FORM ADV

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

rin	nary Bu	siness Name: CWA ASSET N	MANAGEMENT GROUP		CRD N	Number: 15894
۱nn	ual Am	endment - All Sections				Rev. 10/201
/30	/2020 1	0:31:04 PM				
WA	RNING:	· · · · · · · · · · · · · · · · · · ·	-	ns may result in denial of your application, re	vocation of your registration, or criminal prosecution	. You must
tem	1 Iden	tifying Information				
Res	sponses	s to this Item tell us who you	are, where you are doing busine	ess, and how we can contact you. If you are	iling an <i>umbrella registration</i> , the information in Item	1 1 should be
pro	vided fo	or the <i>filing adviser</i> only. Gene	eral Instruction 5 provides inform	nation to assist you with filing an <i>umbrella re</i>	gistration.	
A.		ull legal name (if you are a so ASSET MANAGEMENT GROU	ole proprietor, your last, first, an JP, LLC	d middle names):		
B.		nme under which you primarily	y conduct your advisory busines	ss, if different from Item 1.A.		
	List or	n Section 1.B. of Schedule D	any additional names under wh	ich you conduct your advisory business.		
	(2) If y	ou are using this Form ADV	to register more than one invest	tment adviser under an umbrella registration	, check this box \square	
	If you	check this box, complete a S	Schedule R for each relying adv	iser.		
C.		filing is reporting a change in		primary business name (Item 1.B.(1)), enter	the new name and specify whether the name change	∍ is of
D.		_	EC as an investment adviser, yo xempt reporting adviser, your S	ur SEC file number: 801-79715 EC file number:		
	(3) If y	ou have one or more Central	l Index Key numbers assigned b	by the SEC ("CIK Numbers"), all of your CIK r No Information Filed	numbers:	
E.	(1) If y	ou have a number (" <i>CRD</i> Nu	imber") assigned by the FINRA	's CRD system or by the IARD system, your C	<i>RD</i> number: 158940	
	If your	r firm does not have a CRD n	number, skip this Item 1.E. Do n	ot provide the CRD number of one of your of	ficers, employees, or affiliates.	
	(2) If y	ou have additional <i>CRD</i> Num	nbers, your additional <i>CRD</i> num	nbers:		
				No Information Filed		
F.	Princii	pal Office and Place of Busin	ess			
•	•	ddress (do not use a P.O. Bo				
		umber and Street 1:	<i></i> Į.	Number and Street 2:		
	91	130 GALLERIA COURT		THIRD FLOOR		
		ity: APLES	State: Florida	Country: United States	ZIP+4/Postal Code: 34109	
		this address is a private residual	_	Officed States	34109	
		· 				
	re w	egistration, or are registered, rhom you are registered. If yo	with one or more state securities ou are applying for SEC registrat	s authorities, you must list all of your offices in	th you conduct investment advisory business. If you and the state or states to which you are applying for reginary from the second are reporting to the SEC as an exempt reported the fiscal year.	istration or with
		ays of week that you normall	ly conduct business at your <i>prin</i> e	cipal office and place of business:		
		ormal business hours at this 30 AM - 5:00 PM	s location:			
	(3) To	elephone number at this loca 39-434-7434				
	23	acsimile number at this locati 39-434-7494		ffice and place of hypiracs at which we	duct investment advisory business as of the end of w	10 LUE 90 t
	151 1/1	war ie tha total blimbar of offi	OTDOT TOOD VOUR DEIDOIDOLO	ure and histe of hitelages of Which Voll con	and investment advisory business as of the end of W	OUR INOCI

recently completed fiscal year?

G.	Mailing address, if different fro	om your <i>principal office and pla</i>	ace of business address:			
	Number and Street 1:		Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	If this address is a private re	sidence, check this box:				
Н.	If you are a sole proprietor, st	ate your full residence address	s, if different from your <i>principal office and place</i>	e of business address in Item 1.F.:		
	Number and Street 1:		Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	J.,				Yes	Nr
l.	Do you have one or more well	bsites or accounts on publicly	available social media platforms (including, but	not limited to, Twitter, Facebook and LinkedIn)?		0
	address serves as a portal thi information. You may need to	rough which to access other in o list more than one portal add	nformation you have published on the web, you i ress. Do not provide the addresses of websites	social media platforms on Section 1.I. of Schedule D. If a we may list the portal without listing addresses for all of the other or accounts on publicly available social media platforms whe addresses of employee accounts on publicly available social media platforms when	ere you	
	Objet Occupiones Officer					
J.		ntact information of your Chief (ing adviser, you must provide the contact information for your	· Chief	
	Name:		Other titles, if any:			
	Telephone number:		Facsimile number, if any:			
	Number and Street 1:		Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	Electronic mail (e-mail) addr	ress, if Chief Compliance Offic	per has one:			
K.	Name: IRS Employer Identification N Additional Regulatory Contact may provide that information I	t Person: If a person other than	n the Chief Compliance Officer is authorized to	receive information and respond to questions about this Forr	m ADV, y	/ou
	Name:	nore.	Titles:			
	Telephone number: Number and Street 1:		Facsimile number, if any: Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	Oity.	otate.	Country.	211 1-4/1 ostal osac.		
	Electronic mail (e-mail) addr	ress, if contact person has one	e:			
					Yes	No
L.	Do you maintain some or all of principal office and place of be	-	are required to keep under Section 204 of the A	dvisers Act, or similar state law, somewhere other than your	0	•
	If "yes," complete Section 1.L	. of Schedule D.			Yes	Nc
M.	Are you registered with a fore	ign financial regulatory authori	ity?		0	
	Answer "no" if you are not reg complete Section 1.M. of Sch		regulatory authority, even if you have an affiliate	e that is registered with a foreign financial regulatory authority	y. If "yes,	, "
					Yes	No
N.	Are you a public reporting cor	mpany under Sections 12 or 15	5(d) of the Securities Exchange Act of 1934?		0	•
					Yes	No
O.	Did you have \$1 billion or model of yes, what is the approximate	e amount of your assets:	your most recent fiscal year?		0	•
	C \$1 billion to less than \$7	10 billion				
	\$10 billion to less than \$	\$50 billion				
	C \$50 billion or more					

For purposes of Item 1.O. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.						
Provide your Legal Entity	v Identifier if you have one:					
A legal entity identifier is	a unique number that companies use to ider	tify each other in the financial marketplace. Yo	ou may not have a legal entity identifier.			
CTION 1.B. Other Busines	s Names					
ist your other business nar	nes and the jurisdictions in which you use th	em. You must complete a separate Schedule	D Section 1.B. for each business name.			
lame: BLUEHARBOR WEA	LTH ADVISORS					
urisdictions						
□ AL	□ 1∟	□ NE	□ sc			
AK	□ IN	□ NV	□SD			
AZ	□ IA	□NH	□ TN			
AR	□ KS	□ NJ	□TX			
CA	□KY	□ NM	□ UT			
СО	□ LA	□NY	□VT			
СТ	∥ □ ME	☑ NC	□VI			
DE	□ MD	□ND	□VA			
DC	□ MA	□ OH	□ wA			
FL	□ MI	□ок	□ wv			
■GA	□ MN	□OR	l □ wi			
GU	□ MS	□ PA	□ WY			
∃HI ∃ID	□ мо □ мт	□ PR □ RI	Other:			
st your other business nar		em. You must complete a separate Schedule	D Section 1.B. for each business name.			
urisdictions						
AL		□ NE	□sc			
AK	□ IN	□ NV	□ SD			
AZ	□ IA	□ NH	□ TN			
AR	□ KS	□ NJ	□ TX			
CA	□ KY	□ NM	UT			
co	□ LA	□ NY	□ VT			
СО	I LA □ ME	□ NC	□ VI			
DE	□ MD	□ ND	□ VA			
DC	□ MA	ОН	□ WA			
FL	∥ ⊑ MI	OK	□ w			
GA	∥ ⊑ MN	OR	□ wi			
GU	□ MS	□ PA	□wy			
HI	Гмо	□ PR	Other:			
ID ID	Пмт	□ RI				
CTION 1.F. Other Offices						
eparate Schedule D Section		•	conduct investment advisory business. You must complete a th the SEC, or if you are an exempt reporting adviser, list only			
umbar and Ctraat 1.		Number and Ctreet Or				

SUITE 100

131 PLANTATION RIDGE DRIVE

City:	State:	Country:	ZIP+4/Postal Code:				
MOORESVILLE	North Carolina	United States	28117				
If this address is a private residence, check this box:							
Telephone Number:	Facsimile Number, if any:						
(704) 931-3540							
If this office location is also required to be registered w Branch Office Registration Form (Form BR), please pr	-	as a branch office location for a brol	ker-dealer or investment adviser on the Uniform				
How many <i>employees</i> perform investment advisory full 3	nctions from 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 departr	ment or division of a bank)						
☐ (3) Insurance broker or agent	,						
(4) Commodity pool operator or commodity trading	advisor (whether registered or exempt	from registration)					
(f) Segistered municipal advisor	davisor (whomor registered or exempt	nom regionation,					
(6) Accountant or accounting firm							
(7) Lawyer or law firm							
Describe any other <i>investment-related</i> business activities conducted from this office location:							
Complete the following information for each office, oth separate Schedule D Section 1.F. for each location. If the largest twenty-five offices (in terms of numbers of	you are applying for SEC registration, if						
North an and Otract 4		November and Other at O					
Number and Street 1: 4201 CONGRESS ST		Number and Street 2: SUITE 140					
	Chata		ZID: 4/Dantal Code:				
City: CHARLOTTE	State: North Carolina	Country: United States	ZIP+4/Postal Code: 28209				
OF WILLOTTE	North Carolina	ormed states	20203				
If this address is a private residence, check this box:							
Telephone Number: (704) 931-3540	Facsimile Number, if any:						
If this office location is also required to be registered w Branch Office Registration Form (Form BR), please pr		as a branch office location for a brol	ker-dealer or investment adviser on the Uniform				
How many <i>employees</i> perform investment advisory full 3	nctions from this office location?						
Are other business activities conducted at this affirm to	postion? (chack all that anniv)						
Are other business activities conducted at this office lo	осанотт (спеск ан тлат арргу)						
(1) Broker-dealer (registered or unregistered)							
(2) Bank (including a separately identifiable departr	nent or division of a bank)						
(3) Insurance broker or agent							
(4) Commodity pool operator or commodity trading	advisor (whether registered or exempt	from registration)					
(5) Registered municipal advisor							
(6) Accountant or accounting firm							
(7) Lawyer or law firm							
Describe any other investment-related business activi	ties conducted from this office location:						
Complete the fellowing information for each office other	er than your principal office and place o	of business, at which you conduct invi	estment advisory business. You must complete a				

separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an exempt reporting adviser, list only

the largest twenty-five offices (in terms of numbers of *employees*).

