## **FORM ADV**

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

Primary Business Name: VIRTUS FIXED INCOME ADVISERS, LLC

Other-Than-Annual Amendment - All Sections

8/3/2022 11:32:40 AM

**WARNING:** Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4.

#### Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you. If you are filing an *umbrella* registration, the information in Item 1 should be provided for the *filing adviser* only. General Instruction 5 provides information to assist you with filing an *umbrella* registration.

A. Your full legal name (if you are a sole proprietor, your last, first, and middle names):

#### **VIRTUS FIXED INCOME ADVISERS, LLC**

B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A.

#### **SEIX INVESTMENT ADVISORS 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

☐ your legal name **or** ☑ your primary business name:

VIRTUS FIXED INCOME ADVISERS, LLC

- D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: 801-68743
  - (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: 146029

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:

ONE FINANCIAL PLAZA

City: State: Country: ZIP+4/Postal Code:

HARTFORD Connecticut United States 06103

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,

**CRD Number: 146029** 

Rev. 10/2021

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

	(2) Days of week that	you normally conduct busi	ness at your <i>principal office</i>	and place of business:					
	⊙ Monday - Friday C Other:								
	Normal business hours at this location:								
	8:30 TO 5:00								
	(3) Telephone number	at this location:							
	877-332-8172 (4) Facsimile number a	at this location if any:							
	` '	·	n vour <i>principal office and p</i>	lace of business, at which you conduct investn	nent				
			recently completed fiscal ye						
	6								
G.	Mailing address, if differ	rent from your <i>principal off</i>	fice 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 priv	ate residence, check this b	oox: 🗆						
	·	,							
Н.		etor, state your full residen	ce address, if different from	your principal office and place of business add	dress in Item				
	1.F.:  Number and Street 1:		Number and Stree	· 7·					
	City:	State:	Country:	ZIP+4/Postal Code:					
	2.37.		,		Yes No				
I.	Do you have one or mo	re websites or accounts on	publicly available social me	dia platforms (including, but not limited to,					
	Twitter, Facebook and Li		publicity divaliable social inc	are practically (more arring), but not immediately	⊙ 0				
	Section 1.I. of Schedule web, you may list the p address. Do not provide	e D. If a website address se ortal without listing addres the addresses of websites the individual electronic n	erves as a portal through wl sses for all of the other infor s or accounts on publicly ava	accounts on publicly available social media pla nich to access other information you have publ mation. You may need to list more than one p nilable social media platforms where you do no nployees or the addresses of employee accoun	lished on the ortal ot control the				
J.	Chief Compliance Office	r							
			·	r. If you are an exempt reporting adviser, you one. If not, you must complete Item 1.K. belo					
	Name: DEIRDRE A. DILLON		Other titles, if any: CCO						
				Fanu					
	Telephone number: 201-391-0300		Facsimile number, i 201-391-5023	any.					
	Number and Street 1:		Number and Street	2:					
	ONE MAYNARD DRIVE		<b>SUITE 3200</b>						
	City:	State:	Country:	ZIP+4/Postal Code:					
	PARK RIDGE	New Jersey	United States	07656					
	Electronic mail (e-mail) DEIRDRE.DILLON@VIR	) address, if Chief Complia TUS.COM	nce Officer has one:						
	company registered und	der the Investment Compa		on other than you, a <i>related person</i> or an inve ise for providing chief compliance officer servi					
	Name:								
	IRS Employer Identifica	tion Number:							

K.	K. Additional Regulatory Contact Person: If a person other than the Chief Compliance Officer is authorized to receive information and respond to questions about this Form ADV, you may provide that information here.							
	Name: ROBERT CERETTI		Titles: COMPLIA	ANCE OFFICER				
	Telephone number: 201-743-2606		Facsimile 201-391	e number, if any: 5023				
	Number and Street 1: ONE MAYNARD DRIVE		Number SUITE 3	and Street 2: 200				
	City: PARK RIDGE	State: New Jersey	Country United S		ZIP+4/Pos 07656	tal Code:		
	Electronic mail (e-mail) addre	· ·	ne:					
L.	Do you maintain some or all of	f the books and records you	u are requ	iired to keep under	Section 204 of	the Advisers Act, or	Yes	No C
	similar state law, somewhere o	other than your <i>principal ofi</i>	fice and p	lace of business?				~
	If "yes," complete Section 1.L.	of Schedule D.					Yes	No
М.	Are you registered with a forei	gn financial regulatory auth	nority?				o o	<b>⊙</b>
	A	inhand with a few income	-:-1	- t	··· :6			
	Answer "no" if you are not reg foreign financial regulatory aut	<del>-</del>	_		en if you nave ai	n affiliate that is register	ea witn	а
N.	Are you a public reporting com	npany under Sections 12 or	15(d) of	the Securities Exch	ange Act of 193	4?	Yes	_
	,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	(-,				C Yes	⊙ No
Ο.	Did you have \$1 billion or more If yes, what is the approximate	e amount of your assets:	of your m	ost recent fiscal ye	ar?		0	•
	<ul><li>\$1 billion to less than \$10</li><li>\$10 billion to less than \$5</li></ul>							
	C \$50 billion to less than \$5	oo biiiioii						
	For purposes of Item 1.0. only your total assets using the total	•					etermir	ne .
P.	Provide your <i>Legal Entity Ident</i> 549300L7I4W19C7JV575	tifier if you have one:						
	A legal entity identifier is a unique number that companies use to identify each other in the financial marketplace. You may not have a legal entity identifier.							
	TION 1.B. Other Business Na							. 1
	t your other business names and siness name.	d the jurisdictions in which	you use t	hem. You must con	nplete a separat	e Schedule D Section 1.6	3. for e	ach
Na	me: SEIX INVESTMENT ADVISO	RS						
Jur	isdictions							
V	AL	<b>☑</b> IL		<b>☑</b> NE		<b>☑</b> sc		
	AK	☑ IN		☑ NV ☑ NH		☑ SD ☑ TN		
	AZ	<b>☑</b> IA		IX IVH		I V		11

**☑** NJ

**☑** KS

**☑** AR

	<b>☑</b> CA	<b>☑</b> KY	<b>☑</b> NM	<b>☑</b> UT
	<b>☑</b> co	<b>☑</b> LA	<b>☑</b> NY	<b>☑</b> VT
	<b>⊡</b> ст	<b>☑</b> ME	<b>☑</b> NC	<b>▽</b> ∨I
	<b>☑</b> DE	<b>☑</b> MD	<b>☑</b> ND	<b>▽</b> VA
	<b>☑</b> DC	<b>™</b> MA	<b>№</b> ОН	<b>☑</b> WA
	<b>☑</b> FL	<b>☑</b> MI	<b>Г</b> ок	<b>☑</b> w∨
	<b>☑</b> GA	<b>☑</b> MN	<b>☑</b> OR	<b>☑</b> wɪ
	□ GU	<b>☑</b> MS	<b>☑</b> PA	<b>☑</b> WY
	<b>☑</b> HI	<b>☑</b> MO	□PR	☐ Other:
	<b>☑</b> ID	<b>☑</b> MT	<b>☑</b> RI	E Gener.
	F 10	E	EX	
l				
l				
	List your other business names and business name.	I the jurisdictions in which you use t	them. You must complete a separat	e Schedule D Section 1.B. for each
	business name.			
	Name: NEWFLEET ASSET MANAGE	MENT		
	Name. NEW LEET ASSET MANAGE	TENT		
	Jurisdictions			
	□ AL	□IL	□ NE	□sc
	□ AK	□IN	□NV	□SD
	□ AZ	□ IA	□NH	□TN
	☐ AR	□ ks	□ NJ	□TX
	□ ca	□ KY	□NM	□ ∪т
	□со	□ LA	□NY	□VT
	<b>Г</b> ст	□ ме	□ NC	□VI
	□ DE	□ MD	□ND	□ VA
	□ DC	□ ма	□ он	□ wa
	□FL	□ MI	□ок	□ wv
	□ GA	□ MN	□ or	□ wi
	□ GU	□ MS	□ PA	□ WY
	□HI	□ MO	□ PR	☐ Other:
		□ MT	□RI	Cottlei .
		I MI	LKI	
L				
lr	List your other business names and	t the jurisdictions in which you use	them. You must complete a separat	o Schodulo D Section 1 R. for each
	business name.	title julisdictions in which you use	them. Tou must complete a separat	e Schedule D Section 1.b. for each
	Name: STONE HARBOR INVESTME	NT PARTNERS		
	Jurisdictions			
	□ AL	□IL	□ NE	□ sc
	□ ak	□IN	□NV	□sD
	□az	□IA	□NH	□TN
	□ AR	□ KS	□ NJ	□TX
	□ CA	□ KY	□ NM	□ UT
	□ co	□ LA	✓ NY	□ VT
	□ст	□ ME	□ NC	□VI
	□ DE	□ MD	□ND	□VA
	□ DC	□ MA	□он	□ wa
	□ FL	□ MI	□ок	□ wv
	□ GA	□ MN	□ OR	□ WI
	□ GA	□ MN	□ OR	□ WI □ WY
H	L L UU	L L 1915	L L PA	I I VV Y

8/4/22 10:17 A	NΛ

□ нı	∥	□ PR	□ Other:
□ID	□ мт	□RI	
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SECTION 1.F. Other Offic	ces		
Complete the following in	formation for each office, other	than your <i>principal office and</i>	place of business, at which you conduct investment
advisory business. You mu	ust complete a separate Schedu	le D Section 1.F. for each loca	ition. If you are applying for SEC registration, if you
	ne SEC, or if you are an <i>exempt</i>	reporting adviser, list only th	e largest twenty-five offices (in terms of numbers of
employees).			
Number and Street 1:		Number and Street 2	:
3333 PIEDMONT ROAD		SUITE 1500	
City:	State:	Country:	ZIP+4/Postal Code:
ATLANTA	Georgia	United States	30305
If this address is a private	e residence, check this box: $\Box$		
Telephone Number: 404-845-7700	Facsimile <b>1</b> 404-845-7	lumber, if any:	
104 043 7700	404 043 7	031	
If this office location is als	so required to be registered with	FINRA or a <i>state securities a</i>	uthority as a branch office location for a broker-
			), please provide the CRD Branch Number here:
How many <i>employees</i> per 1	form investment advisory funct	ions from this office location?	
1			
Are other business activiti	es conducted at this office locat	ion? (check all that apply)	
[ (1) Broker-dealer (regi		(	
$\square$ (2) Bank (including a s	eparately identifiable departme	nt or division of a bank)	
$\square$ (3) Insurance broker or	r agent		
(4) Commodity pool op	erator or commodity trading ad	visor (whether registered or e	exempt from registration)
(5) Registered municipal			
(6) Accountant or acco	unting firm		
$\square$ (7) Lawyer or law firm			
Describe any other invest	ment-related business activities	conducted from this office lov	cation
RESEARCH	ment-related business activities	conducted from this office for	Cation.
Complete the fell-wine to	formation for and affire at	than your principal - 66:	place of hydroge at which you are dust investigation
,	·		place of business, at which you conduct investment ition. If you are applying for SEC registration, if you
			e largest twenty-five offices (in terms of numbers of
employees).			
Number and Street 1: 301 PINE STREET		Number and Street 2: SUITE 500	
City:	State:	Country:	ZIP+4/Postal Code:
ORLANDO	Florida	United States	32801
If this address is a private	e residence, check this box: $\Box$		
Talambana Ni b	error 0	Number & sauce	
Telephone Number: 407-674-1270	407-674-	Number, if any: 1271	

If this office location is also required to be registered with FINRA or a <i>state securities authority</i> as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the <i>CRD</i> Branch Number here:						
How many <i>employees</i> perform investment a	advisory functic	ons from this office location	n?			
Are other business activities conducted at this office location? (check all that apply)						
$\square$ (1) Broker-dealer (registered or unregistered)						
(2) Bank (including a separately identifiable department or division of a bank)						
$\square$ (3) Insurance broker or agent						
$\square$ (4) Commodity pool operator or commod	lity trading adv	isor (whether registered o	r exempt from registration)			
$lue{\square}$ (5) Registered municipal advisor						
$\square$ (6) Accountant or accounting firm						
$\square$ (7) Lawyer or law firm						
Describe any other <i>investment-related</i> busi RESEARCH, PORTFOLIO MANAGEMENT, AND		conducted from this office	location:			
advisory business. You must complete a sep	parate Schedule	D Section 1.F. for each lo	and place of business, at which you conduct investment ocation. If you are applying for SEC registration, if you the largest twenty-five offices (in terms of numbers of			
Number and Street 1:		Number and Street 2:				
48 DOVER		5TH FLOOR				
City: LONDON	State:	Country: United Kingdom	ZIP+4/Postal Code: W1S 4FF			
If this address is a private residence, check	this box: $\square$					
Telephone Number: 20-3205-4100	Facsimile Nu 20-3205-419	mber, if any: 96				
•			s authority as a branch office location for a broker-BR), please provide the <i>CRD</i> Branch Number here:			
How many <i>employees</i> perform investment and 10	advisory functic	ons from this office location	n?			
Are other business activities conducted at t	his office location	on? (check all that apply)				
$lue{\square}$ (1) Broker-dealer (registered or unregist	ered)					
$\square$ (2) Bank (including a separately identifia	ble department	or division of a bank)				
(3) Insurance broker or agent						
(4) Commodity pool operator or commod	lity trading adv	isor (whether registered o	r exempt from registration)			
(5) Registered municipal advisor						
(6) Accountant or accounting firm						
$\square$ (7) Lawyer or law firm						
Describe any other <i>investment-related</i> busi	ness activities o	conducted from this office	location:			

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you

are registered only with the SEC, or if you are employees).	e an <i>exempt reportii</i>	<i>ng adviser</i> , list only the	largest twenty-five offices (in terms of numbers of			
Number and Street 1: 3 KILLINEY ROAD		Number and Street 2 WINSLAND HOUSE I				
City: SINGAPORE	State:	Country: Singapore	ZIP+4/Postal Code: 239519			
If this address is a private residence, check this box: $\Box$						
Telephone Number: 65-6671-9711	Facsimile Num 65-6671-9712	· ·				
If this office location is also required to be registered with FINRA or a <i>state securities authority</i> as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the <i>CRD</i> Branch Number here:						
How many <i>employees</i> perform investment ac 2	dvisory functions fro	m this office location?				
Are other business activities conducted at this office location? (check all that apply)  (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable department or division of a bank) (3) Insurance broker or agent (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm						
advisory business. You must complete a sepa	arate Schedule D Sec	ction 1.F. for each locati	place of business, at which you conduct investment ion. If you are applying for SEC registration, if you largest twenty-five offices (in terms of numbers of			
Number and Street 1: 31 WEST 52ND STREET		Number and Street 2 17TH FLOOR	:			
City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10019			
If this address is a private residence, check t	his box:					
Telephone Number: 212-548-1022	Facsimile Number, i 866-302-6524	f any:				
·	-		thority as a branch office location for a broker, please provide the <i>CRD</i> Branch Number here:			
How many <i>employees</i> perform investment ac 31	dvisory functions fro	m this office location?				
Are other business activities conducted at thi $\square$ (1) Broker-dealer (registered or unregister $\square$ (2) Bank (including a separately identifiab	red)					

$\square$ (3) Insurance broker or agent						
☑ (4) Commodity pool operator or commodity	dity trading advisor (	whether registered or exem	npt from registration)			
□ (5) Registered municipal advisor						
(6) Accountant or accounting firm						
(7) Lawyer or law firm						
(7) Lawyer of law fifth						
Describe any other <i>investment-related</i> business activities conducted from this office location:						
Complete the following information for each office, other than your <i>principal office and place of business</i> , 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 <i>exempt reporting adviser</i> , list only the largest twenty-five offices (in terms of numbers of						
employees).						
Number and Street 1: 1 MAYNARD DRIVE		Number and Street 2: SUITE 3200				
City:	State:	Country:	ZIP+4/Postal Code:			
PARK RIDGE	New Jersey	United States	07656			
If this address is a private residence, chec	∢ this box: □					
Telephone Number: 201-391-0300	Facsimile Number, i 201-391-5023	f any:				
	-		ority as a branch office location for a brokerease provide the <i>CRD</i> Branch Number here:			
How many <i>employees</i> perform investment 89	advisory functions fro	om this office location?				
Are other business activities conducted at	this office location? (	check all that apply)				
$\Box$ (1) Broker-dealer (registered or unregis	•	errock air criae appry)				
$\Box$ (2) Bank (including a separately identifi	•	ivision of a hank)				
(2) Dank (melading a separately radiation	able department of di	ivision of a banky				
(4) Commodity pool operator or commo	dity trading advisor (	whether registered or exem	ant from registration)			
(7) Commodity poor operator or commo	aity trading advisor (	Whether registered of exem	pe nom registration)			
(6) Accountant or accounting firm						
(7) Lawyer or law firm						
(7) Lawyer of law fifth						
Describe any other investment-related bus	iness activities condu	icted from this office locatio	n:			
SECTION 1.I. Website Addresses						
			edia platforms where you control the content			

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

Address of Website/Account on Publicly Available Social Media Platform: HTTPS://WWW.LINKEDIN.COM/COMPANY/65266/

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

Address of Website/Account on Publicly Availab	ole Social Media Pl	atform: HTTP://WW	W.VIRTUS.COM
Address of Website/Account on Publicly Availab	ole Social Media Pl	atform: HTTP://WW	W.SHIPEMD.COM
Address of Website/Account on Publicly Availab	ole Social Media Pl	atform: https://ww	w.newfleet.com
Address of Website/Account on Publicly Availab	ole Social Media Pl	atform: https://ww	w.linkedin.com/company/newfleet-asset-management/
Address of Website/Account on Publicly Availab	ole Social Media Pl	atform: https://twit	ter.com/newfleet
SECTION 1.L. Location of Books and Record	ls		
Complete the following information for each loobusiness. You must complete a separate Scheo	•		d records, other than your principal office and place of
Name of entity where books and records are k VIRTUS INVESTMENT PARTNERS, INC.	ept:		
Number and Street 1: ONE FINANCIAL PLAZA		Number and St	reet 2:
'	tate: onnecticut	Country: United States	ZIP+4/Postal Code: 06103
If this address is a private residence, check thi	s box:		
II .	acsimile number, i 60-241-1024	f any:	
This is (check one):			
• one of your branch offices or affiliates.			
C a third-party unaffiliated recordkeeper.			
C other.			
Briefly describe the books and records kept at CORPORATE RECORDS	this location.		
Name of entity where books and records are k SUNTRUST BANK ORLANDO ARCHIVES FACILI			
Number and Street 1: 7474 CHANCELLOR DRIVE		Number and Street 2	2:
City:	State: Florida	Country: United States	ZIP+4/Postal Code: 32809
CKEMBO	Tioriua	Officed States	32007
If this address is a private residence, check thi	s box:		
Telephone Number: 407-762-1914	Facsimile number 407-762-1676	er, if any:	

This is (check one):							
O one of your branch offices or affiliates.							
C a third-party unaffiliated recordkeeper.							
⊙ other.							
Briefly describe the books and records kept STATEMENTS AND OTHER RECORDS OF CLC							
Name of entity where books and records are GRM	e kept:						
Number and Street 1: 215 COLES STREET		Number and Street 2					
City:	State:	Country:	ZIP+4/Postal Code:				
JERSEY CITY	New Jersey	United States	07310				
If this address is a private residence, check	this box:						
Telephone Number:	Facsimile number,	if any:					
201-798-7100	201-239-3986						
This is (check one):							
C one of your branch offices or affiliates.							
a third-party unaffiliated recordkeeper.							
C other.							
Briefly describe the books and records kept CLIENT ACCOUNT AND CORPORATE RELATE							
Name of entity where books and records are SEIX INVESTMENT ADVISORS	e kept:						
Number and Street 1: 3333 PIEDMONT ROAD		Number and Street 2: SUITE 1500					
City:	State:	Country:	ZIP+4/Postal Code:				
ATLANTA	Georgia	United States	30305				
If this address is a private residence, check	this box:						
Telephone Number: 404-845-7700	Facsimile number 404-845-7691	er, if any:					
This is (check one):							
• one of your branch offices or affiliates.							
C a third-party unaffiliated recordkeeper.							
C other.							
Briefly describe the books and records kept CORPORATE RECORDS	at this location.						

Name of entity where books and records are SEIX INVESTMENT ADVISORS	kept:			
Number and Street 1: 301 PINE STREET		Number and Street 2: SUITE 500		
City: ORLANDO	State: Florida	Country: United States	ZIP+4/Postal Code: 32801	
If this address is a private residence, check the	nis box: 🔲			
Telephone Number: 407-674-1270	Facsimile numb 407-674-1271	er, if any:		
This is (check one):				
• one of your branch offices or affiliates.				
C a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept a CLIENT ACCOUNT RELATED DOCUMENTS	t this location.			
Name of entity where books and records are RECORD MANAGEMENT/SUNTRUST BANK	kept:			
Number and Street 1:		Number and Street 2:		
58 EDGEWOOD AVENUE				
58 EDGEWOOD AVENUE City: ATLANTA	State: Georgia	Country: United States	ZIP+4/Postal Code: 30303	
City:	Georgia —	•		
City: ATLANTA	Georgia —	United States		
City: ATLANTA  If this address is a private residence, check the state of the state	Georgia nis box:   Facsimile numbe	United States		
City: ATLANTA  If this address is a private residence, check the state of the state	Georgia nis box:   Facsimile numbe	United States		
City: ATLANTA  If this address is a private residence, check the state of the state	Georgia nis box:   Facsimile numbe	United States		
City: ATLANTA  If this address is a private residence, check the state of the state	Georgia nis box:   Facsimile numbe	United States		
City: ATLANTA  If this address is a private residence, check the state of the state	Georgia  nis box:   Facsimile number 404-724-3760  t this location.	United States		
City: ATLANTA  If this address is a private residence, check the Telephone Number: 404-588-7214  This is (check one): O one of your branch offices or affiliates. O a third-party unaffiliated recordkeeper. O other.  Briefly describe the books and records kept a	Georgia  nis box:   Facsimile number 404-724-3760  t this location.  SED ACCOUNTS	United States		
City: ATLANTA  If this address is a private residence, check the Telephone Number: 404-588-7214  This is (check one): One of your branch offices or affiliates. one of your branch offices or affiliates. one of third-party unaffiliated recordkeeper. other.  Briefly describe the books and records kept a STATEMENTS AND OTHER RECORDS OF CLOSENAME	Georgia  nis box:   Facsimile number 404-724-3760  t this location.  SED ACCOUNTS	United States		
City: ATLANTA  If this address is a private residence, check the Telephone Number: 404-588-7214  This is (check one): One of your branch offices or affiliates. one of your branch offices or affiliates. one of third-party unaffiliated recordkeeper. other.  Briefly describe the books and records kept a STATEMENTS AND OTHER RECORDS OF CLOSENAME	Georgia  nis box:   Facsimile number 404-724-3760  t this location.  SED ACCOUNTS	United States er, if any:		

Telephone Number: 510-785-5651	Facsimile number,	if any:	
This is (check one):			
O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
C other.			
Briefly describe the books and records kept a TRADE TICKETS, GENERAL OFF-SITE STORAGE		TMENTS OF FIRM	
Name of entity where books and records are GLOBAL RELAY	kept:		
Number and Street 1:		Number and Street	2:
220 CAMBIE ST		2ND FLOOR	
City:	State:	Country:	ZIP+4/Postal Code:
VANCOUVER		Canada	V6B 2M9
If this address is a private residence, check the	his box:		
Telephone Number: 604-484-6630	Facsimile nui 604-608-294		
This is (check one):			
one of your branch offices or affiliates.			
C other.			
Briefly describe the books and records kept a EMAIL ARCHIVING AND RETENTION.	t this location.		
Name of entity where books and records are ARKIVE	kept:		
Number and Street 1: 6751 DISCOVERY BOULEVARD		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
MABLETON	Georgia	United States	30126
If this address is a private residence, check the	his box:		
Telephone Number: 770-941-5375	Facsimile numbe 771-941-8234	er, if any:	
This is (check one):			
one of your branch offices or affiliates.			
C a third-party unaffiliated recordkeeper.			
• other.			

Briefly describe the books and record STATEMENTS AND OTHER RECORDS				
Name of entity where books and reco	ords are kept:			
Number and Street 1: 60 E 42ND STREET		Number and Street 2: SUITE 2107		
City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10165	
If this address is a private residence,	, check this box: $\Box$			
Telephone Number: 301-340-3900	Facsimile numb	per, if any:		
This is (check one):				
O one of your branch offices or affil				
a third-party unaffiliated records	eeper.			
C other.				
Briefly describe the books and record PERSONAL TRADING RECORDS	ds kept at this location.			
INSTITUTIONAL SHAREHOLDER SER  Number and Street 1: 702 KING FARM BLVD  City: ROCKVILLE	VICES INC. State: Maryland	Number and Street 2: 400 Country: United States	ZIP+4/Postal Code: 20850	
If this address is a private residence,	, check this box: 🏻			
Telephone Number: 301-566-0550	Facsimile numb	per, if any:		
This is (check one):				
O one of your branch offices or affil	iates.			
a third-party unaffiliated records	eeper.			
O other.				
Briefly describe the books and record PROXY VOTING RECORDS	ds kept at this location.			
Name of entity where books and reco	ords are kept:			
Number and Street 1: 875 6TH AVE.		Number and Street 2: 12TH FLOOR		
City:	State:	Country:	ZIP+4/Postal Code:	

NEW YORK	New York	United States	10001						
If this address is a private residence, check this box: $\ \Box$									
Telephone Number: Facsimile number, if any: 646-787-9370									
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 a PERSONAL TRADING RECORDS	at this location.								
Name of entity where books and records are KAYNE ANDERSON RUDNIK	kept:								
Number and Street 1: 580 CALIFORNIA STREET		Number and Street 2: SUITE 1750							
City:	State:	Country:	ZIP+4/Postal Code:						
SAN FRANCISCO	California	United States	94104						
If this address is a private residence, check t	his box:								
Telephone Number:	Facsimile number, i	f any:							
415-486-6736	415-486-6699								
This is (check one):									
• one of your branch offices or affiliates.									
C a third-party unaffiliated recordkeeper.									
C other.									
Briefly describe the books and records kept a PERFORMANCE DATA	at this location.								
Name of entity where books and records are COMPLYSCI / FTT	kept:								
Number and Street 1: 136 MADISON AVENUE		Number and Street 2: 8TH FLOOR							
City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10016						
If this address is a private residence, check t	his box:								
Telephone Number: 202-327-1533	Facsimile number, i	f any:							
This is (check one):									
O one of your branch offices or affiliates.									

