FORM ADV

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

Prir	mary Business Name: CAPTRUST		CRD Number: 17511		
Oth	ner-Than-Annual Amendment - All Sections		Rev. 10/202		
1/1	15/2025 11:18:57 AM				
W	ARNING: Complete this form truthfully. False statements prosecution. You must keep this form updated by				
Ite	m 1 Identifying Information				
Res	sponses to this Item tell us who you are, where you are o	doing business, and how we can contact	ct you. If you are filing an umbrella registration, the information		
in I	Item 1 should be provided for the <i>filing adviser</i> only. Gener	ral Instruction 5 provides information t			
A.	Your full legal name (if you are a sole proprietor, your la CAPFINANCIAL PARTNERS, LLC	ist, first, and middle names):			
B.	(1) Name under which you primarily conduct your adviso CAPTRUST	ory business, if different from Item 1.A.			
	List on Section 1.B. of Schedule D any additional names un	nder which you conduct your advisory b	usiness.		
	(2) If you are using this Form ADV to register more than	n one investment adviser under an <i>um</i>	brella registration, check this box \square		
	If you check this box, complete a Schedule R for each relyi	ing adviser.			
C.	If this filing is reporting a change in your legal name (Ite change is of \square your legal name or \square your primary business name:	em 1.A.) or primary business name (Ite	em 1.B.(1)), enter the new name and specify whether the name		
D.	(1) If you are registered with the SEC as an investment(2) If you report to the SEC as an exempt reporting advis(3) If you have one or more Central Index Key numbers	iser, your SEC file number:			
	CIK Number				
	1512024				
E.	(1) If you have a number ("CRD Number") assigned by t	the FINRA's CRD system or by the IARD	system, your <i>CRD</i> number: 175112		
	If your firm does not have a CRD number, skip this Item 1	!.E. Do not provide the CRD number of c	ne of your officers, employees, or affiliates.		
	(2) If you have additional CRD Numbers, your additional	I CRD numbers:			
		No Information Filed			
F.	Principal Office and Place of Business				
Γ.	·				
	(1) Address (do not use a P.O. Box): Number and Street 1:	Number and Street 2:			
	4208 SIX FORKS RD	SUITE 1700			
	City: State:	Country:	ZIP+4/Postal Code:		
	RALEIGH North Carolina	United States	27609		
	If this address is a private residence, check this box	x: 🗖			
	are applying for registration, or are registered, with o are applying for registration or with whom you are reg	one or more state securities authorities, gistered. If you are applying for SEC regi	ness, at which you conduct investment advisory business. If you you must list all of your offices in the state or states to which you stration, if you are registered only with the SEC, or if you are ms of numbers of employees as of the end of your most recently		
	(2) Days of week that you normally conduct business a • Monday - Friday • Other:	it your principal office and place of busin	ness:		
	Normal business hours at this location: M-THU 830-530, FRI 830-4				
	(3) Telephone number at this location:919-870-6822(4) Facsimile number at this location, if any:				
	(4) Facsimile number at this location, if any:				

919-870-8891

		per of offices, other than your ontly completed fiscal year?	principal office and place of business,	at which you conduct investment advisory b	usiness as of the
G.	Mailing address, if different	from your <i>principal office and</i>	place of business address:		
	Number and Street 1:		Number and Street 2:		
	City:	State:	Country:	ZIP+4/Postal Code:	
	If this address is a private	residence, check this box: \Box			
	If you are a cale proprietor	stata vour full recidence add	lrace if different from your principal	office and place of business address in Itam 1	г.
Н.		, state your full residence add		office and place of business address in Item 1.	Γ
	Number and Street 1:		Number and Street 2:	715 4/5 4 4 6 4	
	City:	State:	Country:	ZIP+4/Postal Code:	
I.	Do you have one or more v LinkedIn)?	vebsites or accounts on public	ly available social media platforms (including, but not limited to, Twitter, Facebo	Yes No
	website address serves as a all of the other information.	portal through which to access You may need to list more thar do not control the content. Do I	s other information you have publishe n one portal address. Do not provide ti	v available social media platforms on Section 1 d on the web, you may list the portal without the addresses of websites or accounts on public ail (e-mail) addresses of employees or the add	listing addresses for cly available social
J.	Chief Compliance Officer				
		•	ef Compliance Officer. If you are an one. If not, you must complete Item	exempt reporting adviser, you must provide to 1.K. below.	the contact
	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) ad	dress, if Chief Compliance Offi	cer has one:		
	•	act of 1940 that you advise for y):		ou, a <i>related person</i> or an investment compai ervices to you, provide the <i>person's</i> name an	•
K.	•	act Person: If a person other may provide that information h	·	authorized to receive information and response	and to questions
	Name:		Titles:		
	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) ad	dress, if contact person has or	ne:		
L.	-	III of the books and records your principal office and place of b	·	n 204 of the Advisers Act, or similar state law	Yes No ^{w,} ⊙ ○
	If "yes," complete Section 1	.L. of Schedule D.			Vaa Na
M.	Are you registered with a f	oreign financial regulatory auth	ority?		Yes No ○
	· ·	•	al regulatory authority, even if you ha	ve an affiliate that is registered with a foreign	financial regulatory
	authority. II yes, complete	e Section 1.M. of Schedule D.			Yes No
N	Are you a public reporting of	company under Sections 12 or	15(d) of the Securities Exchange Ad	et of 1934?	
	o jou a public reporting (John Paris and Octions 12 Of	. S(a) S. the Securities Exchange At		0 0
<u> </u>	Did you have 64 Lill	mana in assets and the state of	of voice most recent of		Yes No
Ο.	_	nore in assets on the last day mate amount of your assets:	of your most recent fiscal year?		0 0

C \$1 billion to less than \$10 billion

	ity Identifier if you have one:		
254900D9JN5AS48QKE	E02		
A legal entity identifier i	s a unique number that companies use	e to identify each other in the financial m	arketplace. You may not have a legal entity identifie
SECTION 1.B. Other Busin			
List your other business na	ames and the jurisdictions in which you	u use them. You must complete a separa	te Schedule D Section 1.B. for each business name
Name: FREEDOM 401K			
Jurisdictions			
□ AL		□ 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	∥ □ ∨A
□ DC	□ MA	□ОН	□ WA
□ FL	☑ MI	□ок	□ wv
□ GA	□ MN	□ OR	□ WI
□ GU	□ MS	□ PA	□ wy
□ні	□мо	□ PR	☐ Other:
□ID	□ MT	□ RI	a strict.
		JI.	
List your other business na	ames and the jurisdictions in which yo	u use them. You must complete a separa	te Schedule D Section 1.B. for each business name
Name of CADTRICT			
Name: CAPTRUST			
Jurisdictions			
	□ IL	□ NE	□sc
Jurisdictions	□ IL	□ NE	□ sc □ sd
Jurisdictions AL AK	□ IN	□ NV	□ SD
Jurisdictions AL AK AZ	□ IN □ IA	□ NV □ NH	□ SD □ TN
Jurisdictions AL AK AZ AR	□ IN □ IA □ KS	□ NV □ NH □ NJ	□ SD □ TN □ TX
Jurisdictions AL AK AZ AR CA	□ IN □ IA □ KS □ KY	□ NM □ NJ □ NV	□ SD □ TN □ TX □ UT
Jurisdictions AL AK AZ AR CA	□ IN □ IA □ KS □ KY □ LA	MN MH	□ SD □ TN □ TX □ UT □ VT
Jurisdictions AL AK AZ AR CA CO CT	□ IN □ IA □ KS □ KY □ LA □ ME	□ NV □ NH □ NH □ NH	SD TN TX UT VT
Jurisdictions AL AK AZ AR CA CO CT DE	IN IA KS KY LA ME MD	□ NV □ NH □ NJ □ NM □ NY □ NC □ ND	SD TN TX UT VT VI VA
Jurisdictions AL AK AZ AR CA CO CT DE DC	IN IA KS KY LA ME MD MA	□ NV □ NH □ NY □ NH □ NH □ NH	□ SD □ TN □ TX □ UT □ VT □ VI □ VA □ WA
Jurisdictions AL AK AZ AR CA CO CT DE	IN IA KS KY LA ME MD	□ NV □ NH □ NJ □ NM □ NY □ NC □ ND	SD TN TX UT VT VI VA
Jurisdictions AL AK AZ AR CA CO CT DE DC	IN IA KS KY LA ME MD MA	□ NV □ NH □ NY □ NH □ NH □ NH	□ SD □ TN □ TX □ UT □ VT □ VI □ VA □ WA
Jurisdictions AL AK AZ AR CA CO CT DE DC FL	IN IA KS KY LA ME MD MA	□ NV □ NH □ NJ □ NM □ NY □ NC □ ND □ OH □ OK	SD TN TX UT VT VI VA WA WA
Jurisdictions AL AK AZ AR CA CO CT DE DC FL GA	IN IA KS KY LA ME MD MA MI MN	NV NH NJ NM NY NC ND OH OK OR	SD TN TX UT VT VI VA WA WV WV
Jurisdictions AL AK AZ AR CA CO CT DE DC FL GA GU	IN IA KS KY LA ME MD MA MI MN MN	NV NH NJ NM NY NC ND OH OK OR PA	SD TN TX UT VT VI VA WA WA WY