		Number and Street 2:					
City:	State:	Country:	ZIP+4/Postal Code:				
If this address is a private residence, check this box:							
,							
Telephone Number:	Facsimile Number,	if anv:					
(402) 871-4002							
If this office location is also required to be registered with FINRA or a state securities authority 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 advisory functions from t	this office location?						
1							
Are other business activities conducted at this office location? (chec	k all that annly)						
(and this business delivities conducted at this office redation) (and this office redation)	in that apply)						
(2) Bank (including a separately identifiable department or division	on or a bank)						
(3) Insurance broker or agent							
(4) Commodity pool operator or commodity trading advisor (whet	ther registered or exe	empt from registration)					
(5) Registered municipal advisor							
(6) Accountant or accounting firm							
(7) Lawyer or law firm							
Describe any other investment-related business activities conducted	d from this office loca	ation:					
Complete the following information for each office, other than your p	orincipal office and pla	ace of business, at which you	ı conduct investment advisory business. You must complete a				
separate Schedule D Section 1.F. for each location. If you are applyi	ing for SEC registration	on, if you are registered only	with the SEC, or if you are an exempt reporting adviser, list only				
the largest twenty-five offices (in terms of numbers of <i>employees</i>).							
Number and Street 1:		Number and Street 2:					
City:	State:						
	State.	Country:	ZIP+4/Postal Code:				
	State.	Country:	ZIP+4/Postal Code:				
If this address is a private residence, check this box:	State.	Country:	ZIP+4/Postal Code:				
If this address is a private residence, check this box:	State.	Country:	ZIP+4/Postal Code:				
·			ZIP+4/Postal Code:				
If this address is a private residence, check this box: ▼ Telephone Number: 239-434-7434	Facsimile Number,		ZIP+4/Postal Code:				
Telephone Number:			ZIP+4/Postal Code:				
Telephone Number: 239-434-7434	Facsimile Number,	if any:					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a	Facsimile Number, i	if any: hority as a branch office loca					
Telephone Number: 239-434-7434	Facsimile Number, i	if any: hority as a branch office loca					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the <i>CRI</i>	Facsimile Number, i a <i>state securities auti</i> D Branch Number he	if any: hority as a branch office loca					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a	Facsimile Number, i a <i>state securities auti</i> D Branch Number he	if any: hority as a branch office loca					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the <i>CRI</i>	Facsimile Number, i a <i>state securities auti</i> D Branch Number he	if any: hority as a branch office loca					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the <i>CRI</i> . How many <i>employees</i> perform investment advisory functions from the second sec	Facsimile Number, in a state securities aution D Branch Number heather this office location?	if any: hority as a branch office loca					
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Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the <i>CRI</i> . How many <i>employees</i> perform investment advisory functions from the second of the control of the con	Facsimile Number, in a state securities autily D Branch Number heathis office location?	if any: hority as a branch office loca					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the <i>CRI</i> . How many <i>employees</i> perform investment advisory functions from the second of the control of the con	Facsimile Number, in a state securities autily D Branch Number heathis office location? Sk all that apply) Son of a bank)	if any: hority as a branch office loca re:					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the CRI How many employees perform investment advisory functions from to 1 Are other business activities conducted at this office location? (check [a] (1) Broker-dealer (registered or unregistered) [a] (2) Bank (including a separately identifiable department or division [a] (3) Insurance broker or agent [a] (4) Commodity pool operator or commodity trading advisor (whethere)	Facsimile Number, in a state securities autily D Branch Number heathis office location? Sk all that apply) Son of a bank)	if any: hority as a branch office loca re:					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the CRI. How many employees perform investment advisory functions from the state of the control	Facsimile Number, in a state securities autily D Branch Number heathis office location? Sk all that apply) Son of a bank)	if any: hority as a branch office loca re:					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the CRI How many employees perform investment advisory functions from to 1 Are other business activities conducted at this office location? (check [a] (1) Broker-dealer (registered or unregistered) [a] (2) Bank (including a separately identifiable department or division [a] (3) Insurance broker or agent [a] (4) Commodity pool operator or commodity trading advisor (whethere)	Facsimile Number, in a state securities autily D Branch Number heathis office location? Sk all that apply) Son of a bank)	if any: hority as a branch office loca re:					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the CRI. How many employees perform investment advisory functions from the state of the control	Facsimile Number, in a state securities autily D Branch Number heathis office location? Sk all that apply) Son of a bank)	if any: hority as a branch office loca re:					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the CRI How many employees perform investment advisory functions from to 1 Are other business activities conducted at this office location? (check of the conducted in the conducted at this office location? (check of	Facsimile Number, in a state securities autily D Branch Number heathis office location? Sk all that apply) Son of a bank)	if any: hority as a branch office loca re:					
Telephone Number: 239-434-7434 If this office location is also required to be registered with FINRA or a Branch Office Registration Form (Form BR), please provide the CRI How many employees perform investment advisory functions from to 1 Are other business activities conducted at this office location? (check of the conducted in the conducted at this office location? (check of	Facsimile Number, is a state securities autile D Branch Number heathis office location? Sk all that apply) Son of a bank) Ther registered or executions	if any: hority as a branch office local re:					

SECTION 1.I. Website Addresses

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

SECTION 1.L	of Website/Account on Publicly Available Social Media Platfo 1.L. Location of Books and Records 1.M. Registration with Foreign Financial Regulatory Authorit	No Information Filed
SECTION 1.M		
tem 2 SEC R	1.M. Registration with Foreign Financial Regulatory Authorit	
tem 2 SEC R	1.M. Registration with Foreign Financial Regulatory Authorit	ies
		No Information Filed
Responses t	C Registration/Reporting	
•		eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting ag an <i>umbrella registration</i> , the information in Item 2 should be provided for the <i>filing adviser</i> only.
your SE affirmati	SEC registration and you are no longer eligible to register with natively respond to each of these items.	t least one of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an annual updating amendment to h the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you may
	(the adviser):	
⊻ (1)	(1) are a large advisory firm that either:	
	(a) has regulatory assets under management of \$100 i	
	(b) has regulatory assets under management of \$90 m with the SEC;	illion (in U.S. dollars) or more at the time of filing its most recent annual updating amendment and is registered
(2)	(2) are a mid-sized advisory firm that has regulatory asset are either:	s under management of \$25 million (in U.S. dollars) or more but less than \$100 million (in U.S. dollars) and you
	(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 au	thority of the state where you maintain your principal office and place of business;
	Click HERE for a list of states in which an investmen	nt adviser, if registered, would not be subject to examination by the state securities authority.
(3)	(3) Reserved	
(4)	(4) have your principal office and place of business outside	the United States;
(5)	(5) are an investment adviser (or subadviser) to an invest	tment company registered under the Investment Company Act of 1940;
(6)	. ,	ected to be a business development company pursuant to section 54 of the Investment Company Act of 1940 ast \$25 million of regulatory assets under management;
(7)	(7) are a pension consultant with respect to assets of plan	s having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a);
(8)	(8) are a related adviser under rule 203A-2(b) that <i>controls</i> your <i>principal office and place of business</i> is the same a	, is <i>controlled</i> by, or is under common <i>control</i> with, an investment adviser that is registered with the SEC, and as the registered adviser;
	If you check this box, complete Section 2.A.(8) of Scheo	dule D.
(9)	(9) are an adviser relying on rule 203A-2(c) because you ex	xpect to be eligible for SEC registration within 120 days;
	If you check this box, complete Section 2.A.(9) of Scheo	dule D.
<u> </u>	(10) are a multi-state adviser that is required to register in 1	5 or more states and is relying on rule 203A-2(d);
	If you check this box, complete Section 2.A.(10) of Scho	edule D.
(11)	(11) are an Internet adviser relying on rule 203A-2(e);	
☐ (12	(12) have received an SEC order exempting you from the pr	ohibition against registration with the SEC;
	If you check this box, complete Section 2.A.(12) of Sch	edule D.
☐ (13	(13) are no longer eligible to remain registered with the SEC	