Briefly describe the books and records BACKUP COMPLIANCE RECORDS, INCL		NG DATA AND POLITICAL C	CONTRIBUTION RECORDS
Name of entity where books and recor DATASAFE INC	ds are kept:		
Number and Street 1: 574 ECCLES AVENUE		Number and Street 2	2:
City: SOUTH SAN FRANCISCO	State: California	Country: United States	ZIP+4/Postal Code: 94080
If this address is a private residence, o	theck this box:		
Telephone Number: 650-875-38000	Facsimile num 604-608-294:		
This is (check one):			
${f C}$ one of your branch offices or affilia	tes.		
	per.		
Briefly describe the books and records			
Briefly describe the books and records TAPE BACK-UPS OF HARD DRIVE FILES Name of entity where books and recor	ds are kept:		
C other.  Briefly describe the books and records TAPE BACK-UPS OF HARD DRIVE FILES  Name of entity where books and recor INSTITUTIONAL SHAREHOLDER SERVI  Number and Street 1:	ds are kept:	Number and Street 2:	
Briefly describe the books and records TAPE BACK-UPS OF HARD DRIVE FILES  Name of entity where books and recor INSTITUTIONAL SHAREHOLDER SERVI  Number and Street 1: 2099 GAITHER ROAD	ds are kept:	Number and Street 2: SUITE 501 Country:	ZIP+4/Postal Code:
Briefly describe the books and records TAPE BACK-UPS OF HARD DRIVE FILES Name of entity where books and recor INSTITUTIONAL SHAREHOLDER SERVI Number and Street 1: 2099 GAITHER ROAD City:	ds are kept:	SUITE 501	ZIP+4/Postal Code: 20850
Briefly describe the books and records TAPE BACK-UPS OF HARD DRIVE FILES  Name of entity where books and recor INSTITUTIONAL SHAREHOLDER SERVI	ds are kept: CCES State: Maryland	SUITE 501 Country:	
Briefly describe the books and records TAPE BACK-UPS OF HARD DRIVE FILES  Name of entity where books and recor INSTITUTIONAL SHAREHOLDER SERVI  Number and Street 1: 2099 GAITHER ROAD  City: ROCKVILLE	ds are kept: CCES State: Maryland	SUITE 501 Country: United States	
Briefly describe the books and records TAPE BACK-UPS OF HARD DRIVE FILES Name of entity where books and record INSTITUTIONAL SHAREHOLDER SERVINDER SERVINDER GOOD CITY:  ROCKVILLE  If this address is a private residence, of Telephone Number: 301-556-0500	ds are kept: CCES  State:  Maryland  check this box:	SUITE 501 Country: United States	
Briefly describe the books and records TAPE BACK-UPS OF HARD DRIVE FILES  Name of entity where books and record INSTITUTIONAL SHAREHOLDER SERVI  Number and Street 1: 2099 GAITHER ROAD  City: ROCKVILLE  If this address is a private residence, of the content of t	ds are kept: CCES  State:  Maryland  check this box:	SUITE 501 Country: United States	
Briefly describe the books and records TAPE BACK-UPS OF HARD DRIVE FILES  Name of entity where books and record INSTITUTIONAL SHAREHOLDER SERVINATIONAL SHAREHOLDER SHAREHOLDER SERVINATIONAL SHAREHOLDE	ds are kept: CCES  State: Maryland check this box:  Facsimile number ttes.	SUITE 501 Country: United States	
Briefly describe the books and records TAPE BACK-UPS OF HARD DRIVE FILES Name of entity where books and record INSTITUTIONAL SHAREHOLDER SERVINATIONAL SHAREHOLDER SERVINATIONAL STREET	ds are kept: CCES  State: Maryland check this box:  Facsimile number ttes.	SUITE 501 Country: United States	

KAYNE ANDERSON RUDNIK INVESTMENT MANAGEMENT, LLC

Number and Street 1: 2000 AVENUE OF THE STARS		Number and Street 2: SUITE 1110	
City: LOS ANGELES	State: California	Country: United States	ZIP+4/Postal Code: 90067
If this address is a private residence, check	this box:		
Telephone Number: 310-556-2721	Facsimile number, if a	any:	
This is (check one):			
lacktriangle one of your branch offices or affiliates.			
C a third-party unaffiliated recordkeeper.			
C other.			
Briefly describe the books and records kept CUSTOMER ACCOUNT STATEMENTS, CLIENT		ETTLEMENT REPORTS.	
Name of entity where books and records are IRON MOUNTAIN ROCKY HILL	e kept:		
Number and Street 1: 71 HAMMER MILL ROAD		Number and Street 2:	
City: ROCKY HILL	State: Connecticut	Country: United States	ZIP+4/Postal Code: 06067
If this address is a private residence, check	this box:  □		
Telephone Number: 800-899-4766	Facsimile number, if ar	ny:	
This is (check one):			
O one of your branch offices or affiliates.			
C other.			
Briefly describe the books and records kept BACK-UP TAPES FOR FILE SERVER, APX SER		RS AND MICROSOFT ACTIVE	DIRECTORY SERVERS
Name of entity where books and records are IRON MOUNTAIN	e kept:		
Number and Street 1: 1100 KENNERY ROAD		Number and Street 2:	
City: WINDSOR	State: Connecticut	Country: United States	ZIP+4/Postal Code: 06095
If this address is a private residence, check	this box:		

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 OPERATIONAL AND BUSINESS RECORDS	at this location.			
Name of entity where books and records ar STAR COMPLIANCE, LLC	e kept:			
Number and Street 1: 9200 CORPORATE BLVD		Number and Street 2: SUITE 440		
City:	State:	Country:	ZIP+4/Postal Code:	
ROCKVILLE	Maryland	United States	20850	
If this address is a private residence, check	this box:			
Telephone Number: 301-340-3900	Facsimile numbe	r, if any:		
This is (check one):				
O one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
O other.				
Briefly describe the books and records kept BACK-UP COMPLIANCE RECORDS, INCLUDI		DING AND POLITICAL CONT	RIBUTION RECORDS	
Name of entity where books and records ar SMARSH	e kept:			
Number and Street 1: 11 TIMES SQUARE		Number and Street 2: 31ST FLOOR		
City:	State:	Country:	ZIP+4/Postal Code:	
NEW YORK	New York	United States	10036	
If this address is a private residence, check	this box:			
Telephone Number: 866-762-7741	Facsimile number	r, if any:		
This is (check one):				
$^{ extsf{C}}$ one of your branch offices or affiliates.				
<b>ⓒ</b> a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept EMAIL ARCHIVES	at this location.			

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

#### 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

registration, the information in Item 2 should be provided for the filing adviser only. 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 annual updating amendment 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 You (the adviser): (1) are a large advisory firm that either: (a) has regulatory assets under management of \$100 million (in U.S. dollars) or more; or (b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent annual updating amendment and is registered with the SEC; (2) are a 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 state securities authority of the state where you maintain your principal office and place of business; or (b) not subject to examination by the state securities authority of the state where you maintain your principal office and place of business; 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 *controls*, is *controlled* by, or is under common *control* with, an investment adviser that is registered with the SEC, and your principal office and place of business is the same as 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.  $\square$  (13) are **no longer eligible** to remain registered with the SEC.

# State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers

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

Jurisdictions			
<b>☑</b> AL	<b>☑</b> IL	<b>☑</b> NE	<b>☑</b> sc
₩ AL AK	☑ IN	₩ NV	☑ SD
		```	
<b>☑</b> AZ	IA IA	<b>☑</b> NH	▼ TN
<b>☑</b> AR	<b>☑</b> KS	<b>☑</b> NJ	<u></u> ▼ TX
<b>☑</b> CA	<b>☑</b> KY	<b>☑</b> NM	UT UT
<b>☑</b> co	∥ <b>⊠</b> LA	<b>☑</b> NY	<b>☑</b> VT
<b>☑</b> CT	<b>⊠</b> ME	<b>☑</b> NC	<b>☑</b> VI
<b>☑</b> DE	<b>☑</b> MD	<b>☑</b> ND	<b>☑</b> VA
<b>☑</b> DC	<b>☑</b> MA	Г он	<b>☑</b> WA
<b>☑</b> FL	<b>☑</b> MI	<b>☑</b> ok	<b>☑</b> wv
<b>☑</b> GA	<b>™</b> MN	<b>☑</b> OR	<b>⊠</b> wi
□ GU	<b>☑</b> MS	<b>₽</b> PA	 ✓ wy
<b>№</b> HI	₩ MO	□ PR	W I
☑ ID	☑ MT	<b>☑</b> RI	
SECTION 2.A.(8) Relate			cause you <i>control</i> , are <i>controlled</i> by, or are
	adviser, provide the following infor		principal office and place of business is the same
SEC Number of Registered	d Investment Adviser		
SECTION 2.A.(9) Invest	ment Adviser Expecting to be I	Eligible for Commission Regist	ration within 120 Days
SEC registration within 12 the appropriate boxes, yo	20 days, you are required to make u will be deemed to have made th	certain representations about you e required representations. You n	able to an adviser that expects to be eligible for ur eligibility for SEC registration. By checking nust make both of these representations:
	required to be registered with the ter with the SEC within 120 days a		ty and I have a reasonable expectation that In the SEC becomes effective.
	w from SEC registration if, on the 203A(a) of the Advisers Act from r	, , ,	vith the SEC becomes effective, I would be
SECTION 2.A.(10) Multi	-State Adviser		
If you are relying on rule	203A-2(d), the multi-state advise	·	on registration, you are required to make e boxes, you will be deemed to have made the
If you are applying for req	gistration as an investment advise	r with the SEC, you must make bo	oth of these representations:
	oplicable state and federal laws an ser with the <i>state securities autho</i>		red by the laws of 15 or more states to register
☐ I undertake to withdra	w from SEC registration if I file an	amendment to this registration i	ndicating that I would be required by the laws

of fewer than 15 states to register as an investment adviser with the state securities authorities of those states.

If you are submitting your <i>annual updating amendment</i> , 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 <i>Order</i>
If you are relying upon an SEC order exempting you from the prohibition on registration, provide the following information:
Application Number: 803-
Date of order:

Ttom	3	Form	Ωf	Organization	
item		rorm	OI	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)?

0

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**

#### 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.

  158
- 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? 48
  - (3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?
  - (4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?
  - (5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?
  - (6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?
    8

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 <i>Client(s)</i>	(2) Fewer than 5 <i>Clients</i>	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)			\$
(b) High net worth individuals	16		\$ 359,500,196
(c) Banking or thrift institutions			\$
(d) Investment companies	46		\$ 15,067,757,272
(e) Business development companies		1 Γ	\$
(f) Pooled investment vehicles (other than investment companies and business development companies)	49	] [	\$ 5,411,103,784
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	38		\$ 6,256,213,825
(h) Charitable organizations	16		\$ 640,888,919
(i) State or municipal <i>government entities</i> (including government pension plans)	12		\$ 871,906,298
(j) Other investment advisers	18		\$ 1,660,595,259
(k) Insurance companies	7		\$ 1,331,474,287
(I) Sovereign wealth funds and foreign official institutions		V	\$ 965,767,152
(m) Corporations or other businesses not listed above	10		\$ 266,647,023
(n) Other: PRIMARILY NGOS, SUPERANNUATION SCHEMES	6		\$ 455,232,712

Compensation .	Arrangements
----------------	--------------

E.	You are compensated for your investment advisory services by (check all that apply):											
	V	(1)	percentage of assets under your management									
		(2)	ourly charges									
		(3)	Subscription fees (for a newsletter or periodical)									
		(4)	Fixed fees (other than subscription fees)									
		(5)	Commissions									
	V	(6)	Performance-based fees									
		(7)	Other (specify):									

Ttem	5 T	nformation	About	Your	Advisory	Business	- Regulatory	Assets	Under	Manage	ement
Treiii	J 1	momation	ADOUL	ı vuı	AUVISUI Y	Dusiliess	- Negulatoly	MOSELS	Ulluei	rialiaye	21116116

# **Regulatory Assets Under Management**

Yes No

 $\circ$ 

- 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?
    - Total Number of Accounts

U.S. Dollar Amount Discretionary: (a) \$ 33,071,968,937 (d) 217

Non-Discretionary: (b) \$ 215,117,790 (e) 2

(c) \$ 33,287,086,727 (f) 219 Total:

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?

\$ 10,709,720,140

## Item 5 Information About Your Advisory Business - Advisory Activities

#### **Advisory Activities**

- What type(s) of advisory services do you provide? Check all that apply.
  - Financial planning services (1)
  - V (2) Portfolio management for individuals and/or small businesses
  - V Portfolio management for investment companies (as well as "business development companies" that have made an election

	<b>☑</b> (4)	pursuant to section 54 of the Investment Company Act of 1940)  Portfolio management for pooled investment vehicles (other than investment companies)			
	<b>☑</b> (5)	Portfolio management for businesses (other than small businesses) or institutional <i>clients</i> (other than registered in companies and other pooled investment vehicles)	vestm	nent	
	☐ (6)	Pension consulting services			
	□ (7) □ (8)	Selection of other advisers (including <i>private fund</i> managers)			
	□ (8) □ (9)	Publication of periodicals or newsletters Security ratings or pricing services			
	☐ (10)	Market timing services			
	11	Educational seminars/workshops			
	[ (12)	Other(specify):			
	company	eck Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report mber of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Schedu	the 8	11	
н.	If you pro	vide financial planning services, to how many clients did you provide these services during your last fiscal year?			
	⊙ 0				
	C 1-1	0			
	O 11 -	25			
	O 26 -				
	O 51 -				
	0 054	- 250 - 500			
	~	than 500			
	•	ore than 500, how many?			
	(rou	nd to the nearest 500)			
		responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a se relationship with those investors.	эриги		
			Yes	No	
I.	. , ,	u participate in a wrap fee program?	⊙	О	
	(2) If you participate in a wrap fee program, what is the amount of your regulatory assets under management attributable to acting as:				
	(a) sponsor to a wrap fee program \$ 0				
	(b) portfolio manager for a wrap fee program? \$ 2,171,156,110				
	\$ 0	insor to and portfolio manager for the same wrap fee program?			
	If you report an amount in Item 5.I.(2)(c), do not report that amount in Item 5.I.(2)(a) or Item 5.I.(2)(b).				
	If you are a portfolio manager for a wrap fee program, list the names of the programs, their sponsors and related information in Section 5.I.(2) of Schedule D.				
	•	volvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mut ered through a wrap fee program, do not check Item $5.I.(1)$ or enter any amounts in response to Item $5.I.(2)$ .			
1	(1) In roc	nance to Itam 4. P. of Part 24 of Form ADV do you indicate that you provide investment advice only with respect to		No	
J.		ponse to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to pes of investments?	0	⊙	
		u report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to your regulatory assets under management?	0	•	
K.	C	regulatory assets under management:			
	Separatei	y Managed Account <i>Clients</i>			
	Separatei		Yes	No	

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 clients that yo	u 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 clients that you	u 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?	nent, does 🏻 🕞	О
If yes, complete Section 5.K.(3) of Schedule D for each custodian.		
Marketing Activities		
(1) Do any of your advertisements include:	Ye	s No
(a) Performance results?	0	0
(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	c	0
(c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	0
(d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	0
(e) Third-party ratings?	0	0
(2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compens directly or indirectly, in connection with the use of <i>testimonials</i> , <i>endorsements</i> , or <i>third-party ratings</i> ?	sation, C	0
(3) Do any of your advertisements include hypothetical performance?	0	0
(4) Do any of your advertisements include predecessor performance?	О	0

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

If you check Item 5.G.(3), what is the SEC file number (811 or 814 number) of each of the registered investment companies and business development companies to which you act as an adviser pursuant to an advisory contract? You must complete a separate Schedule D Section 5.G.(3) for each registered investment company and business development company to which you act as an adviser.

SEC File Number 811 - 00945

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

SEC File Number 811 - 03364

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number

811 - 04642

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number 811 - 04708

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number 811 - 04739

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number 811 - 05601

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

SEC File Number

811 - 05620

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number

811 - 07257

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number

811 - 07455

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number

811 - 07705

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number

811 - 07923

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number

811 - 22037

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number

811 - 22110

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number 811 - 22153

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number

811 - 22153

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

SEC File Number 811 - 22473

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number 811 - 22608

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number 811 - 22716

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number 811 - 22819

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number 811 - 22906

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number

811 - 23078

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number

811 - 23207

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

## SECTION 5.I.(2) Wrap Fee Programs

If you are a portfolio manager for one or more *wrap fee programs*, list the name of each program and its *sponsor*. You must complete a separate Schedule D Section 5.I.(2) for each *wrap fee program* for which you are a portfolio manager.

Name of Wrap Fee Program

ACCESS ADVISORY PROGRAM

Name of Sponsor

UBS FINANCIAL SERVICES, INC.

Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):

Sponsor's CRD Number (if any):

Name of Wrap Fee Program

CONSULTING SOLUTIONS

Name of Sponsor

RBC

Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):