 $_{
m C}$ \$10 billion to less than \$50 billion

C \$50 billion or more

Name: STRATEGIC ADVISOR GROUP

Jurisdictions				
□ AL	Піг	□ NE	□sc	
□ AK	□IN	□ NV	□ SD	
□ AZ	□ IA	□ NH	□ TN	
□ AR	□ KS	□ NJ	□ TX	
□ CA	□ KY	□ NM	□ UT	
□ co	□ LA	NY	□ VT	
СТ	□ ME	□ NC	□ VI	
□ DE	□ MD	□ ND	□ VA	
□ DC	□ MA	□ он	□ WA	
□ FL	∥ □ MI	Гок	□ w∨	
☐ GA	□ MN	□ OR	∥ □ wı	
□ GU	☐ MS	₽ PA	□ WY	
□ні	□мо	□ PR	Cother:	
□ID	□мт	□ RI		
List your other business n Name: 1776 ADVISOR GRO		use them. You must complete a separa	ate Schedule D Section 1.B. for each business name.	
Jurisdictions		<u> </u>		
□ AL		□ 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	□он	□ WA	
□ FL	□ MI	□ок		
□ GA	MN	□ OR	□ WI	
□ GU	□ MS	□ PA	□ wy	
Пн	□ мо	□ PR	□ Other:	
□ID	□ MT	□ RI		
List your other business n Name: FAMILY OFFICE RIS Jurisdictions		use them. You must complete a separa	ate Schedule D Section 1.B. for each business name.	
□ AL	□ 1∟	□ NE	□ sc	
☐ AK	□IN	□ NV	□ SD	
□ AZ	□ IA	□ NH	□ TN	
☐ AR	□ KS	□ NJ	☑ TX	
□ CA	□ KY	□ NM	I □ UT	
□ co	₽ LA	□ NY	□ VT	
□ CT	□ ME	□ NC	□ ∨I	
	III			
□ DE	□ MD	□ ND	□ VA	
DC	□ MA	ОН	□ WA	
□ FL	□ MI	ГОК	□ wv	
□ GA	□ MN	□ OR	□ WI	
□ GU	□ MS	□ PA	□ WY	
□нг	□мо	□ PR	☐ Other:	
□ID	□ MT	□ RI		

AL	List your other business i	names and the jurisdictions in which yo	u use them. You must complete a separa	ate Schedule D Section 1.B. for each business name.
AL	Name: BOSTON FINANCIA	AL MANAGEMENT LLC		
AK	Jurisdictions			
AN	□ AL	☑ IL	☑ NE	□ sc
A		∥ □ IN	∥ □ NV	□ SD
March			∥ ⊠ NH	
Fig.				
Fig.				
CT				
DE				
Pick				
MI				
GA				
GU				
H				
MT				
Ust your other business names and the jurisdictions in which you use them. You must complete a separate Schedule D Section 1.8. for each business names. WEALTH COVENANT GROUP LLC AL				☐ Other:
Name: WEALTH COVENANT GROUP LLC AL	□ ID	□ MT	☑ RI	
AI			u use them. You must complete a separa	ate Schedule D Section 1.B. for each business name.
AL		NT GROUP LLC		
A		Пп	□ NE	T _{SC}
AZ		II III		
AR				
CCA				
CCO				
□ CT				
□ DE □ MD □ ND □ VA □ VA □ DC □ MA □ OH □ WA □ VA □ VA □ VA □ MI □ OK □ WV □ CA □ MN □ OR □ WI □ CA □ MN □ OR □ WI □ CA □ MO □ PR □ Other: □ ID □ MT □ RI □ CA □ MT □ CA □ ND □ ND □ ND □ TX □ T				
DC				
Ft				
GA MN OR WI WY HI Other: HI		∥ □ MA		∥ □ WA
GU	□ FL	□ MI	□ок	□ wv
□ HI □ MO □ PR □ Other: □ ID □ MT □ RI □ Other: □ RI □ Cother: □ RI □ RI □ Cother: □ RI	☐ GA	∥ □ MN	□ OR	∥ □ wı
List your other business names and the jurisdictions in which you use them. You must complete a separate Schedule D Section 1.B. for each business Name: CAMPBELL WEALTH MANAGEMENT, INC. Jurisdictions	☐ GU	☐ MS	□ PA	□ WY
List your other business names and the Jurisdictions in which you use them. You must complete a separate Schedule D Section 1.B. for each business Name: CAMPBELL WEALTH MANAGEMENT, INC. Jurisdictions IL	□н	□мо	□ PR	☐ Other:
Name: CAMPBELL WEALTH MANAGEMENT, INC. Jurisdictions	□ID	□мт	□ RI	
Name: CAMPBELL WEALTH MANAGEMENT, INC. Jurisdictions				
Jurisdictions □ AL □ IL □ NE □ SC □ AK □ IN □ NV □ SD □ AZ □ IA ☑ NH □ TN □ AR □ KS □ NJ ☑ TX ☑ CA □ KY □ NM □ UT □ CO □ LA ☑ NY □ VT □ CT □ ME ☑ NC □ VI ☑ DE ☑ MD □ ND ☑ VA ☑ DC □ MA □ OH □ WA			u use them. You must complete a separa	ate Schedule D Section 1.B. for each business name.
□ AL □ IL □ NE □ SC □ AK □ IN □ NV □ SD □ AZ □ IA ☑ NH □ TN □ AR □ KS □ NJ ☑ TX ☑ CA □ KY □ NM □ UT □ CO □ LA ☑ NY □ VT □ CT □ ME ☑ NC □ VI ☑ DE ☑ MD □ ND ☑ VA ☑ DC □ MA □ OH □ WA		H MANAGEMENT, INC.		
□ AK □ IN □ NV □ SD □ AZ □ IA ☑ NH □ TN □ AR □ KS □ NJ ☑ TX ☑ CA □ KY □ NM □ UT □ CO □ LA ☑ NY □ VT □ CT □ ME ☑ NC □ VI ☑ DE ☑ MD □ ND ☑ VA ☑ DC □ MA □ OH □ WA				<u> </u>
□ AZ □ IA ☑ NH □ TN □ AR □ KS □ NJ ☑ TX ☑ CA □ KY □ NM □ UT □ CO □ LA ☑ NY □ VT □ CT □ ME ☑ NC □ VI ☑ DE ☑ MD □ ND ☑ VA ☑ DC □ MA □ OH □ WA				
□ AR □ KS □ NJ ☑ TX ☑ CA □ KY □ NM □ UT □ CO □ LA ☑ NY □ VT □ CT □ ME ☑ NC □ VI ☑ DE ☑ MD □ ND ☑ VA ☑ DC □ MA □ OH □ WA				
Image: Constant of the		II III		
□ CO □ LA ☑ NY □ VT □ CT □ ME ☑ NC □ VI ☑ DE ☑ MD □ ND ☑ VA ☑ DC □ MA □ OH □ WA	☐ AR	∥ □ KS	∥ □ NJ	 ☑ TX
□ CO □ LA ☑ NY □ VT □ CT □ ME ☑ NC □ VI ☑ DE ☑ MD □ ND ☑ VA ☑ DC □ MA □ OH □ WA	☑ CA	∥ □ KY	∥ □ NM	∥ □ ∪т
□ CT □ ME □ NC □ VI ☑ DE ☑ MD □ ND ☑ VA ☑ DC □ MA □ OH □ WA		III		
☑ DE ☑ MD ☑ ND ☑ VA ☑ DC ☑ MA ☐ OH ☑ WA		III		
☑ DC □ MA □ OH □ WA				
IV EI II IMM II II OK II I I WW	☑ FL	□ MI	□ ok	□ wv

