JDPT FUND, L.P.		
	(b)	Private fund identification number:		
		(include the "805-" prefix also)		
		805-4728834775		

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

	State: Delaware	Country: United States		
3.	(a) Name(s) of General Partner, Manager, Trus	stee, or Directors (or <i>persons</i> serving in a similar capacity):		
	Name of General Partner, Manager, Truste	ee, or Director		
	JDPT MANAGER, LLC			
	(b) If filing an <i>umbrella registration</i> , identify the fund.	he filing adviser and/or relying adviser(s) that sponsor(s) or manage(s)	this <i>priva</i>	ite
		No Information Filed		
4.	Act of 1940	st check at least one): inition of investment company under section 3(c)(1) of the Investment (inition of investment company under section 3(c)(7) of the Investment (
	Act of 1940	milition of investment company under section 5(e)(7) of the investment of	Sompany	
5.	List the name and country, in English, of each $\it t$	foreign financial regulatory authority with which the private fund is regis	stered.	
		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 i	identification number (if any) of the feeder funds investing in this private	e fund?	
		No Information Filed		
			Yes	No
	(c) Is this a "feeder fund" in a master-feeder a	arrangement?	0	•
	(d) If yes, what is the name and <i>private fund</i> i Name of <i>private fund</i> :	identification number (if any) of the master fund in which this private fu	nd invest	s?
	Private fund identification number: (include the "805-" prefix also)			
	NOTE: You must complete question 6 for each of D, Section 7.B.(1) for the master-feeder arrangements	master-feeder arrangement regardless of whether you are filing a single gement or reporting on the funds separately.	s Schedule	e
7.	If you are filing a single Schedule D, Section 7. 7.B.(1), for each of the feeder funds answer the	.B.(1) for a master-feeder arrangement according to the instructions to the following questions: $oldsymbol{1}$	this Section	on
		No Information Filed		
	substantially all of their assets in a single fund	master-feeder arrangement, one or more funds ("feeder funds") invest ("master fund"). A fund would also be a "feeder fund" investing in a "mle classes (or series) of shares or interests, and each class (or series) in fund.	aster fund	
8.	(a) Is this private fund a "fund of funds"?		•	o
		ver "yes" if the fund invests 10 percent or more of its total assets in other ey are also private funds or registered investment companies.	er pooled	
	(b) If yes, does the private fund invest in fund	Is managed by you or by a related person?	_	0

		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the 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 of the private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	fund (•
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> :		
	\$ 717,148,042		
<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the am forth in the organizational documents of the fund).	ount s	set
13.	Approximate number of the <i>private fund's</i> beneficial owners: 2		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 1%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes O	No C
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
<u> Υοι</u>	ur Advisory Services		
		Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	•
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	tuna.	11
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	0	•
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the fund. If the answer to question 18.(a) is "no," leave this question blank.	orivate	9
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	•
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		

0%

Prime Broker

<u>Priv</u>	vate Offering		
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes ©	O O
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-203229		
B. SE	ERVICE PROVIDERS		
Aud	<u>litors</u>		
		Yes	No No
23.	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	⊙	\circ
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	⊙	\circ
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ore the	an
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm: ERNST & YOUNG		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: State: Country: CLEVELAND Ohio United States		
		Yes	No
	(d) Is the auditing firm an independent public accountant?	•	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 42		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
		Var	s No
	(g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	0	0
	(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> of unqualified opinions?	contai	n
	Yes □ No □ Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your res when the report is available.	ponse	.

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

A. PRIVATE FUND

Information About the Private Fund

KKT, L.P. Private fund identification number: (include the "805-" prefix also) 805-1766052441 der the laws of what state or country is the private fund organized: State: Country: Guernsey Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity): Interest General Partner, Manager, Trustee, or Director TG GP, LLC If filling an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. No Information Filed Private fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940 (3) the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.
der the laws of what state or country is the <i>private fund</i> organized: State: Country: Guernsey Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): Inne of General Partner, Manager, Trustee, or Director CT GP, LLC If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> . No Information Filed Perivate fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
der the laws of what state or country is the <i>private fund</i> organized: State: Country: Guernsey Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): In each General Partner, Manager, Trustee, or Director CT GP, LLC If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> . No Information Filed Perivate fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): The General Partner, Manager, Trustee, or Director To GP, LLC If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> . No Information Filed Perivate fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): The General Partner, Manager, Trustee, or Director To GP, LLC If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> . No Information Filed Perivate fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): Imme of General Partner, Manager, Trustee, or Director (T GP, LLC If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> . No Information Filed Perivate fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. No Information Filed Perivate fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. No Information Filed Perivate fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> . No Information Filed e private fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
No Information Filed Perivate fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
e private fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
of 1940
t the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered
No Information Filed
Yes No
Is this a "master fund" in a master-feeder arrangement?
If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?
No Information Filed
Yes No
Is this a "feeder fund" in a master-feeder arrangement?
If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :
Private fund identification number: (include the "805-" prefix also)
TE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.
you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section B.(1), for each of the feeder funds answer the following questions:

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=\&viewChanges=N\&FLNG_PK=1791155$

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"

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	•
		Yes	No
	No Information Filed		
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	fund.	
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	· 140
You	ur Advisory Services	Yes	. No
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 99%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes ⊙	No C
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 1%		
13.	Approximate number of the <i>private fund's</i> beneficial owners:		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0 NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the am forth in the organizational documents of the fund).	ount :	set
	<u>rnership</u>		
	\$ 201,005,049		
11.	Current gross asset value of the <i>private fund</i> :		
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
20.	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital for the private fund: REAL ESTATE FUND OF FUNDS INVESTING IN REAL ESTATE-RELATED INVESTMENT PRODUCTS	fund	•
10.	What type of fund is the <i>private fund</i> ?		
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?		No ⊙
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	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.	pooled	d d
8.	(a) Is this <i>private fund</i> a "fund of funds"?	Yes	No
	substantially all of its assets in a single master fund.	SIS	

	No Information Filed		
		Y	es l
9.	. Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	(,
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
0.	. Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
riv	ivate Offering		
	Hardhard of Carlos and Carlos and Carlos Carlos Carlos Companies C	-	es l
1.	. Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	es (9
2.	. If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
S	SERVICE PROVIDERS		
u	<u>ditors</u>	Y	es l
		-	
3.	. (a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?		ð.
:3.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses	more t	9
3.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	ć	9
3.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	more t	9
3.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses 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> use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	more t	9
3.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses	more t	9
3.	 (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses 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 use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: 	more t	9
3.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses 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 use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: State: Country:	more t	9
3.	 (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses 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> use 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): 	more t	han
3.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses 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 use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: State: Country:	more t	han
3.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses 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 use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: State: Country: ST PETERS PORT Guernsey	more t	han
3.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses 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 use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: ERNST & YOUNG LLP (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: State: Country: ST PETERS PORT Guernsey (d) Is the auditing firm an independent public accountant?	es Yes	No C

(h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> of unqualified opinions?	contair	1
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your result when the report is available.	sponse	
Prime	<u>Broker</u>	Yes	No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	0	•
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>priva</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately prime broker.		
	No Information Filed		
Custod	lian_	Yes	No
25. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets?	0	\odot
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for custodian.		
	No Information Filed		
	Does the <i>private fund</i> use an administrator other than your firm? If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more administrator, you must complete questions (b) through (f) separately for each administrator.	Yes C than o	•
	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, including any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distribute calculations (including allocations) was the valuation determined by such <i>person</i> .		
Market	ter <u>s</u>		
20 /->	Does the private fund use the conject of company other than you are selected as a selection of the selection	Yes	No
zo. (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 advisorable 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 questionugh (g) separately for each marketer.	w for	(b)

No Information Filed

		No Information Filed	
A. P	RIVAT	E FUND	
Info	ormat	tion About the Private Fund	
1.		Name of the <i>private fund</i> : KVT, L.P.	
	,	Private fund identification number: (include the "805-" prefix also) 805-4089633764	
2.	Unde	er the laws of what state or country is the <i>private fund</i> organized:	
		State: Country:	
		Delaware United States	
3.		Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	
	_	ne of General Partner, Manager, Trustee, or Director	
	KVT	GP, LLC	
		If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>priva</i>	эte
		No Information Filed	
4.	Tho	private fund (check all that apply; you must check at least one):	
٦.	V	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940	
		(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940	
5.	List	the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.	
		No Information Filed	
		Yes	No
6.		Is this a "master fund" in a master-feeder arrangement?	⊚
	(b)	If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?	
		No Information Filed	
	(-)	Yes	No
		Is this a "feeder fund" in a master-feeder arrangement?	0
		If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invest Name of <i>private fund</i> :	:s?
		Private fund identification number: (include the "805-" prefix also)	