```
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
DMA
Name of Sponsor
WELLS FARGO ADVISORS
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
FIDUCIARY SERVICES PROGRAM
Name of Sponsor
CITI PRIVATE BANK
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
FIRST REPUBLIC
Name of Sponsor
FIRST REPUBLIC
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
MANAGED DIVERSIFIED PORTFOLIO
Name of Sponsor
WELLS FARGO PRIVATE BANK
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
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Sponsor's CRD Number (if any):
Name of Wrap Fee Program
MASTERS
Name of Sponsor
WELLS FARGO ADVISORS
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
MERRILL LYNCH CONSULTS/ UMA, U.S. TRUST SPS/MERRILL LYNCH ONE
Name of Sponsor
BANK OF AMERICA MERRILL LYNCH/ U.S. TRUST
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
NEW EDGE WEALTH MANAGEMENT
Name of Sponsor
FIDELITY
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
SCHWAB MANAGED ACCOUNT ACCESS PROGRAM
Name of Sponsor
CHARLES SCHWAB & CO., INC.
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
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Sponsor's CRD Number (if any):
Name of Wrap Fee Program
SELECT
Name of Sponsor
CHARLES SCHWAB & CO., INC.
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
SELECT UMA
Name of Sponsor
MORGAN STANLEY SMITH BARNEY, LLC
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
STIFEL NICOLAUS OPPORTUNITY PROGRAM
Name of Sponsor
STIFEL
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
STRATEGIC INVESTMENT SERVICES (STRATIS)
Name of Sponsor
JP MORGAN SECURITIES
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
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```
Name of Wrap Fee Program
STRATEGIC WEALTH PROGRAM
Name of Sponsor
UBS FINANCIAL SERVICES, INC.
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
UMA (ADVISORY PORTFOLIOS)
Name of Sponsor
CITI PRIVATE BANK
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
UNIFIED MANAGED ACCOUNT
Name of Sponsor
JP MORGAN SECURITIES
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
UNIFORM OVERLAY MANAGER PROGRAM
Name of Sponsor
DYNASTY WEALTH MANAGEMENT
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
```

### 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.

Asset 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	14 %	16 %
(iv)	U.S. State and Local Bonds	1 %	1 %
(v)	Sovereign Bonds	25 %	24 %
(vi)	Investment Grade Corporate Bonds	25 %	23 %
(vii)	Non-Investment Grade Corporate Bonds	21 %	21 %
(viii)	Derivatives	0 %	0 %
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	1 %	1 %
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	4 %	4 %
(xi)	Cash and Cash Equivalents	4 %	3 %
(xii)	Other	6 %	6 %

Generally describe any assets included in "Other" ABS, NON-AGENCY ABS, LEVERAGED LOANS

Asse	t 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 Borrowings and 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	ngs		(3) Derivat			
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative		(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$ 9,037,006,382	\$ 0	0 %	0.14 %	0 %	0 %	0 %	0 %
10-149%	\$ 3,373,383,631	\$ 132,866,566	0 %	31 %	1 %	11 %	0 %	0 %
150% or more	\$ 2,433,168,987	\$ 0	0.1 %	106 %	31 %	53 %	0 %	0 %

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) Derivat	ive Exposuı	·es	

			(a) Interest Rate Derivative		(c) Credit Derivative		(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$ 9,200,539,951	\$	0 %	0.9 %	0 %	0 %	0 %	0 %
10-149%	\$ 3,152,975,939	\$ 132,308,428	0 %	36 %	1 %	12 %	0 %	0 %
150% or more	\$ 2,448,286,357	\$	1 %	105 %	27 %	58 %	0 %	0 %

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.

Country:

United Kingdom

(a) Legal name of custodian:

CITIGROUP, NA

(b) Primary business name of custodian:

CITIGROUP, NA

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

City: State: LONDON

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?

\$ 2,222,650,000

		<u> </u>						
Iten	n 6 O	ther Business Activities						
In t	his It	em, we request information about your firm's other business activities.						
Α.	If you	are actively engaged in business as a (check all that apply):  (1) broker-dealer (registered or unregistered) (2) registered representative of a broker-dealer (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (4) futures commission merchant (5) real estate broker, dealer, or agent (6) insurance broker or agent (7) bank (including a separately identifiable department or division of a bank) (8) trust company (9) registered municipal advisor (10) registered security-based swap dealer (11) major security-based swap participant (12) accountant or accounting firm (13) lawyer or law firm (14) other financial product salesperson (specify):						
	of S	chedule D. Yes No						
В.	(1)	Are you actively engaged in any other husiness not listed in Item 6.4. (other than giving investment advise)?						
	(2)	If yes, is this other business your primary business?						
	(-)	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.						
SEC	TION	6.A. Names of Your Other Businesses						
		No Information Filed						
SEC	TION	6.B.(2) Description of Primary Business						
		your primary business (not your investment advisory business):						
If y	ou en	gage in that business under a different name, provide that name:						
SEC	TION	6.B.(3) Description of Other Products and Services	$\neg$					
		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.	$\exists$					
If y	if you engage in that business under a different name, provide that name:							

#### Item 7 Financial Industry Affiliations

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

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): broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered) V (2) other investment adviser (including financial planners) (3) registered municipal advisor (4) registered security-based swap dealer (5) major security-based swap participant V (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

 $\square$  (13) pension consultant

(14) real estate broker or dealer

 $\square$  (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

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

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

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

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

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

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

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

 Legal Name of Related Person: SILVANT CAPITAL MANAGEMENT LLC

2. Primary Business Name of Related Person: SILVANT CAPITAL MANAGEMENT LLC

3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 68741

or

Other

4. Related Person's

(a) CRD Number (if any):

146025

	(b)	CIK Number(s) (if any):		
		CIK Number		
		1738728		
_				
5.		nted 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)			
	(n)	real estate broker or dealer		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	$\square$ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	$\circ$	⊙
7.	Are	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	0	0
		overcome the presumption that you are not operationally independent (pursuant to rule $206(4)-2(d)(5)$ ) from the <i>related</i>	~	~
		person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained		
		at the related person?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custo	ody 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: $\Box$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$^{\circ}$	⊙
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	О	•
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relat		
	. ,	person is registered.		
		No Information Filed		
11.	Do y	you and the related person share any supervised persons?	•	0
			•	~
12	Do v	you and the <i>related person</i> share the same physical location?	_	_
	20,	you and the related person that a the same physical location.	⊚	0
1.	Leaz	al Name of Related Person:		
1.	_	STCHESTER CAPITAL MANAGEMENT, LLC		
		· · · · · · · · · · · · · · · · · · ·		
2.	Prim	nary Business Name of <i>Related Person</i> :		
		STCHESTER CAPITAL MANAGEMENT, LLC		
		, , , , , , , , , , , , , , , , , , ,		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
1				

	801	- 72002		
	or			
	Othe	er		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		'
		155686		
	(b)	CIK Number(s) (if any):		
		CIK Number		
		1512805		
_				
5.		ted Person is: (check all that apply)		
	(a)			
		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		
	(i)	accountant or accounting firm		
	,	_		
	` '	<u> </u>		
	(I)	insurance company or agency		
	(m)			
	(n)	_		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	$\circ$	$\odot$
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	•	$\sim$
			œ.	0
0	(2)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to		
8.	(a)	clients?	$\circ$	⊙
	(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 <i>related</i>	$\circ$	$\circ$
		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>	oay o	Г
		your <i>clients</i> ' assets:		
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	⊙
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	•
				٠
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relat</i>	eu	
		person is registered.  No Information Filed		
	_			
11.	ро у	you and the related person share any supervised persons?	$\odot$	О
12.	Do y	you and the related person share the same physical location?	$\circ$	⊙
			_	

1.	Legal Name of <i>Related Person</i> :  DUFF & PHELPS INVESTMENT MANAGEMENT CO.						
2.		ary Business Name of <i>Related Person</i> : F & PHELPS INVESTMENT MANAGEMENT CO.					
3.	801 - 14813						
	or Othe	ur					
4.		ted Person's					
	(a)	CRD Number (if any): 107296					
	(b)	CIK Number(s) (if any):					
	(5)	CIK Number					
		765443					
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	Yes	No ⊙			
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 <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	c	О			
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custo</i> your <i>clients'</i> assets:	ody o	f			
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:					
			Yes	No			
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	$\circ$	⊙			
	(b)	If the answer is yes, under what exemption?					
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	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>relati</i> person is registered.	ed				

		No Information Filed					
11.	Do yo	ou and the related person share any supervised persons?	⊙	$\circ$			
12.	Do yo	ou and the <i>related person</i> share the same physical location?	0	•			
1.	CERE	I Name of <i>Related Person</i> : EDEX VALUE ADVISORS LLC  Bary Business Name of <i>Related Person</i> :					
	CEREDEX VALUE ADVISORS LLC						
3.	3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 68739 or Other						
4.	Relat	red Person's					
	(a)	CRD Number (if any):					
	(h)	146023 CIK Number(s) (if any):					
	(b) CIK Number(s) (if any):  CIK Number						
		1738726					
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	<b>N</b> I -			
6.	Do yo	ou control or are you controlled by the related person?	Yes C	⊙			
7.	Are y	rou and the related person under common control?	⊙	О			
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•			
		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 o	f			
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:					
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: $\square$					

			Yes	No
9.	(a)	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 ?	_	_
	` '	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	ou and the related person share any supervised persons?	_	_
11.	БО ў	ou and the related person share any supervised persons:	⊙	
12.	Do y	ou and the related person share the same physical location?	•	o
1.		Il Name of <i>Related Person</i> : TUS FUND ADVISERS, LLC		
2.	Prim	ary Business Name of <i>Related Person</i> :		
		US FUND ADVISERS, LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
		- 23163		
	or Othe	or .		
	Otric			
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	107346 CIK Number(s) (if any):		
	(5)	CIK Number		$\neg$
		1319111		
E	Pola	ted Person is: (check all that apply)		
5.	(a)			
	(b)			
	` '	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		
	(j)	accountant or accounting firm		
		☐ lawyer or law firm ☐ insurance company or agency		
	(l) (m)			
		real estate broker or dealer		
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
		sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	,		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?	$\odot$	О
c	(-\ <u>\</u>	Door the veleted names pat as a qualified suctodies for view disate in security 200 at 100 at		
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	$\circ$	0

		person and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custod</i> your <i>clients'</i> assets:	ly o	f
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$	<b>,</b>	N.
9.	(a)	If the related person is an investment advisor is it exempt from registration?	es O	No
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
	(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.	d	
		No Information Filed		
11.	Do y	rou and the related person share any supervised persons?	⊙	0
12.	Do y	rou and the <i>related person</i> share the same physical location?	$\circ$	⊙
1.	_	Il Name of <i>Related Person</i> : CCLO MANAGEMENT LLC		
2.		ary Business Name of <i>Related Person</i> :		
	SEIX	C CLO MANAGEMENT LLC		
3.		ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
		- 108565		
	or Othe	er en		
4.		ted Person's  CRD Number (if any):		
	(a)	285354		
	(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)	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		
	(1)	$\square$ 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		
	(P)		es/	No
6.	Do y	any control on two year controlled by the veleted neares?	⊙	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> ?	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>custod</i> your <i>clients'</i> assets:	dy c	f
			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
	٥.	(b)	If the answer is yes, under what exemption?	O	⊚
		(0)	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>relate person</i> is registered.	ed	
			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?	$\odot$	C
Ŀ					
	1.		ll Name of <i>Related Person:</i> US ALTERNATIVE INVESTMENT ADVISERS, INC.		
		VIIVI	OS ALIEMATIVE INVESTMENT ADVISERS, INC.		
	2.		ary Business Name of <i>Related Person</i> : "US ALTERNATIVE INVESTMENT ADVISERS, INC.		
	3.		ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 67924		
		or Othe	or.		
		Othe			
	4.	Rela	ted Person's		
		(a)	CRD Number (if any):		
		(b)	143732 CIK Number(s) (if any):		
		(0)	CIK Number		
			1591068		
	_				
	5.	(a)	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		
		(d)	registered security-based swap dealer		
		(e)	$\square$ 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		
		(i)	trust company		
			□ accountant or accounting firm □ lawyer or law firm		
		(K) (I)	insurance company or agency		
П					

	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	$\square$ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	$\square$ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	O	•
7.	Are y	ou 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 <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>custod</i> your <i>clients'</i> assets:	dy c	f
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$		
		·	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 ?	o	•
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relate		•
	(0)	person is registered.	-u	
		No Information Filed		
11	Do v	ou and the related person share any supervised persons?	_	_
11.	БО у	ou und 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.	VIRT	l Name of <i>Related Person</i> : US ETF ADVISERS LLC		
2.		ary Business Name of <i>Related Person</i> : US ETF ADVISERS LLC		
3.		ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 78585		
	or			
	Othe	r		
4.	Relat	ted Person's		
	(a)	CRD Number (if any):		
		168955		
	(b)	CIK Number(s) (if any):		
		CIK Number		
		1587281		
5.	Relat	red 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		
1	. ,			

	(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)	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)	$\square$ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	$\circ$	⊙
7.	Are	you and the related person under common control?	$\odot$	О
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	_	_
0.	(4)	clients?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	$\circ$	0
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related</i>		
		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> your <i>clients'</i> assets:	ody o	Ť
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$		
			Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	$\circ$	⊙
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	$\circ$	⊙
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relative	ted	
		person is registered.  No Information Filed		
1.1	Davi			
11.	ро у	ou and the <i>related person</i> share any <i>supervised persons</i> ?	⊙	
1,	D	and the meleted granes above the same above the same		
12.	ро у	ou and the <i>related person</i> share the same physical location?	$\circ$	⊙
1.	Lega	l Name of <i>Related Person</i> :		
	_	TCHESTER CAPITAL PARTNERS, LLC		
		'		
2.	Prim	ary Business Name of <i>Related Person</i> :		
	WES	TCHESTER CAPITAL PARTNERS, LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	801	- 73214		
	or			
	Othe			
4.	Rela	ted Person's		
		CRD Number (if any):		
	(-)	135955		
	(b)	CIK Number(s) (if any):		
		CIK Number		
		1277372		
11				

5.	Rela	ted Person is: (check all that apply)		
	(a)	$\square$ broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
		futures commission merchant		
	(h)			
		trust company		
	,	accountant or accounting firm		
	. ,	lawyer or law firm		
	(1)	insurance company or agency		
	(m)			
	(n)			
	(0)			
	(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?	$\odot$	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	$\circ$	⊙
		clients?		
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	$\circ$	$\circ$
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related</i>		
		person and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cust</i>	ody c	\f
	(C)	your clients' assets:	Juy C	"
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	⊙
	(b)	If the answer is yes, under what exemption?		
	. ,			
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the rela		
	(5)	person is registered.	teu	
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	•	0
			•	~
12.	Do v	ou and the <i>related person</i> share the same physical location?	_	•
	,		U	٠
1.	Lega	ll Name of <i>Related Person</i> :		
	NFJ	INVESTMENT GROUP, LLC		
2.	Prim	ary Business Name of Related Person:		
	NFJ :	INVESTMENT GROUP, LLC		
3.		ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
		- 119686		
	or Oth -			
	Othe			

4.	1. Related Person's					
	(a) CRD Number (if any): 310902					
	(b)	CIK Number(s) (if any):				
	` ,	No Information Filed				
5.		ted Person is: (check all that apply)				
	(a)	, , , ,				
	(b)					
		registered municipal advisor				
		registered security-based swap dealer				
	(e)					
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)				
		futures commission merchant				
	(h)					
		trust company				
		accountant or accounting firm				
	(k)	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				
		Y	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)		$\circ$	⊙		
	(L)	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</i>	$\circ$	0		
		person and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained				
		at the <i>related person</i> ?				
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custoc</i>	lv o	f		
	(5)	your clients' assets:	, -	.		
		Number and Street 1: Number and Street 2:				
		City: State: Country: ZIP+4/Postal Code:				
		If this address is a private residence, check this box: $\Box$				
		Y	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?	•	~		
	(5)	The diswer is yes, and what exemption:				
10	(a)	Is the related person registered with a foreign financial regulatory authority ?	_	_		
10.			0	⊙		
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>relate</i>	a			
		person is registered.  No Information Filed				
	Day					
11.	ро у	ou and the <i>related person</i> share any <i>supervised persons</i> ?	⊚			
	_					
12.	Do y	ou and the <i>related person</i> share the same physical location?	$\circ$	⊙		
				=		
1	Lagr	I Name of <i>Related Person</i> :				
1.	_	ISTRIBUTORS LLC				
	V1 L					
2.	Prim	ary Business Name of <i>Related Person</i> :				
~ .		ISTRIBUTORS II C				

3.	3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 8 - 14100			
	8 - 1 or	4100		
	Othe	r		
4.		ted Person's		
	(a)	CRD Number (if any): 3036		
	(b)	CIK Number(s) (if any):		
	(-)	CIK Number		
		78272		
_	- · ·			
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)		
		registered municipal advisor		
	` ,	registered multicipal davisor  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		
	(i)	☐ trust company		
	(j)	□ accountant or accounting firm		
	(k)	☐ lawyer or law firm		
	` '	insurance company or agency		
	(m)	pension consultant		
	(n)	_		
	` '	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	V	NI -
6.	Do v	ou control or are you controlled by the related person?	Yes	_
0.	D0 y	od control of are you controlled by the related person.	О	⊚
7.	Are y	ou and the related person under common control?	•	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	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</i>	O	0
		person and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custo</i> your <i>clients'</i> assets:	ody o	f
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:		
		If this address is a private residence, check this box.	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	⊙
	(b)	If the answer is yes, under what exemption?		٠
	( - )			
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>relat</i>	ted	
		person is registered.  No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	•	
	•		137	$\sim$
12.	Do y	ou and the <i>related person</i> share the same physical location?	O	$_{\odot}$

_					
1		_	l Name of <i>Related Person</i> : TAINABLE GROWTH ADVISERS, LP		
2			ary Business Name of <i>Related Person</i> : TAINABLE GROWTH ADVISERS, LP		
3			ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 62151		
		Othe	ur		
,		Dala	ted Develople		
4			ted Person's  CRD Number (if any):		
		(-)	127447		
		(b)	CIK Number(s) (if any):		
			CIK Number		
			1290668		
5	j	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)			
			commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
			futures commission merchant		
		(h)	$\square$ banking or thrift institution		
		(i)	trust company		
		(j)	accountant or accounting firm		
		(k) (l)	☐ lawyer or law firm ☐ insurance company or agency		
		(i) (m)	• • •		
		(n)	real estate broker or dealer		
		(0)	$\square$ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
		(p)	$\square$ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
		_		Yes	No
6	<b>.</b>	Do y	ou control or are you controlled by the related person?	О	⊙
  -	, .	Aro v	you and the <i>related person</i> under common <i>control</i> ?	_	_
′	•	AIC	you and the related person under common controls	⊙	О
8	3.	(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> ?	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>custo</i>	ody c	f
			your <i>clients'</i> assets:		
			Number and Street 1: Number and Street 2:  City: State: Country: 7TP+4/Poctal Code:		
			City: State: Country: ZIP+4/Postal Code:  If this address is a private residence, check this box:		
				Yes	No
9	).	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	⊙
		(b)	If the answer is yes, under what exemption?		_
1	.0.	(a)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	•	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.	ted	
	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Canada - Alberta Securities Commission		
	Canada - Ontario Securities Commission		
	Ireland - Central Bank of Ireland		
1.	Do you and the related person share any supervised persons?	0	6
		~	-
2.	Do you and the <i>related person</i> share the same physical location?	О	G
	Legal Name of <i>Related Person</i> : STONE HARBOR INVESTMENT PARTNERS LIMITED		
	STONE HARDON INVESTMENT PARTICLES EIMITED		
	Primary Business Name of Related Person:		
	STONE HARBOR INVESTMENT PARTNERS LIMITED		
	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or .		
	Other		
	Related Person's		
	(a) CRD Number (if any):		
	(b) CIK Number(s) (if any):		
	(b) CIK Number(s) (if any):  No Information Filed		
	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		
	<ul> <li>(d) ☐ registered security-based swap dealer</li> <li>(e) ☐ major security-based swap participant</li> </ul>		
	(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) $\square$ insurance company or agency		
	(m) pension consultant		
	(n)		
	(o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p) 🗹 sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
		Yes	i N
	Do you control or are you controlled by the related person?	$\circ$	6
	Are you and the <i>related person</i> under common <i>control</i> ?	_	
	The you and the related person under common control.	•	(
	(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	Ó
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	0	(
	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>cust</i>	ody i	۰£

		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
	(h)		•	
	(b)	If the answer is yes, under what exemption? FOREIGN ADVISOR		
		FOREIGN ADVISOR		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	$\odot$	$\circ$
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relat	ed	
		person is registered.		
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		Ireland - Central Bank of Ireland		
11	Do v	ou and the related person share any supervised persons?	_	_
	D0	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?	$\circ$	⊙
1.	Lega	l Name of <i>Related Person</i> :		
	STO	NE HARBOR INVESTMENT PARTNERS (UK) LLP		
2.	Prim	ary Business Name of Related Person:		
	STO	NE HARBOR INVESTMENT PARTNERS (UK) LLP		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe	er en		
4.	Relai	ted Person's		
''		CRD Number (if any):		
	(4)	CAD Number (ii dily).		
	(b)	CIK Number(s) (if any):		
	(5)	No Information Filed		
		No Information Fraction		
				1
_	0-1-	ted Demon in (check all that and )		
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)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
		□ trust company		
	٠,	accountant or accounting firm		
		_		
	(k)			
	` ,	insurance company or agency		
	(m)			
	(n)			
	(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	•
			~	~
<sub>7.</sub>	Are v	you and the <i>related person</i> under common <i>control</i> ?	~	
11	1	,	4.7	- N. J. I.

8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	⊙
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <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 c	of
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: $\Box$		
		If this address is a private residence, check this box.	Vec	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	.⊙	
	(b)	If the answer is yes, under what exemption?	•	
	(0)	FOREIGN ADVISOR		
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.	:ea	
		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.		Il Name of <i>Related Person</i> : NE HARBOR INVESTMENT PARTNERS PTE. LTD.		
2.	Prim	ary Business Name of <i>Related Person</i> :		
	STO	NE HARBOR INVESTMENT PARTNERS PTE. LTD.		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	er en		
	Dolo	ted Person's		
4.		CRD Number (if any):		
	. ,			
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela	ted Person is: (check all that apply)		
	(a)	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		
	(f)	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		
	(J) (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  Do you control or are you controlled by the related person?  Are you and the related person under common control?  8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients? (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person? (c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:  Number and Street 1:  Country:  State:  Country:  State:  Country:  Yes No  1. If the related person is an investment adviser, is it exempt from registration?  (b) If the answer is yes, under what exemption?  FOREIGN ADVISOR  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.  Name of Country/English Name of Foreign Financial Regulatory Authority  Singapore - Monetary Authority of Singapore  11. Do you and the related person share the same physical location?  C G  12. Do you and the related Person share the same physical location?			
	(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?		
	,		U	⊚
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	⊙	О
8.	(a)		0	⊙
	(b)	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained	0	О
	(c)		ody o	f
		<u> </u>		
		If this address is a private residence, check this box. I	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	_	_
	(b)	If the answer is yes, under what exemption?	~	~
		FOREIGN ADVISOR		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	•	0
	(b)		ted	
		Singapore - Monetary Authority of Singapore		
11.	Do y	ou and the related person share any supervised persons?	0	•
12	Dow	you and the related parson share the same physical location?		
12.	ро у	ou and the related person share the same physical location?	0	⊙
1	Leas	Name of Polated Person		
1.	_	NE ANDERSON RUDNICK INVESTMENT MANAGEMENT, LLC		
		, , , , , , , , , , , , , , , , , , ,		
2.		ary Business Name of Related Person:		
	KAYI	NE ANDERSON RUDNICK INVESTMENT MANAGEMENT, LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
		- 24241		
	or Othe	or		
	Othic	•		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	104599 CIK Number(s) (if any):		
	(D)	CIK Number		
		1021223		
5.		ted Person is: (check all that apply)		
	(a)			
		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		
	(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?	$\circ$	$\odot$
7.	Are y	you and the related person under common control?	$\odot$	$\circ$
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to	$\circ$	$\odot$
		clients?		
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	$\circ$	$\circ$
		overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related</i>		
		person and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custo</i>	ndv c	ıf
	(0)	your clients' assets:	uy c	''
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	$\odot$
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the relat	ed	
		person is registered.		
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	$\odot$	$\circ$
12.	Do y	ou and the <i>related person</i> share the same physical location?	$\circ$	$\odot$
1.	_	Il Name of Related Person:		
	VIKI	TUS INVESTMENT ADVISERS, INC.		
2.	Drim	ary Business Name of <i>Related Person</i> :		
		TUS INVESTMENT ADVISERS, INC.		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	801	- 5995		
	or			
	Othe	er en		
4.		ted Person's		
	(a)	CRD Number (if any):		
	(I- )	106982		
	(b)	CIK Number(s) (if any):  CIK Number		
		ICIN NUMBER		- 1

		CIK Number		
		19481		
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)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			S	No
6.	Do y	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	,	⊚
7.	Are	ou 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	)	⊚
	(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 <i>related</i>	)	
		person and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained		
		at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i>	of	.
	(-)	your clients' assets:	٠.	
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\Box$		
		Ye	s	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	,	$_{\odot}$
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	)	⊙
	(b)	$If the answer is yes, list the name and country, in English of each {\it foreign financial regulatory authority} with which the {\it related}$		
		person is registered.		
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	)	$\circ$
4.0	_	and the system of a survey shows the same plantical backing?		
12.	DO A	ou and the <i>related person</i> share the same physical location?	)	⊙

# Item 7 Private Fund Reporting

Yes	No

B. Are you an adviser to any private fund?

 $\odot$   $\circ$ 

If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports

this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.

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

	1 2 >> Funds per Page: 15 V Total Funds: 16	
۹. F	PRIVATE FUND	
<u>[nf</u>	ormation About the <i>Private Fund</i>	
1.	(a) Name of the <i>private fund</i> :	
	BRODERICK CDO 1 LTD.	
	(b) <i>Private fund</i> identification number: (include the "805-" prefix also)	
	805-2890188394	
2.	Under the laws of what state or country is the <i>private fund</i> organized:	
۷.	State: Country:	
	Cayman Islands	
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	
	No Information Filed	
	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this prefund.	vate
4	fund.  No Information Filed	vate
4.	fund.	
4.	fund.  No Information Filed  The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company	y Act
	The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company	y Act
	The private fund (check all that apply; you must check at least one):  ☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  ☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940	y Act
	The private fund (check all that apply; you must check at least one):  ☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  ☐ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed	y Act
5.	The private fund (check all that apply; you must check at least one):  ☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  ☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed	y Act y Act  No
<b>4</b> .	The private fund (check all that apply; you must check at least one):  ☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  ☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  You  (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)	y Act y Act
5.	The private fund (check all that apply; you must check at least one):  ☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  ☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed	y Act y Act
5.	The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  You  (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 in No Information Filed	y Act y Act
5.	The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  You  (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 in No Information Filed	y Act
5.	The private fund (check all that apply; you must check at least one):  ☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940  ☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  You  (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 in No Information Filed	y Act y Act  s No  s No

(include the "805-" prefix also)

	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sch Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	nedul	e D,
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:	Secti	on
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all o substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.	r fun s	
•		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	$\circ$	⊙
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poinvestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	oolea	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	0
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type of fund is the <i>private fund</i> ?		
	$^{f C}$ hedge fund $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital function $^{f C}$ other <i>private fund</i> :	nd C	
	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> :		
	\$ 133,553,943		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount forth in the organizational documents of the fund).	unt s	et