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

Jurisdictions				
□ AL	☑ IL	☑ NE	☑ sc	
□ AK	□ IN	☑ NV	□ SD	
□ AZ	I ☑ A	□ NH	□ TN	
□ AR	□ KS	□ NJ	▼ TX	
□ CA	□ KY	□ NM	□ UT	
□ CO		✓ NY	□ Vī	
СТ	□ ME	☑ NC	<u>-</u> v	
□ DE	∥ □ MD	□ ND	□ VA	
□ DC	∥ □ MA	Г ОН	□ WA	
☑ FL	☑ M	□ ok	∥ □ w	
☑ GA	□ MN	□ OR	∥ □ wı	
□ GU	□ MS	₽ PA	□ wy	
□ ні	□ мо	□ PR		
□ ID	□ мт	□ RI		
ECTION 2.A.(8) Related Adviser	n in rule 203A-2(h) from the prohibition on t	registration because you control are controlle	d by, or are under common <i>control</i> with an inves	stment adviser
		es is the same as that of the registered advise	-	simeni auvisei
Name of Registered Investment A	Adviser			
CRD Number of Registered Inves	tment Adviser			
SEC Number of Registered Inves	tment Adviser			
EOTION 0.4 (0)		D. 1.4.41. 100 D.		
. ,	ser Expecting to be Eligible for Commission c), the exemption from the prohibition on reg		to be eligible for SEC registration within 120 day	/s, you are
	ntations about your eligibility for SEC registr	-	u will be deemed to have made the required rep	=
I am not registered or required		ecurities authority and I have a reasonable ex	pectation that I will be eligible to register with the	e SEC within
-	SEC registration if, on the 120th day after m	y registration with the SEC becomes effective	, I would be prohibited by Section 203A(a) of the	e Advisers Act
ECTION 2.A.(10) Multi-State Adv	iser			
	d), the multi-state adviser exemption from the opriate boxes, you will be deemed to have		l to make certain representations about your eliç	gibility for SEC
	e state and federal laws and have conclude	ou must make both of these representations: d that I am required by the laws of 15 or more	e states to register as an investment adviser with	h the <i>state</i>
	SEC registration if I file an amendment to thate securities authorities of those states.	nis registration indicating that I would be requ	red by the laws of fewer than 15 states to regist	er as an
f you are submitting your annual	updating amendment, you must make this	representation:		
	te of filing this amendment, I have reviewed ment adviser with the state securities author		ve concluded that I am required by the laws of a	at least 15
ECTION 2.A.(12) SEC Exemptive	Order			
		egistration, provide the following information:		

Application Number:

303	3-		
)ai	te of <i>order</i> .		
Ju			
em	a 3 Form of Organization		
	u are filing an <i>umbrella registration</i> , the information in Item 3 should be provided for the <i>filing adviser</i> only.		
۹.	How are you organized?		
	Corporation		
	C Sole Proprietorship		
	C Limited Liability Partnership (LLP)		
	C Partnership		
	C Limited Partnership (LP)		
	Other (specify):		
	If you are changing your response to this Item, see Part 1A Instruction 4.		
3.	In what month does your fiscal year end each year? DECEMBER		
Э.	Under the laws of what state or country are you organized?		
	State Country		
	Florida 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 country where you reside.	or	
	If you are changing your response to this Item, see Part 1A Instruction 4.		
em	a 4 Successions		
		Yes	No
۹.	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.		
3.	Date of Succession: (MM/DD/YYYY)		
	If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.		

SECTION 4 Successions

No Information Filed

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

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

Employees

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

- A. Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.
 - 45
- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?

	31
(2)	Approximately how many of the <i>employees</i> reported in 5.A. are registered representatives of a broker-dealer?
	0

(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?
4

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?

U

(2) Approximately what percentage of your *clients* are non-*United States persons*? 0%

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 (d)(1) or (d)(3) 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 Client	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)	875		\$ 349,615,035
(b) High net worth individuals	153		\$ 1,110,683,546
(c) Banking or thrift institutions			\$
(d) Investment companies			\$
(e) Business development companies			\$
(f) Pooled investment vehicles (other than investment companies and business development companies)			\$
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	28		\$ 10,258,670
(h) Charitable organizations	23		\$ 30,920,738
(i) State or municipal government entities (including government pension plans)			\$
(j) Other investment advisers			\$
(k) Insurance companies	1		\$ 4,189,750
(I) Sovereign wealth funds and foreign official institutions			\$
(m) Corporations or other businesses not listed above	9		\$ 59,730,888
(n) Other:			\$

Compensation Arrangements

E.	You are compensated for	your investment	advisory services b	y (check all that apply):
----	-------------------------	-----------------	---------------------	---------------------------

	(1)	A percentage of	f acceta			m a n a a a m	
•	(1)	A percentage c	กลรรษเร	unaer	voui	manageme	zm

(2) Hourly charges

	(4) Fixed fees (other than subscription fees)	ulcai)						
	(i) Fixed roos (earlier than easeenplier roos)							
	(6) Performance-based fees							
	(7) Other (specify): SELECTION OF OTHER AD	VISERS	FEES					
Item	m 5 Information About Your Advisory Business - Regul	latory As	ssets Under Management					
Re	egulatory Assets Under Management							
							Yes	s No
F.	. (1) Do you provide continuous and regular superviso	ory or ma	anagement services to securitie	es portfolios?			•	0
	(2) If yes, what is the amount of your regulatory asse	ts under	management and total numbe	r of accounts?				
			U.S. Dollar Amount			Total Number of Accounts		
	Discretionary:	(a)	\$ 1,486,351,545		(d)	920		
	Non-Discretionary:		\$ 79,047,082		(e)	169		
	Total:		\$ 1,565,398,627		(f)	1,089		
	rotal.	(0)	Ψ 1,500,030,027		(1)	1,505		
	Part 1A Instruction 5 h. avalains how to coloulate	. vour ro	aulatory agosta under managar	mont Vou must fallow	ı than	a instructions carefully when completing this	tom	
	Part 1A Instruction 5.b. explains how to calculate	your re	guiatory assets under manager	nent. You must lollow	i ii ies	e instructions carefully when completing this h	terri.	
	(3) What is the approximate amount of your total regu	ulatory a	ssets under management (repo	orted in Item 5.F.(2)(c)) abo	ve) attributable to <i>clients</i> who are non- <i>United</i> S	States	
	persons?							
	\$ 0							
lton	m 5 Information About Your Advisory Business - Advisory	ory Activ	uitios					
	dvisory Activities	JI y Activ	viues					
_		ock all th	eat apply					
G.		eck all th	ы арріу.					
	 (1) Financial planning services (2) Portfolio management for individuals and/ 	or emal	husinesses					
				nent companies" that	have	made an election pursuant to section 54 of th	e Investr	ment
	Company Act of 1940)	, , , , ,	,	,		1		
	(4) Portfolio management for pooled investme	nt vehic	les (other than investment com	npanies)				
	-	er than	small businesses) or institution	nal <i>clients</i> (other than	regis	stered investment companies and other poole	d investn	nent
	vehicles) (6) Pension consulting services							
	 □ (6) Pension consulting services □ (7) Selection of other advisers (including <i>priva</i> 	ate fund i	managers)					
	(8) Publication of periodicals or newsletters	to rana i	nanagers)					
	(9) Security ratings or pricing services							
	(10) Market timing services							
	(11) Educational seminars/workshops							
	(12) Other(specify): FAMILY OFFICE SERVICES							
							_	
	Do not check Item 5.G.(3) unless you provide advisor	-					-	
	Act of 1940, including as a subadviser. If you check It in Section 5.G.(3) of Schedule D.	em s.G.	(3), report the 611 of 614 hums	er or the investment t	comp	any or investment companies to which you pr	ovide ad	vice
	in coolen c.c.(c) of conodate 2.							
H.	. If you provide financial planning services, to how man	v clients	did you provide these services	during vour last fisca	al vea	r?		
		,	, a.a. jou promac mosco comoco	aumig your last lissa	,			
	· ·							
	O 1-10							
	O 11 - 25							
	O 26 - 50							
	O 51 - 100							
	O 101 - 250							
	O 251 - 500							
	More than 500							
	If more than 500, how many?							
	(round to the nearest 500)							
	In your reanances to this Item F.I.I. do not include as	"alianta"	the investors in a private fund	vou odviso valogo vo	60	re a concrete advisory relationship with these i	invoctoro	
	In your responses to this Item 5.H., do not include as	chents"	uie ilivestois ili a private tund j	rou auvise, uriiess yol	u nav	e a separate auvisory relationship with those i	rivestors.	•
							Voc	s No
	(1) Do you participate in a wron for program?						_	
ı.	(1) Do you participate in a wrap fee program?						0	⊙
	(2) If you participate in a wrap fee program, what is the	e amour	nt of your regulatory assets und	er management attrib	outab	e to acting as:		
	(a) sponsor to a wrap fee program							
	(h) portfolio managar for a urran foe program?							
	(b) portfolio manager for a wrap fee program?							

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

If you report an amount in Item 5.1.(2)(c), do not report that amount in Item 5.1.(2)(a) or Item 5.1.(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 5.1.(2) of Schedule D.

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

J. (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?

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

K. Separately Managed Account Clients

(1) Do you have regulatory assets under management attributable to *clients* other than those listed in Item 5.D.(3)(d)-(f) (separately managed account *clients*)?

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 you advise?

0 0

Yes No

 \circ

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 advise?

9 0

If yes, complete Section 5.K.(2) of Schedule D.

(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management?

• o

If yes, complete Section 5.K.(3) of Schedule D for each custodian.

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

No Information Filed

SECTION 5.I.(2) Wrap Fee Programs

No Information Filed

SECTION 5.K.(1) Separately Managed Accounts

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

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

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

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

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

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

(a)	Asset Type		Mid-year	End of year	
	(i)	Exchange-Traded Equity Securities	%	%	
	(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	nies) %	%
(xi) Cash and Cash Equivalents	%	%
(xii) Other	%	%

Generally describe any assets included in "Other"

Ass	set Type	End of year
(i)	Exchange-Traded Equity Securities	59 %
(ii)	Non Exchange-Traded Equity Securities	0 %
(iii)	U.S. Government/Agency Bonds	10 %
(iv)	U.S. State and Local Bonds	19 %
(v)	Sovereign Bonds	0 %
(vi)	Investment Grade Corporate Bonds	5 %
(vii)	Non-Investment Grade Corporate Bonds	1 %
(viii) Derivatives	1 %
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	0 %
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	2 %
(xi)	Cash and Cash Equivalents	3 %
(xii)	Other	0 %

Generally describe any assets included in "Other"

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

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

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

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

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

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

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

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

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

(i) Mid-Year

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

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

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

(ii) End of Year

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

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

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

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

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

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

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

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

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

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

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

(a) Legal name of custodian:

CHARLES SCHWAB & CO., INC.

(b) Primary business name of custodian:

CHARLES SCHWAB & CO., INC.