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

/.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:
	No Information Filed
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.
	Yes No
8.	(a) Is this <i>private fund</i> a "fund of funds"?
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?
	Yes No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?
10.	What type of fund is the <i>private fund</i> ?
	C hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C 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 <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 set forth in the organizational documents of the fund).
13.	Approximate number of the <i>private fund's</i> beneficial owners:
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 4%
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to qualified clients?
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 96%
You	<u>ur Advisory Services</u> Yes No

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx? RefNum=\&viewChanges=N\&FLNG_PK=1791155$

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.
8.	(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.	oriva	e
		No Information Filed		
_	_		Yes	N
9.		your <i>clients</i> solicited to invest in the <i>private fund</i> ?	О	0
	NOI	E: For purposes of this question, do not consider feeder funds of the private fund.		
0.	App 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
riv	/ate	<u>Offering</u>	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?	0	C
2.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
	litor		Yes	. No
3.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	⊙	C
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. 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 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:		
		CLEVELAND Ohio United States	' 00	N.a
		(d) Is the auditing firm an independent public accountant?	∕es ⊙	C
		(a) Is the suditing firm registered with the Dublic Company Assessating Oversight Board?		
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	⊙	\circ
		If yes, Public Company Accounting Oversight Board-Assigned Number:	•	0

Marketers

	Oversight Board in accordance with its rules?	0 0	1
		W	
(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?	Yes ⊙	No C
(h)) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> co unqualified opinions?	ntain	
	⊙ 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 resp when the report is available.	onse	
Prime	<u>Broker</u>		
24 (2)). Does the private fund use one or more prime brokers?	Yes	
24. (a)) Does the <i>private fund</i> use one or more prime brokers?	O	.⊙ ./
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>privat</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for prime broker.		
	No Information Filed		
25. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fuuses</i> . If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for ecustodian.		No ©
	No Information Filed		
	istrato <u>r</u>		
Admini		Yes	No
Admini		. 63	
) Does the <i>private fund</i> use an administrator other than your firm?	0	\odot
	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 the administrator, you must complete questions (b) through (f) separately for each administrator.	0	⊙ ne
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more th	0	ne

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 other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below f each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete question through (g) separately for each marketer.	or or	(O)
other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below f each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete question	r	ı)
through (g) separately for each marketen.		
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	tary Interest in <i>Client</i> Transactions		
A.	Doy	you or any related person:	Yes	No
	(1)	buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?	0	\odot
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?	•	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		
B.	Doy	you or any related person:	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	•
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	0	⊙
	(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	0	•
Inv	estn	nent or Brokerage Discretion		
C.	Doy	you or any related person have discretionary authority to determine the:	Yes	No
	(1)	securities to be bought or sold for a <i>client's</i> account?	\odot	\circ
	(2)	amount of securities to be bought or sold for a <i>client's</i> account?	\odot	\circ
	(3)	broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?	\odot	\circ
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	•	0
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	•
E.	Doy	you or any related person recommend brokers or dealers to clients?	О	•
F.	If yo	ou answer "yes" to E. above, are any of the brokers or dealers <i>related persons</i> ?	0	0
G.	(1)	Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	О	•
	(2)	If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	О	0
н.	(1)	Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	•	0
	(2)	Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)?	•	0
I.		you or any <i>related person</i> , including any <i>employee</i> , directly or indirectly, receive compensation from any <i>person</i> (other a you or any <i>related person</i>) for <i>client</i> referrals?	0	•
	In y	our response to Item 8.I., do not include the regular salary you pay to an employee.		
	Iten	esponding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in a n 8.H.) or received from (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is b t in part, on the number or amount of client referrals.		