13.	Approximate number of the <i>private fund's</i> beneficial owners:  0		
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> ?	O	O

16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
You	ır Ac	dvisory Services	V	NI-
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	Yes	_
	` '	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 file</i> the answer to question 17.(a) is "no," leave this question blank.	und. 1	<b>⊙</b> f
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	О	•
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the property fund. If the answer to question 18.(a) is "no," leave this question blank.	rivate	
		No Information Filed		
			Yes	No
19.		your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	<u>vate</u>	<u>Offering</u>		
21	Hac	s the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities	Yes	No ①
22.		of 1933?  es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
B. SI	ERVI	CE PROVIDERS		
Auc	litor	r <u>s</u>	Vac	No
23.	(a)	(1) Are the private fund's financial statements subject to an annual audit?	_	
	` ,	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	0
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		No Information Filed		
			Voc	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?	Yes O	No C
			0	_
		private fund's investors?  Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment co	0	_

		is "yes," respond to que	estions (b) through (e) below for each prime broker the <i>priv</i> e ser, you must complete questions (b) through (e) separately		
		No	o Information Filed		
todia	an				
(a)	Does the <i>private fund</i> use any c	custodians (including the	prime brokers listed above) to hold some or all of its assets	Yes	
			estions (b) through (g) below for each custodian the <i>private</i> nust complete questions (b) through (g) separately for each	fund u	se
	Additional Custodian Inform	nation: 1 Record(s) Fil	led.		
			questions (b) through g) below for each custodian the <i>private</i> n, you must complete questions (b) through (g) separately f		h
	(b) Legal name of custodian: BNY MELLON CAPITAL MA				
	(c) Primary business name o BNY MELLON CAPITAL MA				
	(d) The location of the custoo	dian's office responsible f	for <i>custody</i> of the <i>private fund's</i> assets (city, state and count Country:	try):	
	HOUSTON	Texas	United States		
				Yes	N
	(e) Is the custodian a <i>related</i>	d person of your firm?		0	0
	(f) If the custodian is a brok 8 - 35255	er-dealer, provide its SEC	C registration number (if any):		
	CRD Number (if any): 17454				
	(g) If the custodian is not a l	•	ker-dealer but does not have an SEC registration number, pr	rovide i	it
	<u>trator</u>			Yes	5
	Does the <i>private fund</i> use an ac			⊚	
			estions (b) through (f) below. If the <i>private fund</i> uses more to (f) separately for each administrator.	than or	16

	(b)	Name of administrate			
	(c)	Location of administr	ator (city, state and country):		
		City:	State:	Country:	
		HOUSTON	Texas	United States	Yes No
	(d)	Is the administrator a	a related person of your firm?		0 0
	(e)	Does the administrat	or prepare and send investor a	ccount statements to the <i>private func</i>	d's investors?
		• Yes (provided to a investors)	ll investors) ${f C}$ Some (provided	to some but not all investors) $^{f C}$ No	(provided to no
	(f)	•	ors? If investor account stateme	who sends the investor account stater arts are not sent to the (rest of the) p	, ,
I	obtaining	any relevant quotes, a		valuation procedure established for surposes of investor subscriptions, redulined by such <i>person</i> .	· · · · · · · · · · · · · · · · · · ·
Mark	<u>reters</u>				Yes No
28. (	(a) Does	the <i>private fund</i> use t	ne services of someone other the	nan you or your <i>employees</i> for marke	
	solicit mark	cor, or similar <i>person</i> . I	If the answer to question 28.(a ses. If the <i>private fund</i> uses m	ment agent, consultant, finder, introc is "yes," respond to questions (b) th ore than one marketer you must com	lucer, municipal advisor or other prough (g) below for each such
			No Ir	oformation Filed	
A. PRI	VATE FUN	ND			
Infor	mation A	about the <i>Private Fu</i>	<u>1d</u>		
1. (	(a) Name	e of the <i>private fund</i> :			
	MOUN	NTAIN VIEW CLO 2013	-1 LTD		
(	` '	te fund identification n			
		de the "805-" prefix a 9243147251	50)		
2. l	Jnder the	laws of what state or	country is the <i>private fund</i> org	anized:	
	State	:	Country: Cayman Islands		
3. (	(a) Name	e(s) of General Partner	. Manager, Trustee, or Directors	(or <i>persons</i> serving in a similar capa	acity):

Name of General Partner, Manager, Trustee, or Director

LAURA CHISOLM		
WENDY EBANKS		
(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>p fund</i> .	oriva	te
No Information Filed		
The <i>private fund</i> (check all that apply; you must check at least one):		
$\Box$ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940	any <i>i</i>	Act
(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940	any /	Act
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
(a) Is this a "master fund" in a master-feeder arrangement?	0	$\odot$
(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund	d?	
No Information Filed		
·	Yes	No
(c) Is this a "feeder fund" in a master-feeder arrangement?	0	•
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> in	vests	s?
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 Sche Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	edule	e D,
If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this S 7.B.(1), for each of the feeder funds answer the following questions:		n
	ectic	
No Information Filed	ectic	
	ectio	
No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		1"
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	fund	
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	fund Yes	No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poor	fund Yes	No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other podinvestment vehicles, regardless of whether they are also private funds or registered investment companies.	fund Yes Colled	No ⊙
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pod 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?	fund Yes Colled	No ⊙
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pod 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?	fund Yes Colled	No ⊙

10.	What type of fund is the <i>private fund</i> ?		
	$^{\circ}$ hedge fund $^{\circ}$ liquidity fund $^{\circ}$ private equity fund $^{\circ}$ real estate fund $^{\circ}$ securitized asset fund $^{\circ}$ venture capital fund $^{\circ}$ other <i>private fund</i> :	nd C	)
	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> : \$ 345,412,483		
<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :		
	\$ 250,000 NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount forth in the organizational documents of the fund).	ınt se	et
13.	Approximate number of the <i>private fund's</i> beneficial owners:  10		
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: 10%		
	1070	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> : 10%		
You	ır Advisory Services		
		Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	$\circ$	$\odot$
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fu</i> the answer to question 17.(a) is "no," leave this question blank.	ınd. I	.f
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	О	•
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the profund. If the answer to question 18.(a) is "no," leave this question blank.	ivate	
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?  0%		
<u>Pri</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?

	No Information Filed			
SERVI	ICE PROVIDERS			
<u>uditor</u>	<u>rs</u>			
3 (a)	(1) Are the private fund's financial statements subject to an annual audit?			
J. (u)				
	No Information Filed			
		Yes	N	
(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	C	
(h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> counqualified opinions?	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		
ime E	<u>Broker</u>	<b>V</b>		
l. (a)	Doos the private fund use one or more prime brokers?			
	Does the <i>brivate rund</i> use one of more brille brokers:		1.5	
(-,	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>privat</i>	e func		
	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	e func		
, ,	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private</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	e func		
ustodi	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private</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	e func or eac	h 	
B. SERVICE PROVIDERS  Auditors  Yes No  23. (a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?  (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  (b) 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 than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  No Information Filed  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?  (h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified opinions?  C Yes C No C Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  24. (a) Does the <i>private fund</i> use one or more prime brokers?  If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.				
	ustodi	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  No Information Filed  The answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian Information: 1 Record(s) Filed.  If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian Information: 1 Record(s) Filed.	Yes  • und usustodia	h (Sees, an.

AIVI		IARD - All Sections [t	oser Name, rcerettizz, Orgio, 146029]			
	DEUTSCHE BANK TRUST C	COMPANY AMERICAS				
(d)	(d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and c					
(4)		State:		souriery).		
	City: SANTA ANA	California	Country: United States			
		242	5.11.55	Yes N		
(e)	Is the custodian a <i>related</i>	nerson of your firm?				
	Tis the custodian a related person of your firm?					
(f)	If the custodian is a broker-dealer, provide its SEC registration number (if any):					
	CRD Number (if any):					
(g)	g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide i legal entity identifier (if any)					
istrato	<u>r</u>			Yes		
) Does	the <i>private fund</i> use an adr	ministrator other than your firm	n?	_		
admir	nistrator, you must complete		(b) through (f) below. If the <i>private fund</i> uses morately for each administrator.			
one			ns (b) through (f) below. If the <i>private fund</i> uses (f) separately for each administrator.	more than		
(c)	Location of administrator (	city, state and country):				
	City:	State:	Country:			
	GEORGE TOWN	State	Cayman Islands			
			,	Yes No		
(d)	Is the administrator a rela	ted person of your firm?		0 0		
(e)	Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?					
	$^{f C}$ Yes (provided to all investors) $^{f C}$ Some (provided to some but not all investors) $^{f C}$ No (provided to no investors)					
(f)	· · · · · · · · · · · · · · · · · · ·		sends the investor account statements to the (reare not sent to the (rest of the) private fund's inv	-		

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%

respond "not applicable."

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*.

MONTHLY REPORTS ARE POSTED ON THE INDENTURE TRUSTEE'S WEBSITE AND ARE ACCESSIBLE BY INVESTORS.

٠ ,	(a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purpos	ses: C
		You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, munic solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) is marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete quest separately for each marketer.	pelow for each su
		No Information Filed	
PRI	Γ\/ΔΤ	TE FUND	
or	mat	ition About the <i>Private Fund</i>	
(	(a)	Name of the <i>private fund</i> :	
		MOUNTAIN VIEW CLO 2014-1 LTD.	
(	` '	Private fund identification number: (include the "805-" prefix also)	
		805-9863282844	
ι	Unde	der the laws of what state or country is the <i>private fund</i> organized:	
,		State: Country:	
		Cayman Islands	
-		Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	
	Nar	me of General Partner, Manager, Trustee, or Director	
	<b>Nar</b> LAU	me of General Partner, Manager, Trustee, or Director URA CHISOLM	
	<b>Nar</b> LAU	me of General Partner, Manager, Trustee, or Director	
	Nar LAU WEI	me of General Partner, Manager, Trustee, or Director URA CHISOLM	nage(s) this <i>priva</i>
	Nar LAU WEI	me of General Partner, Manager, Trustee, or Director  URA CHISOLM  ENDY EBANKS  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar	nage(s) this <i>priva</i>
	Nar LAU WEI	me of General Partner, Manager, Trustee, or Director  URA CHISOLM  ENDY EBANKS  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar fund.	nage(s) this <i>priva</i>
(	Nar LAU WEI	me of General Partner, Manager, Trustee, or Director  URA CHISOLM  ENDY EBANKS  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar fund.	nage(s) this <i>priva</i>
] - -	Nar LAU WEI	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar 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	
]  -  -  -	Nar LAU WEI	me of General Partner, Manager, Trustee, or Director  URA CHISOLM ENDY EBANKS  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar fund.  No Information Filed  exprivate 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	tment Company
- - -	Nar LAU WEI	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar 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	tment Company
- - - -	Nar LAU WEI (b)	me of General Partner, Manager, Trustee, or Director  URA CHISOLM  In filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar fund.  No Information Filed  In 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 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) and (4) are the company under section 3(c)(7) of the Investment (3) and (4) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7) of the Investment (3) are the company under section 3(c)(7)	tment Company :
- - - -	Nar LAU WEI (b)	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar 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 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3)	tment Company tment Company
- - - -	Nar LAU WEI (b)	THE OFFICE OFFIC	tment Company tment Company is registered.
	Nar LAU WEI (b)	THE OFFICE OFFIC	tment Company :
	WEI  WEI  (b)  The  of 19  List	URA CHISOLM ENDY EBANKS  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar fund.  No Information Filed  exprivate 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 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment (3) qualifies for the exclusion from the definition of investment (3) qualifies for the exclusion from the definition of investment (4) qualifies for the exclusion from the definition of investment (4) qualifies fo	is registered.  Yes
	WEI  WEI  (b)  The  of 19  List	URA CHISOLM ENDY EBANKS  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar fund.  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 Invest.  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Invest.  (3) the name and country, in English, of each foreign financial regulatory authority with which the private fund No Information Filed  Is this a "master fund" in a master-feeder arrangement?	is registered.  Yes
	WEI  WEI  (b)  The  of 19  List	The of General Partner, Manager, Trustee, or Director  URA CHISOLM  ENDY EBANKS  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar 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 Invest.  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Invest.  (3) the name and country, in English, of each foreign financial regulatory authority with which the private fund.  No Information Filed  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	is registered.  Yes
	WEI  WEI  (b)  The  of 19  List	The of General Partner, Manager, Trustee, or Director  URA CHISOLM  ENDY EBANKS  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or mar 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 Invest.  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Invest.  (3) the name and country, in English, of each foreign financial regulatory authority with which the private fund.  No Information Filed  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	is registered.  Yes

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

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

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

No Information Filed

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

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

Yes No

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other 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 C

- 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*?

 $^{f C}$  hedge fund  $^{f C}$  liquidity fund  $^{f C}$  private equity fund  $^{f C}$  real estate fund  $^{f C}$  securitized asset fund  $^{f C}$  venture capital fund  $^{f C}$  Other *private 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 *private fund*:

\$ 85,214,652

### Ownership

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

\$ 250,000

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

13. Approximate number of the  $\emph{private fund's}$  beneficial owners:

10

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: 10%

Yes No

(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the

о с

Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : %		
You	ır Ac	dvisory Services	<b>V</b>	<b>N</b> -
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 fo</i> the answer to question 17.(a) is "no," leave this question blank.		~
		No Information Filed		
			Yes	No
18.		Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	0	⊙
	(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>pr</i> fund. If the answer to question 18.(a) is "no," leave this question blank.	ivate	
		No Information Filed		
			Yes	No
19.		your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	⊙
	NO.	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	ate	<u>Offering</u>		
21	Has	the nuivate fund ever relied on an everything from registration of its conviction under Deculation D of the Conviction	Yes	No
21.		s the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	•	О
22.	If y	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
	ERVI litor	CE PROVIDERS	Yes	: No
23.	(a)	(1) Are the private fund's financial statements subject to an annual audit?	0	•
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	О	$\odot$
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	e thar	1
		No Information Filed		
			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	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?	ntain	
		C Yes C No C Report Not Yet Received		
		If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.	onse	

		Yes N
24. (a) Does the <i>private fund</i> use or	e or more prime brokers?	0.6
		(b) through (e) below for each prime broker the <i>private fund</i> must complete questions (b) through (e) separately for each
	No Inform	nation Filed
Custodian		Yes N
If the answer to question 25	(a) is "yes," respond to questions	brokers listed above) to hold some or all of its assets?   (b) through (g) below for each custodian the <i>private fund</i> uses.
	e than one custodian, you must con	nplete questions (b) through (g) separately for each custodian.
Additional Custodian Inte	mucion : 1 Record(3) i ned.	
III		ns (b) through g) below for each custodian the <i>private fund</i> must complete questions (b) through (g) separately for each
(b) Legal name of custodi DEUTSCHE BANK TRU	an: ST COMPANY AMERICAS	
(c) Primary business nam DEUTSCHE BANK TRU	e of custodian: ST COMPANY AMERICAS	
(d) The location of the cu	stodian's office responsible for <i>cust</i>	rody of the private fund's assets (city, state and country):
City: SANTA ANA	State: California	Country: United States
SANTATA	Camorria	Yes No
(e) Is the custodian a <i>rela</i>	ted person of your firm?	○ ●
(f) If the custodian is a b	roker-dealer, provide its SEC regist	ration number (if any):
CRD Number (if any):		
(g) If the custodian is not legal entity identifier (	•	aler but does not have an SEC registration number, provide its
<u>Administrator</u>		Voc. N
6. (a) Does the <i>private fund</i> use ar	administrator other than your firn	Yes N
If the answer to question 26	,	(b) through (f) below. If the <i>private fund</i> uses more than one
Additional Administrator	Information : 1 Record(s) Filed	l <b>.</b>

	one administrator, yo	a mast complete que	( )	, ,	
	(b) Name of adminis	trator:			
	MAPLESFS LIMIT	ED			
	(c) Location of admi	histrator (city, state a	and country): State:	Country:	
	GEORGE TOWN		State.	Cayman Islands	
					Yes No
	(d) Is the administra	tor a <i>related person</i>	of your firm?		○ <b>⑥</b>
	(e) Does the adminis	strator prepare and s	end investor accou	int statements to the private fu	und's investors?
	C Yes (provided investors)	to all investors) $^{f C}$ S	ome (provided to	some but not all investors) 🗿 🛭	No (provided to no
	private fund's invrespond "not app	vestors? If investor ad dicable."	ccount statements	sends the investor account sta are not sent to the (rest of the RUSTEE'S WEBSITE AND ARE	e) <i>private fund's</i> investors,
adm 100 Incl	ninistrator, that is not yo %	ur related person?  here (i) such person	carried out the va	uation procedure established for	or that asset, if any, including
	calculations (including a	llocations) was the va			caempaons or assingations, and
		llocations) was the v			
fee <u>Markete</u>	<u>ers</u>	,	aluation determine		Yes No
fee <u>Markete</u>	Does the <i>private fund</i> u You must answer "yes" solicitor, or similar <i>pers</i>	se the services of so whether the <i>person</i> a on. If the answer to a nd uses. If the <i>privat</i>	aluation determine meone other than acts as a placemer question 28.(a) is	ed by such <i>person</i> .  you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b)	Yes No
fee <u>Markete</u>	Does the <i>private fund</i> und you must answer "yes" solicitor, or similar <i>pers</i> marketer the <i>private fu</i>	se the services of so whether the <i>person</i> a on. If the answer to a nd uses. If the <i>privat</i>	meone other than acts as a placemen question 28.(a) is the fund uses more	you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b) than one marketer you must co	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such
fee <u>Markete</u>	Does the <i>private fund</i> und you must answer "yes" solicitor, or similar <i>pers</i> marketer the <i>private fu</i>	se the services of so whether the <i>person</i> a on. If the answer to a nd uses. If the <i>privat</i>	meone other than acts as a placemen question 28.(a) is the fund uses more	ed by such <i>person</i> .  you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b)	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such
fee <u>Markete</u>	Does the <i>private fund</i> und you must answer "yes" solicitor, or similar <i>pers</i> marketer the <i>private fu</i>	se the services of so whether the <i>person</i> a on. If the answer to a nd uses. If the <i>privat</i>	meone other than acts as a placemen question 28.(a) is the fund uses more	you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b) than one marketer you must co	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such
fee <u>Markete</u>	Does the <i>private fund</i> u You must answer "yes" solicitor, or similar <i>pers</i> marketer the <i>private fu</i> separately for each man	se the services of so whether the <i>person</i> a on. If the answer to a nd uses. If the <i>privat</i>	meone other than acts as a placemen question 28.(a) is the fund uses more	you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b) than one marketer you must co	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such
Markete 28. (a)  A. PRIVAT	Does the <i>private fund</i> u You must answer "yes" solicitor, or similar <i>pers</i> marketer the <i>private fu</i> separately for each man	se the services of so whether the <i>person</i> and the answer to and uses. If the <i>privat</i> eketer.	meone other than acts as a placemen question 28.(a) is the fund uses more	you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b) than one marketer you must co	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such
Markete 28. (a)  A. PRIVAT	Pres  Does the private fund up You must answer "yes" solicitor, or similar personarketer the private fur separately for each manager of the private fur separately for each manager of the private fur separately for each manager of the private function of the private func	se the services of so whether the <i>person</i> and the answer to and uses. If the <i>privat</i> eketer.	meone other than acts as a placemen question 28.(a) is the fund uses more	you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b) than one marketer you must co	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such
Markete 28. (a)  A. PRIVAT	Pres  Does the private fund up You must answer "yes" solicitor, or similar pers marketer the private fur separately for each manager of the private fur separately for each manager of the private further than the private function About the Private function	se the services of so whether the <i>person</i> and the answer to and uses. If the <i>privat</i> electer.	meone other than acts as a placemen question 28.(a) is the fund uses more	you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b) than one marketer you must co	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such
A. PRIVAT	Press  Does the private fund up You must answer "yes" solicitor, or similar personarketer the private fur separately for each manager of the private fur the p	se the services of so whether the <i>person</i> and the services. If the <i>privat</i> exercises we have the services with the services whether the services we have a services with the	meone other than acts as a placemen question 28.(a) is the fund uses more	you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b) than one marketer you must co	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such
A. PRIVAT	Does the private fund up You must answer "yes" solicitor, or similar personarketer the private fur separately for each manager of the private fur MOUNTAIN VIEW CLO 2 Private fund identification.	se the services of so whether the <i>person</i> and the services. If the <i>privat</i> exercises we have the services with the services whether the services we have a services with the	meone other than acts as a placemen question 28.(a) is the fund uses more	you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b) than one marketer you must co	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such
A. PRIVAT	Does the private fund up You must answer "yes" solicitor, or similar personarketer the private fur separately for each man sep	se the services of so whether the <i>person</i> and the services. If the <i>privat</i> exercises we have the services with the services whether the services we have a services with the	meone other than acts as a placemen question 28.(a) is the fund uses more	you or your <i>employees</i> for man nt agent, consultant, finder, into "yes," respond to questions (b) than one marketer you must co	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such
A. PRIVAT	Does the private fund up You must answer "yes" solicitor, or similar personarketer the private fur separately for each man sep	se the services of so whether the person a con. If the answer to ond uses. If the private theter.  Fund  at:  017-2  on number:  ix also)	meone other than acts as a placemen question 28.(a) is the fund uses more	you or your <i>employees</i> for maint agent, consultant, finder, into the system of the sy	Yes Norketing purposes? © © roducer, municipal advisor or other of through (g) below for each such

	STACY BODDEN		
	WENDY EBANKS		
(	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this fund.	priva	ate
	No Information Filed		
7	The <i>private fund</i> (check all that apply; you must check at least one):		
ľ	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company unde	pany	Ad
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Com of 1940	oany	Ac
L	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registere	d.	
	No Information Filed		
		Yes	· 1
	(a) Is this a "master fund" in a master-feeder arrangement?	0	4
	(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	10?	
L	THE STITION FILES		
		Yes	1
(	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	
(	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> in		
•	Name of <i>private fund</i> :  **Private fund identification number:  (include the "805-" prefix also)		
1	Name of <i>private fund</i> :  Private fund identification number:		
ľ	Name of <i>private fund</i> :  **Private fund identification number: (include the "805-" prefix also)  **NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sch	nedul	le
I I	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 Schection 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	nedul	le
I 7	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 Schection 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  **If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:	nedul Secti r r fun s	le ior
N S ff S	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 Schection 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  **If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:  **NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing in a "master fund").	nedul Secti r r fun	le ior
M s f f s	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 Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.	r r fun s Yes	le ior
	Name of private fund:  Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all o substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other portions.	r r fun s Yes	le ior
N s f s () N i	Note: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all o substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poinvestment vehicles, regardless of whether they are also private funds or registered investment companies.	r r fun s Yes	dd"

10.	What type of fund is the <i>private fund</i> ?		
	$^{f C}$ hedge fund $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capit Other <i>private fund</i> :	al fund C	5
	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> : \$ 366,080,041		
<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the afforth in the organizational documents of the fund).	imount se	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 t Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?		C
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 10%		
<u>Yοι</u>	r Advisory Services	Ves	. 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>priva</i> the answer to question 17.(a) is "no," leave this question blank.	te fund. 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>prival fund</i> ?	te o	•
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the fund. If the answer to question 18.(a) is "no," leave this question blank.	e <i>private</i>	*
	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> ?  0%		
<u>Priv</u>	rate Offering	Yes	. No

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx? RefNum=\&viewChanges=N\&FLNG\_PK=1667594$ 

Act	the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	⊙	0
22. If y	es, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
SERVI	CE PROVIDERS		
Auditor	<u>s</u>		
)2 (-)	(4) And the projects foundle financial attachments out in the property of the property of the project of the pr	Yes	N
23. (a)	<ul><li>(1) Are the <i>private fund's</i> financial statements subject to an annual audit?</li><li>(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?</li></ul>	0	9
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	C thar	
	No Information Filed		
		Yes	N
(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> con unqualified opinions?	ntain	
	C Yes C No C Report Not Yet Received		
rime B	when the report is available.  Broker		
4. (a)	Does the <i>private fund</i> use one or more prime brokers?	Yes	N
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private</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.	func	1
	No Information Filed		
<u>Custodi</u>	<u>an</u>		
		Yes	-
5 (a)	Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?		- (
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?  If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.		
25. (a)	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fur</i>	nd us	
25. (a)	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fun</i> If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	nd us stodi	an.

(c) Primary business name of custodian:

(d)	The location of the custo	dian's office responsible for <i>custo</i>	dy of the private fund's assets (city, si	tate and country):
	City:	State:	Country:	
	PITTSBURGH	Pennsylvania	United States	
				Yes I
(e)	Is the custodian a relate	d person of your firm?		0
(f)	If the custodian is a brok	ser-dealer, provide its SEC registra	ation number (if any):	
	- CRD Number (if any):			
(g)	If the custodian is not a legal entity identifier (if a	•	er but does not have an SEC registrati	on number, provide i
nistrato	<u>or</u>			
	The section of the Contract of	destruction of the state of the		Yes
a) Does	the <i>private fund</i> use an a	dministrator other than your firm	?	•
		formation: 1 Record(s) Filed.	rately for each administrator.	
<b>Add</b> If t	itional Administrator In	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions	(b) through (f) below. If the <i>private t</i>	fund uses more than
Add If t	itional Administrator In the answer to question 26. e administrator, you must	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions		fund uses more than
Add If t	itional Administrator In	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions	(b) through (f) below. If the <i>private t</i>	fund uses more than
Add If t	itional Administrator In the answer to question 26. e administrator, you must	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions	(b) through (f) below. If the <i>private t</i>	fund uses more than
Add  If tone  (b)	the answer to question 26.e administrator, you must	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions complete questions (b) through (to the complete questions)	(b) through (f) below. If the <i>private t</i>	fund uses more than
Add  If tone  (b)	the answer to question 26. administrator, you must  Name of administrator:  MAPLESFS LIMITED	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions complete questions (b) through (to the complete questions)	(b) through (f) below. If the <i>private f</i> f) separately for each administrator.  Country:	fund uses more than
Add  If tone  (b)	the answer to question 26. e administrator, you must  Name of administrator:  MAPLESFS LIMITED  Location of administrator	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions complete questions (b) through (in the complete questions).	s (b) through (f) below. If the <i>private f</i> f) separately for each administrator.	fund uses more than
Add  If tone  (b)	the answer to question 26. e administrator, you must  Name of administrator: MAPLESFS LIMITED  Location of administrator City:	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions complete questions (b) through (in the complete questions).	(b) through (f) below. If the <i>private f</i> f) separately for each administrator.  Country:	fund uses more than
Add  If tone (b)	the answer to question 26. e administrator, you must  Name of administrator: MAPLESFS LIMITED  Location of administrator City:	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions complete questions (b) through (to the complete questions (b) through (to the complete questions):  State:	(b) through (f) below. If the <i>private f</i> f) separately for each administrator.  Country:	
Add  If tone (b) (c)	the answer to question 26. administrator; you must Name of administrator: MAPLESFS LIMITED  Location of administrator City: GEORGE TOWN  Is the administrator a re	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions complete questions (b) through (to the complete questions (b) through (to the complete questions):  State:	(b) through (f) below. If the <i>private f</i> f) separately for each administrator.  Country:	Yes No ⊜ ⊙