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

City:State:Country:SAN FRANCISCOCaliforniaUnited States

Yes No

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

 \circ

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

8 - 16514

(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?

\$ 162,936,297

(a)	Legal name of custodian:				
	TD AMERITRADE, INC.				
(b)	Primary business name of custoo	ian:			
	TD AMERITRADE, INC.				
(c)		office(s) responsible for custody of the	assets :		
(-)		State:			
	City: OMAHA	State. Nebraska	Country: United States		
		Nozracka	Chillou Clates		
				Yes	No
(d)	Is the custodian a related person	of your firm?		0	•
(e)	If the custodian is a broker-dealer	provide its SEC registration number (if	any)	_	
(0)	8 - 23395	provide to 020 regionation named (ii	any,		
(f)		aler or is a broker-dealer but does not b	nave an SEC registration number, provide its legal entity identifier (if any)		
(f)					
(g)		ssets under management attributable to	separately managed accounts is held at the custodian?		
	\$ 1,363,476,021				
(0)	Logal name of quotodian:				
(a)	Legal name of custodian:	ONIAL			
	NATIONWIDE - JEFFERSON NATI				
(b)	Primary business name of custod				
	NATIONWIDE ADVISORY SOLUTI				
(c)	The location(s) of the custodian's	office(s) responsible for <i>custody</i> of the a	assets:		
	City:	State:	Country:		
	LOUISVILLE	Kentucky	United States		
				Yes	No
(4)					
(u)	Is the custodian a related person of	f your firm?		_	_
(d)	Is the custodian a related person of			0	•
(a) (e)		of your firm? provide its SEC registration number (if	any)	0	•
	If the custodian is a broker-dealer,	provide its SEC registration number (if		0	•
	If the custodian is a broker-dealer,	provide its SEC registration number (if	any) ave an SEC registration number, provide its <i>legal entity identifier</i> (if any)	0	•
(e)	If the custodian is a broker-dealer, - If the custodian is not a broker-dealer	provide its SEC registration number (if		0	•
(e) (f)	If the custodian is a broker-dealer, - If the custodian is not a broker-dealer	provide its SEC registration number (if	ave an SEC registration number, provide its legal entity identifier (if any)	o	•
(e) (f)	If the custodian is a broker-dealer, If the custodian is not a broker-deal What amount of your regulatory as	provide its SEC registration number (if	ave an SEC registration number, provide its legal entity identifier (if any)	0	•
(e) (f)	If the custodian is a broker-dealer, If the custodian is not a broker-deal What amount of your regulatory as	provide its SEC registration number (if	ave an SEC registration number, provide its legal entity identifier (if any)	c	•
(e) (f) (g)	If the custodian is a broker-dealer, If the custodian is not a broker-deal What amount of your regulatory as \$ 20,704,524	provide its SEC registration number (if	ave an SEC registration number, provide its legal entity identifier (if any)	c	•
(e) (f) (g)	If the custodian is a broker-dealer, If the custodian is not a broker-dealer, What amount of your regulatory as \$ 20,704,524 ther Business Activities	provide its SEC registration number (if aler, or is a broker-dealer but does not he seets under management attributable to	ave an SEC registration number, provide its legal entity identifier (if any)	0	•
(e) (f) (g) Item 6 Of	If the custodian is a broker-dealer, If the custodian is not a broker-dealer, What amount of your regulatory as \$ 20,704,524 ther Business Activities em, we request information about your	provide its SEC registration number (if aler, or is a broker-dealer but does not he seets under management attributable to firm's other business activities.	ave an SEC registration number, provide its legal entity identifier (if any)	0	•
(e) (f) (g) Item 6 Of In this Ite A. You	If the custodian is a broker-dealer, If the custodian is not a broker-dealer, What amount of your regulatory as \$ 20,704,524 Ther Business Activities There we request information about your The actively engaged in business as a	provide its SEC registration number (if aler, or is a broker-dealer but does not he sets under management attributable to firm's other business activities.	ave an SEC registration number, provide its legal entity identifier (if any)	0	•
(e) (f) (g) Item 6 Of In this Ite A. You	If the custodian is a broker-dealer, If the custodian is not a broker-dealer What amount of your regulatory as \$ 20,704,524 Ther Business Activities There we request information about your The actively engaged in business as a (1) broker-dealer (registered or unregistered)	provide its SEC registration number (if aler, or is a broker-dealer but does not have under management attributable to firm's other business activities. (check all that apply):	ave an SEC registration number, provide its legal entity identifier (if any)	0	•
(e) (f) (g) Item 6 Of In this Ite A. You	If the custodian is a broker-dealer, If the custodian is not a broker-dealer, What amount of your regulatory as \$ 20,704,524 Ther Business Activities There we request information about your are actively engaged in business as a (1) broker-dealer (registered or unr (2) registered representative of a broker-dealer.	provide its SEC registration number (if aler, or is a broker-dealer but does not he seets under management attributable to firm's other business activities. (check all that apply): egistered) oker-dealer	ave an SEC registration number, provide its legal entity identifier (if any) separately managed accounts is held at the custodian?	0	•
(e) (f) (g) Item 6 Of In this Ite A. You	If the custodian is a broker-dealer, If the custodian is not a broker-dealer, What amount of your regulatory as \$ 20,704,524 Ther Business Activities Therefore, we request information about your are actively engaged in business as a (1) broker-dealer (registered or unr (2) registered representative of a br (3) commodity pool operator or com	provide its SEC registration number (if aler, or is a broker-dealer but does not have under management attributable to firm's other business activities. (check all that apply):	ave an SEC registration number, provide its legal entity identifier (if any) separately managed accounts is held at the custodian?	0	•
(e) (f) (g) Item 6 Of In this Ite A. You	If the custodian is a broker-dealer, If the custodian is not a broker-dealer, What amount of your regulatory as \$ 20,704,524 Ther Business Activities Therefore, we request information about your Therefore, are actively engaged in business as a (1) broker-dealer (registered or unr (2) registered representative of a br (3) commodity pool operator or com (4) futures commission merchant	provide its SEC registration number (if aler, or is a broker-dealer but does not he seets under management attributable to firm's other business activities. (check all that apply): egistered) oker-dealer modity trading advisor (whether registe	ave an SEC registration number, provide its legal entity identifier (if any) separately managed accounts is held at the custodian?	0	•
(e) (f) (g) Item 6 Of In this Ite A. You	If the custodian is a broker-dealer, If the custodian is not a broker-dealer, What amount of your regulatory as \$ 20,704,524 Ther Business Activities Therefore, we request information about your are actively engaged in business as a (1) broker-dealer (registered or unr (2) registered representative of a br (3) commodity pool operator or com	provide its SEC registration number (if aler, or is a broker-dealer but does not he seets under management attributable to firm's other business activities. (check all that apply): egistered) oker-dealer modity trading advisor (whether registe	ave an SEC registration number, provide its legal entity identifier (if any) separately managed accounts is held at the custodian?	0	•
(e) (f) (g) Item 6 Of In this Ite A. You	If the custodian is a broker-dealer, If the custodian is not a broker-dealer, What amount of your regulatory as \$ 20,704,524 Ther Business Activities Therefore, we request information about your Therefore, are actively engaged in business as a (1) broker-dealer (registered or unr (2) registered representative of a br (3) commodity pool operator or com (4) futures commission merchant (5) real estate broker, dealer, or age (6) insurance broker or agent (7) bank (including a separately ide	provide its SEC registration number (if aler, or is a broker-dealer but does not he seets under management attributable to firm's other business activities. (check all that apply): egistered) oker-dealer modity trading advisor (whether registe	ave an SEC registration number, provide its legal entity identifier (if any) separately managed accounts is held at the custodian? red or exempt from registration)	0	•
(e) (f) (g) Item 6 Of In this Ite A. You	If the custodian is a broker-dealer, If the custodian is not a broker-dealer, What amount of your regulatory as \$ 20,704,524 Ther Business Activities Therefore, we request information about your Therefore, are actively engaged in business as a (1) broker-dealer (registered or unr (2) registered representative of a br (3) commodity pool operator or com (4) futures commission merchant (5) real estate broker, dealer, or age (6) insurance broker or agent (7) bank (including a separately ide (8) trust company	provide its SEC registration number (if aler, or is a broker-dealer but does not he seets under management attributable to firm's other business activities. (check all that apply): egistered) oker-dealer modity trading advisor (whether registe	ave an SEC registration number, provide its legal entity identifier (if any) separately managed accounts is held at the custodian? red or exempt from registration)	0	•
(e) (f) (g) Item 6 Of In this Ite A. You	If the custodian is a broker-dealer, If the custodian is not a broker-dealer, What amount of your regulatory as \$ 20,704,524 Ther Business Activities Therefore, we request information about your Therefore, are actively engaged in business as a (1) broker-dealer (registered or unr (2) registered representative of a br (3) commodity pool operator or com (4) futures commission merchant (5) real estate broker, dealer, or age (6) insurance broker or agent (7) bank (including a separately ide	provide its SEC registration number (if aler, or is a broker-dealer but does not he seets under management attributable to firm's other business activities. (check all that apply): egistered) oker-dealer modity trading advisor (whether registeent ent	ave an SEC registration number, provide its legal entity identifier (if any) separately managed accounts is held at the custodian? red or exempt from registration)	0	•

 $\hfill\Box$ (11) major security-based swap participant ☐ (12) accountant or accounting firm (13) lawyer or law firm (14) other financial product salesperson (specify): If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D. Yes No B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)? \circ If yes, is this other business your primary business? \circ If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name. Yes No Do you sell products or provide services other than investment advice to your advisory clients? \circ

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ii yes, describe this other business on dection o.b.(3) or deflective b, and if you engage in this business under a different fiame, provide that fiame.					
SECTION 6.A. Names of Your Other Businesses					
No Information Filed					
SECTION 6.B.(2) Description of Primary Business					
Describe your primary business (not your investment advisory business):					
If you engage in that business under a different name, provide that name:					
SECTION 6.B.(3) Description of Other Products and Services					
Describe other products or services you sell to your <i>client</i> . You may omit products and services that you listed in Section 6.B.(2) above.					
If you engage in that business under a different name, provide that name:					
Itam 7 Financial Industry Attitions					
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 <i>clients</i> .					
A. This part of Item 7 requires you to provide information about you and your related persons, including foreign affiliates. Your related persons are all of your advisory affiliates and any person that is under common control with you.					
You have a <i>related person</i> that is a (check all that apply):					
 (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered) (2) other investment adviser (including financial planners) 					
(3) registered municipal advisor					
 (4) registered security-based swap dealer (5) major security-based swap participant 					
(6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)					
 (7) futures commission merchant (8) banking or thrift institution 					
(9) trust company					
 (10) accountant or accounting firm (11) lawyer or law firm 					
(12) insurance company or agency					
 (13) pension consultant (14) real estate broker or dealer 					
(15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles					
(16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles					
Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).					
Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.					
For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.					
You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.					
You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.					
SECTION 7 A Einangial Industry Affiliations					
SECTION 7.A. Financial Industry Affiliations					
Complete a separate Schedule D Section 7.A. for each <i>related person</i> listed in Item 7.A.					