№ GA	MN	∥ L OR	∥ L WI	
□GU	☐ MS	₽ PA	□ wy	
Пнı	Г мо	□ PR	☐ Other:	
			E other.	
□ ID	□ MT	□RI		
List your ather business mans a and	+ h = 1, wie die tie von in 1, which 1, c	vivia them. Vai mouat appendate a com-	arata Cabadula D Castian 1 D for each husiness name	
List your other business names and	the jurisdictions in which yo	u use them. You must complete a sepa	arate Schedule D Section 1.B. for each business name.	
Name: TRUNORTH WEALTH PARTNER	RS, LLC			
Jurisdictions				
□ AL		☑ NE	□sc	
□ AK		□ NV	□ SD	
	□ IN			
☑ AZ	□ IA	▼ NH	□ TN	
☐ AR	☐ KS	∥ □ NJ	I ▼ TX	
☑ CA	□ KY	□ NM	∥ □ uT	
СО	□ LA	□ NY	□VT	
☑ CT	□ ME	□ NC	□ vi	
□ DE	□ MD	□ ND	□ VA	
□ DC	☐ MA	□ он	☑ WA	
☑ FL	□ MI	▽ OK	∥ □ w∨	
□ GA	☑ MN	□ OR	☑ WI	
□GU	☐ MS	□ PA	□ wy	
□HI	□ MO	□ PR	☐ Other:	
			other.	
□ID	□ MT	□ RI		
SECTION 1.F. Other Offices				
			, at which you conduct investment advisory business. Y	
			ration, 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 employ	vees).	
Number and Street 1:		Number and Street 2:		
4200 W 115TH STREET, SUITE 210				
City:	State:	Country:	ZIP+4/Postal Code:	
LEAWOOD	Kansa	s United States	66211	
If this address is a private residence	s shock this boy:			
ii tiiis address is a private residence	e, check this box:			
Telephone Number:	Facsim	nile Number, if any:		
816-753-5100	816-7!	53-5101		
If this office location is also required	to be registered with FINRA	or a state securities authority as a bra	anch office location for a broker-dealer or investment	
	_	R), please provide the <i>CRD</i> Branch Num		
How many ampleyees perform inves	tmont advisory functions from	m this office leastion?		
How many <i>employees</i> perform inves	tment advisory functions from	n this office location?		
11				
Are other business activities conduc		l111 +141. A		
(1) Draker dealer (registered or a	ted at this office location? (c	neck all that apply)		
\square (1) Broker-dealer (registered or ι		песк ан тпат арргу)		
	unregistered)			
☐ (1) Broker-dealer (registered of to ☐ (2) Bank (including a separately i☐ (3) Insurance broker or agent	unregistered)			

 \square (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

Describe any other *investment-related* business activities conducted from this office location:

□ (5) Registered municipal advisor□ (6) Accountant or accounting firm

(7) Lawyer or law firm

	ion 1.F. for each location. If y	you are applying for SEC registrat	t which you conduct investment advisory business. You tion, if you are registered only with the SEC, or if you as).
Number and Street 1: 9100 KEYSTONE CROSSING, SUITE 700		Number and Street	2:
City:	State:	Country:	ZIP+4/Postal Code:
INDIANAPOLIS	Indiana	United States	46240
If this address is a private residence, check	< this box: □		
Telephone Number: 317-663-6500	Facsimile N 317-663-6	lumber, if any: 501	
If this office location is also required to be adviser on the Uniform Branch Office Regis		_	ch office location for a broker-dealer or investment er here:
How many <i>employees</i> perform investment and 16	advisory functions from this o	ffice location?	
Are other business activities conducted at	this office location? (check all	that apply)	
(1) Broker-dealer (registered or unregis			
(2) Bank (including a separately identifia	able department or division of	a bank)	
(3) Insurance broker or agent	ditu tradina advisar (whathar	registered or event from regist	ration
☐ (4) Commodity pool operator or commod☐ (5) Registered municipal advisor	uity trading advisor (whether	registered or exempt from regist	ration)
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other investment-related busing	ness activities conducted fron	n this office location:	
	ion 1.F. for each location. If y	you are applying for SEC registrat	t which you conduct investment advisory business. You tion, if you are registered only with the SEC, or if you es).
Number and Street 1: 15 INDEPENDENCE BLVD		Number and Street 2:	
City: WARREN	State: New Jersey	Country: United States	ZIP+4/Postal Code: 07059
WARKLIN	New Jersey	Officed States	07039
If this address is a private residence, check	k this box:		
Telephone Number: 973.538.4347	Facsimile Number, if a	any:	
If this office location is also required to be adviser on the Uniform Branch Office Regis		_	ch office location for a broker-dealer or investment er here:
How many <i>employees</i> perform investment a	advisory functions from this o	ffice location?	
Are other business activities conducted at [[(1) Broker-dealer (registered or unregis	tered)		
(3) Insurance broker or agent	able departificnit or division of	a Dalikj	
(4) Commodity pool operator or commod	dity trading advisor (whether	registered or exempt from regist	ration)
(5) Registered municipal advisor	J 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3	5	,
(6) Accountant or accounting firm			
(7) Lawyer or law firm			

Describe any other *investment-related* business activities conducted from this office location:

.F. for each location	n. If you are applying for SEC i	siness, at which you conduct investment advisory business. You registration, if you are registered only with the SEC, or if you apployees).				
	Number and Street 2: SUITE 100					
State: Texas	Country: United States	ZIP+4/Postal Code: 78205				
box:						
	•					
	-	a branch office location for a broker-dealer or investment Number here:				
ory functions from t	his office location?					
Are other business activities conducted at this office location? (check all that apply) (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable department or division of a bank) (3) Insurance broker or agent (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm						
		siness, at which you conduct investment advisory business. You registration if you are registered only with the SEC, or if you				
	Number and 9 6TH FLOOR	Street 2:				
State: Massachusetts	Country: United States	ZIP+4/Postal Code: 02109				
box:						
Facsimile Number, 617-338-4079	if any:					
	-	a branch office location for a broker-dealer or investment Number here:				
ory functions from t	this office location?					
	ins office location?					
	State: Texas box: Facsimile Nu 210-824-87 tered with FINRA or n Form (Form BR), ory functions from te ffice location? (cheen) department or division adding advisor (where exercises twenty-five off State: Massachusetts box: Facsimile Number, 617-338-4079 tered with FINRA or n Form (Form BR),	Number and Street 2: SUITE 100 State: Country: Texas United States box: Facsimile Number, if any: 210-824-8718 tered with FINRA or a state securities authority as n Form (Form BR), please provide the CRD Branch for fice location? ffice location? (check all that apply)) lepartment or division of a bank) rading advisor (whether registered or exempt from activities conducted from this office location: Dec, other than your principal office and place of business. F. for each location. If you are applying for SEC regest twenty-five offices (in terms of numbers of ending section) State: Number and Section of the States of				

Describe any other <i>investment-related</i> business activities	s conducted from	this office loc	ation:			
Complete the following information for each office, other must complete a separate Schedule D Section 1.F. for each are an exempt reporting adviser, list only the largest twen	ach location. If y	ou are applyin	g for SEC registration	· · · · · · · · · · · · · · · · · · ·		
Number and Street 1: 1826 NORTH LOOP 1604 WEST, SUITE 260			Number and Street	2:		
City: SAN ANTONIO	State: Texas		Country: United States	ZIP+4/Postal Code: 78248		
If this address is a private residence, check this box:	1					
Telephone Number: 210.402.7200		nile Number, if 90-4669	any:			
If this office location is also required to be registered with FINRA or a <i>state securities authority</i> as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the <i>CRD</i> Branch Number here:						
How many <i>employees</i> perform investment advisory funct 9	tions from this of	fice location?				
Are other business activities conducted at this office location? (check all that apply) (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable department or division of a bank) (3) Insurance broker or agent (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm						
Complete the following information for each office, other	r than your <i>princ</i> ;	ipal office and p	place of business, at w	hich you conduct investment advisory business. You		
must complete a separate Schedule D Section 1.F. for eare an exempt reporting adviser, list only the largest twen	ach location. If y	ou are applyin	g for SEC registration	· · · · · · · · · · · · · · · · · · ·		
Number and Street 1: 5005 LBJ FREEWAY, SUITE 1313		Number a	nd Street 2:			
City: DALLAS	State: Texas	Country: United St	ates	ZIP+4/Postal Code: 75224		
If this address is a private residence, check this box: \Box						
Telephone Number: 972.661.4600	Facsimile Numb	per, if any:				
If this office location is also required to be registered wit adviser on the Uniform Branch Office Registration Form (813305			•			
How many <i>employees</i> perform investment advisory funct 8	tions from this of	fice location?				
Are other business activities conducted at this office local (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable department) (3) Insurance broker or agent (4) Commodity pool operator or commodity trading activities.	ent or division of	a bank)	xempt from registrat	ion)		