Add  If tone (b) (c)	the answer to question 26. e administrator, you must Name of administrator: MAPLESFS LIMITED  Location of administrator City: GEORGE TOWN  Is the administrator a re	formation: 1 Record(s) Filed.  (a) is "yes," respond to questions complete questions (b) through (if the complete questions (c) through (c	(b) through (f) below. If the <i>private f</i> f) separately for each administrator. Country: Cayman Islands	Yes No C

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

100%

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

<u>larket</u>	<u>Yes</u>
8. (a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or oth solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each suc marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (separately for each marketer.
	No Information Filed
PRIVA	ATE FUND
forma	ation About the <i>Private Fund</i>
. (a)	Name of the <i>private fund</i> :
	MOUNTAIN VIEW CLO IX LTD.
(b)	Private fund identification number: (include the "805-" prefix also)
	805-8661120712
. Und	der the laws of what state or country is the <i>private fund</i> organized:
	State: Country:
	Cayman Islands
	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
Na	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  ame of General Partner, Manager, Trustee, or Director
<b>N</b> a KA	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
<b>N</b> a KA	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  The serving in a similar capacity:
Na KA WI	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  The serving in a similar capacity:
Na KA WE	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  The serving in a similar capacity:  The serving in a similar capacit
Na KA WE	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  AMEN PERKINS  ENDY EBANKS  If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>privat fund</i> .
Na KA WE	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  AREN PERKINS  ENDY EBANKS  If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>privat fund</i> .  No Information Filed
Na KA WE	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  AREN PERKINS  ENDY EBANKS  If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>privat fund</i> .  No Information Filed  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 Area.
(b) The	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  AREN PERKINS  ENDY EBANKS  If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>privat fund</i> .  No Information Filed
Na KA WE	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):  AREN PERKINS  ENDY EBANKS  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 <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 A 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company A
Na KA WE	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):  Taken Perkins  ENDY EBANKS  If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.  No Information Filed  The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Action (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Action (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Action (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Action (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Action (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Action (3) and 3) are section 3(c)(7) of the Investment Company Action (3) and 3) are section 3(c)(7) of the Investment Company Action (3) are section 3(c)(7) of the Investment Company Action (3) are section 3(c)(7) of the Investment Company Action (3) are section 3(c)(7) of the Investment Company Action (3) are section 3(c)(7) of the Investment Company Action (3) are section 3(c)(7) of the Investment Company Action (3) are section 3(c)(7) of the Investment Company (4) are section 3(c)(7) of the Investment Com
Na KA WE	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):  AREN PERKINS  ENDY EBANKS  No Information Filed  Pervivate 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 A 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company A 1940  (2) the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.
(b) The of:	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):  Taken Perkins  ENDY EBANKS  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 A 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company A 1940  t the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed
Na KA Will (b) The of:	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):  ame of General Partner, Manager, Trustee, or Director  AREN PERKINS  ENDY EBANKS  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  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 A 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company A 1940  t the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed
(b)  The of:	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):  ame of General Partner, Manager, Trustee, or Director  AREN PERKINS  ENDY EBANKS  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 Are 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Are 1940  It the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes  Is this a "master fund" in a master-feeder arrangement?
(a)	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):  ame of General Partner, Manager, Trustee, or Director  AREN PERKINS  ENDY EBANKS  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  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 Are 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Are 1940  It the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes  Its this a "master fund" in a master-feeder arrangement?  Of If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?
Na KA Wis  (b)  The of:  List (a) (b)	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):  ame of General Partner, Manager, Trustee, or Director  AREN PERKINS  ENDY EBANKS  If filling an umbrella registration, identify the filling adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.  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 A 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company A 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 Is this a "master fund" in a master-feeder arrangement?  O 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

Name	of	nrive	nto.	fun	٦.
wame	OL	nriva	яге.	TUIN	a:

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"?

ວ ⊙

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

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

0 0

- 9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?
- Yes No

10. What type of fund is the private fund?

 $^{\circ}$  hedge fund  $^{\circ}$  liquidity fund  $^{\circ}$  private equity fund  $^{\circ}$  real estate fund  $^{\circ}$  securitized asset fund  $^{\circ}$  venture capital fund  $^{\circ}$  Other *private fund*:

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:

\$ 496,211,369

## Ownership

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

\$ 250,000

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

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

10

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: 10%

Yes No

	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
Yo	ur Ad	<u>lvisory Services</u>		
			Yes	No
1/.		Are you a subadviser to this <i>private fund</i> ?  If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fu</i>	O und. I	o ef
		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</i>	Yes	_
10.	(a)	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 $pr$ fund. If the answer to question 18.(a) is "no," leave this question blank.	rivate	
		No Information Filed		
			Yes	No
19.		your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
	Has	Offering the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	Yes ⊙	No C
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
	ERVI ditor	CE PROVIDERS		
			Yes	No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	$\circ$	⊙
		(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 one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	e thar	1
		No Information Filed		
			Vec	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
			0	0
		private fund's investors?  Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contains a since your last annual updating amendment and your last annu	0	0

when the report is available.

<u>Prime E</u>	<u>roker</u>			<b>V</b>	<b>N</b> 1 -
24. (a)	Does the <i>private fund</i> use one or more p	prime brokers?		Yes	_
	If the answer to question 24.(a) is "yes,	" respond to question"	ns (b) through (e) below for each prime broker the <i>private</i> ou must complete questions (b) through (e) separately fo		
		No Info	ormation Filed		
Custodi	a <u>n</u>				
25 (2)	Doos the private fund use any sustedian	as (including the prim	no hydrogra listed above) to hold some or all of its assets?	Yes	No
25. (a)	If the answer to question 25.(a) is "yes,	" respond to question	ne brokers listed above) to hold some or all of its assets?  ns (b) through (g) below for each custodian the <i>private fu</i> complete questions (b) through (g) separately for each cu		
	Additional Custodian Information :	1 Record(s) Filed.			
			ions (b) through g) below for each custodian the <i>private f</i> ou must complete questions (b) through (g) separately for		
	(b) Legal name of custodian: CITIBANK, N.A.				
	(c) Primary business name of custodi CITIBANK, N.A.	ian:			
	(d) The location of the custodian's off	fice responsible for <i>c</i>	ustody of the private fund's assets (city, state and country	·):	
	City:	State:	Country:		
	NEW YORK	New York	United States	'es N	
	(e) Is the custodian a <i>related person</i>	of your firm?		o e	5
	(f) If the custodian is a broker-deale	r, provide its SEC reg	gistration number (if any):		
	CRD Number (if any):				
	(g) If the custodian is not a broker-delegal entity identifier (if any)	ealer, or is a broker-o	dealer but does not have an SEC registration number, prov	/ide its	5
Adminis	strator				
				Yes	No
26. (a)	Does the <i>private fund</i> use an administra If the answer to question 26.(a) is "yes, administrator, you must complete quest	" respond to question	ns (b) through (f) below. If the <i>private fund</i> uses more th	<b>⊙</b> an one	0
	Additional Administrator Information		<u> </u>		

	If the answer to question 26.(a) one administrator, you must cor		h (f) separately for each administrato	
	(b) Name of administrator:  MAPLESFS LIMITED			
	(c) Location of administrator (c	city, state and country):		
	City:	State:	Country: Cayman Islands	
	GEORGE TOWN		Cayman Islanus	Yes No
	(d) Is the administrator a <i>relate</i>	ed person of your firm?		○ ●
	(e) Does the administrator prepared	pare and send investor acco	unt statements to the <i>private fund's</i> i	nvestors?
	C Yes (provided to all inves investors)	stors) ${f C}$ Some (provided to	some but not all investors) $^{f C}$ No (pr	ovided to no
			sends the investor account statements are not sent to the (rest of the) <i>priv</i>	
		OSTED ON THE INDENTURE	TRUSTEE'S WEBSITE AND ARE ACCES	SSIBLE BY INVESTORS.
Market	Does the <i>private fund</i> use the serv You must answer "yes" whether the solicitor, or similar <i>person</i> . If the a	vices of someone other than the <i>person</i> acts as a placeme answer to question 28.(a) is	you or your <i>employees</i> for marketing ont agent, consultant, finder, introduce "yes," respond to questions (b) throu than one marketer you must comple	er, municipal advisor or other igh (g) below for each such
		No Info	mation Filed	
A. PRIVA	ITE FUND			
Informa	ation About the Private Fund			
1. (a)	Name of the <i>private fund</i> :  MOUNTAIN VIEW CLO X LTD.			
(b)	Private fund identification number	-:		
,	(include the "805-" prefix also)			
,	(include the "805-" prefix also) 805-2587762335			
, ,		ry is the <i>private fund</i> organi	zed:	

of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Ac of 1940  Ust the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes N  (a) Is this a "master fund" in a master-feeder arrangement?  No Information Filed  Yes N  (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 N  (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 filling a single Schedule D Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the 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 is used multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of their assets in a single master fund."  Yes N  (a) Is this private fund a "fund of funds"?  O G  NOTE: For purposes of this question facility and includes in federa paraged leaves the fund of regardless of whether they are also private funds or registered investment companies.		Name of General Partner, Manager, Trustee, or Director		
(a) Is this a "feeder fund" in a master-feeder arrangement?  (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.  No Information Filed  The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Ac of 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Ac of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes N  (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?  (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 7.8.(1) for a master-feeder arrangement according to the instructions to this Section 7.8.(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 questions if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of the is assets in a single master fund.  Yes N  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this q		KAREN PERKINS		
No Information Filed  The private fund (check all that apply; you must check at least one):  □ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Ac of 1940  ☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Ac of 1940  ☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Ac of 1940  ☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Ac of 1940  ☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Ac of 1940  ☑ (3) Is this a "fraster fund" in a master-feeder arrangement?  ☐ (4) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?  ☐ (5) Is this a "feeder fund" in a master-feeder arrangement?  ☐ (6) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  ☐ (a) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  ☐ (a) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  ☐ (a) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  ☐ (6) If you must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D.  ☐ (7) Getting the feeder funds answer the following questions:  ☐ (8) No Information Filed  ☐ (8) No Information Filed  ☐ (9) No Information Filed  ☐ (9) No Information Filed  ☐ (1) No Information Filed  ☐ (1) No Information Filed  ☐ (2) No Information Filed  ☐ (3) Is this private fund a "fund of funds"?  ☐ (4) No Information Filed  ☐ (6)	-	WENDY EBANKS		
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 Acrif 1940  7 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Acrif 1940  8 (1) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Acrif 1940  8 (1) gualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Acrif 1940  8 (1) gualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Acrif 1940  9 (2) Qualifies for the exclusion from the definition of investment regulatory authority with which the private fund is registered.  No Information Filed  9 (2) Is this a "master fund" in a master-feeder arrangement?  No Information Filed  9 (2) Is this a "feeder fund" in a master-feeder arrangement?  Of If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  No Information Filed  1 (2) Is this a "feeder fund identification number:  (Include the "805-" prefix also)  1 (2) Is this private fund identification number:  (Include the "805-" prefix also)  1 (2) Is the private fund identification number:  (Include the "805-" prefix also)  1 (2) Is the private fund of the instructions to this Section 7.B.(1) for each of the feeder funds answer the following questions:  No Information Filed  1 (2) Is a master-feeder arrangement or reporting on the funds separately.  No Information Filed  1 (2) Is a master fund of the feeder funds answer fund ("master fund") investing in a "master fund" or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests unbestantially all of their assets in a single master fund.  1 (2) Is this private fund a "fund of fun	(		oriva	ate
(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act 1940  7 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act 1940  8 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act 1940  8 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act 1940  8 (2) Qualifies for the exclusion from the definition of investment invested act 1940  9 (2) Is this a "master fund" in a master-feeder arrangement?  8 (2) Is this a "feeder fund" in a master-feeder arrangement?  9 (3) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  10 (3) Is this a "feeder fund" in a master-feeder arrangement?  11 (3) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  12 (3) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  13 (a) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  14 (a) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund:  15 (c) Is this a "feeder fund" in a master-feeder arrangement regardless of whether you are filing a single Schedule Decition 7.B.(1) for a master-feeder arrangement according to the instructions to this 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:  16 (a) In private fund in the feeder funds answer the following questions:  17 (a) In private fund a "fund of funds"?  18 (b) It is private fund a "fund of funds"?  19 (c) It is this private fund	_	No Information Filed		
(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act f 1940  7 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act f 1940  8 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act f 1940  8 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act f 1940  9 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act f 1940  1 (2) qualifies for the exclusion from the definition of investment regulatory authority with which the private fund is registered.  No Information Filed  1 (2) Is this a "feeder fund" in a master-feeder arrangement?  No Information Filed  1 (3) 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)  2 (4) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  NoTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule Discition 7.B.(1) for the master-feeder arrangement according to the instructions to this 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  2 (4) 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  3 (5) Is this private fund a "fund of funds"?  No Information Filed  3 (6) Is this private fund a "fund of funds"?  No Information	т	The private fund (check all that apply: you must sheek at least one):		
ist the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  Yes N  a) Is this a "master fund" in a master-feeder arrangement?  No Information Filed  Yes N  No Information Filed  Yes N  (c) Is this a "feeder fund" in a master-feeder arrangement?  No Information Filed  Yes N  (d) 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 N  (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  Name of private fund identification number:  (include the "305-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule Election 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		(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Comp	any	Ac
No Information Filed  Yes N  a) Is this a "master fund" in a master-feeder arrangement?  D) 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 N  (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.  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") or 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 N  (a) Is this private fund a "fund of funds"?  O	•		any	Ac
Yes N 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 N c) Is this a "feeder fund" in a master-feeder arrangement? c) 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)  OOTE: 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 (B.(1), for each of the feeder funds answer the following questions:  No Information Filed  IOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests ubstantially all of its assets in a single master fund.  Yes N a) Is this private fund a "fund of funds"?  O G OOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled prestment vehicles, regardless of whether they are also private funds or registered investment companies.	L	ist the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered		
(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 N  (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 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" or 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 N (a) Is this private fund a "fund of funds"?  O		No Information Filed		
(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?  No Information Filed  Yes N  (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.  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 N  (a) Is this private fund a "fund of funds"?  O			Yes	N
No Information Filed  Yes N  C) Is this a "feeder fund" in a master-feeder arrangement?  (I) 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)  IOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule Detection 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 (B.(1)), for each of the feeder funds answer the following questions:  No Information Filed  IOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or ubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" or purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests ubstantially all of its assets in a single master fund.  Yes N  (a) Is this private fund a "fund of funds"?  (b) OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled westment vehicles, regardless of whether they are also private funds or registered investment companies.	(;	a) Is this a "master fund" in a master-feeder arrangement?	O	Œ
Yes N 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 Disection 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" or 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 N 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 pooled novestment vehicles, regardless of whether they are also private funds or registered investment companies.	(	b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund	d?	
(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 filling a single Schedule D. Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the 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 N  (a) Is this private fund a "fund of funds"?  O		No Information Filed		
(c) Is this a "feeder fund" in a master-feeder arrangement? (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?  Name of private fund:  Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filling a single Schedule D. Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the 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 N  (a) Is this private fund a "fund of funds"?  O				
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)  IOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule Disection 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  IOTE: 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" or 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 N  a) Is this private fund a "fund of funds"?  O G  IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled novestment vehicles, regardless of whether they are also private funds or registered investment companies.	,		Yes	
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" or 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 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.		d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> in	vest	_
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 N  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies.				
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 N  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies.			edule	e D
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 N  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies.			ectio	on
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 N  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies.		No Information Filed		
(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.		substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled nvestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.			_	
(h) If you does the private fund invest in funds managed by you or by a related person?		NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poo		•
	r	nvestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.		
	ľ		0	C

<b>ZU.</b>	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?  0%		
20	NOTE: For purposes of this question, do not consider feeder funds of the private fund.  Approximately what percentage of your clients has invested in the private fund?		
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?  NOTE: For purposes of this question, do not consider feeder funds of the private fund.	С	⊙
		Yes	No
	No Information Filed		
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>priv</i> fund. If the answer to question 18.(a) is "no," leave this question blank.	vate	
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
	the answer to question 17.(a) is "no," leave this question blank.  No Information Filed		
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fur	nd. It	f
17.	(a) Are you a subadviser to this <i>private fund</i> ?	C	<b>⊙</b>
<u> Υοι</u>	ur Advisory Services	Yes	Nο
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 10%		
	(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 C	No C
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 10%		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
13.	Approximate number of the <i>private fund's</i> beneficial owners:  10		
	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).	nt se	t
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :  \$ 250,000		
<u>Ow</u>	<u>nership</u>		
11.	Current gross asset value of the <i>private fund</i> : \$ 208,290,332		
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
	C hedge fund C liquidity fund C private equity fund C real estate fund $\bullet$ securitized asset fund C venture capital fun Other <i>private fund</i> :	d C	
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.)?	0	⊙

Priv	ate Offering		
	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes ⊙	No C
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. SE	RVICE PROVIDERS		
Aud	<u>itors</u>		
22	(a) (1) Are the private fundle financial electroments subject to an annual sudit?	Yes	No
23.	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	0	⊙
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?		⊙
	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 one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	than	·
	No Information Filed		
		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	0
	(h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment cor unqualified opinions?	ıtain	
	C Yes C No C Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your responsible when the report is available.	nse	
<u>Prin</u>	ne Broker		
2.4	(c) December of the Condesses of the Land	Yes	No
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	C	⊚
	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		
Cust	<u>codian</u>		
25	(a) Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets?	Yes	No
23.	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fun</i>	o edus	C) es
	If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each cu		
	Additional Custodian Information: 1 Record(s) Filed.		
	If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fuses</i> . If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for custodian.  (b) Legal name of custodian:		

	CITIBANK, N.A.			
(c)	Primary business name CITIBANK, N.A.	of custodian:		
(d)		•	custody of the private fund's assets	s (city, state and country):
	City: NEW YORK	State: New York	Country: United States	
				Yes N
(e)	Is the custodian a relate	ed person of your firm?		0 6
(f)	If the custodian is a bro	ker-dealer, provide its SEC re	gistration number (if any):	
	- CRD Number (if any):			
(g)	If the custodian is not a legal entity identifier (if	•	-dealer but does not have an SEC r	egistration number, provide it
	a P			
trato	<u>//</u>			
trato	<u></u>			Yes
Does If the	the <i>private fund</i> use an a		firm? ons (b) through (f) below. If the <i>pr</i> separately for each administrator.	•
Does If the admi	the <i>private fund</i> use an a e answer to question 26.(a nistrator, you must compl	a) is "yes," respond to questi	ons (b) through (f) below. If the <i>pr</i> separately for each administrator.	~
Does If the admi	the private fund use an a e answer to question 26.(a nistrator, you must comple itional Administrator Ir	a) is "yes," respond to questilete questions (b) through (f)  Information: 1 Record(s) F  (a) is "yes," respond to questions is "yes," respond to questions is "yes,"	ons (b) through (f) below. If the <i>pr</i> separately for each administrator.	ivate fund uses more than one
Does If the admi  Add  If to one	the private fund use an a e answer to question 26.(a nistrator, you must comple itional Administrator Ir	a) is "yes," respond to questilete questions (b) through (f)  Information: 1 Record(s) F  (a) is "yes," respond to questions is "yes," respond to questions is "yes,"	ons (b) through (f) below. If the <i>pr</i> separately for each administrator.  iled.  stions (b) through (f) below. If the	ivate fund uses more than one
Does If the admi  Add  If the one	the private fund use an all answer to question 26.(anistrator, you must completional Administrator Ir the answer to question 26 administrator, you must Name of administrator:	a) is "yes," respond to questilete questions (b) through (f)  Information: 1 Record(s) F  (a) is "yes," respond to questile complete questions (b) through	ons (b) through (f) below. If the <i>pr</i> separately for each administrator.  iled.  stions (b) through (f) below. If the	ivate fund uses more than one
Does If the admi  Add  If the one	the private fund use an all answer to question 26.(anistrator, you must completional Administrator Ir the answer to question 26 administrator, you must Name of administrator:  MAPLESFS LIMITED  Location of administrator	a) is "yes," respond to questi- lete questions (b) through (f)  Information: 1 Record(s) F	ons (b) through (f) below. If the pr separately for each administrator.  iled.  stions (b) through (f) below. If the ugh (f) separately for each adminis	ivate fund uses more than one
Does If the admi  Add  If the one	the private fund use an all answer to question 26.(anistrator, you must completional Administrator Ir the answer to question 26 administrator, you must Name of administrator:	a) is "yes," respond to questilete questions (b) through (f)  Information: 1 Record(s) F  (a) is "yes," respond to questile complete questions (b) through	ons (b) through (f) below. If the <i>pr</i> separately for each administrator.  iled.  stions (b) through (f) below. If the	ivate fund uses more than one
Does If the admi  Add  If the one	the private fund use an all answer to question 26.(a nistrator, you must completional Administrator Ir the answer to question 26 administrator, you must Name of administrator:  MAPLESFS LIMITED  Location of administrato City:	a) is "yes," respond to questi- lete questions (b) through (f)  Information: 1 Record(s) F	cons (b) through (f) below. If the preseparately for each administrator.  iled.  stions (b) through (f) below. If the uph (f) separately for each administrator.	ivate fund uses more than one
Does If the admi  Add  If to one (b)	the private fund use an all answer to question 26.(anistrator, you must completional Administrator Ir the answer to question 26 administrator, you must Name of administrator:  MAPLESFS LIMITED  Location of administrator City: GEORGE TOWN	a) is "yes," respond to questi- lete questions (b) through (f)  Information: 1 Record(s) F	cons (b) through (f) below. If the preseparately for each administrator.  iled.  stions (b) through (f) below. If the uph (f) separately for each administrator.	ivate fund uses more than one private fund uses more than trator.
Does If the admi Add  If to one (b) (c)	the private fund use an all answer to question 26.(a nistrator, you must completional Administrator Ir the answer to question 26 administrator, you must Name of administrator:  MAPLESFS LIMITED  Location of administrator City: GEORGE TOWN	a) is "yes," respond to questi- lete questions (b) through (f)  Information: 1 Record(s) F  Information: 1 Record(	cons (b) through (f) below. If the preseparately for each administrator.  iled.  stions (b) through (f) below. If the uph (f) separately for each administrator.	ivate fund uses more than one private fund uses more than trator.  Yes No
Does If the admi Add  If to one (b) (c)	the private fund use an all answer to question 26.(a nistrator, you must completional Administrator Ir the answer to question 26 administrator, you must Name of administrator:  MAPLESFS LIMITED  Location of administrator City: GEORGE TOWN  Is the administrator a result of the private of the	a) is "yes," respond to questi- lete questions (b) through (f)  Information: 1 Record(s) F  Information: 1 Record(	cons (b) through (f) below. If the preseparately for each administrator.  iled.  stions (b) through (f) below. If the present of the present	ivate fund uses more than one private fund uses more than trator.  Yes No

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

100%

 $Include \ only \ those \ assets \ where \ (i) \ such \ \textit{person} \ carried \ out \ the \ valuation \ procedure \ established \ for \ that \ asset, \ if \ any, \ including$ 

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*.

Ma	rkete	<u>ers</u>			
	, ,	Yes No			
28.	(a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?			
		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.			
		Separately for each marketen.			
		No Information Filed			
۸ D	D T\/A	TE FUND			
4. Г	KIVA	IL TOND			
<u>[nfc</u>	rma	tion About the <i>Private Fund</i>			
1.	(a)	Name of the <i>private fund</i> :			
		MOUNTAIN VIEW CLO XIV LTD.			
	(b)	Private fund identification number:			
		(include the "805-" prefix also)			
		805-7894808639			
2.	Und	er the laws of what state or country is the <i>private fund</i> organized:			
		State: Country:			
		Cayman Islands			
3.	(a)	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):			
	Na	me of General Partner, Manager, Trustee, or Director			
	STA	ACY BODDEN			
	WE	NDY EBANKS			
	(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	<b>T</b> L -	and the first first that and the control of the state of			
4.		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 1				
	<b>▽</b> of 1	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act 940			
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> 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 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> ?
	$^{f C}$ hedge fund $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital fund $^{f C}$ Other <i>private fund</i> :
	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> : \$ 373,880,602
<u>Ow</u>	<u>nership</u>
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).
13.	Approximate number of the <i>private fund's</i> beneficial owners:  10
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 1%

https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd\_iad\_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG\_PK=1667594

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

	10%		Yes	No
	٠,	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	C	C
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>	ur Ad	<u>lvisory Services</u>		
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 fu</i> the answer to question 17.(a) is "no," leave this question blank.	nd. If	€
		No Information Filed		
			Yes	No
18.		Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	О	•
		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>pri fund</i> . If the answer to question 18.(a) is "no," leave this question blank.	ivate	
		No Information Filed		
			Yes	No