 Legal Name of Related Person: TD AMERITRADE, INC.

2.	Primary Business Name of <i>Related Person</i> : TD AMERITRADE, INC.						
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 60469						
	or Other						
4.	Related Person's (a) CRD Number (if any):						
	7870						
	(b) CIK Number(s) (if any): No Information Filed						
	140 miorination i ned						
5.	Related Person is: (check all that apply)						
0.	(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) utures commission merchant						
	(h) banking or thrift institution						
	(i) trust company						
	 (j) □ accountant or accounting firm (k) □ lawyer or law firm 						
	(I) insurance company or agency						
	(m) pension consultant						
	(n) real estate broker or dealer						
	 (o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles 						
		Yes	s No	o			
6.	Do you control or are you controlled by the related person?	0	•	5			
7.	Are you and the related person under common control?	•	C	,			
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	_	,				
	(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	0	0				
	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 <i>clients'</i> assets: Number and Street 1: Number and Street 2:						
	City: State: Country: ZIP+4/Postal Code:						
	If this address is a private residence, check this box: \Box	V					
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes					
0.	(b) If the answer is yes, under what exemption?	0	•)			
	(b) It the driewer to you, under what exemption.						
10.	(a) Is the related person registered with a foreign financial regulatory authority?	0	•	5			
	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed						
11.	Do you and the related person share any supervised persons?	0	•	5			
12.	Do you and the <i>related person</i> share the same physical location?	0	0	5			
	Legal Name of Related Person: 5TH AVENUE BROKERAGE, LLC Primary Business Name of Related Person:						
	5TH AVENUE BROKERAGE, LLC						
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)						

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

	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (o)	lated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant 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		
6.	Do y	you control or are you controlled by the related person?	Yes O	
7.	Are	you and the related person under common control?	•	0
8.	(a) (b) (c)	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> ? 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> ? 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 <i>clients'</i> assets: Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:	0 0	•
		If this address is a private residence, check this box:	Yes	No
9.	(a) (b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption?	0	0
	(b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	0	•
11.	Do y	you and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
12.	Do y	you and the <i>related person</i> share the same physical location?	•	0
1.	_	gal Name of <i>Related Person</i> : PITAL WEALTH ADVISORS, INC.		
2.		mary Business Name of <i>Related Person</i> : PITAL WEALTH ADVISORS, INC.		
3.	Related to the control of the contro	lated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) ner		
4.		lated Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
5.		lated Person is: (check all that apply)		

	(b)	other investment adviser (including financial planners)			
	(c)	registered municipal advisor			
	(d)	registered security-based swap dealer			
	(e)	major security-based swap participant			
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			
	(g)	futures commission merchant			
	(h)	banking or thrift institution			
	(i)	trust company			
	(j)	accountant or accounting firm			
	(k)	lawyer or law firm			
	(I)	insurance company or agency			
	(m)				
	(n)	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	. NL	_
6.	Dov	you control or are you controlled by the related person?			
0.	БО у	ou control of are you controlled by the related person:	О	•)
7	Δra	you and the <i>related person</i> under common <i>control</i> ?	_	_	
٠.	AIC)	you and the related person under common controls	⊚	С)
8.	(2)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <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	0	С)
		or securities that are maintained at the <i>related person</i> ?			
		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 <i>clients'</i> assets:			
	(0)	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	כ
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	О)
	(b)	If the answer is yes, under what exemption?			
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•	5
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.			
		No Information Filed			
11.	Do y	ou and the related person share any supervised persons?	\odot	С)
12.	Do y	ou and the <i>related person</i> share the same physical location?	\odot	С	j
					_
				=	=
1.	Lea	al Name of Related Person:			
	-	FUNDS MANAGEMENT, LLC			
2.	Prim	nary Business Name of Related Person:			
	FGI	FUNDS MANAGEMENT, LLC			
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	-				
	or Othe				
	Otilio				
4.	Rela	ated Person's			
	(a)	CRD Number (if any):			
	(b)	CIK Number(s) (if any):			
		No Information Filed			
_	_				
5.		ated Person is: (check all that apply)			
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer			
	(b)	other investment adviser (including financial planners)			
	(c)	registered municipal advisor			
	(-)	registered security-based swap dealer major security-based swap participant			
	(e) (f)	major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			
	(a)	futures commission merchant			

	(h)	banking or thrift institution		
	(i)	trust company		
	(1)	accountant or accounting firm lawyer or law firm		
	(k) (l)	insurance company or agency		
	` '			
	(n)	real estate broker or dealer		
	` '	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	. No
6.	Do y	you control or are you controlled by the related person?	0	
			~	
7.	Are y	you and the related person under common control?	•	0
8.		Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	\circ	\odot
		If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:		
		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:		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	\odot	0
		If the answer is yes, under what exemption?		
		RELYING ADVISER OF FUNDAMENTAL GLOBAL INVESTORS LLC, 2012 ABA SEC NO ACTION LETTER		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.		٠
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	\odot	0
12	Do v	you and the <i>related person</i> share the same physical location?	_	
12.	БО у	ou and the related person share the same physical location:	⊙	0
1.	-	al Name of <i>Related Person</i> : IDAMENTAL GLOBAL INVESTORS, LLC		
2.		nary Business Name of Related Person:		
	FUN	IDAMENTAL GLOBAL INVESTORS, LLC		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
		- 76977		
	or			
	Othe			
4.	Rela	ated Person's		
		CRD Number (if any):		I
		164299		1
	(b)	CIK Number(s) (if any): No Information Filed		
				1
5.	, ,	ated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer		
	` '	other investment adviser (including financial planners)		
	` '	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f) (g)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant		
		banking or thrift institution		
	(i)	□ trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm insurance company or agency		
	(I)	- medianes company or agonor		

	(m) pension consultant		
	(n)		
		o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)		
				No
	6. [Do you control or are you controlled by the related person?	0	⊙
	_			
	7. <i>i</i>	Are you and the related person under common control?	⊙	0
	8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	\circ	⊙
	(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	\circ	0
		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>custody</i> of your <i>clients'</i> assets:		
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:		
		ii dilo dadrece le a private recidence, check tille box.	Yes	No
	9. (a) If the related person is an investment adviser, is it exempt from registration?		
			0	•
	(b) If the answer is yes, under what exemption?		
	10. (a) Is the related person registered with a foreign financial regulatory authority?	,	
	,		О	⊙
	(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed		
	11 F	Do you and the <i>related person</i> share any <i>supervised persons</i> ?	_	
	11. L	Do you and the related person share any supervised persons?	⊚	
	40 .			
	12. I	Do you and the <i>related person</i> share the same physical location?	\odot	0
	1. L	Legal Name of Related Person:		
		/ALUETREE INVESTMENTS, LLC		
	2. F	Primary Business Name of <i>Related Person</i> :		
		VALUETREE INVESTMENTS, LLC		
	3. <i>l</i>	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	(or .		
	(Other		
	4. <i>I</i>	Related Person's		
	((a) CRD Number (if any):		
	,	150598		
	(b) CIK Number(s) (if any): No Information Filed		
		No information i fled		
	5. <i>l</i>	Related Person is: (check all that apply)		
		a) Droker-dealer, municipal securities dealer, or government securities broker or dealer		
	Ì	b) other investment adviser (including financial planners)		
	(c) registered municipal advisor		
	(d) registered security-based swap dealer		
	(e) I major security-based swap participant		
	(f) 🗖 commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g) utures commission merchant		
		(h) banking or thrift institution		
	(i) trust company		
	(j) accountant or accounting firm		
	(k) 🔲 lawyer or law firm		
	(insurance company or agency		
	(m) 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	No
	6. [Do you control or are you controlled by the related person?	0	•

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

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: No	umber and Street 2:	
		·	ountry: ZIP+4/Postal Code:	
		If this address is a private residence, check this box: \square		
^			Yes N	
9.	(a)	If the related person is an investment adviser, is it exempt from registration?		0
	(b)	If the answer is yes, under what exemption?		
10	(0)	le the valeted never registered with a favoign financial regulatory outhority?		
10.		Is the related person registered with a foreign financial regulatory authority?	0.6	⊙
	(b)	If the answer is yes, list the name and country, in English of each foreign finant	ncial regulatory authority with which the <i>related person</i> is registered. No Information Filed	
11.	Dον	ou and the related person share any supervised persons?	⊚ (_
	,	,		0
12.	Do y	ou and the related person share the same physical location?	⊙ (0
1.	-	al Name of <i>Related Person</i> : INTERNATIONAL USVI, LLC		
2.		nary Business Name of Related Person:		
	FGI	INTERNATIONAL USVI, LLC		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	er en		
4.		ated Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		1	No Information Filed	
_	D-1	ated Decreasing (about all that are ha)		
5.		ated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities brok	vor or dealer	
	()	other investment adviser (including financial planners)	ter of dealer	
	(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)	ed or exempt from registration)	
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	trust company		
	(i)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding po	ooled investment vehicles	
	(p)		vestment vehicles	
			Yes N	10
6.	Do y	ou control or are you controlled by the related person?	0.6	•
_	•			
1.	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 connec	ction with advisory services you provide to clients?	_
		If you are registering or registered with the SEC and you have answered "yes,"		
	(~)		erson and thus are not required to obtain a surprise examination for your <i>clients'</i> funds	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the	related person's office responsible for custody of your clients' assets:	
			umber and Street 2:	
		·	ountry: ZIP+4/Postal Code:	
		If this address is a private residence, check this box:	Yes N	.lc