(6) Accountant or accounting firm							
(o) Accountant of accounting mini							
Describe any other <i>investment-related</i> business a	ctivities conducted fron	n this office location:					
	The state of the s						
, ,	f. for each location. If y	you are applying for SEC regis	ss, at which you conduct investment advisory business. You stration, if you are registered only with the SEC, or if you oyees).				
Number and Street 1: 2614 19TH STREET SOUTH		Number and Street 2:					
City:	State:	Country:	ZIP+4/Postal Code:				
BIRMINGHAM	Alabama	United States	35209				
If this address is a private residence, check this b	oox:						
Telephone Number: 205-949-6050	Facsimile Number, i 205-949-6041	if any:					
If this office location is also required to be registe adviser on the Uniform Branch Office Registration 366767		_	oranch office location for a broker-dealer or investment imber here:				
How many <i>employees</i> perform investment advisor 8	y functions from this o	ffice location?					
Are other business activities conducted at this off (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable de (3) Insurance broker or agent (4) Commodity pool operator or commodity tra (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm	partment or division of	f a bank)	egistration)				
Describe any other <i>investment-related</i> business a	ctivities conducted fror	n this office location:					
	f. for each location. If y	you are applying for SEC regis	ss, at which you conduct investment advisory business. You stration, if you are registered only with the SEC, or if you pyees).				
Number and Street 1: 5314 MARYLAND WAY, STE. 300		Number and Street 2:					
City:	State:	Country:	ZIP+4/Postal Code:				
BRENTWOOD	Tennessee	United States	37027				
If this address is a private residence, check this b	oox:						
Telephone Number:	Facsimile Number, if	any:					
615.377.1177	615.490.3784						
If this office location is also required to be registe adviser on the Uniform Branch Office Registration		_	eranch office location for a broker-dealer or investment imber here:				
How many <i>employees</i> perform investment advisor 23	y functions from this o	ffice location?					
Ann alban bust to the second		Albak and N					
Are other business activities conducted at this off (1) Broker-dealer (registered or unregistered)	ice location? (check all	тпат арріу)					

(2) Bank (including a separately id	lentifiable department or divisio	n of a bank)		
\square (3) Insurance broker or agent				
☐ (4) Commodity pool operator or co	ommodity trading advisor (whet	her registered or exempt fron	n registration)	
(5) Registered municipal advisor				
(6) Accountant or accounting firm				
(7) Lawyer or law firm				
Describe any other investment-relate	ed business activities conducted	from this office location:		
	D Section 1.F. for each location.	. If you are applying for SEC r	iness, at which you conduct investment advisory busi registration, if you are registered only with the SEC, on apployees).	
Number and Street 1:		Number and S	Street 2:	
1116 SOUTH MAIN STREET				
City:	State:	Country:	ZIP+4/Postal Code:	
GREENVILLE	South Carolina	United States	29601-3300	
If this address is a private residence	, check this box:			
Telephone Number: 864-467-9800	Facsimile Number, it 864-467-9443	f any:		
If this office location is also required adviser on the Uniform Branch Office	•	•	a branch office location for a broker-dealer or investi Number here:	ment
How many <i>employees</i> perform invest 9	ment advisory functions from th	nis office location?		
Are other business activities conduct (1) Broker-dealer (registered or u (2) Bank (including a separately id (3) Insurance broker or agent (4) Commodity pool operator or cd (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm	nregistered) dentifiable department or divisio	on of a bank)	n registration)	
Describe any other investment-relate	ed business activities conducted	from this office location:		
	D Section 1.F. for each location.	. If you are applying for SEC r	siness, at which you conduct investment advisory busi egistration, if you are registered only with the SEC, on an apployees).	
Number and Street 1: 13961 S. MINUTEMAN DRIVE		Number and Street 2: SUITE 300		
City:	State:	Country:	ZIP+4/Postal Code:	
DRAPER	Utah	United States	84020	
If this address is a private residence	, check this box:			
Telephone Number: 801-984-8000	Facsimile Nun 919-870-889	•		
If this office location is also required adviser on the Uniform Branch Office 685880	•		a branch office location for a broker-dealer or investo Number here:	nent
How many <i>employees</i> perform invest	ment advisory functions from th	nis office location?		

🗹 (1) Broker-dealer (registered or unregis	tered)		
\square (2) Bank (including a separately identifia	able department or divisio	on of a bank)	
(3) Insurance broker or agent			
(4) Commodity pool operator or commo	dity trading advisor (whet	ther registered or exempt from r	registration)
(5) Registered municipal advisor			
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other <i>investment-related</i> busi	ness activities conducted	from this office location:	
Complete the following information for eac	h office, other than your	principal office and place of busine	ess, at which you conduct investment advisory business. You
	ion 1.F. for each location.	. If you are applying for SEC reg	istration, if you are registered only with the SEC, or if you
Number and Street 1: 400 N. TAMPA STREET		Number and Street 2: SUITE 1800	
City:	State:	Country:	ZIP+4/Postal Code:
ГАМРА	Florida	United States	33602
f this address is a private residence, check	k this box:		
Telephone Number: 313-218-5000	Facsimile Nun 919-870-889	•	
If this office location is also required to be adviser on the Uniform Branch Office Regis 668193	•	_	branch office location for a broker-dealer or investment umber here:
How many <i>employees</i> perform investment and 17	advisory functions from th	nis office location?	
Are other business activities conducted at (1) Broker-dealer (registered or unregis		k all that apply)	
(1) Broker-dealer (registered or diffegis (2) Bank (including a separately identific (3) Insurance broker or agent	,	on of a bank)	
(4) Commodity pool operator or commodity (5) Registered municipal advisor	dity trading advisor (whet	ther registered or exempt from r	registration)
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other <i>investment-related</i> busi	ness activities conducted	from this office location:	
		nrincinal office and place of husing	ess, at which you conduct investment advisory business. You
must complete a separate Schedule D Sect	ion 1.F. for each location.	. If you are applying for SEC reg	istration, if you are registered only with the SEC, or if you loyees).
must complete a separate Schedule D Sectare an exempt reporting adviser, list only the Number and Street 1:	ion 1.F. for each location.	. If you are applying for SEC reg	
must complete a separate Schedule D Sect are an <i>exempt reporting adviser</i> , list only the Number and Street 1: 2375 EAST CAMELBACK RD	ion 1.F. for each location.	If you are applying for SEC reg ces (in terms of numbers of <i>emp</i> Number and Street 2:	
	ion 1.F. for each location e largest twenty-five offic	If you are applying for SEC reg ces (in terms of numbers of <i>emp</i> Number and Street 2: SUITE 700	loyees).
must complete a separate Schedule D Sect are an <i>exempt reporting adviser</i> , list only the Number and Street 1: 2375 EAST CAMELBACK RD	ion 1.F. for each location e largest twenty-five offic State: Arizona	If you are applying for SEC reg ces (in terms of numbers of <i>emp</i> Number and Street 2: SUITE 700 Country:	ZIP+4/Postal Code:

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 *CRD* Branch Number here:

How many <i>employees</i> perform investment advisory fun 20	ctions from this off	ice location?	
Are other business activities conducted at this office low ✓ (1) Broker-dealer (registered or unregistered) ✓ (2) Bank (including a separately identifiable departmonsor) ✓ (3) Insurance broker or agent ✓ (4) Commodity pool operator or commodity trading ✓ (5) Registered municipal advisor ✓ (6) Accountant or accounting firm ✓ (7) Lawyer or law firm	nent or division of a	a bank)	gistration)
Describe any other investment-related business activiti	es conducted from	this office location:	
	each location. If yo	ou are applying for SEC regis	s, at which you conduct investment advisory business. You tration, if you are registered only with the SEC, or if you yees).
Number and Street 1: 1640 CORPORATE WOODS CIRCLE		Number and Street 2	:
City: UNIONTOWN	State: Ohio	Country: United States	ZIP+4/Postal Code: 44685-7819
If this address is a private residence, check this box:			
Telephone Number: 330-896-6250	Facsimile Nur 330-896-629		
If this office location is also required to be registered wadviser on the Uniform Branch Office Registration Form		•	
How many <i>employees</i> perform investment advisory fun 11	ctions from this off	ice location?	
Are other business activities conducted at this office lo (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable departm (3) Insurance broker or agent (4) Commodity pool operator or commodity trading (5) Registered municipal advisor (6) Accountant or accounting firm	nent or division of a	a bank)	gistration)
(7) Lawyer or law firm			
Describe any other investment-related business activiti	es conducted from	this office location:	
	each location. If yo	ou are applying for SEC regis	s, at which you conduct investment advisory business. You tration, if you are registered only with the SEC, or if you yees).
Number and Street 1: 71 SOUTH WACKER DRIVE		Number and Street 2: SUITE 3490	
		Country: United States	ZIP+4/Postal Code: 60606
If this address is a private residence, check this box:			
•	Facsimile Number,	if any:	

If this office location is also required to be registere adviser on the Uniform Branch Office Registration Fo		•	
How many <i>employees</i> perform investment advisory 13	functions from this off	ice location?	
Are other business activities conducted at this office (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable depart (3) Insurance broker or agent (4) Commodity pool operator or commodity tradi (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm	artment or division of a	a bank)	ration)
Describe any other <i>investment-related</i> business acti	vities conducted from	this office location:	
	for each location. If yo	ou are applying for SEC registrati	which you conduct investment advisory business. You on, if you are registered only with the SEC, or if you s).
Number and Street 1: 3100 VILLAGE POINT		Number and Street 2: SUITE 200	
City: CHESTERTON	State: Indiana	Country: United States	ZIP+4/Postal Code: 46304
If this address is a private residence, check this box	«: □		
Telephone Number: 219-926-1182	Facsimile Number, if 219-395-9525	f any:	
If this office location is also required to be registere adviser on the Uniform Branch Office Registration Fo 737967		•	
How many <i>employees</i> perform investment advisory 20	functions from this off	ice location?	
Are other business activities conducted at this office (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable depart (3) Insurance broker or agent (4) Commodity pool operator or commodity tradi (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm	artment or division of a	a bank)	ation)
Describe any other investment-related business acti	vities conducted from	this office location:	
	for each location. If yo	ou are applying for SEC registrati	which you conduct investment advisory business. You on, if you are registered only with the SEC, or if you s).
Number and Street 1: 740 UNIVERSITY AVE.		Number and Street 2:	
City: SACRAMENTO	State: California	Country: United States	ZIP+4/Postal Code: 95825
If this address is a private residence, check this box	c: 🗖		