19.		your <i>clients</i> solicited to invest in the <i>private fund</i> ?	О	$\odot$
	NOT	TE: For purposes of this question, do not consider feeder funds of the private fund.		
<u>Priv</u>	0% vate	<u>Offering</u>		
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	Yes ⊙	No C
22.	If ve	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
B. S	ERVIC	CE PROVIDERS		
Aud	ditors	<u>s</u>	Yes	No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	0	•
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	Ö	•
		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 one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	than	
		No Information Filed		
			Yes	No
		Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	0	0
	٠,	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> corunqualified opinions?	ıtain	

	C Yes C No C Report Not Yet Re	ceived		
	If you check "Report Not Yet Receiv when the report is available.	ed," you must promptly fil	e an amendment to your Form ADV to update your re	esponse
Prime I	<u>Broker</u>			Yes No
24. (a)	Does the <i>private fund</i> use one or m	ore prime brokers?		0.0
			s (b) through (e) below for each prime broker the <i>pri</i> ous was broker the prious (b) through (e) separately	vate fund
		No Infor	mation Filed	
Custod	i <u>an</u>			Yes No
25. (a)	Does the <i>private fund</i> use any custo	odians (including the prime	brokers listed above) to hold some or all of its asset	
			s (b) through (g) below for each custodian the <i>private</i> complete questions (b) through (g) separately for each	e fund uses.
	Additional Custodian Information	on: 1 Record(s) Filed.		
			ons (b) through g) below for each custodian the <i>priva</i> must complete questions (b) through (g) separately	
	(c) Primary business name of cur	stodian:		
	(d) The location of the custodian	's office responsible for <i>cu</i> s	stody of the private fund's assets (city, state and cour	ntry):
	City:	State:	Country:	,,
	NEW YORK	New York	United States	
	(e) Is the custodian a <i>related per</i>	rson of your firm?		Yes No
	(c) is the sustaining related per	son er yeur mm.		0 0
	(f) If the custodian is a broker-d	ealer, provide its SEC regi	stration number (if any):	
	- CRD Number (if any):			
	(g) If the custodian is not a brok legal entity identifier (if any)	er-dealer, or is a broker-de	ealer but does not have an SEC registration number, p	provide its
<u>Admini</u>	<u>strator</u>			Yes No
26. (a)	Does the <i>private fund</i> use an admin	istrator other than your fir	m?	⊙ O
	If the answer to question 26.(a) is 'administrator, you must complete q		s (b) through (f) below. If the <i>private fund</i> uses more sparately for each administrator.	

Additional Administrato	Information::	1 Record(s) Filed.
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			) is "yes," respond to questions (b) through (f) below. If the <i>priva</i> mplete questions (b) through (f) separately for each administrato	
		(b) Name of administrator:		
		MAPLESFS LIMITED		
		(c) Location of administrator (d	city, state and country):	
		City:	State: Country:	
		GEORGE TOWN	Cayman Islands	
		(d) Is the administrator a <i>relat</i>	ted person of your firm?	Yes No
		(e) Does the administrator pre	pare and send investor account statements to the <i>private fund's</i> in	nvestors?
		C Yes (provided to all inve- investors)	stors) $^{f C}$ Some (provided to some but not all investors) $^{f G}$ No (pro	ovided to no
		private fund's investors? If respond "not applicable."	26.(e) is "no" or "some," who sends the investor account statemen investor account statements are not sent to the (rest of the) privents	ate fund's investors,
			) the valuation used for purposes of investor subscriptions, redem was the valuation determined by such <i>person</i> .	ptions or distributions, and
Mai	rkete	<u>rs</u>		
20	(-)	December with the first the second		Yes No
28.	. ,	•	vices of someone other than you or your <i>employees</i> for marketing	
		solicitor, or similar person. If the a	he <i>person</i> acts as a placement agent, consultant, finder, introduce answer to question 28.(a) is "yes," respond to questions (b) throu f the <i>private fund</i> uses more than one marketer you must comple	igh (g) below for each such
			No Information Filed	
	) I) (AT	T FUND		
A. Pl	≺ı∨AT	E FUND		
<u>Info</u>	rmat	ion About the <i>Private Fund</i>		
1.	. ,	Name of the <i>private fund</i> :		
		MOUNTAIN VIEW CLO XV LTD.	_	
	(b)	Private fund identification number	r:	
		(include the "805-" prefix also)		

State: Country: Cayman Islands  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  STACY BODDEN  WENDY EBANKS  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
Name of General Partner, Manager, Trustee, or Director  STACY BODDEN  WENDY EBANKS  b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.
Name of General Partner, Manager, Trustee, or Director  STACY BODDEN  WENDY EBANKS  b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.
WENDY EBANKS  b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.
b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.
fund.
NO INICITIALION MEDI
he <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 A f 1940
(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company A f 1940
ist the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.
No Information Filed
Yes I
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 Filed
Yes I
c) Is this a "feeder fund" in a master-feeder arrangement?
d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?
Name of private fund:
Private fund identification number:
(include the "805-" prefix also)
OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule ection 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:
f f is a b

		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 function of the private fund:	<sub>ind</sub> C	)
	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> : \$ 375,606,205		
<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount forth in the organizational documents of the fund).	unt se	et
13.	Approximate number of the <i>private fund's</i> beneficial owners:  10		
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: 10%		
	(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> : 10%		
<u>You</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 f</i>	Und. I	<b>⊙</b> f
	the answer to question 17.(a) is "no," leave this question blank.  No Information Filed		
	NO IIIOIIIIauoii i lieu	V	N.
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	Yes O	Θ
	(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	
	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> ?		

0%

Private	e Offering		
	is the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities t of 1933?	Yes ⊙	No C
22. If v	yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. SERV	TICE PROVIDERS		
<u>Audito</u>	u <u>rs</u>	Yes	No
23. (a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	0	•
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	o	•
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	e than	
	No Information Filed		
		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	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> cor unqualified opinions?	ntain	
	C Yes C No C Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your respondent the report is available.	onse	
Prime	<u>Broker</u>		
24 (-)		Yes	No
24. (a)	) Does the <i>private fund</i> use one or more prime brokers?  If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private</i>	O e fund	′
	uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately fo prime broker.		
	No Information Filed		
Custod	lian		
25 (2)	Deep the private find use any quatedians (including the prime hydrone listed above) to held some or all of its assets?	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?  If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fu</i>	• • • • • • • • • • • • • • • • • • •	C es
	If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each cu		
	Additional Custodian Information : 1 Record(s) Filed.		
	If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private f</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for custodian.		

US	egal name of custodian: S BANK, N.A.			
' '	imary business name of custodia S BANK NA	n:		
(d) Th	ne location of the custodian's offic	e responsible for <i>cust</i> o	ody of the private fund's assets (city,	state and country):
	ty:	State:	Country:	
CI	NCINATTI	Ohio	United States	
				Yes No
(e) Is	the custodian a related person of	f your firm?		0 0
(f) If	the custodian is a broker-dealer,	provide its SEC registi	ration number (if any):	
CF	RD Number (if any):			
	the custodian is not a broker-dea gal entity identifier (if any)	ler, or is a broker-dea	ler but does not have an SEC registra	ation number, provide its
<u>Administrator</u>				
			_	Yes No
` '	e private fund use an administrato	·		• c
	swer to question 26.(a) is "yes," rator, you must complete question		b) through (f) below. If the <i>private f</i> arately for each administrator.	fund uses more than one
Additio	nal Administrator Information	ı: 1 Record(s) Filed		
	, , , , , ,		s (b) through (f) below. If the <i>private</i> (f) separately for each administrator.	e fund uses more than
` `	ame of administrator: APLESFS LIMITED			
(c) Lc	ocation of administrator (city, stat	e and country):		
Ci	ty:	State:	Country:	
GF	EORGE TOWN		Cayman Islands	
				Yes No
(d) Is	the administrator a related perso	on of your firm?		0 ⊚
(e) Do	pes the administrator prepare and	d send investor accour	t statements to the <i>private fund's</i> in	vestors?
	Yes (provided to all investors) Cvestors)	Some (provided to so	ome but not all investors) 🌀 No (pro	vided to no
pr	-		ends the investor account statement are not sent to the (rest of the) priva	
	, , ,	N THE INDENTURE TR	USTEE'S WEBSITE AND ARE ACCESS	SIBLE BY INVESTORS.

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*.

Mar	kete	ers
20	(-)	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. PF	RIVA	TE FUND
<u>Info</u>	<u>rma</u>	tion About the <i>Private Fund</i>
1.		Name of the private fund:  NEWFLEET CLO 2016-1 LTD.  Private fund identification number: (include the "805-" prefix also)  805-8198420563
2.	Und	er the laws of what state or country is the <i>private fund</i> organized:  State:  Country:  Cayman Islands
3.	(a)	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
		No Information Filed
	(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.	☐ of 1	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act
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?
	(D)	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 Fred
		Yes No
	(c)	Is this a "feeder fund" in a master-feeder arrangement?

 $\circ$ 

	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> in Name of <i>private fund</i> :	ests/	5?
	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 Sche Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	dule	e D,
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this S 7.B.(1), for each of the feeder funds answer the following questions:	ectic	on
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	fund	1"
		⁄es	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 poor	C led	•
	investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.  (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	_	_
	(b) If yes, does the private rulid livest in fullus managed by you of by a related person:	0	0
	·	⁄es	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> ?		
	C hedge fund C liquidity fund C private equity fund C real estate fund securitized asset fund C venture capital fund Other <i>private fund</i> :	O 6	
	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> : \$ 300,493,871		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount forth in the organizational documents of the fund).	nt se	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> : 10%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		

			Yes	No
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
You	r Ad	dvisory Services		
17	(a)	Are you a subadviser to this <i>private fund</i> ?	Yes	_
17.	` '	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fu</i>	O und. T	⊚
	(-)	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</i> fund?	$\circ$	⊙
	(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>pr</i> fund. If the answer to question 18.(a) is "no," leave this question blank.	ivate	
		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 0%	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Priv	ate	<u>Offering</u>		
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	Yes O	No ⊙
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
3. SE	ERVI	CE PROVIDERS		
Aud	itor	<u>s</u>		
			Yes	No
23.	(a)	<ul><li>(1) Are the <i>private fund's</i> financial statements subject to an annual audit?</li><li>(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?</li></ul>	0	⊙ -
			O.	0
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	: tnan	
		No Information Filed		
	, .		Yes	No
	(g)	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	О	O
	(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> corunqualified opinions?	ntain	
		C Yes C No C Report Not Yet Received		

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

	when the report is available.
Prime E	<u>Broker</u>
	Yes No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.
	No Information Filed
Custodi	ian
Custou	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?
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.
	Additional Custodian Information : 1 Record(s) Filed.
	If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.
	(b) Legal name of custodian:  BNY MELLON CAPITAL MARKETS, LLC
	(c) Primary business name of custodian: BNY MELLON CAPITAL MARKETS, LLC
	(d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country):
	City: State: Country:
	HOUSTON Texas United States
	Yes No
	(e) Is the custodian a <i>related person</i> of your firm?
	(f) If the custodian is a broker-dealer, provide its SEC registration number (if any): 8 - 35255
	CRD Number (if any): 17454
	(g) 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)
Admini	strator
Aummi	Yes No
26. (a)	Does the <i>private fund</i> use an administrator other than your firm?
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.
	Additional Administrator Information: 1 Record(s) Filed.

	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.							
	(b) Name of administrator:							
		BNY MELLON TRUST CO	MPANT, N.A.					
	(c)	Location of administrato	or (city, state and country):					
		City:	State:	Country:				
		HOUSTON	Texas	United States				
	(d)	Is the administrator a re	elated person of your firm?		Yes No			
	(e)	Does the administrator	prepare and send investor a	ccount statements to the <i>private fund's</i> in	nvestors?			
		• Yes (provided to all in investors)	nvestors) CSome (provided	d to some but not all investors) $ {}^{f C}$ No (pro	ovided to no			
	(f)		? If investor account statem	who sends the investor account statemen ents are not sent to the (rest of the) <i>prive</i>				
ob	taining e calcula	any relevant quotes, and	•	e valuation procedure established for that purposes of investor subscriptions, redem mined by such <i>person</i> .				
28. (a	) Does	the <i>private fund</i> use the	services of someone other t	han you or your <i>employees</i> for marketing	Yes No purposes?			
	solicit marke	or, or similar <i>person</i> . If tl	he answer to question 28.(a	ement agent, consultant, finder, introduce ) is "yes," respond to questions (b) throu lore than one marketer you must complet	r, municipal advisor or other gh (g) below for each such			
			No I	nformation Filed				
A. PRIV	ATE FUN	ID						
<u>Inform</u>	ation A	bout the <i>Private Fund</i>						
1. (a		of the <i>private fund</i> :						
				MERGING MARKETS DEBT BLEND PORTFO				
(b	•	<i>e fund</i> identification num de the "805-" prefix also)			LIO			
		2287396919	,		LIO			
					LIO			
					LIO			
2. Ur	nder the State		untry is the <i>private fund</i> org Countr		LIO			

Name of General Partner, Manager, Trustee, or Director					
CARL O'SULLIVAN, DIRECTOR					
DAVID SCOTT, DIRECTOR					
PAUL TIMLIN, DIRECTOR					
PETER WILBY, DIRECTOR					
WERNER SCHWANBERG, DIRECTOR					
(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) the <i>fund</i> .	is <i>priva</i>	ite			
No Information Filed					
The private fund (check all that apply; you must check at least one):					
$\Box$ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Color of 1940	mpany	Ac			
(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Color of 1940	mpany	Ac			
List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registe	red.				
Name of Country/English Name of Foreign Financial Regulatory Authority					
Ireland - Central Bank of Ireland					
	Yes	N			
(a) Is this a "master fund" in a master-feeder arrangement?	0	6			
(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private is	fund?				
No Information Filed					
	Yes	N.			
/-> T- +b::   CdCd   :	163	11			
(c) Is this a "feeder fund" in a master-feeder arrangement?	°				
<ul><li>(c) Is this a "reeder rund" in a master-reeder arrangement?</li><li>(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund.</li><li>Name of private fund:</li></ul>	0	(			
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i>	0	(			
(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund. Name of private fund: Private fund identification number:	O d invest	ss?			
<ul> <li>(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund.</li> <li>Name of private fund:</li> <li>Private fund identification number:         <ul> <li>(include the "805-" prefix also)</li> </ul> </li> <li>NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single S Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.</li> </ul>	C d invest	e [			
<ul> <li>(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund.  Name of private fund:  Private fund identification number: (include the "805-" prefix also)</li> <li>NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.</li> <li>If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this</li> </ul>	C d invest	e [			
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> .  Name of <i>private fund</i> :  **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 S 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 thi 7.B.(1), for each of the feeder funds answer the following questions:	Grant or ster functions	e [ on			
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> .  Name of <i>private fund</i> :  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 S 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 thi 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 "mas for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing in a "mas for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing in a "mas for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing in a "mas for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing in a "mas for purpose of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing in a "mas for purpose of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) investing in a "mas for purpose of this question is in the fundant purpose of this question is in the fundant purpose of this question is in the fundant purpose of the fundant purpose of this question is in the fundant purpose of the fundant purpose of the fundant purpose of the fundant purpose of the fundant purpose	C d invest scheduli is Secti	e [ on			

	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	6	•	0
			es	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered unc Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	ler the		⊙
10.	What type of fund is the <i>private fund</i> ?			
	$^{\circ}$ hedge fund $^{\circ}$ liquidity fund $^{\circ}$ private equity fund $^{\circ}$ real estate fund $^{\circ}$ securitized asset fund $^{\circ}$ venture of other <i>private fund</i> : IRISH AIF FUND OF FUND HOLDING IRISH UCITS PRIMARILY FIXED INCOME	apital 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> : \$ 404,670,000			
<u>Ow</u>	<u>vnership</u>			
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :			
	\$ 5,000,000  NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from t forth in the organizational documents of the fund).	he amount	: se	t
13.	Approximate number of the <i>private fund's</i> beneficial owners: 7			
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 fund 0%			
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) 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> : 27%			
You	ur Advisory Services			
4.7		Ye	es	No
17.	<ul><li>(a) Are you a subadviser to this <i>private fund</i>?</li><li>(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the p</li></ul>	c rivate funa	⊃ ⁄. If	•
	the answer to question 17.(a) is "no," leave this question blank.			
	No Information Filed			
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>p</i> fund?		es	No ⊙
	<ul><li>(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers t fund. If the answer to question 18.(a) is "no," leave this question blank.</li></ul>	o the <i>priva</i>	ite	
	No Information Filed			
		Y	es	No
19.	Are your clients solicited to invest in the private fund?	ć	•	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> ?  2%			
Priv	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 ①	No C	
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):			
		—	$\dashv$	
	021-102465			
B. SI	ERVICE PROVIDERS			
Aud	<u>litors</u>			
		Yes	No	
23.		$\odot$	$\circ$	
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	О	⊙	
	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 one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	thar	1	
	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 mo than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re		
	(b) Name of the auditing firm:  DELOITTE & TOUCHE			
	(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:			
	DUBLIN Ireland			
	(d) Is the auditing firm an independent public accountant?		40	
	(u) is the additing initial independent public accountant:	) (		
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	ð (	0	
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1193			
	(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?	) <i>(</i>		
22. If yes, provide the <i>private fund's</i> Form D file number (if any):    Form D file number				
			0	
		tain		
	⊙ Yes C No C Report Not Yet Received			
		nse		
Prii	ne Broker			

	Y	es l	lo
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>private fu</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for exprime broker.		
	No Information Filed		
Custodia	an_		
		es l	lo
	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets?  If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	uses	
	Additional Custodian Information : 1 Record(s) Filed.		
	If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for eacustodian.		
	(b) Legal name of custodian: STATE STREET CUSTODIAL SERVICES (IRELAND) LIMITED		
	(c) Primary business name of custodian: STATE STREET CUSTODIAL SERVICES (IRELAND) LIMITED		
	(d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country):  City: State: Country:  DUBLIN Ireland		
	Yes	No.	
	(e) Is the custodian a <i>related person</i> of your firm?	⊙	
	(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):		
	CRD Number (if any):		
	(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide legal entity identifier (if any)	e its	
<b>N</b> dminic	the store		
Adminis		es l	lo
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 than administrator, you must complete questions (b) through (f) separately for each administrator.	one	
	Additional Administrator Information : 1 Record(s) Filed.		
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more that one administrator, you must complete questions (b) through (f) separately for each administrator.	'n	

	(b) Name of administrator.			
	STATE STREET FUND SERVICES	S (IRELAND) LIMITED		
	(c) Location of administrator (city,	state and country):		
	City:	State:	Country:	
	DUBLIN		Ireland	
				Yes No
	(d) Is the administrator a <i>related p</i>	person of your firm?		○ ●
	(e) Does the administrator prepare	e and send investor account	statements to the <i>private fund's</i>	s investors?
	• Yes (provided to all investors investors)	s) CSome (provided to son	ne but not all investors) $^{f C}$ No ( $_{f I}$	provided to no
	(f) If the answer to question 26.(e private fund's investors? If inverespond "not applicable."		nds the investor account statem e not sent to the (rest of the) <i>pr</i>	
Inc ob	0% clude only those assets where (i) such <i>p</i> taining any relevant quotes, and (ii) the calculations (including allocations) was	valuation used for purpose	s of investor subscriptions, rede	· · · · · · · · · · · · · · · · · · ·
Market	<u>C13</u>			Yes No
28. (a)	Does the <i>private fund</i> use the services	s of someone other than yo	ı or your <i>employees</i> for marketi	ng purposes?
	You must answer "yes" whether the <i>p</i> solicitor, or similar <i>person</i> . If the answ marketer the <i>private fund</i> uses. If the separately for each marketer.	ver to question 28.(a) is "ye	s," respond to questions (b) thr	ough (g) below for each such
		No Informa	tion Filed	
A. PRIVA	ATE FUND			
Informa	ation About the <i>Private Fund</i>			
1 (2)	Name of the private fund			
1. (a)	Name of the <i>private fund</i> :  STONE HARBOR INVESTMENT FUNDS	DIC - STONE HADROD EME	DOING MADVETS DERT FUND	
(b)	Private fund identification number:	TEC STONE HARBOR EME	NOTING MANKETS DEDITIOND	
	(include the "805-" prefix also)			
	805-5099022599			
ე II⊶	der the laws of what state or country is	the private fund examined		
2. Un	der the laws of what state or country is State:	Country:		
	State.	Country: Ireland		
3. (a)	Name(s) of General Partner, Manager,	Trustee, or Directors (or ne	ersons serving in a similar canac	itv):
	ame of General Partner, Manager, T	· · ·		
_	API O'SHILIVAN DIRECTOR			

DAVID SCOTT, DIRECTOR  PAUL TIMLIN, DIRECTOR  PETER WILBY, DIRECTOR  WERNER SCHWANBERG, DIRECTOR  (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this fund.  No Information Filed  The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Comport 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Comport 1940	pany	Act
PETER WILBY, DIRECTOR  WERNER SCHWANBERG, DIRECTOR  (b) If filling an umbrella registration, identify the filling adviser and/or relying adviser(s) that sponsor(s) or manage(s) this fund.  No Information Filed  The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Comport 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Comport 1940	pany	Act
WERNER SCHWANBERG, DIRECTOR  (b) If filling an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this fund.  No Information Filed  The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Compof 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compof 1940	pany	Act
(b) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>fund</i> .  No Information Filed  The <i>private fund</i> (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Compof 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compof 1940	pany	Act
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 Compof 1940  (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compof 1940	pany	Act
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 Composition (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Composition (1940)		
<ul> <li>□ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Composition 1940</li> <li>☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Composition 1940</li> </ul>		
<ul> <li>□ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Composition 1940</li> <li>☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Composition 1940</li> </ul>		
(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Composition 1940	any	
		Act
List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registere	d.	
Name of Country/English Name of Foreign Financial Regulatory Authority		
Ireland - Central Bank of Ireland		
	Yes	No
(a) Is this a "master fund" in a master-feeder arrangement?	0	⊙
(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund	nd?	
No Information Filed		
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> in Name of <i>private fund</i> :  **Private fund identification number: (include the "805-" prefix also)	ivest	<b>⋾</b> ?
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		
substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "maste	Yes	
	(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 in Name of private fund:  Private fund identification number: (include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sch Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this \$7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?  No Information Filed  Yes  (c) Is this a "feeder fund" in a master-feeder arrangement?  (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 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

		165	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 for Other private fund: IRISH UCITS PRIMARILY FIXED INCOME	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> : \$ 661,780,000		
<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :  \$ 5,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount in the organizational documents of the fund).	ount se	et
13.	Approximate number of the <i>private fund's</i> beneficial owners: 29		
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: 24%		
	(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 C	No C
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 94%		
<u>You</u>	ur Advisory Services		
4.7		Yes	No
17.	<ul><li>(a) Are you a subadviser to this <i>private fund</i>?</li><li>(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private i</i> the answer to question 17.(a) is "no," leave this question blank.</li></ul>	C fund. I	E
	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	
	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> ?		

<u>Priva</u>	<u>ate Offering</u>		
		Yes	No
	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. SE	RVICE PROVIDERS		
Audi	itore		
Auui		Yes	No
23.	(a) (1) Are the private fund's financial statements subject to an annual audit?	0	0
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	Õ	•
	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 one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	e thar	1
	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 me than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ore	
	(b) Name of the auditing firm:		
	DELOITTE & TOUCHE		
	(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: DUBLIN Ireland		
		Yes I	ok
	(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: 1193		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	© (	0
		Yes	No
	(g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	⊙	С
	(h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment counqualified opinions?	ntain	
	Ses ○ No ○ Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your respondent the report is available.	onse	
Prim	ne Broker		
		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 private	e fund	d

			No Inf	Formation Filed
ıstod	<u>ian</u>			
	_			Yes
o. (a)	If the	answer to question 25.(	a) is "yes," respond to question	me brokers listed above) to hold some or all of its assets?  ons (b) through (g) below for each custodian the <i>private fund</i> us complete questions (b) through (g) separately for each custodi
	Addi	itional Custodian Infor	mation : 1 Record(s) Filed.	
	use	•		ctions (b) through g) below for each custodian the <i>private fund</i> ou must complete questions (b) through (g) separately for each
	(b)	Legal name of custodia	n: NAL SERVICES (IRELAND) LIM	IITED
	(c)	Primary business name STATE STREET CUSTOD	of custodian: VIAL SERVICES (IRELAND) LIM	IITED
	(d)	The location of the cust	odian's office responsible for a	custody of the private fund's assets (city, state and country):
		City:	State:	Country:
		DUBLIN		Ireland
	(6)	Is the custodian a <i>relat</i>	ed person of your firm?	Yes I
	(0)	15 the custodian a relat	ed person or your min.	0
	(f)	If the custodian is a bro	oker-dealer, provide its SEC re	gistration number (if any):
		CRD Number (if any):		
	(g)	If the custodian is not a legal entity identifier (if	· ·	dealer but does not have an SEC registration number, provide i
dmini	strato	r		
				Yes
i. (a)		•	administrator other than your	· ·
				ons (b) through (f) below. If the <i>private fund</i> uses more than on separately for each administrator.
	Addi	itional Administrator I	nformation: 1 Record(s) F	iled.
				itions (b) through (f) below. If the <i>private fund</i> uses more than ligh (f) separately for each administrator.
	71.3	Name of administrator:		

	(c)	Location of administrator (d	city, state and country):		
		City:	State:	Country:	
		DUBLIN		Ireland	
					Yes No
	(d)	Is the administrator a <i>relat</i>	red person of your firm?		0 0
	(e)	Does the administrator pre	pare and send investor acc	ount statements to the private fund's	s investors?
		• Yes (provided to all investors)	stors) $^{f C}$ Some (provided to	o some but not all investors) ${f C}$ No ( ${f I}$	provided to no
	(f)			no sends the investor account statem ts are not sent to the (rest of the) <i>pr</i>	
adr 100 Inc obt	ministra 0% clude on caining a	tor, that is not your <i>related</i> ly those assets where (i) su	person?  och person carried out the v  the valuation used for pur	s assets (by value) was valued by a possible of the valuation procedure established for the poses of investor subscriptions, redefined by such person.	nat asset, if any, including
<u>Market</u>	ers				<b>V N</b>
28. (a)	Does 1	the <i>private fund</i> use the ser	vices of someone other tha	ın you or your <i>employees</i> for marketi	Yes No ing purposes?
( )	You m solicite marke	oust answer "yes" whether the or, or similar person. If the o	he <i>person</i> acts as a placem answer to question 28.(a) i	nent agent, consultant, finder, introdu is "yes," respond to questions (b) thr re than one marketer you must comp	cer, municipal advisor or other ough (g) below for each such
			No Info	ormation Filed	
A. PRIVA		D bout the Private Fund			
,	STONI Private (includ	of the <i>private fund</i> : E HARBOR INVESTMENT FUI <i>e fund</i> identification number de the "805-" prefix also) 671141585		EMERGING MARKETS LOCAL CURRE	NCY DEBT FUND
2. Und	der the State:	laws of what state or counti	ry is the <i>private fund</i> organ Country: Ireland	nized:	
	State:		Country: Ireland		ity):
3. (a)	State:	(s) of General Partner, Mana	Country: Ireland ager, Trustee, or Directors (	nized: or <i>persons</i> serving in a similar capac	ity):
3. (a)	State:  Name  ame of	(s) of General Partner, Mana General Partner, Manage	Country: Ireland ager, Trustee, or Directors (		ity):
3. (a)  Na  CA	State:  Name  ame of  ARL O'SI	(s) of General Partner, Mana <b>General Partner, Manage</b> ULLIVAN, DIRECTOR	Country: Ireland ager, Trustee, or Directors (		ity):
3. (a)  Na  CA  DA	State:  Name ame of ARL O'SI	(s) of General Partner, Mana General Partner, Manage	Country: Ireland ager, Trustee, or Directors (		ity):

WERNER SCHWANBERG, DIRECTOR	
(b) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponso <i>fund</i> .	r(s) or manage(s) this <i>private</i>
No Information Filed	
The <i>private fund</i> (check all that apply; you must check at least one):	
$\square$ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of 1940	of the Investment Company Ac
lacktriangledown (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of 1940	of the Investment Company Ac
List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the p	rivate fund is registered.
Name of Country/English Name of Foreign Financial Regulatory Authority	
Other - IRISH FINANCIAL SERVICES REGULATORY AUTHORITY	
	Yes N
(a) Is this a "master fund" in a master-feeder arrangement?	0.0
(b) If yes, what is the name and private fund identification number (if any) of the feeder funds inve	esting in this <i>private fund</i> ?
No Information Filed	
	Yes N
(c) Is this a "feeder fund" in a master-feeder arrangement?	0.0
(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in w Name of <i>private fund</i> :	~ ^
·	
Private fund identification number: (include the "805-" prefix also)	