2/23,	2:18	PM	IARD - All Sections [User Name: amay123, OrgID: 160006]		
Iten	n 9 C	Custody			
			elated person has custody of client (other than clients that are investment companies) assets and about your custodial practices.	registe	ered
Α.	(1)	Do you have <i>custody</i> of any advise	ory <i>clients'</i> :	Yes	No
		(a) cash or bank accounts?		•	0
		(b) securities?			0
				~	_
	ded adv	uct your advisory fees directly from	th the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because a your clients' accounts, or (ii) a related person has custody of client assets in connects, but you have overcome the presumption that you are not operationally independen 2(d)(5)) from the related person.	tion wit	
	(2)	If you checked "yes" to Item 9.A.(clients for which you have custody	(1)(a) or (b), what is the approximate amount of <i>client</i> funds and securities and total γ :	numbe	er of
		U.S. Dollar Amount	Total Number of <i>Clients</i>		
		(a) \$ 8,512,109,977	(b) 38		
		•			
	you you of t	r clients' accounts, do not include tl r related person has custody of clie	th the SEC and you have custody solely because you deduct your advisory fees directly the amount of those assets and the number of those clients in your response to Item sont assets in connection with advisory services you provide to clients, do not include the lients in your response to 9.A.(2). Instead, include that information in your response to 9.A.(2).	9.A.(2). he amo	unt
В.	(1)	In connection with advisory service advisory clients':	tes you provide to <i>clients</i> , do any of your <i>related persons</i> have <i>custody</i> of any of your	Yes	No
		(a) cash or bank accounts?		⊙	0
		(b) securities?		•	0
	You	are required to answer this item re	egardless of how you answered Item 9.A.(1)(a) or (b).		
	(2)	If you checked "yes" to Item 9.B.(clients for which your related pers	(1)(a) or (b), what is the approximate amount of <i>client</i> funds and securities and total cons have <i>custody</i> :	numbe	∍r of
		U.S. Dollar Amount	Total Number of <i>Clients</i>		
		(a) \$ 8,512,109,977	(b) 38		
C.		ou or your <i>related persons</i> have <i>cus</i> ck all the following that apply:	stody of client funds or securities in connection with advisory services you provide to	clients,	,
	(1)	A qualified custodian(s) sends acc vehicle(s) you manage.	count statements at least quarterly to the investors in the pooled investment	V	
	(2)	An <i>independent public accountant</i> financial statements are distribute	audits annually the pooled investment vehicle(s) that you manage and the audited at to the investors in the pools.	V	
	(3)	An independent public accountant	conducts an annual surprise examination of client funds and securities.		
	(4)		prepares an internal control report with respect to custodial services when you or custodians for <i>client</i> funds and securities.		
	or e Sec	examination or prepare an internal c	C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform to control report. (If you checked Item 9.C.(2), you do not have to list auditor information dy provided this information with respect to the private funds you advise in Section 7	on in	
D.		you or your related person(s) act as lients?	s qualified custodians for your <i>clients</i> in connection with advisory services you provide	Yes	No

(1) you act as a qualified custodian

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

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

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

 6

SECTION 9.C. Independent Public Accountant

No Information Filed

Item 10 Control Persons

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

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

Yes No

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

 \circ

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

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

SECTION 10.A. Control Persons

No Information Filed

SECTION 10.B. Control Person Public Reporting Companies

- B. If any *person* named in Schedules A, B, or C, or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please provide the following information (you must complete a separate Schedule D Section 10.B. for each public reporting company):
 - (1) Full legal name of the public reporting company:

AON PLC

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

315293

Item 11 Disclosure Information

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

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

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A. (2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.

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

		Yes	No
00 8	any of the events below involve you or any of your <i>supervised persons</i> ?	\circ	⊙
or	"yes" answers to the following questions, complete a Criminal Action DRP:		
	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	•
	(2) been <i>charged</i> with any <i>felony</i> ?	0	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your reto Item 11.A.(2) to charges that are currently pending.	espor	nse
	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	0	•
	(2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)?	0	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your reto Item 11.B.(2) to charges that are currently pending.	espor	nse
	to Item 11.B.(2) to charges that are currently pending. "yes" answers to the following questions, complete a Regulatory Action DRP:		
	to Item 11.B.(2) to charges that are currently pending. "yes" answers to the following questions, complete a Regulatory Action DRP: Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	
	"yes" answers to the following questions, complete a Regulatory Action DRP: Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: (1) found you or any advisory affiliate to have made a false statement or omission?		Ne
	to Item 11.B.(2) to charges that are currently pending. "yes" answers to the following questions, complete a Regulatory Action DRP: Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	No ©
	"yes" answers to the following questions, complete a Regulatory Action DRP: Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: (1) found you or any advisory affiliate to have made a false statement or omission?	Yes O	N:
	"yes" answers to the following questions, complete a Regulatory Action DRP: Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: (1) found you or any advisory affiliate to have made a false statement or omission? (2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes? (3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do	Yes O	0 0
	 "yes" answers to the following questions, complete a Regulatory Action DRP: Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: (1) found you or any advisory affiliate to have made a false statement or omission? (2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes? (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? 	Yes O	No
	 "yes" answers to the following questions, complete a Regulatory Action DRP: Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: (1) found you or any advisory affiliate to have made a false statement or omission? (2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes? (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? (4) entered an order against you or any advisory affiliate in connection with investment-related activity? (5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and 	Yes O	Nc ⊙ ⊙
<u>or</u>	 "yes" answers to the following questions, complete a Regulatory Action DRP: Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: (1) found you or any advisory affiliate to have made a false statement or omission? (2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes? (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? (4) entered an order against you or any advisory affiliate in connection with investment-related activity? (5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity? 	Yes O	No
•	"yes" answers to the following questions, complete a Regulatory Action DRP: Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: (1) found you or any advisory affiliate to have made a false statement or omission? (2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes? (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? (4) entered an order against you or any advisory affiliate in connection with investment-related activity? (5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity? Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority: (1) ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or	Yes O	No