If this office location is also required to be regist	ered with FINRA or a <i>state secur</i>	ities authority as a branch office lo	ocation for a broker-dealer or investment
adviser on the Uniform Branch Office Registration 753197	n Form (Form BR), please provide	e the <i>CRD</i> Branch Number here:	
How many <i>employees</i> perform investment adviso 17	ry functions from this office loca	tion?	
Are other business activities conducted at this of	fice location? (check all that app	ly)	
(1) Broker-dealer (registered or unregistered)			
(2) Bank (including a separately identifiable de	epartment or division of a bank)		
☐ (3) Insurance broker or agent☐ (4) Commodity pool operator or commodity transfer	ading advisor (whether registere	ed or exempt from registration)	
(5) Registered municipal advisor	daming davisor (miletiner registers	a er exempt i em region anem,	
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other <i>investment-related</i> business a	activities conducted from this off	ice location:	
Complete the following information for each office must complete a separate Schedule D Section 1. are an exempt reporting adviser, list only the large	F. for each location. If you are a	pplying for SEC registration, if you	•
Number and Street 1: 600 HAMILTON STREET		Number and Street 2: SUITE 900	
City:	State:	Country:	ZIP+4/Postal Code:
ALLENTOWN	Pennsylvania	United States	18101
If this address is a private residence, check this	box:		
Telephone Number: (610) 865-2600	Facsimile Number, if any: (610) 865-2408		
If this office location is also required to be regist adviser on the Uniform Branch Office Registration 142426		3	ocation for a broker-dealer or investment
How many <i>employees</i> perform investment adviso 15	ry functions from this office loca	tion?	
Are other business activities conducted at this of	fice location? (check all that app	uly)	
▼ (1) Broker-dealer (registered or unregistered)			
\square (2) Bank (including a separately identifiable de	epartment or division of a bank)		
(3) Insurance broker or agent			
(4) Commodity pool operator or commodity tr	ading advisor (whether registere	ed or exempt from registration)	
□ (5) Registered municipal advisor□ (6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other <i>investment-related</i> business a FAS ARE ALSO REGISTERED WITH M HOLDINGS S			RANCE (AND VARIABLE ANNUITY) BUSINESS
Complete the following information for each office must complete a separate Schedule D Section 1. are an exempt reporting adviser, list only the large	F. for each location. If you are a	pplying for SEC registration, if you	•

Facsimile Number, if any:

916-646-3287

Number and Street 1: 40 WALL STREET

Telephone Number:

916-924-7527

Number and Street 2: 56TH FLOOR

NEW YORK	New York	United States	10005
If this address is a private residence, check this bo	x: 🗖		
Telephone Number: 781-237-2291	Facsimile Number, if 781-237-8536	any:	
If this office location is also required to be registered adviser on the Uniform Branch Office Registration F		•	oranch office location for a broker-dealer or investment umber here:
How many <i>employees</i> perform investment advisory 13	functions from this of	fice location?	
Are other business activities conducted at this office	e location? (check all	that apply)	
☑ (1) Broker-dealer (registered or unregistered)			
\square (2) Bank (including a separately identifiable dep	artment or division of	a bank)	
(3) Insurance broker or agent			
(4) Commodity pool operator or commodity trad	ling advisor (whether r	registered or exempt from re	egistration)
(5) Registered municipal advisor			
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other investment-related business act	civities conducted from	this office location:	
	for each location. If yo	ou are applying for SEC regi	ess, at which you conduct investment advisory business. You istration, if you are registered only with the SEC, or if you loyees).
Number and Street 1: 3 DAKOTA DRIVE		Number and Street 2: SUITE 310	
City:	State:	Country:	ZIP+4/Postal Code:
LAKE SUCCESS	New York	United States	11042
If this address is a private residence, check this bo	»: 🗖		
Telephone Number:	Facsimile Number, if	anv [.]	
516-487-8220	516-342-4321		
If this office location is also required to be registered adviser on the Uniform Branch Office Registration F 700624		•	oranch office location for a broker-dealer or investment umber here:
How many <i>employees</i> perform investment advisory 8	functions from this of	fice location?	
Are other business activities conducted at this office ✓ (1) Broker-dealer (registered or unregistered)			
\square (2) Bank (including a separately identifiable dep	artment or division of	a bank)	
☑ (3) Insurance broker or agent			
(4) Commodity pool operator or commodity trad	ling advisor (whether r	registered or exempt from re	egistration)
(5) Registered municipal advisor			
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other <i>investment-related</i> business act	civities conducted from	this office location:	
Complete the following information for each office,	other than your princi	ipal office and place of busine	ess, at which you conduct investment advisory business. You

must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you

are an exempt reporting adviser, list only the largest twenty-five offices (in terms of numbers of employees).

Number and Street 1:		Number and Street 2:		
ONE LIBERTY SQUARE		13TH FLOOR	710 4/0 110 1	
City: BOSTON	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 02109	
BOSTON	Wassachusetts	Officed States	02107	
If this address is a private residence, c	heck this box:			
Telephone Number:	Facsimile Number, if any:			
617-348-3158	racsimile Number, ir arry.			
If this office location is also required to adviser on the Uniform Branch Office R	-	_	office location for a broker-dealer or investment nere:	
How many <i>employees</i> perform investment 17	ent advisory functions from this off	ice location?		
Are other business activities conducted	I at this office location? (check all t	hat apply)		
(1) Broker-dealer (registered or unr		11 37		
(2) Bank (including a separately idea		a hank)		
(3) Insurance broker or agent	itiliable department of division of a	i barik)		
(4) Commodity pool operator or com	nmodity trading advisor (whether re	egistered or exempt from registra	tion)	
(5) Registered municipal advisor				
(6) Accountant or accounting firm				
(7) Lawyer or law firm				
Describe any other investment-related	business activities conducted from	this office location:		
,	, , , , , , , , , , , , , , , , , , ,	,	which you conduct investment advisory business. Y	
must complete a separate Schedule D are an exempt reporting adviser, list on	=		n, if you are registered only with the SEC, or if you	
are an exempt reporting adviser, list on	ry the largest twenty-live offices (if	rterms of numbers of <i>employees</i>).		
November and Charact 1		Normale are a real China et 2		
Number and Street 1: 4201 CONGRESS STREET		Number and Street 2: SUITE 160		
	State:	Country:	ZIP+4/Postal Code:	
City:	North Carolina	United States	28209	
OTHER TE	North Caronna	office States	20207	
If this address is a private residence, c	hock this box:			
ii tiiis address is a private residence, c	Heck this box.			
Tolophono Numbori	Eassimile Number if any			
Telephone Number: 704-927-0360	Facsimile Number, if any: 704-927-1099			
701 727 0000	701 727 1077			
If this office leastion is also required to	he registered with FINDA or a star	to conviting outbority on a branch	office leastion for a broker dealer or investment	
adviser on the Uniform Branch Office R	-	_	office location for a broker-dealer or investment	
120345	egistration Form (Form Bit), piedse	provide the CND Branch Namber 1		
1255.5				
How many <i>employees</i> perform investment	ent advisory functions from this off	ice location?		
6	chi advisory functions from this on	ice location:		
Are other business activities conducted	l at this office location? (check all t	hat annly)		
		пат арргу)		
(1) Broker-dealer (registered or unr		, la a mil N		
(2) Bank (including a separately iden	minable department or division of a	ы рапк)		
(3) Insurance broker or agent				
\square (4) Commodity pool operator or com	nmodity trading advisor (whether re	egistered or exempt from registra	tion)	
\square (5) Registered municipal advisor				
☐ (6) Accountant or accounting firm				
(7) Lawyer or law firm				
(7) Lawyer or law firm				
Describe any other <i>investment-related</i>	business activities conducted from	this office location:		