	u are filing a single Schedule [
(include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether yo Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	
(include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether yo Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the section of the funds separately.	
(include the "805-" prefix also)  NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether yo 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 t 7.B.(1), for each of the feeder funds answer the following questions:	the instructions to this Section der funds") invest all or investing in a "master fund"
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the 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 ("feeds substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund for purposes of this question if it issued multiple classes (or series) of shares or interests, and each substantially all of its assets in a single master fund.	the instructions to this Section der funds") invest all or investing in a "master fund"
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether yo 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 to 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 ("feeds substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund for purposes of this question if it issued multiple classes (or series) of shares or interests, and each substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?	der funds") invest all or " investing in a "master fund" class (or series) invests  Yes N
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the 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 ("feeds substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund for purposes of this question if it issued multiple classes (or series) of shares or interests, and each substantially all of its assets in a single master fund.	der funds") invest all or " investing in a "master fund" class (or series) invests  Yes N  C  total assets in other pooled
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether yo 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 to 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 ("feeds substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund for purposes of this question if it issued multiple classes (or series) of shares or interests, and each substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its	der funds") invest all or " investing in a "master fund" class (or series) invests  Yes N  C  total assets in other pooled
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether yo 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 to 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feesubstantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund for purposes of this question if it issued multiple classes (or series) of shares or interests, and each substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its investment vehicles, regardless of whether they are also private funds or registered investment compared to the funds of the funds of the funds or registered investment compared to the funds of t	der funds") invest all or " investing in a "master fund" class (or series) invests  Yes N  Contotal assets in other pooled apanies.

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 function of the private fund: IRISH UCITS PRIMARILY FIXED INCOME	ınd 🧿	,
	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> : \$ 754,290,000		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :		
	\$ 5,000,000  NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amo forth in the organizational documents of the fund).	unt se	et
13.	Approximate number of the <i>private fund's</i> beneficial owners:  14		
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: 27%		
		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> : 68%		
Vai	ur Advisory Services		
100	II 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 for</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 properties 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> ?	$\odot$	$\circ$
	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> ?  2%		
Pri	vate Offering		
1		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?

22.	If yes, provide the private rand's Form D me namber (if any).
	Form D file number
	021-350290

#### **B. SERVICE PROVIDERS**

Auditors	

23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

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 we would the minet finally France D file assessment (if any)

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:

**DELOITTE & TOUCHE** 

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

City: State: Country: DUBLIN Ireland

(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: 1193

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

Yes No

Yes No

 $\circ$ 

 $\circ$ 

Yes No

Yes No ⊙ ೧

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

€ Yes C No C Report Not Yet Received

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

# **Prime Broker**

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

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

No Information Filed

Custodian Yes No 25. (a) Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: STATE STREET CUSTODIAL SERVICES (IRELAND) LIMITED (c) Primary business name of custodian: STATE STREET CUSTODIAL SERVICES (IRELAND) LIMITED (d) The location of the custodian's office responsible for custody of the private fund's assets (city, state and country): City: State: Country: **DUBLIN** Ireland Yes No (e) Is the custodian a related person of your firm?  $\circ$  $\odot$ (f) If the custodian is a broker-dealer, provide its SEC registration number (if any): CRD Number (if any): (g) 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) **Administrator** Yes No 26. (a) Does the private fund use an administrator other than your firm? If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator, you must complete questions (b) through (f) separately for each administrator. Additional Administrator Information: 1 Record(s) Filed. If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator, you must complete questions (b) through (f) separately for each administrator. (b) Name of administrator: STATE STREET FUND SERVICES (IRELAND) LIMITED (c) Location of administrator (city, state and country): Citv: State: Country: **DUBLIN** Ireland

		Yes	No
	(d) Is the administrator a <i>related person</i> of your firm?	O	•
	(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 private fund's investors? If investor account statements are not sent to the (rest of the) private fund's inverse, investor account statements are not sent to the (rest of the) private fund's inverse, investor account statements are not sent to the (rest of the) private fund's inverse, investor account statements are not sent to the (rest of the) private fund's inverse, investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund sent to the (re		
ad	uring your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as a ministrator, that is not your <i>related person</i> ?	n	
ob	clude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, taining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or districted calculations (including allocations) was the valuation determined by such <i>person</i> .		_
<u>Marke</u>	<u>ters</u>		
			Yes N
28. (a	) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?		0 0
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal acts solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) separately for each marketer.	or ead	ch such
	No Information Filed		
<u>Inform</u>	ATE FUND  ation About the Private Fund  Name of the private fund:		
	STONE HARBOR INVESTMENT FUNDS PLC - STONE HARBOR HIGH YIELD BOND FUND		
(b	) Private fund identification number:		
	(include the "805-" prefix also)		
	805-1046284598		
2. Ur	nder the laws of what state or country is the <i>private fund</i> organized:		
	State: Country: Ireland		
3. (a	) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):		
	ame of General Partner, Manager, Trustee, or Director		
-	ARL O'SULLIVAN, DIRECTOR		
-	AVID SCOTT, DIRECTOR		
-	AUL TIMLIN, DIRECTOR		
PI	ETER WILBY, DIRECTOR		
W	ERNER SCHWANBERG, DIRECTOR		

No Information Filed		
The <i>private fund</i> (check all that apply; you must check at least one):		
(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Com of 1940	pany	Act
(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Com of 1940	pany	' Ac
List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered	ed.	
Name of Country/English Name of Foreign Financial Regulatory Authority		
Ireland - Central Bank of Ireland		
	Yes	s N
(a) Is this a "master fund" in a master-feeder arrangement?	$\circ$	G
(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fu	nd?	
No Information Filed		
	Yes	s N
(c) Is this a "feeder fund" in a master-feeder arrangement?	0	G
(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> i Name of <i>private fund</i> :	nves	_
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 Scl Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	nedu	le [
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Scl		
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.		
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NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:	Sect r r fun	ion
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all c substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.	Sect or or fun	and"
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all comparison of the feeder funds in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other parts.	Sect  r r r fun s  Yes	ion nd"
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?	Sect  r r r fun s  Yes	ion nd"
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all consultantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poinvestment vehicles, regardless of whether they are also private funds or registered investment companies.	Sect  r r r r r fun s  Yes	ion nd"
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all consultantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poinvestment vehicles, regardless of whether they are also private funds or registered investment companies.	Sect  r r r r r fun s  Yes  C pooled	ion nd"
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sci Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.  If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 7.B.(1), for each of the feeder funds answer the following questions:  No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all consults substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invest substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other purposes in the private fund invest in funds managed by you or by a related person?  During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the	r r funss Yes Cooled C	ion  nd"  s N

	NO	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> : 4,840,000		
<u>Ow</u>	ners	<u>ship</u>		
12.	Min	imum investment commitment required of an investor in the private fund:		
	NO	.000,000 FE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amo h in the organizational documents of the fund).	unt se	et
13.	App 5	proximate number of the <i>private fund's</i> beneficial owners:		
14.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15.	(a) 40%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
			Yes	No
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
<u> Υοι</u>	ır Ac	lvisory Services		
			Yes	No
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	$\circ$	$\odot$
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fi</i> the answer to question 17.(a) is "no," leave this question blank.	und. I	f
		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 property 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> ?	$\odot$	$\circ$
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App 2%	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	<u>vate</u>	Offering	Yes	No
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	⊙	0

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

No Information Filed

Auditors  Yes No. (2) (1) Are the <i>private fund</i> 's financial statements subject to an annual audit?  (2) If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information: 1 Record(a) Filed.  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (f) 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: DELOTITE & TOUCHE  (c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country): City: State: Country: DUBLIN  (d) Is the auditing firm an <i>independent public accountant?</i> (e) Is the auditing firm an <i>independent public accountant?</i> (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  If yes, Public Company Accounting Oversight Board-Assigned Number: 1193  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  (g) Are the <i>private fund</i> 's audited financial statements for the most recently completed fiscal year distributed to the <i>private fund</i> 's audited financial statements for the most recently completed fiscal year distributed to the <i>private fund</i> 's audited financial statements for the most recently completed fiscal year distributed to the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's audited financial statements for the private fund with the private fund with the private fund with the private fu	B. SERV	ICE PRO	OVIDERS				
23. (a) (1) Are the <i>private fund</i> 's financial statements subject to an annual audit?  (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?  (B) If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information: 1 Record(s) Filed.  If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:  (c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country):  City:  City:  DUBLIN  (d) Is the auditing firm an <i>independent public accountant</i> ?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If yes, Public Company Accounting Oversight Board-Assigned Number:  1193  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  (g) Are the <i>private fund</i> 's audited financial statements for the most recently completed fiscal year distributed to the <i>private fund</i> 's investors?  (h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last annual updating amendment contain unqualified opinions?  Yes No  Yes No  Yes 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 response when the report is available.	<u>Audito</u>	ors				V-	- N-
(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 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:  DELOITTE & TOUCHE  (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):  City:  DUBLIN  State:  Country:  DUBLIN  Ireland  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:  1193  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?  (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?  Yes No  (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?  (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?  Yes No  (g) Are the private fund use one or more prime broker, "you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  (g) Boes the privat	23. (a	) (1) Aı	e the <i>private fund'</i> s financial o	statements subject to an a	nnual audit?	_	
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:  DELOITTE & TOUCHE  (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):  City:  State:  Country:  DUBLIN  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes, Public Company Accounting Oversight Board-Assigned Number:  1193  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?  (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?  Yes No  Report Not Yet Received  If you check "Report Not Yet Received  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  C @  If 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 for each	25. (4	, , ,	•	-		_	
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's office responsible for the <i>private fund</i> 's audit (city, state and country):  City:  City:  State:  Country:  DUBLIN  Ireland  Yes No  (d) Is the auditing firm an <i>independent public accountant</i> ?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes, Public Company Accounting Oversight Board-Assigned Number:  1193  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  (g) Are the <i>private fund</i> 's audited financial statements for the most recently completed fiscal year distributed to the <i>private fund</i> 's investors?  (h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified opinions?  Yes No  Yes C No C Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses nore than one prime broker, you must complete questions (b) through (e) separately for each		If the	answer to question 23.(a)(1)	is "yes," respond to questi	ions (b) through (h) below. If the <i>private fund</i> uses more		
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's office responsible for the <i>private fund</i> 's audit (city, state and country):  City:  City:  State:  Country:  DUBLIN  Ireland  Yes No  (d) Is the auditing firm an <i>independent public accountant?</i> (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  If yes, Public Company Accounting Oversight Board-Assigned Number:  1193  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  (g) Are the <i>private fund</i> 's audited financial statements for the most recently completed fiscal year distributed to the <i>private fund</i> 's investors?  (h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified opinions?  © Yes C No C Report Not Yet Received  If you check "Report Not Yet Received." you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  C C  If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each					f) separately for each auditing firm.		
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City: State: Country: Ireland  Yes No  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If yes, Public Company Accounting Oversight Board-Assigned Number:  1193  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?  (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?  Yes Yes C No C Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  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			DELOITTE & TOUCHE				
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(d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes, Public Company Accounting Oversight Board-Assigned Number: 1193  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?  (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?  Yes Yes C No C Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  1 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			City:	State:	Country:		
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If yes, Public Company Accounting Oversight Board-Assigned Number: 1193  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?  (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?  Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  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		(a)	is the auditing firm an <i>indep</i>	endent public accountant?	•	⊙	
(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?  (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?  Yes C No C Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  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		(e)	Is the auditing firm registere	ed with the Public Company	Accounting Oversight Board?	•	0
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(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> contain unqualified opinions?  (a) Yes (b) No (c) Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  24. (a) Does the <i>private fund</i> use one or more prime brokers?  If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each		(f)			ular inspection by the Public Company Accounting	•	0
private fund's investors?  (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?  (e) Yes (in No (in Report Not Yet Received)  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  24. (a) Does the private fund use one or more prime 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						Ye	s No
unqualified opinions?  Yes No Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes No  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	(g			ncial statements for the mo	st recently completed fiscal year distributed to the	⊙	О
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when the report is available.  Prime Broker  Yes No  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		<b>⊙</b> Ye	s C No C Report Not Yet Re	eceived			
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If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each						Ye	s No
uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each	24. (a	-	·	·			
		uses.	If the <i>private fund</i> uses more				
No Information Filed				No Infor	mation Filed		

St		

If the	private fund uses more than	one custodian, you must t	complete questions (b) through (g) sepa	atery for each custour
Addi	itional Custodian Informat	ion: 1 Record(s) Filed.		
use			ons (b) through g) below for each custou u must complete questions (b) through (	
(b)	Legal name of custodian: STATE STREET CUSTODIAL	SERVICES (IRELAND) LIMI	TED	
(c)	Primary business name of c STATE STREET CUSTODIAL		TED	
(q)	The location of the custodia	n's office responsible for <i>cu</i>	ustody of the private fund's assets (city,	state and country):
(4)	City: DUBLIN	State:	Country: Ireland	,,,
				Yes I
(e)	Is the custodian a related pe	erson of your firm?		o ·
(f)		dealer provide its SEC reg	istration number (if any):	
(')	If the custodian is a broker-	dealer, provide its see reg	. ,,	
	If the custodian is a broker- - CRD Number (if any):	dedicit, provide its SEE reg		
(g)	CRD Number (if any):  If the custodian is not a bro legal entity identifier (if any	ker-dealer, or is a broker-d	ealer but does not have an SEC registra	tion number, provide i
	CRD Number (if any):  If the custodian is not a bro legal entity identifier (if any	ker-dealer, or is a broker-d		tion number, provide i
(g)	CRD Number (if any):  If the custodian is not a bro legal entity identifier (if any	ker-dealer, or is a broker-d )	ealer but does not have an SEC registra	
(g) trato Does If the	CRD Number (if any):  If the custodian is not a bro legal entity identifier (if any)  the private fund use an admit answer to question 26.(a) is	ker-dealer, or is a broker-d ) inistrator other than your fi "yes," respond to questior	ealer but does not have an SEC registra	Yes <b>⊙</b>
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(g)  trato  Does  If the admin  Addi  If t one (b)	CRD Number (if any):  If the custodian is not a bro legal entity identifier (if any)  the private fund use an admit answer to question 26.(a) is histrator, you must complete itional Administrator Information answer to question 26.(a) and administrator, you must complete administrator, you must complete administrator.  Name of administrator:  STATE STREET FUND SERVI	ker-dealer, or is a broker-d )  inistrator other than your fi "yes," respond to question questions (b) through (f) s  mation: 1 Record(s) File  is "yes," respond to question plete questions (b) through  CES (IRELAND) LIMITED  ity, state and country):	ealer but does not have an SEC registrater.  rm?  Is (b) through (f) below. If the private full the private	<b>Yes</b> • and uses more than or

 $\odot$  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?

) (

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

No Information Filed

#### A. PRIVATE FUND

# **Information About the Private Fund**

1. (a) Name of the private fund:

STONE HARBOR INVESTMENT FUNDS PLC - STONE HARBOR INVESTMENT GRADE EMERGING MARKETS CORPORATE DEBT FUND

(b) Private fund identification number:

(include the "805-" prefix also)

805-1755683229

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

State:

Country:

Ireland

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

CARL O'SULLIVAN, DIRECTOR

DAVID SCOTT, DIRECTOR

PAUL TIMLIN, DIRECTOR

PETER WILBY, DIRECTOR

WERNER SCHWANBERG, DIRECTOR

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

No Information Filed

4.	The <i>private fund</i> (check all that apply; you must check at least one):		
	$\Box$ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Composition of 1940	any .	Act
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Composition 1940	any ,	Act
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registere	d.	
	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Ireland - Central Bank of Ireland		
		<b>.</b>	
_		Yes	NO
6.	(a) Is this a "master fund" in a master-feeder arrangement?	$\circ$	⊙
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i>	nd?	
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	•
	(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund in		
	Name of <i>private fund</i> :		
	Private fund identification number:		
	(include the "805-" prefix also)		
7.	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Sch 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 5.7.B.(1), for each of the feeder funds answer the following questions:		
	7.B.(1), for each of the reeder fullus 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 for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests	func	<b>i</b> "
	substantially all of its assets in a single master fund.		
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	$\circ$	$\odot$
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poinvestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	oled	
	(b) If yes, does the private fund invest in funds managed by you or by a related person?	О	$\circ$
		V	NI -
_		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 fund $^{ m C}$ Other private fund: IRISH UCITS PRIMARILY FIXED INCOME	nd 🖸	
	,		

Current gross asset value of the <i>private fund</i> :		
\$ 18,565,492		
<u>nership</u>		
Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 5,000,000		
NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amo forth in the organizational documents of the fund).	unt s	et
Approximate number of the <i>private fund's</i> beneficial owners:		
What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 64%		
(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> ?		O
What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 64%		
<u>ır Advisory Services</u>	Yes	No
(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 fit</i> the answer to question 17.(a) is "no," leave this question blank.	und. 1	-
No Information Filed		
	Yes	No
(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	О	⊙
(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the property fund. If the answer to question 18.(a) is "no," leave this question blank.	rivate	
No Information Filed		
	Yes	No
	⊙	О
NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?  2%		
vate Offering	Yes	No
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	•
	О	•
	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 5,000,000  NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amo forth in the organizational documents of the fund).  Approximate number of the <i>private fund's</i> beneficial owners:  5  What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :  0%  (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 64%  (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> ?  What is the approximate percentage of the <i>private fund</i> beneficially owned by non-United States persons: 64%  ur Advisory Services  (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>private fund</i> ?  (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> ?  (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> ?  (c) 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>private fund</i> ?  (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> ?  No Information Filed  Are your clients solicited to invest in the <i>private fund</i> ?  NoTE: For purposes of this question, do not consider feeder funds of the private fund?	mership  Minimum investment commitment required of an investor in the private fund: \$ 5,000,000  NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount so forth in the organizational documents of the fund).  Approximate number of the private fund's beneficial owners:  5  What is the approximate percentage of the private fund beneficially owned by you and your related persons:  0%  (a) What is the approximate percentage of the private fund beneficially owned (in the aggregate) by funds of funds:  64%  Yes  (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?  What is the approximate percentage of the private fund beneficially owned by non-United States persons:  64%  Yes  (a) Are you a subadviser to this private fund?  (b) If the answer to question 17.(a) is "inves," provide the name and SEC file number, if any, of the adviser of the private fund. Internative to question 17.(a) is "inves," provide the name and SEC file number, if any, of the adviser of the private fund. Information Filed  Yes  (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?  (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the private fund?  No Information Filed  Yes  Are your clients solicited to invest in the private fund?  No Information Filed  Yes  Are your clients solicited to invest in the private fund?  Approximately what percentage of your clients has invested in the private fund?

Audito	<u>rs</u>		
23 (a)	(1) Are the private fund's financial statements subject to an annual audit?	Yes	No
23. (a)	(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	U thar	. ⊙
	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 mo than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	re	
	(b) Name of the auditing firm:  DELOITTE & TOUCHE		
	(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:		
	DUBLIN Ireland	es N	ا ملا
	(d) Is the auditing firm an independent public accountant?		0
		,	
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	Ð (	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1193		
	(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?	5 (	0
		Voc	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?	res ⊙	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> con unqualified opinions?	ıtain	
	● 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 respo when the report is available.	ınse	
Prime I	<u>Broker</u>		
24 (5)	Does the private fund use one or more prime business	Yes	No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?  If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private</i>	C	. ⊙
	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		
_			

<u>Custodian</u>

Yes No

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

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses.

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

Additional Custodian Information: 1 Record(s) Filed.

cus				
(b)	Legal name of custodiar STATE STREET CUSTOD	n: IAL SERVICES (IRELAND) LI	MITED	
(c)	Primary business name STATE STREET CUSTOD	of custodian: IAL SERVICES (IRELAND) LI	MITED	
(d)	The location of the custo	odian's office responsible for	custody of the private fund's assets (c	ity, state and country):
	City:	State:	Country:	
	DUBLIN		Ireland	Yes
(e)	Is the custodian a <i>relate</i>	ed person of your firm?		0
				v
(f)	If the custodian is a bro	ker-dealer, provide its SEC r	egistration number (if any):	
	- CRD Number (if any):			
	<b>TO</b> 11			
(g)		•	dealer but does not have an SEC regi	stration number, provide
	the <i>private fund</i> use an a	administrator other than you		Ye G
Does If the	the <i>private fund</i> use an a	administrator other than you a) is "yes," respond to quest	r firm? ons (b) through (f) below. If the <i>priva</i> ) separately for each administrator.	G
Does If the admir	the <i>private fund</i> use an a e answer to question 26.(a nistrator, you must compl	administrator other than you a) is "yes," respond to quest	ons (b) through (f) below. If the <i>priva</i> separately for each administrator.	G
Does If the admir Addi	the private fund use an at answer to question 26.(anistrator, you must complitional Administrator In	administrator other than your a) is "yes," respond to quest lete questions (b) through (f information: 1 Record(s) I	ons (b) through (f) below. If the <i>priva</i> separately for each administrator.	te fund uses more than o
Does If the admir  Addi  If tl one	the private fund use an ate answer to question 26.(anistrator, you must completional Administrator In the answer to question 26 administrator, you must Name of administrator:	administrator other than your a) is "yes," respond to quest lete questions (b) through (f information: 1 Record(s) I	ons (b) through (f) below. If the <i>priva</i> of separately for each administrator.  Filed.  stions (b) through (f) below. If the <i>priva</i> of the prival of the p	te fund uses more than o
Does If the admir  Addi  If the	the private fund use an attachment and answer to question 26.(anistrator, you must completional Administrator In the answer to question 26 administrator, you must Name of administrator:  STATE STREET FUND SE	administrator other than your a) is "yes," respond to quest lete questions (b) through (f information: 1 Record(s) I (a) is "yes," respond to que to complete questions (b) thro	ons (b) through (f) below. If the <i>priva</i> of separately for each administrator.  Filed.  stions (b) through (f) below. If the <i>priva</i> of the prival of the p	te fund uses more than o
Does If the admir  Addi  If the	the private fund use an ate answer to question 26.(anistrator, you must completional Administrator In the answer to question 26 administrator, you must Name of administrator:  STATE STREET FUND SELOCATION of administrator City:	administrator other than your a) is "yes," respond to quest lete questions (b) through (f information : 1 Record(s) I (a) is "yes," respond to que a complete questions (b) thro	ons (b) through (f) below. If the <i>priva</i> of separately for each administrator.  Filed.  stions (b) through (f) below. If the <i>priva</i> of the privaction of t	te fund uses more than o
Does If the admir  Addi  If the	the private fund use an attack answer to question 26.(anistrator, you must completional Administrator III) the answer to question 26 administrator, you must Name of administrator: STATE STREET FUND SE	administrator other than your a) is "yes," respond to quest lete questions (b) through (f information: 1 Record(s) I (a) is "yes," respond to que a complete questions (b) thro ERVICES (IRELAND) LIMITED or (city, state and country):	ons (b) through (f) below. If the <i>priva</i> of separately for each administrator.  Filed.  stions (b) through (f) below. If the <i>pri</i> of the prival of the pri	te fund uses more than o
Does If the admir  Addi  If tl one (b)	the private fund use an attack answer to question 26.(anistrator, you must complished answer to question 26 administrator; you must Name of administrator:  STATE STREET FUND SE  Location of administrator City: DUBLIN	administrator other than your a) is "yes," respond to quest lete questions (b) through (f information: 1 Record(s) I (a) is "yes," respond to que a complete questions (b) thro ERVICES (IRELAND) LIMITED or (city, state and country):	ons (b) through (f) below. If the <i>priva</i> of separately for each administrator.  Filed.  stions (b) through (f) below. If the <i>priva</i> of the privaction of t	te fund uses more than o
Does If the admir  Addi  If tl one (b) (c)	the private fund use an attachment and an attachment and an attachment and a sanswer to question 26 and an attachment and a sanswer to question 26 and administrator, you must a sanswer to question 26 and administrator, you must a sanswer to question 26 and administrator.  STATE STREET FUND SELOCATION OF Administrator City:  DUBLIN  Is the administrator a results for the sanswer to question of administrator a results for the sanswer to question 26 and 30	administrator other than your a) is "yes," respond to quest lete questions (b) through (for a complete questions (b) through (city, state and country):  State:	ons (b) through (f) below. If the <i>priva</i> of separately for each administrator.  Filed.  stions (b) through (f) below. If the <i>priva</i> of the privaction of t	vate fund uses more than cor.  Yes N