9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	\odot	\circ
		If the answer is yes, under what exemption? RELYING ADVISER OF FUNDAMENTAL GLOBAL INVESTORS LLC, 2012 ABA SEC NO ACTION LETTER		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	6
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	•	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	•	0
1.	-	al Name of <i>Related Person</i> : GLOBAL ASSET ALLOCATION GP, LLC		
2.		ary Business Name of <i>Related Person</i> : GLOBAL ASSET ALLOCATION GP, LLC		
3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.	Rela	nted Person's		
		CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	(a) (b)	broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)		
	(c) (d)	registered municipal advisor registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f) (g)	 commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant 		
		banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm lawyer or law firm		
	(k) (l)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(17)		Yes	No
6.	Do y	ou control or are you controlled by the related person?	0	\odot
7.	Are y	you and the related person under common control?	•	0
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	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	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets: Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
			Yes	No
9.	. ,	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		
10.	` '	Is the related person registered with a foreign financial regulatory authority?	0	•
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.		

		No Information Filed		
11	Doy	you and the related person share any supervised persons?	\odot	0
12	Doy	you and the <i>related person</i> share the same physical location?	•	_
1.	_	al Name of Related Person:		
	FUN	NDAMENTAL GLOBAL PARTNERS GP, LLC		
2.		nary Business Name of Related Person:		
	FUN	NDAMENTAL GLOBAL PARTNERS GP, LLC		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	er		
4.	Rela	ated Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.		ated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(a) (b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-pased swap participant		
	(f) (g)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant		
	(9) (h)	banking or thrift institution		
	(i)	□ trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(l) (m)	insurance company or agency pension consultant		
	(III) (n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6	Day	vou control or are you controlled by the related nerses?	Yes	
6.	БО ў	you control or are you controlled by the related person?	0	•
7.	Are	you and the related person under common control?	•	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	_	_
0.	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not	0	
	(~)	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>custody</i> of your <i>clients'</i> assets:		
	` ,	Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
		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	0
	(b)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority?	0	<u>@</u>
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.	~	~
11	Do:	No Information Filed	_	. ==
11	, טט	you and the <i>related person</i> share any <i>supervised persons</i> ?	⊙	0
12	Doy	you and the related person share the same physical location?	•	0

1.	Legal Name of <i>Related Person</i> : TCG NAPLES, LLC		
2.	Primary Business Name of <i>Related Person</i> : CAPITAL WEALTH ADVISORS		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's (a) CRD Number (if any): 166489		
	(b) CIK Number(s) (if any): No Information Filed		
5.	Related Person is: (check all that apply) (a) broker-dealer, municipal securities dealer, or government securities broker or dealer (b) other investment adviser (including financial planners) (c) registered municipal advisor (d) registered security-based swap dealer (e) major security-based swap participant (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) futures commission merchant (h) banking or thrift institution (i) trust company (j) accountant or accounting firm (k) lawyer or law firm (l) insurance company or agency (m) pension consultant (n) real estate broker or dealer 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?	0	•
1.	Are you and the related person under common control?	•	0
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?		•
	(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>custody</i> of your <i>clients'</i> assets: Number and Street 1: Number and Street 2:		
	City: State: Country: ZIP+4/Postal Code:		
	If this address is a private residence, check this box: \square	Yes	No
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	•
	(b) If the answer is yes, under what exemption?		
10.	(a) Is the related person registered with a foreign financial regulatory authority?	0	•
	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	~	~
11.	Do you and the related person share any supervised persons?	•	0
12.	Do you and the <i>related person</i> share the same physical location?	•	0
			=
1.	Legal Name of <i>Related Person</i> : CWA FGI SPECIAL OPPORTUNITIES FUND GP, LLC		
2	Primary Rusiness Name of Related Person		

CWA FGI SPECIAL OPPORTUNITIES FUND GP, LLC

3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)				
	or				
	Other				
4.	Related Person's				
	(a) CRD Number (if any):				
	(b) CIK Number(s) (if any):				
	No Information Filed				
5.	Related Person is: (check all that apply)				
	 (a)				
	(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				
	(m) pension consultant (n) real estate broker or dealer				
	(o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles				
	(p) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No		
6.	Do you control or are you controlled by the related person?		e		
7.	Are you and the related person under common control?	⊙	С		
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you 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		О		
	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 related person's office responsible for custody of your clients' assets:				
	Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:				
	If this address is a private residence, check this box:				
0	(a) If the related person is an investment advisor, is it exempt from registration?	Yes			
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	С		
	(b) If the answer is yes, under what exemption:				
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>related person</i> is registered. No Information Filed				
11.	Do you and the related person share any supervised persons?	•	С		
40					
12.	Do you and the <i>related person</i> share the same physical location?	⊙	С		
1.	Legal Name of Related Person:				
	FGI 1347 GP, LLC				
2.	Primary Business Name of <i>Related Person</i> :				
•	FGI 1347 GP, LLC				
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)				
٥.	-				
	or Other				

4.	Rela	ated Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
		146 Illiothiation Filed		
5.	(a) (b) (c) (d)	ated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	i N
6.	Doy	you control or are you controlled by the related person?	0	9
7.	Are	you and the related person under common control?	•	(
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	6
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	Ô	
	(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 <i>clients'</i> assets:		
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:		
			Yes	; N
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	(
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	6
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.		
11	Dox	No Information Filed you and the <i>related person</i> share any <i>supervised persons</i> ?	_	
' ' '	D0 ;	you and the related person share any supervised persons:	•	(
12.	Doy	you and the related person share the same physical location?	•	(
	FGI	al Name of <i>Related Person</i> : METROLINA GP, LLC		
2.		nary Business Name of <i>Related Person</i> : METROLINA GP, LLC		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.	Rela (a)	ated Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		

5.	Rela	ate	d Person is: (check all that apply)							
	(a)									
	` '									
	` '									
	(d)		registered security-based swap dealer major security-based swap participant							
	(e) (f)		commodity pool operator or commodity trading advisor (whether registered or exempt from registration)							
	(i) (g)									
	(h)		banking or thrift institution							
	(i)									
	(j)		accountant or accounting firm							
	(k)		lawyer or law firm							
	(I)		insurance company or agency							
	(m)									
	(n)									
	(o) (p)	V								
	(P)	1.4	sponsor, general partner, managing member (or equivalent) or pooled investment vehicles	Yes	No					
6.	Dον	/ou	control or are you controlled by the related person?							
	,	,		0	٠					
7.	Are	γοι	u and the related person under common control?	•	_					
		•		٠						
8.	(a)	Do	oes the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•					
	(b)	lf [,]	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	0						
	()	op	perationally 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 a securities that are maintained at the <i>related person</i> ?							
	(c)	lf y	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:							
		Ν	lumber and Street 1: Number and Street 2:							
			State: Country: ZIP+4/Postal Code:							
		lf	this address is a private residence, check this box: \square	V	NI-					
9.	(a)	lf t	the related person is an investment adviser, is it exempt from registration?	Yes	ONO.					
			the answer is yes, under what exemption?							
	(~)									
10.	(a)	ls	the related person registered with a foreign financial regulatory authority?	0	•					
	(b)	lf t	the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.							
11	Dox	,OII	No Information Filed and the <i>related person</i> share any <i>supervised persons</i> ?	_	_					
	D0)	you	and the related person share any supervised persons:	⊙	О					
12.	Doy	you	and the <i>related person</i> share the same physical location?	•	0					
1.	Leg	al N	Name of Related Person:							
	FGI	HC	DLDINGS GP, LLC							
2.		_	y Business Name of <i>Related Person</i> :							
	FGI	HC	DLDINGS GP, LLC							
3.	Rela	ated	d Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)							
	-									
	or Oth	۰.								
	Othe	eı								
4.	Rela	ated	d Person's							
			RD Number (if any):							
	(b)	CI	IK Number(s) (if any):							
			No Information Filed							
5.	Rela	ated	d Person is: (check all that apply)							
	(b)		other investment adviser (including financial planners)							
	(c)		registered municipal advisor							
	(d)	d) 🗖 registered security-based swap dealer								