	ection 1.F. for each location	. If you are applying for SEC req	ness, at which you conduct investment advisory business. You gistration, if you are registered only with the SEC, or if you poloyees).
Number and Street 1: 330 JOHN CARLYLE STREET		Number and Street 2: SUITE 400	
City: ALEXANDRIA	State: Virginia	Country: United States	ZIP+4/Postal Code: 22314
ALEXANDRIA	vii gii iia	United States	22314
If this address is a private residence, ch	eck this box:		
Telephone Number: 703-535-5300	Facsimile Num 703-535-531	•	
If this office location is also required to ladviser on the Uniform Branch Office Reg	•		branch office location for a broker-dealer or investment Number here:
How many <i>employees</i> perform investment 13	nt advisory functions from th	nis office location?	
Are other business activities conducted a (1) Broker-dealer (registered or unreg		k all that apply)	
(2) Bank (including a separately ident	ifiable department or division	on of a bank)	
☐ (3) Insurance broker or agent☐ (4) Commodity pool operator or commodity	andity trading advisor (what	ther registered or event from	registration)
(4) Commodity pool operator or commodity pool op	nounty trading advisor (when	ther registered or exempt from	registration)
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other investment-related b	usiness activities conducted	from this office location:	
	ection 1.F. for each location	. If you are applying for SEC req	ness, at which you conduct investment advisory business. You gistration, if you are registered only with the SEC, or if you poloyees).
Number and Street 1: 5535 CURRITUCK DRIVE, SUITE 110		Number and Str	
City: WILMINGTON	State: North Carolina	Country: United States	ZIP+4/Postal Code: 28403
If this address is a private residence, ch	eck this box:		
Telephone Number: 910-839-6584	Facsimile Number, i	f any:	
If this office location is also required to I adviser on the Uniform Branch Office Reg	•		branch office location for a broker-dealer or investment Number here:
How many <i>employees</i> perform investment 12	nt advisory functions from th	nis office location?	
Are other business activities conducted a (1) Broker-dealer (registered or unreg	gistered)		
(2) Bank (including a separately ident	ifiable department or division	on of a bank)	
☐ (3) Insurance broker or agent☐ (4) Commodity pool operator or commodity	nodity trading advisor (who	ther registered or exempt from	registration)
(4) Commodity pool operator of commodity pool op	mounty trading advisor (WHE	mor registered of exempt from	rogisti attoriy
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other <i>investment-related</i> b	usiness activities conducted	from this office location:	

Complete the following information for each office, must complete a separate Schedule D Section 1.F. are an <i>exempt reporting adviser</i> , list only the larges	for each location. If yo	ou are applying for SEC registrati	on, if you are registered only with the SEC, or	
Number and Street 1: 10650 RED CIRCLE DRIVE, SUITE 303		Number and Street 2:		
City:	State:	Country:	ZIP+4/Postal Code:	
MINNETONKA	Minnesota	United States	55343	
If this address is a private residence, check this bo	ox: 🗖			
Telephone Number: 866.767.8007	Facsimile Number,	if any:		
If this office location is also required to be register adviser on the Uniform Branch Office Registration F		-		nent
How many <i>employees</i> perform investment advisory 16	functions from this off	ice location?		
Are other business activities conducted at this office	ce location? (check all t	hat apply)		
\square (1) Broker-dealer (registered or unregistered)				
(2) Bank (including a separately identifiable dep	artment or division of a	a bank)		
(3) Insurance broker or agent				
☐ (4) Commodity pool operator or commodity trac☐ (5) Registered municipal advisor	ding advisor (whether r	egistered or exempt from registr	ation)	
(6) Accountant or accounting firm				
(7) Lawyer or law firm				
Describe any other <i>investment-related</i> business ac	tivities conducted from	this office location:		
SECTION 1.I. Website Addresses				
List your website addresses, including addresses for limited to, Twitter, Facebook and/or LinkedIn). You media platform.				
Address of Website/Account on Publicly Available S	Social Media Platform:	HTTP://WWW.STRATEGICADVIS	ORGROUP.COM	
Address of Website/Account on Publicly Available S	Social Media Platform:	https://linkedin.com/company/o	aptrust/	
Address of Website/Account on Publicly Available S	Social Media Platform:	https://captrustcommunityfoun	dation.org	
Address of Website/Account on Publicly Available S	Social Media Platform:	https://twitter.com/columncapi	al	
Address of Website/Account on Publicly Available S	Social Media Platform:	HTTPS://TWITTER.COM/CAPTRU	STFA	
Address of Website/Account on Publicly Available S	Social Media Platform:	HTTP://WWW.CAPTRUSTADVICI	E.COM	
Address of Website/Account on Publicly Available S	Social Media Platform:	HTTP://WWW.CAPTRUST.COM		

Address of Website/Account on Publicly Available Social Media Platform:	HTTPS://WWW.FACEBOOK.COM/CAPTRUSTADVISORS
Address of Website/Account on Publicly Available Social Media Platform:	HTTP://WWW.BFMINVEST.COM
Address of Website/Account on Publicly Available Social Media Platform:	https://www.instagram.com/bfminvest
Address of Website/Account on Publicly Available Social Media Platform:	https://www.facebook.com/Boston-Financial-Management-LLC-697219740676885
Address of Website/Account on Publicly Available Social Media Platform:	http://bfmcap.com/
Address of Website/Account on Publicly Available Social Media Platform:	HTTPS://WWW.LINKEDIN.COM/COMPANY/383748/
Address of Website/Account on Publicly Available Social Media Platform:	HTTPS://TWITTER.COM/BFM_INVEST
Address of Website/Account on Publicly Available Social Media Platform:	https://www.youtube.com/@bostonfinancialmanagementl5813
Address of Website/Account on Publicly Available Social Media Platform:	HTTP://WWW.CAMPBELLWEALTH.COM
Address of Website/Account on Publicly Available Social Media Platform:	HTTPS://TWITTER.COM/CAMPBELLWEALTH
Address of Website/Account on Publicly Available Social Media Platform:	HTTPS://WWW.FACEBOOK.COM/CAMPBELL-WEALTH-MANAGEMENT-260075957396036/
Address of Website/Account on Publicly Available Social Media Platform:	HTTPS://WWW.LINKEDIN.COM/COMPANY/CAMPBELL-WEALTH-MANAGEMENT/
Address of Website/Account on Publicly Available Social Media Platform:	HTTPS://WWW.LINKEDIN.COM/IN/KELLY-CAMPBELL-CFP-CMFC-CHFC-AIF-938BB63/
Address of Website/Account on Publicly Available Social Media Platform:	HTTPS://TWITTER.COM/PETERREKSTADTN
Address of Website/Account on Publicly Available Social Media Platform:	HTTPS://WWW.LINKEDIN.COM/COMPANY/2825692
Address of Website/Account on Publicly Available Social Media Platform:	HTTPS://WWW.TRUNORTHWEALTHPARTNERS.COM
Address of Website/Account on Publicly Available Social Media Platform:	HTTP://WWW.WEALTHCOVENANTGROUP.COM
Address of Website/Account on Publicly Available Social Media Platform:	http://www.linkedin.com/in/dennisstavinoha
Address of Website/Account on Publicly Available Social Media Platform:	https://twitter.com/wealth_covenant
Address of Website/Account on Publicly Available Social Media Platform:	https://www.facebook.com/Wealth-Covenant-Group-LLC-862558173905234

Address of Website/Account on Publicly Available Social Media Platform: https://www.linkedin.com/company/wealth-covenant-group-llc SECTION 1.L. Location of Books and Records Complete the following information for each location at which you keep your books and records, other than your principal office and place of business. You must complete a separate Schedule D, Section 1.L. for each location. Name of entity where books and records are kept: GLOBAL RELAY COMMUNICATIONS, INC. Number and Street 1: Number and Street 2: 2 ROBERT SPECK PARKWAY SUITE 500 ZIP+4/Postal Code: City: State: Country: MISSISSAUGA Canada L4Z 1H8 If this address is a private residence, check this box: \square Telephone Number: Facsimile number, if any: 866-484-6630 604-608-2941 This is (check one): one of your branch offices or affiliates. a third-party unaffiliated recordkeeper. other. Briefly describe the books and records kept at this location. THIS IS A "MIRROR" LOCATION FOR GLOBAL RELAY, THE VENDOR OF THE EMAIL SURVEILLANCE AND ARCHIVING MANAGEMENT SYSTEM THAT CAPFINANCIAL BEGAN USING ON JANUARY 1, 2013 TO ARCHIVE EMAIL/SOCIAL MEDIA FOR COMPLIANCE PURPOSES Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC Number and Street 1: Number and Street 2: 1725 HUGHES LANDING BLVD. SUITE 880 State: Country: ZIP+4/Postal Code: THE WOODLANDS Texas **United States** 77381 If this address is a private residence, check this box: \Box Telephone Number: Facsimile number, if any: 281-616-5935 This is (check one): one of your branch offices or affiliates. o a third-party unaffiliated recordkeeper. other. Briefly describe the books and records kept at this location. CAPTRUST ACQUIRED THE ASSETS OF ENGRAVE WEALTH PARTNERS LLC. COPIES OF ADVISORY CONTRACTS AND CLIENT CORRESPONDENCE MAY BE LOCATED AT THIS BRANCH OFFICE. Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC. Number and Street 1: Number and Street 2: 1209 CULBRETH DRIVE City: Country: ZIP+4/Postal Code: State:

If this address is a private residence, check this box	ĸ : □				
Telephone Number: Fa	acsimile number, if	any:			
This is (check one): one of your branch offices or affiliates. a third-party unaffiliated recordkeeper. other.					
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF FOUNTAIN FIN CLIENT CORRESPONDENCE.		ES, INC. THIS OFF	TICE MAY HAVE COPII	ES OF HISTORICAL RECORDS I	LIKE CONTRACTS AND
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC					
Number and Street 1: 7904 N. SAM HOUSTON PKWY W., SUITE 310			Number and Stree SUITE 310	et 2:	
City: HOUSTON	Sta Uta		Country: United States	ZIP+4/Postal Code 77064	∋:
If this address is a private residence, check this box	ĸ : □				
Telephone Number: (281) 640-8100	Fac	simile number, if a	iny:		
This is (check one): o one of your branch offices or affiliates.					
a third-party unaffiliated recordkeeper.					
o other.					
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF WEALTH COVICLIENT CORRESPONDENCE.		THIS LOCATION I	MAY HAVE COPIES OF	F HISTORICAL RECORDS LIKE (CONTRACTS AND
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC.					
Number and Street 1: 33 W MONROE		Number and S SUITE 1000	Street 2:		
City: CHICAGO	State: Illinois	Country: United States		ZIP+4/Postal Code: 60603	
If this address is a private residence, check this box	x: □				
Telephone Number: 312-782-5432	Facsimile numb	er, if any:			
This is (check one): o one of your branch offices or affiliates.					
o a third-party unaffiliated recordkeeper.					
O other.					
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF J.H. ELLWOOL CONTRACTS AND CLIENT CORRESPONDENCE.		NC. (ELLWOOD). 1	THIS LOCATION MAY	HAVE COPIES OF HISTORICAL	RECORDS LIKE

United States

28405

North Carolina

WILMINGTON

Name of entity where books and records are kep CAPFINANCIAL PARTNERS, LLC.	t:		
Number and Street 1: ONE COMMERCE STREET		Number and Street 2: SUITE 800	
City:	State:	Country:	ZIP+4/Postal Code:
MONTGOMERY	Alabama	United States	36104
If this address is a private residence, check this k	oox:		
Telephone Number: 334-272-1192	Facsimile number, i 334-244-9091	if any:	
This is (check one): one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
o other.			
Briefly describe the books and records kept at th CAPTRUST ACQUIRED THE ASSETS OF WELCH HOLCORRESPONDENCE.		MAY HAVE COPIES OF HISTORIC	AL RECORDS LIKE CONTRACTS AND CLIENT
Name of entity where books and records are kep CAPFINANCIAL PARTNERS, LLC.	t:		
Number and Street 1: 1116 SOUTH MAIN STREET		Number and Street 2:	
3	State:	Country:	ZIP+4/Postal Code:
GREENVILLE	South Carolina	United States	29601
If this address is a private residence, check this k	oox:		
	Facsimile number, if any 864-467-9443	<i>y</i> :	
This is (check one): one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
other.			
Briefly describe the books and records kept at th CAPTRUST ACQUIRED THE ASSETS OF NACHMAN ICLIENT CORRESPONDENCE.		INC. THIS OFFICE MAY HAVE COF	PIES OF HISTORICAL RECORDS LIKE CONTRACTS AND
Name of entity where books and records are kep CAPFINANCIAL PARTNERS, LLC	t:		
Number and Street 1: 4201 CONGRESS STREET		Number and Street 2: SUITE 160	
City:	State:	Country:	ZIP+4/Postal Code:
CHARLOTTE	North Carolina	United States	28209
If this address is a private residence, check this k	oox:		
Telephone Number: 704-927-0360	Facsimile number, if any 704-927-1099	y:	
This is (check one): one of your branch offices or affiliates.			

 $_{\hbox{\ensuremath{\mathbb{C}}}}$ a third-party unaffiliated record keeper.

other.				
Briefly describe the books and records kep CUSTOMER ACCOUNT DOCUMENTS, CORRE		(ING FILES.		
Name of entity where books and records a CAPFINANCIAL PARTNERS, LLC	are kept:			
Number and Street 1: 10811 MAIN STREET		Number and Street 2:		
City: BELLEVUE	State: Washington	Country: United States	ZIP+4/Postal Code: 98004	
If this address is a private residence, check	k this box:			
Telephone Number: 425-401-1211	Facsimile number, if any	y :		
This is (check one): one of your branch offices or affiliates.				
${\bf C}$ a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kep CAPTRUST ACQUIRED THE ASSETS OF TRUT CORRESPONDENCE.		N MAY HAVE COPIES OF HISTORI	ICAL RECORDS LIKE CONTRACTS AND CLIENT	
Name of entity where books and records a CAPFINANCIAL PARTNERS, LLC.	ıre kept:			
Number and Street 1: 60 W BROAD STREET		Number and Street 2: SUITE 300		
City: BETHLEHEM	State: Pennsylvania	Country: United States	ZIP+4/Postal Code: 18018-5721	
If this address is a private residence, check	k this box:			
Telephone Number: 610-954-0400	Facsimile number, if any 610-954-0500	:		
This is (check one): one of your branch offices or affiliates.				
${f C}$ a third-party unaffiliated recordkeeper.				
O other.				
Briefly describe the books and records kep CAPTRUST ACQUIRED THE ASSETS OF MCQ CLIENT CORRESPONDENCE.		THIS OFFICE MAY HAVE COPIES	OF HISTORICAL RECORDS LIKE CONTRACTS AND	
Name of entity where books and records a CAPFINANCIAL PARTNERS, LLC.	ıre kept:			
Number and Street 1: 3 DAKOTA DRIVE		Number and Street 2: SUITE 310		
City: LAKE SUCCESS	State: New York	Country: United States	ZIP+4/Postal Code: 11042	
If this address is a private residence, check	k this box:			

5164878220	5163424321			
This is (check one): one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
o other.				
O strist.				
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF FCE GROUP. CORRESPONDENCE.		IAVE COPIES OF HISTORICAL RE	CORDS LIKE CONTRACTS AND CLIENT	
Name of entity where books and records are kept CAPFINANCIAL PARTNERS, LLC.	:			
Number and Street 1: 2010 CROW CANYON PLACE		Number and Street 2:		
City:	State:	Country:	ZIP+4/Postal Code:	
SAN RAMON	California	United States	94583	
If this address is a private residence, check this bo	ох:			
Telephone Number: 9256484730	Facsimile number, if	any:		
This is (check one): O one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
other.				
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF WATERMARK CLIENT CORRESPONDENCE.		INC. THIS LOCATION MAY HAVE	COPIES OF HISTORICAL RECORDS LIKE CONTRACTS	ANI
Name of entity where books and records are kept CAPFINANCIAL PARTNERS, LLC.	:			
Number and Street 1: 740 UNIVERSITY AVENUE		Number and Street 2: SUITE 100		
City:	State:	Country:	ZIP+4/Postal Code:	
SACRAMENTO	California	United States	95825	
If this address is a private residence, check this bo	ox:			
Telephone Number: 916-924-7527	Facsimile number, if 916-646-3287	any:		
This is (check one): one of your branch offices or affiliates.				
o a third-party unaffiliated recordkeeper.				
O other.				
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF GENOVESE E CLIENT CORRESPONDENCE MAY BE LOCATED IN THE	BURFORD & BROTHERS	WEALTH AND RETIREMENT PLAN	MGMT, LLC. COPIES OF ADVISORY CONTRACTS AND	ı
Name of entity where books and records are kept	:			

Facsimile number, if any:

Telephone Number:

CAPFINANCIAL PARTNERS, LLC

8201 MISSION ROAD		SUITE 200	
City: PRAIRIE VILLAGE	State: Kansas	Country: United States	ZIP+4/Postal Code: 66208
If this address is a private residence, check this b	ox:		
Telephone Number: 913-262-1108	Facsimile number, it 913-262-2015	f any:	
This is (check one): o one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.other.			
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF DANDA TRO CONTRACTS AND CLIENT CORRESPONDENCE.		GEMENT, INC. THIS OFFICE N	MAY HAVE COPIES OF HISTORICAL RECORDS LIKE
Name of entity where books and records are kept CAPFINANCIAL PARTNERS, LLC	:		
Number and Street 1: 5314 MARYLAND WAY SUITE 300		Number and Street 2:	
City: BRENTWOOD	State: Tennessee	Country: United States	ZIP+4/Postal Code: 37027
If this address is a private residence, check this b	ox:		
Telephone Number: 615-377-1177	Facsimile number, if ar 615-490-3784	ny:	
This is (check one): one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.other.			
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF TRUSTCORE CLIENT CORRESPONDENCE.		LC. THIS OFFICE MAY HAVE	COPIES OF HISTORICAL RECORDS LIKE CONTRACTS AND
Name of entity where books and records are kept CAPFINANCIAL PARTNERS, LLC	:		
Number and Street 1: 255 STATE STREET		Number and Stree 6TH FLOOR	t 2:
	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 02109
If this address is a private residence, check this b	ox:		
·	Facsimile number, if any: 517-338-4079		
This is (check one): o one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.o other.			
Briefly describe the books and records kept at this	s location.		
,			