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 (

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

No Information Filed

#### A. PRIVATE FUND

# **Information About the Private Fund**

1. (a) Name of the private fund:

STONE HARBOR INVESTMENT FUNDS PLC - STONE HARBOR INVESTMENT GRADE EMERGING MARKETS DEBT FUND

(b) Private fund identification number:

(include the "805-" prefix also)

805-8101342909

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

State:

Country:

Ireland

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

CARL O'SULLIVAN, DIRECTOR

DAVID SCOTT, DIRECTOR

PAUL TIMLIN, DIRECTOR

PETER WILBY, DIRECTOR

WERNER SCHWANBERG, DIRECTOR

(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

	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Ireland - Central Bank of Ireland		
		Yes	N
	(a) Is this a "master fund" in a master-feeder arrangement?	$\circ$	6
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private funds in the feeder funds investing in this private funds in the feeder funds investing in this private funds in the feeder funds in th	nd?	
	No Information Filed		
		Yes	N
	(c) Is this a "feeder fund" in a master-feeder arrangement?	$\circ$	6
	(d) 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:	nvest	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 Sch Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	nedul	le [
	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this 97.B.(1), for each of the feeder funds answer the following questions:	Secti	ion
	No Information Filed		
1	No Information Filed  NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	r fun	d"
:	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all on substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests	r fun	
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all on substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests	r fun s	
1 1	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	r fun s Yes	N G
: i	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other po	r fun s Yes	N G
: 11 ::	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other point investment vehicles, regardless of whether they are also private funds or registered investment companies.	r fun s <b>Yes</b> Oooled	: N
: 1 : : : : : : : : : : : : : : : : : :	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this private fund a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other point investment vehicles, regardless of whether they are also private funds or registered investment companies.	Yes Cooled	: N
: 1 : : : : : : : : : : : : : : : : : :	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poinvestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.  (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?  During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the	Yes Cooled C	: N
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other point investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.  (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?  During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	Yes Cooled C Yes C	: N
: 1 :	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poinvestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.  (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?  During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?  What type of fund is the <i>private fund</i> ?  Private equity fund C real estate fund S securitized asset fund V venture capital funded be a "feeder funds" investing in a "master fund" investing in a "master fund" investing in a "master funds or interests, and each class (or series) investing in a "master fund" investing in a "master fund" investing in a "master fund investing in a "fund each class (or series) of shares or interests, and each class (or series) in each class (or series) of shares or interests, and each class (or series) investing in a master fund "master fund" investing in a "master fund" investing in a "fund each class (or series) of shares or interests, and each class (or series) investing in a "master fund" investing in a "master fund" investing in a "master fund" investing in a "fund each class (or series) of shares or interests, and each class (or series) investing in a "fund each class (or series) of shares or interests, and each class (or series) investing in th	Yes Cooled C Yes C	: N
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.  (a) Is this <i>private fund</i> a "fund of funds"?  NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other poinvestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.  (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?  During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?  What type of fund is the <i>private fund</i> ?  C hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital fund Other <i>private fund</i> : IRISH UCITS PRIMARILY FIXED INCOME	Yes Cooled C Yes C	: N

12.		imum investment commitment required of an investor in the private fund:		
		,000,000		
		FE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount in the organizational documents of the fund).	unt s∈	et
13.	Арр	proximate number of the <i>private fund's</i> beneficial owners:		
	5			
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) 51%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
			Yes	No
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	O
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
You	ır Ac	dvisory Services		
			Yes	No
17.		Are you a subadviser to this <i>private fund</i> ?	0	⊙
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fu</i> the answer to question 17.(a) is "no," leave this question blank.	ınd. 1	Γ 
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	0	⊙
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>pr fund</i> . If the answer to question 18.(a) is "no," leave this question blank.	ivate	
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	•	0
	NOT	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App 3%	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Priv	/ate	Offering		
		<u></u>	Yes	No
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities of 1933?	o	⊚
22.	If y	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
B. S	ERVI	CE PROVIDERS		
۸	litor			
Aut	litor	<u>=</u>	Yes	No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	· •	0
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	*27	~

Add	ditional Auditor Information: 1 Record(s) Filed.		
- 11	the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses an one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	s more	
(b	) Name of the auditing firm: DELOITTE & TOUCHE		
(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:  DUBLIN Ireland		
		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: 1193		
(f)	) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
		Υe	es
	the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the ate fund's investors?	G	9
<i>priva</i> [h) Do a	the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>ate fund's</i> investors?  All of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i> ualified opinions?		
priva (h) Do a unqu	ate fund's investors? Ill of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i>		
privation privation privation privation privation private priv	ate fund's investors? Ill of the reports prepared by the auditing firm for the <i>private fund</i> since your last annual updating amendmen ualified opinions?	<i>t</i> contai	n
privation privation privation privation privation private priv	ate fund's investors?  All of the reports prepared by the auditing firm for the private fund since your last annual updating amendmen ualified opinions?  Yes O No O Report Not Yet Received but check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your report is available.	t contai	n
privation privation privation privation privation privation private pr	ate fund's investors?  All of the reports prepared by the auditing firm for the private fund since your last annual updating amendmentualified opinions?  Ares O No O Report Not Yet Received  And the check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your report is available.	t contai	n e
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privation privation privation privation privation privation private in the private pri	all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> ualified opinions?  Yes O No O Report Not Yet Received  You check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your report is available.  Yet Private fund use one or more prime brokers?  Yes answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the prices. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate	t contai responso <b>Ye</b> C ivate fu	n e es nd
privation privation privation privation privation privation private in the private pri	all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i> ualified opinions?  The orange of the report Not Yet Received on the control of the report Not Yet Received, "you must promptly file an amendment to your Form ADV to update your report is available.  The report is available.  The private fund use one or more prime brokers?  The answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the price. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separate the broker.	t contai responso <b>Ye</b> C ivate fu	n e es nd
privation privation privation privation privation privation private in the private pri	all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i> ualified opinions?  The orange of the report Not Yet Received on the control of the report Not Yet Received, "you must promptly file an amendment to your Form ADV to update your report is available.  The report is available.  The private fund use one or more prime brokers?  The answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the price. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separate the broker.	responso Ye  ivate fu	n e ind ach
privation privat	ate fund's investors?  all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment ualified opinions?  Yes O No O Report Not Yet Received  But check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your report is available.  But the report is available.  But the private fund use one or more prime brokers?  But an amendment to your Form ADV to update your report is available.  But the private fund use one or more prime brokers?  But an amendment to your Form ADV to update your report is available.  But an amendment to your Form ADV to update your report is available.  But an amendment to your Form ADV to update your report is available.  But an amendment to your Form ADV to update your report is available.  But an amendment to your Form ADV to update your report is available.  But an amendment to your last annual updating annual updating amendment to your last annual updating amendment to	t containt c	n e ess ach
privation privat	all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i> ualified opinions?  The orange of the report Not Yet Received on the control of the report Not Yet Received, "you must promptly file an amendment to your Form ADV to update your report is available.  The report is available.  The private fund use one or more prime brokers?  The answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the price. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separate the broker.	response  Ye  ivate fully for eater  ter fund	n e

(b)	Legal name of custodian:					
	STATE STREET CUSTODIAL S	SERVICES (IRELAND) L	IMITED			
(c)	Primary business name of cu STATE STREET CUSTODIAL S		IMITED			
(d)	The location of the custodian	n's office responsible fo	r <i>custody</i> of the <i>p</i>	orivate fund's asse	ets (city, state and	country):
	City:	State:		Country:		
	DUBLIN		J	reland		V-
, ,	*					Ye
(e)	Is the custodian a related pe	erson of your firm?				0
(f)	If the custodian is a broker-o	dealer, provide its SEC	registration numb	er (if any):		
	- CRD Number (if any):					
(a)	If the custodian is not a brok	,	er-dealer but does	s not have an SEC	registration numl	ber, provic
rato	legal entity identifier (if any)  or  the private fund use an admin		ur firm?			,
<u>rato</u>	<b>r</b> the <i>private fund</i> use an admir	nistrator other than you		(f) below. If the <i>j</i>	private fund uses I	
rato Does f the	o <u>r</u>	nistrator other than you "yes," respond to ques	tions (b) through	• •		
rato Does f the	the <i>private fund</i> use an admire answer to question 26.(a) is	nistrator other than you "yes," respond to ques questions (b) through (	tions (b) through f) separately for (	• •		
rato Does f the idmin  Addi  If t	the <i>private fund</i> use an admire answer to question 26.(a) is nistrator, you must complete c	nistrator other than you "yes," respond to ques questions (b) through (i mation : 1 Record(s) is "yes," respond to que uplete questions (b) through	tions (b) through f) separately for of  Filed.  estions (b) through	each administrato	r. e <i>private fund</i> use	more than
rato noes f the dmin  Addi  If t one (b)	the <i>private fund</i> use an admire answer to question 26.(a) is nistrator, you must complete constrained answer to question 26.(a) the answer to question 26.(a) and administrator, you must complete administrator, you must complete administrator.  STATE STREET FUND SERVICES	nistrator other than you "yes," respond to ques questions (b) through (i mation : 1 Record(s) is "yes," respond to que iplete questions (b) through (i) CES (IRELAND) LIMITED	tions (b) through f) separately for of  Filed.  estions (b) through	each administrato	r. e <i>private fund</i> use	more than
rato noes f the dmin  Addi  If t one (b)	the private fund use an admire answer to question 26.(a) is nistrator, you must complete continual Administrator Informational Administrator Informational Administrator Information administrator, you must complete administrator, you must complete administrator.  STATE STREET FUND SERVICE Location of administrator (cit	nistrator other than you "yes," respond to quest questions (b) through (to mation: 1 Record(s)  is "yes," respond to questions (b) through (b)  CES (IRELAND) LIMITED  ty, state and country):	tions (b) through f) separately for of Filed.  estions (b) through ough (f) separate	each administrato gh (f) below. If th ly for each admin	r. e <i>private fund</i> use	more than
rato noes f the dmin  Addi  If t one (b)	the private fund use an admire answer to question 26.(a) is nistrator, you must complete continual Administrator Informational Administrator Informational Administrator Information administrator, you must complete administrator, you must complete administrator.  STATE STREET FUND SERVICE Location of administrator (citicity:	nistrator other than you "yes," respond to ques questions (b) through (i mation : 1 Record(s) is "yes," respond to que iplete questions (b) through (i) CES (IRELAND) LIMITED	tions (b) through f) separately for of Filed.  estions (b) through through (f) separate	each administrato gh (f) below. If th ly for each admin	r. e <i>private fund</i> use	more than
rato noes f the dmin  Addi  If t one (b)	the private fund use an admire answer to question 26.(a) is nistrator, you must complete continual Administrator Informational Administrator Informational Administrator Information administrator, you must complete administrator, you must complete administrator.  STATE STREET FUND SERVICE Location of administrator (cit	nistrator other than you "yes," respond to quest questions (b) through (to mation: 1 Record(s)  is "yes," respond to questions (b) through (b)  CES (IRELAND) LIMITED  ty, state and country):	tions (b) through f) separately for of Filed.  estions (b) through through (f) separate	each administrato	r. e <i>private fund</i> use	more than
rato Does f the dmin  Addi  If t one (b)	the private fund use an admire answer to question 26.(a) is nistrator, you must complete continual Administrator Informational Administrator Informational Administrator Information administrator, you must complete administrator, you must complete administrator.  STATE STREET FUND SERVICE Location of administrator (citicity:	nistrator other than you "yes," respond to quesiquestions (b) through (i mation: 1 Record(s) is "yes," respond to que plete questions (b) through CES (IRELAND) LIMITED ty, state and country): State:	tions (b) through f) separately for of Filed.  estions (b) through through (f) separate	each administrato gh (f) below. If th ly for each admin	r. e <i>private fund</i> use	more than
rato Does If the If t One (b) (c)	the private fund use an admir e answer to question 26.(a) is nistrator, you must complete of itional Administrator Information answer to question 26.(a) e administrator, you must come Name of administrator: STATE STREET FUND SERVICE Location of administrator (cited Cite): DUBLIN	nistrator other than you "yes," respond to quesiquestions (b) through (i mation: 1 Record(s) is "yes," respond to que iplete questions (b) through ty, state and country): State:  d person of your firm?	tions (b) through f) separately for or  Filed.  estions (b) through ough (f) separate	each administrato gh (f) below. If th ly for each admin ountry: eland	r. e <i>private fund</i> use istrator.	more than

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?

) G

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

No Information Filed

 1	2	>>	Funds per Page:	15	~	Total Funds: 16
			runds per Page:	10	~	Total Funds. 10

### SECTION 7.B.(2) Private Fund Reporting

1. Name of the private fund:

MOUNTAIN VIEW CLO 2016-1 LTD.

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

805-5590033800

3. Name and SEC File number of adviser that provides information about this *private fund* in Section 7.B.(1) of Schedule D of its Form ADV filing

Name:

SEIX CLO MANAGEMENT LLC

SEC File Number:

801 - 108565

Yes No

4. Are your *clients* solicited to invest in this *private fund*?



In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, 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.

1. Name of the *private fund*:

MOUNTAIN VIEW CLO 2017-1 LTD.

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

805-1594813114

3. Name and SEC File number of adviser that provides information about this *private fund* in Section 7.B.(1) of Schedule D of its Form ADV filing

Name:

SEIX CLO MANAGEMENT LLC

SEC File Number:

801 - 108565

Yes No

4. Are your *clients* solicited to invest in this *private fund*?

 $\circ$ 

In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, 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.

# Item 8 Participation or Interest in Client Transactions

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

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

Pro	priet	ary Interest in <i>Client</i> Transactions		
Α.	Do y	you or any related person:	Yes	No
	(1)	buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?	$\circ$	$\odot$
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?	•	0
	(3)	recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	•	0
Sal	es In	terest in <i>Client</i> Transactions		
В.	Do y	you or any related person:	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	⊙
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	•	0
	(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	0	•
Inv	estm	ent 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?	•	0
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	•	0
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	•
E.	Do y	you or any related person recommend brokers or dealers to clients?	•	0
F.	If yo	ou answer "yes" to E. above, are any of the brokers or dealers <i>related persons</i> ?	0	•
G.	(1)	Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	•	0
	(2)	If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	•	0
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?	o	•
	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 an n 8.H.) or received from (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is ba t in part, on the number or amount of client referrals.		

to clients?

(1) you act as a qualified custodian

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

/22, 1	0:17	AM	IARD - All Sections [User Name: rceretti22, OrgID: 146029]		
Iter	n 9 C	ustody			
		em, we ask you whether you or a <i>relate</i> e Investment Company Act of 1940) ass	d person has custody of client (other than clients that are investment companies resets and about your custodial practices.	gister	ed
Α.	(1)	Do you have <i>custody</i> of any advisory of	clients':	Yes	No
		(a) cash or bank accounts?		•	O
		(b) securities?		•	0
	ded adv	uct your advisory fees directly from you	SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i or clients' accounts, or (ii) a related person has custody of client assets in connection t you have overcome the presumption that you are not operationally independent ( the related person.	n with	
	(2)	If you checked "yes" to Item 9.A.(1)(a clients for which you have custody:	) or (b), what is the approximate amount of <i>client</i> funds and securities and total nu	mber	of
		U.S. Dollar Amount	Total Number of <i>Clients</i>		
		(a) \$ 40,720,000	(b) 1		
	cliei rela	nts' accounts, do not include the amount ted person has custody of client assets i	SEC and you have custody solely because you deduct your advisory fees directly fit of those assets and the number of those clients in your response to Item 9.A.(2). in connection with advisory services you provide to clients, do not include the amount your response to 9.A.(2). Instead, include that information in your response to Item.	If you int of	ur
В.	(1)	In connection with advisory services ye advisory <i>clients</i> ':	ou 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?		$\circ$	$\odot$
		(b) securities?		$\circ$	$\odot$
	You	are required to answer this item regard	lless of how you answered Item 9.A.(1)(a) or (b).		
	(2)	If you checked "yes" to Item 9.B.(1)(a clients for which your related persons	) or (b), what is the approximate amount of <i>client</i> funds and securities and total nu have <i>custody</i> :	mber	of
		U.S. Dollar Amount	Total Number of <i>Clients</i>		
		(a) \$	(b)		
C.	-	ou or your <i>related persons</i> have <i>custody</i> ck all the following that apply:	$\gamma$ of <i>client</i> funds or securities in connection with advisory services you provide to <i>client</i>	ents,	
	(1)	A qualified custodian(s) sends account you manage.	statements at least quarterly to the investors in the pooled investment vehicle(s)	V	
	(2)	An independent public accountant aud financial statements are distributed to	its annually the pooled investment vehicle(s) that you manage and the audited the investors in the pools.	V	
	(3)	An independent public accountant cond	ducts an annual surprise examination of <i>client</i> funds and securities.		
	(4)	An independent public accountant prepretated persons are qualified custodian	pares an internal control report with respect to custodial services when you or your as for <i>client</i> funds and securities.		
	exa	mination or prepare an internal control i	list in Section 9.C. of Schedule D the accountants that are engaged to perform the report. (If you checked Item 9.C.(2), you do not have to list auditor information in this information with respect to the private funds you advise in Section 7.B.(1) of Science.	Sectio	n
D.	Do '	you or your <i>related person(s)</i> act as qua	alified custodians for your <i>clients</i> in connection with advisory services you provide	Yes	No

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:
- 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?

ECT	ION 9.C. Independent Public Accountant										
an a	•	ehicle that you ma	anage, or prepare an interna	ntant engaged to perform a surprise examination, I control report. You must complete a separate Sci							
(1)	1) Name of the <i>independent public accountant</i> :  COHEN & COMPANY										
(2)	The location of the independent	ent public account	tant's office responsible for t	he services provided:							
	Number and Street 1:		Number and Street 2	:							
	1350 EUCLID AVE		#800								
	City:	State:	Country:	ZIP+4/Postal Code:							
	CLEVELAND	Ohio	United States	44115							
					Yes	No					
(3)	Is the independent public acc	countant registere	d with the Public Company A	Accounting Oversight Board?	$\odot$	$\circ$					
	If "yes" to (3) above, is the <i>independent public accountant</i> subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  The <i>independent public accountant</i> is engaged to:										
	<ul> <li>A.</li></ul>										
(6)	) Since your last annual updating amendment, did all of the reports prepared by the independent public accountant that audited the pooled investment vehicle or that examined internal controls contain unqualified opinions?										
	<b>⊙</b> Yes										
	C No										
	C Report Not Yet Received										
	f you check "Report Not Yet R accountant's report is available		st promptly file an amendme	ent to your Form ADV to update your response who	en the	2					
(1)	Name of the <i>independent pu</i> DELOITTE & TOUCHE	blic accountant:									

(2) The location of the *independent public accountant's* office responsible for the services provided:

Number and Street 1: Number and Street 2: **DELOITTE & TOUCHE HOUSE** EARLSFORT TERRACE

City: State: Country: ZIP+4/Postal Code:

	DUBLIN	reland		
		Y	'es	No
(3)	Is the <i>independent public accountant</i> registered with the Public Co	mpany Accounting Oversight Board?	•	О
	If "yes," Public Company Accounting Oversight Board-Assigned Nu 1193	mber:		
(4)	If "yes" to (3) above, is the <i>independent public accountant</i> subject Oversight Board in accordance with its rules?	to regular inspection by the Public Company Accounting	•	0
(5)	The independent public accountant is engaged to:			
	A. audit a pooled investment vehicle			
	B. ☐ perform a surprise examination of <i>clients'</i> assets C. ☐ prepare an internal control report			
(6)	Since your last <i>annual updating amendment</i> , did all of the reports pooled investment vehicle or that examined internal controls contains	• • • •	l the	
	C No			
	C Report Not Yet Received			
	f you check "Report Not Yet Received", you must promptly file an a ccountant's report is available	mendment to your Form ADV to update your response when	the	

#### **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:

VIRTUS INVESTMENT PARTNERS, INC.

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

883237

#### **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.(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.

י טכו	any of the events below involve you or any of your <i>supervised persons</i> ?	$\circ$	⊙
<u>For</u>	"yes" answers to the following questions, complete a Criminal Action DRP:		
Α.	In the past ten years, have you or any advisory affiliate:	Yes	No
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?	0	$\odot$
	(2) been charged with any felony?	0	•
		~	~
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your relation 11.A.(2) to charges that are currently pending.	spons	se to
В.	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	0	•
	(2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)?	O	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your relatem 11.B.(2) to charges that are currently pending.	spons	se to
<u>For</u>	yes" answers to the following questions, complete a Regulatory Action DRP:		
C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	<b>M</b>	
		Yes	No
	(1) found you or any advisory affiliate to have made a false statement or omission?	Yes O	No ⊙
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	•
	<ol> <li>found you or any advisory affiliate to have made a false statement or omission?</li> <li>found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?</li> <li>found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do</li> </ol>	0	<b>⊙</b>
	<ol> <li>found you or any advisory affiliate to have made a false statement or omission?</li> <li>found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?</li> <li>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?</li> </ol>	0 0	⊙ ⊙
D.	<ol> <li>found you or any advisory affiliate to have made a false statement or omission?</li> <li>found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?</li> <li>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?</li> <li>entered an order against you or any advisory affiliate in connection with investment-related activity?</li> <li>imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and</li> </ol>	0000	© © ©
D.	<ol> <li>found you or any advisory affiliate to have made a false statement or omission?</li> <li>found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?</li> <li>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?</li> <li>entered an order against you or any advisory affiliate in connection with investment-related activity?</li> <li>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?</li> </ol>	0000	© © ©
D.	<ol> <li>found you or any advisory affiliate to have made a false statement or omission?</li> <li>found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?</li> <li>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?</li> <li>entered an order against you or any advisory affiliate in connection with investment-related activity?</li> <li>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?</li> <li>Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:</li> <li>ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or</li> </ol>	000 00	© © ©
D.	<ol> <li>found you or any advisory affiliate to have made a false statement or omission?</li> <li>found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?</li> <li>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?</li> <li>entered an order against you or any advisory affiliate in connection with investment-related activity?</li> <li>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?</li> <li>ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical?</li> </ol>	000000000	© © © ©

Ves No

	(5)	ever denied, suspended, or revoked your or any <i>advisory affiliate's</i> registration or license, or otherwise prevented you or any <i>advisory affiliate</i> , by <i>order</i> , from associating with an <i>investment-related</i> business or restricted your or any <i>advisory affiliate's</i> activity?	0	•
E.	Has	any self-regulatory organization or commodities exchange ever:		
	(1)	found you or any advisory affiliate to have made a false statement or omission?	0	$\odot$
	(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)?	О	$\odot$
	(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?	О	$\odot$
	(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?	0	•
F.		an authorization to act as an attorney, accountant, or federal contractor granted to you or any <i>advisory affiliate</i> ever been bked or suspended?	0	⊚
G.		you or any <i>advisory affiliate</i> now the subject of any regulatory <i>proceeding</i> that could result in a "yes" answer to any part tem 11.C., 11.D., or 11.E.?	0	⊙
<u>For</u>	<u>"yes'</u>	answers to the following questions, complete a Civil Judicial Action DRP:		
н.	(1)	Has any domestic or foreign court:	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?	О	$\odot$
		(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> ?	О	$\odot$
	(2)	Are you or any advisory affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of Item 11.H.(1)?	О	•

#### **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 filling 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?	$\circ$	0
If "y	ves," 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?	О	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.
- 5. Do you have any indirect owners to be reported on Schedule B? Yes O 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.
(Individuals: Last Name, First Name, Middle Name)			Status Acquired MM/YYYY	Code	Person		No. and Date of Birth, IRS Tax No. or Employer ID No.
DILLON, DEIRDRE, ANN	I	CHIEF COMPLIANCE OFFICER	03/2008	NA	N	N	5469512
AYLWARD, GEORGE, ROBERT	I	CHIEF EXECUTIVE OFFICER	06/2017	NA	Υ	N	4932163
ANGERTHAL, MICHAEL, AARON	I	EXECUTIVE VICE PRESIDENT, CHIEF FINANCIAL OFFICER	06/2017	NA	Υ	N	5632934
VIRTUS PARTNERS, INC.	DE	SHAREHOLDER	06/2017	E	Υ	Υ	95-4191764
HILLS, WENDY, JACQUELINE	I	EXECUTIVE VICE PRESIDENT, GENERAL COUNSEL AND SECRETARY	09/2019	NA	Υ	N	3096057
SMIRL, RICHARD, WILLIAM	I	EXECUTIVE VICE PRESIDENT	07/2022	NA	N	N	4232829

#### Schedule B

#### **Indirect Owners**

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

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

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

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Entity in Which Interest is Owned				Control Person		CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
VIRTUS INVESTMENT PARTNERS, INC.	DE	VIRTUS PARTNERS, INC.	SOLE SHAREHOLDER	11/2008	E	Y	Y	26-3962811

#### Schedule D - Miscellaneous

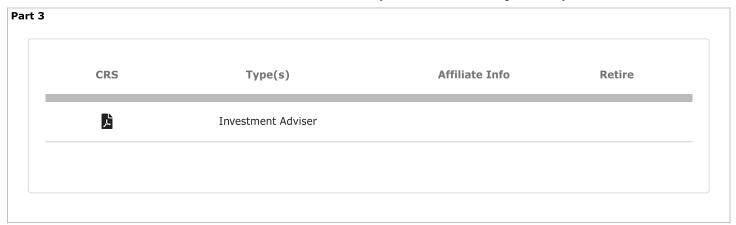
You may use the space below to explain a response to an Item or to provide any other information.

In addition to the websites noted, the Stone Harbor division of VFIA has reserved two Twitter handles but as of the date of the ADV had not published any tweets to either profile. These "handles" are: @StoneHarbor\_INV and @StoneHarborEMD. In certain situations, responses to item 7.B(1) questions 13 - 16 are unavailable. In Item 7.B (1), for Newfleet CLO 2016-1 initial purchaser data was used for the responses. In respect to Item 5, VFIA utilizes the personnel and/or services of one or more of its affiliates in the performance of its business including, but not limited to, back office operations, legal and compliance, finance and accounting, marketing, sales, information technology, and human resources. Item 5.k.3 custodian identification details are provided on a best efforts basis. VFIA has a related person domiciled in the UK, Virtus Investment Partners International Ltd. ("Virtus International") which we believe does not fit into any of the categories listed in Section 7.A. Pursuant to a written agreement, Virtus International's (FRN 673689) approved persons are permitted to introduce the investment advisory services of VFIA and certain of its affiliates to institutional entities, sovereign wealth funds, and other foreign official institutions within the United Kingdom. In addition, Virtus International's representatives will, to the extent permitted by each applicable jurisdiction, be introducing the investment advisory services of VFIA and certain of its affiliates to institutional entities, sovereign wealth funds and other foreign official institutions in certain European Economic Area member states and outside the European Economic Area. Stone Harbor Investment Partners (UK), LLP and Stone Harbor Investment Partners Pte. Ltd. provide similar services to VFIA and other Virtus affiliates, in addition to other services that they currently perform for the Stone Harbor division of VFIA.

Schedule R	
	No Information Filed

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

Part 2		
Exemption from brochure delivery requirements for SEC-registered advisers		
SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you felivering a brochure to <i>all</i> of your advisory clients, you do not have to prepare a brochure.	fron	n
Ye	es	No
Are you exempt from delivering a brochure to all of your clients under these rules?	5	$\odot$
If no, complete the ADV Part 2 filing below.		
Amend, retire or file new brochures:		



#### **Execution Pages**

#### **DOMESTIC INVESTMENT ADVISER EXECUTION PAGE**

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

# Appointment of Agent for Service of Process

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

# Signature

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

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

Signature: Date: MM/DD/YYYY
DEIRDRE A. DILLON 08/03/2022

Printed Name: Title:

DEIRDRE A. DILLON CHIEF COMPLIANCE OFFICER

Adviser CRD Number:

146029

# **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:

146029

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