	(e)	major security-based swap participant					
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)					
	(g)	futures commission merchant					
	(h)	banking or thrift institution					
	(i)	□ trust company					
	(j)	accountant or accounting firm					
	(k)	lawyer or law firm					
	(I)	insurance company or agency					
	(m)	pension consultant					
	(n)	real estate broker or dealer					
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles					
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles					
			Yes	No			
6.	Do y	ou control or are you controlled by the related person?	0	•			
7.	Are	you and the related person under common control?	•	0			
				~			
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•			
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not	0	0			
	(-)	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	0	0			
		or securities that are maintained at the related person?					
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:					
		Number and Street 1: Number and Street 2:					
		City: State: Country: ZIP+4/Postal Code:					
		If this address is a private residence, check this box:					
			Yes	No			
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	\circ			
	(b)	If the answer is yes, under what exemption?					
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	\odot			
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.					
		No Information Filed					
11.	Do y	ou and the related person share any supervised persons?	•	0			
	The post and the relation person chare any supervisor persone.						
12.	Doy	you and the <i>related person</i> share the same physical location?	•				
12.	Do y	ou and the <i>related person</i> share the same physical location?					
12.	Doy	you and the <i>related person</i> share the same physical location?					
	Lega	al Name of Related Person:					
	Lega						
1.	Leg:	al Name of <i>Related Person</i> : IDAMENTAL ACTIVIST FUND I GP, LLC					
1.	Lega FUN Prim	al Name of <i>Related Person</i> : IDAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of <i>Related Person</i> :					
1.	Lega FUN Prim	al Name of <i>Related Person</i> : IDAMENTAL ACTIVIST FUND I GP, LLC					
1.	Lega FUN Prim FUN	al Name of <i>Related Person</i> : IDAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of <i>Related Person</i> : IDAMENTAL ACTIVIST FUND I GP, LLC					
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1.	Lega FUN Prim FUN	al Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC hated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)					
1.	Lega FUN Prim FUN Rela	al Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC hated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)					
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1. 2. 3.	Lega FUN Prim FUN Rela or Other	al Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC inted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er inted Person's CRD Number (if any): CIK Number(s) (if any):					
1. 2. 3.	Lega FUN Prim FUN Rela or Other	al Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC hated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) eted Person's CRD Number (if any):					
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1. 2. 3.	Lega FUN Prim FUN Rela Other (a)	al Name of <i>Related Person</i> : IDAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of <i>Related Person</i> : IDAMENTAL ACTIVIST FUND I GP, LLC inted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) inted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed					
1. 2. 3.	Legar FUN Prim FUN Rela - or Other (a) (b)	al Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC hard Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er sted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed					
1. 2. 3.	Legar FUN Prim FUN Rela - or Other (a) (b)	al Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) ated Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed broker-dealer, municipal securities dealer, or government securities broker or dealer					
1. 2. 3.	Legar FUN Prim FUN Rela Or Other (a) (b) Rela (a) (b)	al Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC hated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er hated Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)					
1. 2. 3.	Legar FUN Prim FUN Rela or Other (a) (b) Rela (b) (c)	al Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC hard Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er seted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed hated Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)					
1. 2. 3.	Legar FUN Prim FUN Rela Or Other (a) (b) Rela (a) (b)	al Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC hary Business Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC sited Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor					
1. 2. 3.	Legar FUN Prim FUN Rela Or Other (a) (b) Rela (b) (c) (d)	al Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC harry Business Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC sted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or titled Person's CRD Number (if any): No Information Filed titled Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer or their investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer					
1. 2. 3.	Legar FUN Prim FUN Relation (a) (b) Relation (b) (c) (d) (e)	al Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC that Business Name of Related Person: IDAMENTAL ACTIVIST FUND I GP, LLC Intel Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) Intel Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed Intel Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer or registered municipal advisor registered security-based swap dealer major security-based swap participant					
1. 2. 3.	Legar FUN Prim FUN Rela or Other (a) (b) Rela (b) (c) (d) (e) (f)	al Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC lary Business Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC sted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) et aled Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed inted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration)					
1. 2. 3.	Legar FUN Print FUN Relation (a) (b) Relation (b) (c) (d) (e) (f) (g)	al Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC harry Business Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC harry Business Name of Related Person: DAMENTAL ACTIVIST FUND I GP, LLC hated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) Or Inted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed Inted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap dealer major security-based swap dealer major security-based swap dealer commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant					

	(k) Lawyer	or law firm		
	(I) 🔲 insurar	ce company or agency		
	(m) pensio	consultant		
	(n) real es	ate broker or dealer		
		or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p) 🗹 sponso	, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do you <i>control</i> o	are you controlled by the related person?	\circ	⊙
7.	Are you and the	elated person under common control?	\odot	0
8.		ated person act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	\circ	⊙
	operational	gistering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not 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 that are maintained at the <i>related person</i> ?	0	0
		nswered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets:		
	Number an City:	Street 1: Number and Street 2: State: Country: ZIP+4/Postal Code:		
		ss is a private residence, check this box:		
			Yes	No
9.	(a) If the related	person is an investment adviser, is it exempt from registration?	0	
	(b) If the answe	is yes, under what exemption?		
10.	(a) Is the relate	person registered with a foreign financial regulatory authority?	0	•
	(b) If the answe	is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed		
11.	Do you and the n	lated person share any supervised persons?	\odot	0
12.	Do you and the n	lated person share the same physical location?	\odot	0
lten	n 7 Private Fund I	eporting		
Iten	n 7 Private Fund I	eporting	Yes	No
		eporting to any private fund?		
			Yes	No ⊙
В.	Are you an advise	to any private fund?	0	
В.	Are you an advise If "yes," then for e Instruction 6 of the adviser or SEC ex		C n egiste	⊙ ered
В.	Are you an advise If "yes," then for each Instruction 6 of the adviser or SEC each do not complete S	to any private fund? ch 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 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-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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.	C n egiste advis	⊙ ered
В.	Are you an advise If "yes," then for each Instruction 6 of the adviser or SEC each do not complete S In either case, if y	to any private fund? ch 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 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-rempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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	C n egiste advis	€ ered er),
В.	Are you an advise If "yes," then for each Instruction 6 of the adviser or SEC each do not complete S In either case, if y	to any private fund? ch 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 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-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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.	C n egiste advis	€ ered er),
В.	Are you an advise If "yes," then for each Instruction 6 of the adviser or SEC each do not complete S In either case, if y	to any private fund? ch 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 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-rempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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	C n egiste advis	€ ered er),
В.	Are you an advise If "yes," then for e. Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse	to any private fund? ch 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 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-nempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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	C n egiste advis	€ ered er),
В.	Are you an advise If "yes," then for e. Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse	to any private fund? ch 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 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-rempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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	C n egiste advis	€ ered er),
В.	Are you an advise If "yes," then for e. Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse	to any private fund? ch 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 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-nempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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	C n egiste advis	€ ered er),
В.	Are you an advise If "yes," then for e. Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse	to any private fund? ch 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 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-rempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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 the Fund Reporting	C n egiste advis	€ ered er),
В.	Are you an advise If "yes," then for e. Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse	to any private fund? ch 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 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-nempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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	C n egiste advis	€ ered er),
В.	Are you an advise If "yes," then for e. Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse	to any private fund? ch 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 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-rempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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 the Fund Reporting	C n egiste advis	€ ered er),
SEC	Are you an advise If "yes," then for e Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse CTION 7.B.(1) Prive	to any private fund? ch 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 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-rempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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 the Fund Reporting	C n egiste advis	€ ered er),
SEC	Are you an advise If "yes," then for e Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse CTION 7.B.(1) Prive	to any private fund? ch 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 Instructions to Part 14. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-nempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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 the Fund Reporting No Information Filed	C n egiste advis	€ ered er),
SEC	Are you an advise If "yes," then for e Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse CTION 7.B.(1) Prive	to any private fund? ch 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 Instructions to Part 14. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-nempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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 the Fund Reporting No Information Filed	C n egiste advis	€ ered er),
SEC	Are you an advise If "yes," then for e Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse CTION 7.B.(1) Prive	to any private fund? ch 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 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-nempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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 the Fund Reporting No Information Filed	C n egiste advis	€ ered er),
SEC	Are you an advise If "yes," then for e Instruction 6 of the adviser or SEC ex do not complete S In either case, if y designation, purse CTION 7.B.(1) Prive	to any private fund? ch 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 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-nempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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 the Fund Reporting No Information Filed	C n egiste advis	€ ered er),
SEC	Are you an advise If "yes," then for ellinstruction 6 of the adviser or SEC exition not complete S In either case, if y designation, purse CTION 7.B.(1) Prive CTION 7.B.(2) Prive	to any private fund? ch 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 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-nempt 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 and 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 the Fund Reporting No Information Filed	C n egiste advis	€ ered er),
SEC	Are you an advise If "yes," then for ellinstruction 6 of the adviser or SEC exido not complete S In either case, if y designation, purse CTION 7.B.(1) Prive CTION 7.B.(2) Prive To 8 Participation of	to any private fund? ch 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 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-report 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 subsection 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 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 te Fund Reporting No Information Filed No Information Filed	C n	ered er),
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SECO SECO Item In the best year Like	Are you an advise If "yes," then for each instruction 6 of the adviser or SEC existed on the complete Section 1. In either case, if yeldesignation, pursuance in 8 Participation 6 in the section of the section in the	to any private fund? ch 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 Instructions to Part 1.A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC, many 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 subscition 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D. u 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 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 fee Fund Reporting No Information Filed Therest in Client Transactions Information about your participation and interest in your clients' transactions. This information identifies additional areas in which conflicts of interest machines. Newly-formed advisers should base responses to these questions on the types of participation and interest that you expect to engage in during the 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 clients. Newly-formed information about you and your related persons, including foreign affiliates. In Client Transactions	C n n egiste advis	ered er),
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	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	\odot	0
	(3)	recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	•	0
Sal	es In	terest in <i>Client</i> Transactions		
В.	Doy	you or any related person:	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	•
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related</i> person 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	0
	(2)	amount of securities to be bought or sold for a <i>client's</i> account?	•	0
	(3)	broker or dealer to be used for a purchase or sale of securities for a client's 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	0
E.	Doy	you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ?	•	0
F.	If yo	ou answer "yes" to E. above, are any of the brokers or dealers related persons?	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	•
l.		you or any related person, including any employee, directly or indirectly, receive compensation from any person (other than you or any related person) for client errals?	0	•
	In y	our response to Item 8.I., do not include the regular salary you pay to an employee.		
		esponding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or received from (in answ n 8.I.) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.	ering	!
		ustody em, we ask you whether you or a related person has custody of client (other than clients that are investment companies registered under the Investment Company Act	of 10	140)
		nd about your custodial practices.		40)
A.	(1)	Do you have <i>custody</i> of any advisory <i>clients</i> ':	Yes	No
		(a) cash or bank accounts?	\odot	\circ
		(b) securities?	•	0
	clie	ou are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from y nts' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption the not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.		ЭU
	(2)	If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for which you have <i>custody</i> :		
		U.S. Dollar Amount Total Number of <i>Clients</i>		
		(a) \$ 47,730,931		
	of th	ou are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the hose assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you lients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.	u pro	

B. (1) In connection with advisory services you provide to *clients*, do any of your *related persons* have *custody* of any of your advisory *clients*':

(a) cash or bank accounts?