,		[
	(4)	in the past ten years, entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with an <i>investment-related</i> activity?	0	⊙						
	(5)	(5) ever denied, suspended, or revoked your or any advisory affiliate's registration or license, or otherwise prevented you or any advisory affiliate, by order, from associating with an investment-related business or restricted your or any advisory affiliate's activity?								
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?									
	(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)	(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 advisory affiliate 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?	\circ	\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
A.	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) control another investment adviser that had regulatory assets under management (calculated in response to Item 5.F. (2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	О
C.	Are you:		
	(1) controlled by or under common control with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	О
	(2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0

Schedule A

Direct Owners and Executive Officers

- 1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
- 2. Direct Owners and Executive Officers. List below the names of:
 - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer (Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
 - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);

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

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

Schedule B

Indirect Owners

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

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

- (b) in the case of an owner that is a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
- (c) in the case of an owner that is a trust, the trust and each trustee; and
- (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
- 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
- 5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: C 25% but less than 50% E 75% or more
 - D 50% but less than 75% F Other (general partner, trustee, or elected manager)
- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

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

Schedule D - Miscellaneous

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

ITEM 5F(2); ITEM 7.B.: TOWNSEND RELIES ON THIRD PARTIES TO PROVIDE ASSET VALUATIONS. SOME OF THESE PARTIES TAKE MORE THAN 90 DAYS AFTER THE CALENDAR YEAR END TO PROVIDE SUCH VALUATIONS. AS A RESULT, TOWNSEND HAS CALCULATED ITS RESPONSE TO QUESTION 5F(2) USING SEPTEMBER 30, 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

DRP Pages	
CRIMINAL DISCLOSURE REPORTING PAGE (ADV)	
No I	nformation Filed
REGULATORY ACTION DISCLOSURE REPORTING PAGE (AI	DV)
No I	information Filed
CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE	(ADV)
No I	information Filed

Part 2

Exemption from brochure delivery requirements for SEC-registered advisers

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

Yes No

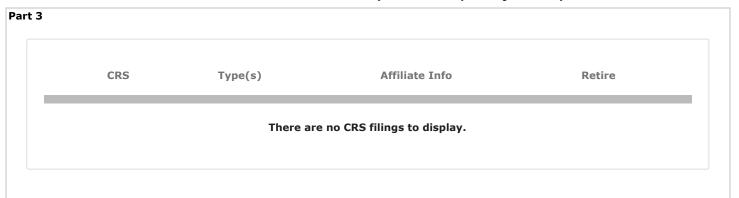
Are you exempt from delivering a brochure to all of your clients under these rules?

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If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
388611	2023 TOWNSEND ADV PART II	Pension plans/profit sharing plans,
		Foundations/charities, Government/municipal,
		Other institutional, Private funds or pools,
		Selection of Other Advisers/Solicitors



Execution Pages

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

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

Appointment of Agent for Service of Process

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

Signature

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

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

Signature: Date: MM/DD/YYYY

AIMEE MAY 10/02/2023

Printed Name: Title:

AIMEE MAY CHIEF COMPLIANCE OFFICER

Adviser CRD Number:

160006

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

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

1. Appointment of Agent for Service of Process

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

2. Appointment and Consent: Effect on Partnerships

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

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

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

Signature

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

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

Signature: Date: MM/DD/YYYY

Printed Name: Title:

Adviser CRD Number:

160006

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