Yes No

	(b) s	ecurities?				0	•
	You are re	equired to answer this ite	m regardless of how you an	oswered Item 9.A.(1)(a) or (b).			
	(2) If you custo	•	.B.(1)(a) or (b), what is the a	approximate amount of <i>client</i> funds ar	nd securities and total number of clients for which your related persons	s have	
	U.S.	Dollar Amount	Tota	al Number of Clients			
	(a) \$;	(b)				
C.	If you or yo	our <i>related persons</i> have	custody of client funds or se	ecurities in connection with advisory s	services you provide to <i>clients</i> , check all the following that apply:		
	(1) A qua	alified custodian(s) send	s account statements at lea	st quarterly to the investors in the po	oled investment vehicle(s) you manage.		
		dependent public accou tors in the pools.	ntant audits annually the po	oled investment vehicle(s) that you n	nanage and the audited financial statements are distributed to the		
	(3) An <i>inc</i>	dependent public accou	ntant conducts an annual s	urprise examination of client funds a	nd securities.	V	
		dependent public accou ient funds and securities	· ·	ontrol report with respect to custodial	services when you or your related persons are qualified custodians		
	report. (If y), you do not have to list au		re engaged to perform the audit or examination or prepare an internal hedule D if you already provided this information with respect to the pr		o/
D.	Do you or	your related person(s) a	ct as qualified custodians fo	or your <i>client</i> s in connection with advis	sory services you provide to <i>clients</i> ?	Yes	No
	(1) you a	ct as a qualified custodi	an			0	•
	(2) your <i>i</i>	related person(s) act as	qualified custodian(s)			0	•
	-	-	•		any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be son to be operationally independent under rule 206(4)-2 of the Advise		:
E.	-	filing your <i>annual updati</i> YYYY) the examination o	-	re subject to a surprise examination b	y an <i>independent public accountant</i> during your last fiscal year, provi	de the	
F.			custody of client funds or so advisory services you provid		ng, but not limited to, you and your <i>related persons</i> , act as qualified cu	stodia	ns
SEC	CTION 9.C. <i>II</i>	ndependent Public Acc	ountant				
		•	· · · · · · · · · · · · · · · · · · ·		orm a surprise examination, perform an audit of a pooled investment vition 9.C. for each independent public accountant.	/ehicle	
(•	the <i>independent public</i> ASSOCIATES, LLC	accountant.				
(2) The loca	tion of the <i>independent</i>	oublic accountant's office re	sponsible for the services provided:			
	Number	and Street 1:		Number and Street 2:			
	5121 CA	ASTELLO DRIVE		SUITE 1			
	City:		State:	Country:	ZIP+4/Postal Code:		
	NAPLES	S	Florida	United States	34103		
(3) Is the inc	dependent public accou	ntant registered with the Pul	olic Company Accounting Oversight E	Board?	Yes I	No C
	If "yes," I 5870	Public Company Accoun	ting Oversight Board-Assigr	ned Number:			
(4) If "yes" to rules?	o (3) above, is the <i>indepe</i>	endent public accountant su	bject to regular inspection by the Pub	olic Company Accounting Oversight Board in accordance with its	0	0
(5) The <i>inde</i>	ependent public account	ant is engaged to:				
		dit a pooled investment v					
		form a surprise examina					

(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 exinternal controls contain unqualified opinions?	amine	d
	O Yes		
	O No		
	C Report Not Yet Received		
	If you check "Report Not Yet Received", you must promptly file an amendment to your Form ADV to update your response when the accountant's report is available.		
tem	10 Control Persons		
In th	is Item, we ask you to identify every <i>person</i> that, directly or indirectly, <i>controls</i> you. If you are filing an <i>umbrella registration</i> , the information in Item 10 should be provided for ser only.	r the f	filing
Sch	ou 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 edule 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 be filed with your initial application or report, you must complete Schedule C.		
		Yes	No
A.	Does any <i>person</i> not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, <i>control</i> your management or policies?	0	•
	If yes, complete Section 10.A. of Schedule D.		
B.	If any <i>person</i> 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 or please complete Section 10.B. of Schedule D.	i 1934,	,
SEC	ΓΙΟΝ 10.A. Control Persons		
	No Information Filed		
SEC	ΓΙΟΝ 10.B. <i>Control Person</i> Public Reporting Companies		
	No Information Filed		
tem	11 Disclosure Information		
appl focu	is 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 gratication 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 are so 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 A "your" include the filing adviser and all relying advisers under an umbrella registration.	eas to	
part	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 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 identifial artment or division" (SID) of a bank, see the Glossary of Terms to determine who your advisory affiliates are.		
the eve	u 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 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 only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.	of an	
You	must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.		
Do :	any of the events below involve you or any of your supervised persons?	Yes	No ©
	"yes" answers to the following questions, complete a Criminal Action DRP:	0	•
	In the past ten years, have you or any advisory affiliate:	Yes	No
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?	0	•
	(2) been 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 response to Item 11.A.(2) to charges that are c pending.	urrenti	ly
B.	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 charged with a misdemeanor listed in Item 11.B.(1)?	0	•

If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are currently pending. For "yes" answers to the following questions, complete a Regulatory Action DRP: C. Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: Yes No (1) found you or any advisory affiliate to have made a false statement or omission? • (2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes? \odot \circ (3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted? (4) entered an order against you or any advisory affiliate in connection with investment-related activity? • (5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity? 0 \odot D. Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority: (1) ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical? (⊙ (2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes? \odot (3) ever found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted? (4) in the past ten years, entered an order against you or any advisory affiliate in connection with an investment-related activity? (5) ever denied, suspended, or revoked your or any advisory affiliate's registration or license, or otherwise prevented you or any advisory affiliate, by order, from associating with an investment-related business or restricted your or any advisory affiliate's activity? E. Has any self-regulatory organization or commodities exchange ever: (1) found you or any advisory affiliate to have made a false statement or omission? (2) found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)? (3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted? (4) disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities? Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or suspended? **(** Are you or any advisory affiliate now the subject of any regulatory proceeding that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.? For "yes" answers to the following questions, complete a Civil Judicial Action DRP: H. (1) Has any domestic or foreign court: Yes No

Item 12 Small Businesses

financial regulatory authority?

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.

(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against you or any advisory affiliate by a state or foreign

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

For purposes of this Item 12 only:

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

Yes No

0 0

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A. Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?

(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?

(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?

(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)?

В.	Do you:		
	(1) control another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0
C.	Are you:		
	(1) controlled by or under common control with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of	0	0

Schedule A

Direct Owners and Executive Officers

fiscal year?

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) 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

2. Direct Owners and Executive Officers. List below the names of:

Form ADV) of \$25 million or more on the last day of its most recent fiscal year?

If "yes," you do not need to answer Items 12.B. and 12.C.

- (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,
- (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.

through the exercise of any option, warrant, or right to purchase the security.

- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
- 5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: NA less than 5% B 10% but less than 25% D 50% but less than 75%
 - A 5% but less than 10% $\,$ C 25% but less than 50% $\,$ E 75% or more
- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name,	DE/FE/I	Title or Status	Date Title or Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date of Birth, IRS
First Name, Middle Name)			Acquired MM/YYYY	Code	Person		Tax No. or Employer ID No.
FERGUSON, BLAINE, MICHAEL	I	MANAGING	08/2011	С	Υ	N	4799223
		MEMBER					
BEYNON, WILLIAM, NICK	I	MANAGING	08/2011	С	Υ	N	2849087
		MEMBER					
FUNDAMENTAL GLOBAL INVESTORS LLC	DE	OWNER	01/2013	D	Υ	N	45-5182330
SUTTON, JEFFREY, LANCE	I	CHIEF	10/2015	NA	Υ	N	4244836
		COMPLIANCE					
		OFFICER					

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,	DE/FE/I	Entity in Which Interest	Status	Date Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date of Birth,	ı
First Name, Middle Name)		is Owned		Acquired MM/YYYY	Code	Person		IRS Tax No. or Employer ID No.	ı
CERMINARA, DANIEL, KYLE	-	FUNDAMENTAL GLOBAL INVESTORS	OWNER	01/2013	С	Υ	N	4202026	
JOHNSON, LEWIS, MCKAY	-	FUNDAMENTAL GLOBAL INVESTORS	OWNER	01/2013	С	Y	N	6095890	
MOGLIA, JOSEPH, HUGH	-	FUNDAMENTAL GLOBAL INVESTORS	OWNER	01/2013	С	Υ	N	1302369	

Schedule D - Miscellaneous

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

Schedule R

No Information Filed

DRP Pages

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

Part 2

Exemption from brochure delivery requirements for SEC-registered advisers

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

Yes No

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

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If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)			
312865	CWA FORM ADV PART 2A	Individuals, High net worth individuals, Pension plans/profit			

sharing plans, Foundations/charities, Other institutional, Financial Planning Services, Selection of Other Advisers/Solicitors

Execution Pages

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

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

Appointment of Agent for Service of Process

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

Signature

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

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

Signature: JEFF SUTTON

Printed Name:

JEFF SUTTON

Adviser CRD Number:

158940

Date: MM/DD/YYYY

03/30/2020

Title:

CHIEF COMPLIANCE OFFICER

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

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

1. Appointment of Agent for Service of Process

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

2. Appointment and Consent: Effect on Partnerships

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

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 <i>person</i> having <i>custody</i> or possession of these books and records to make them available to federal and state regulatory representatives.				
Printed Name:	Title:			
Adviser <i>CRD</i> Number: 158940				