Number and Street 2:

Number and Street 1:

CORRESPONDENCE AT THIS BRANCH.			
Name of entity where books and records are keeperson of the control of the contro	ept:		
Number and Street 1: 27 CLEVELAND ST., SUITE 202		Number and Street 2:	
City: GREENVILLE	State: South Carolina	Country: United States	ZIP+4/Postal Code: 29601
If this address is a private residence, check this	s box:		
Telephone Number: 864-232-8670	Facsimile number, if any:		
This is (check one): one of your branch offices or affiliates.			
$_{ m C}$ a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at CAPTRUST ACQUIRED THE ASSETS OF REYNOLD CORRESPONDENCE.		T INC. THIS OFFICE MAY HAVE O	COPIES OF CONTRACTS AND CLIENT
Name of entity where books and records are k CAPFINANCIAL PARTNERS, LLC	ept:		
Number and Street 1: 15 INDEPENDENCE BOULEVARD		Number and Street 2:	
City: WARREN	State: New Jersey	Country: United States	ZIP+4/Postal Code: 07059
If this address is a private residence, check this	s box:		
Telephone Number: 973-538-4347	Facsimile number, if any 973-538-0935	:	
This is (check one): one of your branch offices or affiliates.			
$_{f C}$ a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at CAPTRUST ACQUIRED THE ASSETS OF PORTFOL CONTRACTS AND CLIENT CORRESPONDENCE.		THIS OFFICE MAY HAVE COPIES	S OF HISTORICAL RECORDS LIKE ADVISORY
Name of entity where books and records are keepstood and control of the control o	ept:		
Number and Street 1: 601 POYDRAS STREET		Number and Street 2: SUITE 1855	
City: NEW ORLEANS	State: Louisiana	Country: United States	ZIP+4/Postal Code: 70130
If this address is a private residence, check this	s box:		
Telephone Number: 504-799-3170	Facsimile number, if ar 504-799-3179	ıy:	

CAPTRUST AQUIRED THE ASSETS OF BOSTON FINANCIAL MANAGEMENT LLC. THIS LOCATION MAY HAVE HISTORICAL RECORDS LIKE CONTRACTS AND CLIENT

This is (check one):			
one of your branch offices or affiliates.			
o a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this loc CAPTRUST ACQUIRED THE ASSETS OF SOUTHERN WEA CLIENT CORRESPONDENCE.		T LLP. THIS LOCATION MAY HAVE	COPIES OF HISTORICAL RECORDS LIKE CONTRACTS AND
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC.			
Number and Street 1: 10 SOUTH JEFFERSON ST.		Number and Street 2: SUITE 1210	
City: ROANOKE	State: Virginia	Country: United States	ZIP+4/Postal Code: 24011
If this address is a private residence, check this box:			
Telephone Number: 5403421212	Facsimile numbe	r, if any:	
This is (check one): one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
O other.			
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC (CAPTRUST)			
Number and Street 1: 9100 KEYSTONE CROSSING, SUITE 700		Number and Street	2:
City: INDIANAPOLIS	State: Indiana	Country: United States	ZIP+4/Postal Code: 46240
If this address is a private residence, check this box:			
Telephone Number: 317-663-6500	Facsimile I	number, if any:	
This is (check one): one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this loc CAPTRUST ACQUIRED THE ASSETS OF COLUMN CAPITA CLIENT CORRESPONDENCE.		. THIS LOCATION MAY HAVE COPI	ES OF HISTORICAL RECORDS LIKE CONTRACTS AND
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC.			
Number and Street 1: 100 SPECTRUM CENTER DRIVE, SUITE 125		Number and Stre	et 2:
City:	State:	Country:	ZIP+4/Postal Code:

If this address is a private residence, check this bo	ox:		
Telephone Number: 657-900-1899	Facsimile nun 657-900-189	•	
This is (check one): one of your branch offices or affiliates. a third-party unaffiliated recordkeeper. other.			
Briefly describe the books and records kept at this CAPTRUST AQUIRED THE ASSETS OF NEW MARKET AND CLIENT CORRESPONDENCE.		LLC. THIS LOCATION MAY HAV	/E COPIES OF HISTORICAL RECORDS LIKE CONTRACTS
Name of entity where books and records are kept: STORR RECORDS			
Number and Street 1: 9221 GLOBE CENTER DRIVE		Number and Street	2:
1.9	state: Jorth Carolina	Country: United States	ZIP+4/Postal Code: 27560
If this address is a private residence, check this bo	ox:		
Telephone Number: F 919-313-3816	acsimile number, if any	<i>r</i> :	
This is (check one): O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
other.			
Briefly describe the books and records kept at this STORAGE FACILITY FOR ARCHIVED HARD COPY CLI			
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC			
Number and Street 1: 330 JOHN CARLYLE STREET		Number and Street 2: SUITE 400	
City:	State:	Country:	ZIP+4/Postal Code:
ALEXANDRIA	Virginia	United States	22314
If this address is a private residence, check this bo	ox: 🗖		
Telephone Number: 703-535-5300	Facsimile number,	if any:	
This is (check one): o one of your branch offices or affiliates.			
o a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF CAMPBELL W CONTRACTS AND CLIENT CORRESPONDENCE.		INC. THIS OFFICE MAY HAVE C	OPIES OF HISTORICAL RECORDS LIKE ADVISORY

California

United States

92618

IRVINE

Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC				
Number and Street 1: 3050 WELLS FARGO PLACE City:	State:	Number and Street 2: 30 EAST 7TH STREET Country:	ZIP+4/Postal Code:	
ST. PAUL	Minnesota	United States	55101	
If this address is a private residence, check this box	κ: □			
Telephone Number: 651-735-5878	Facsimile number, if 651-735-5881	any:		
This is (check one): one of your branch offices or affiliates.				
o a third-party unaffiliated recordkeeper.				
O other.				
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF TRUNORTH WAND CLIENT CORRESPONDENCE.		C. THIS OFFICE MAY HAVE COPIE	S OF HISTORICAL RECORDS LIKE ADVISORY CONT	RACTS
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC				
Number and Street 1: 5005 LBJ FREEWAY		Number and Street 2: SUITE 1313		
City:	State:	Country:	ZIP+4/Postal Code:	
DALLAS	Texas	United States	75244	
If this address is a private residence, check this box	κ: □			
Telephone Number: 972-661-4600	Facsimile number, 972-934-8310	, if any:		
This is (check one): one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
O other.				
Briefly describe the books and records kept at this CAPTRUST ACQUIRED THE ASSETS OF SOUTHERN W CLIENT CORRESPONDENCE.		LLP. THIS LOCATION MAY HAVE	COPIES OF HISTORICAL RECORDS LIKE CONTRACT	ſS AND
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC				
Number and Street 1: 1826 NORTH LOOP 1604 WEST		Number and Street 2: SUITE 260		
City: SAN ANTONIO	State: Texas	Country: United States	ZIP+4/Postal Code: 78248	
If this address is a private residence, check this box	k: 🗖			
Telephone Number: 210-402-7200	Facsimile numbe 210-490-4669	r, if any:		
This is (check one): one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				

O other.			
Briefly describe the books and records kept at this I CAPTRUST ACQUIRED THE ASSETS OF SOUTHERN WILLIAM CORRESPONDENCE.		LLP. THIS LOCATION MAY HAVE	COPIES OF HISTORICAL RECORDS LIKE CONTRACTS AND
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC.			
Number and Street 1: 3100 VILLAGE POINT		Number and Street 2: SUITE 200	
City:	State:	Country:	ZIP+4/Postal Code:
CHESTERTON	Indiana	United States	46304
If this address is a private residence, check this box	c: 🗖		
Telephone Number: 219-926-1182	Facsimile number, i 219-395-9528	if any:	
This is (check one): one of your branch offices or affiliates.			
o a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this I CAPTRUST ACQUIRED THE ASSETS OF LAKESIDE WE AND CLIENT CORRESPONDENCE.		ROUP, LLC. THIS OFFICE MAY H.	AVE COPIES OF HISTORICAL RECORDS LIKE CONTRACTS
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC			
Number and Street 1: 10 LAUREL AVE. SUITE 100		Number and Street 2	:
3	ate: assachusetts	Country: United States	ZIP+4/Postal Code: 02481
If this address is a private residence, check this box	c: 🗖		
Telephone Number: Fac 781-239-1180	csimile number, if any	:	
This is (check one): one of your branch offices or affiliates.			
${f C}$ a third-party unaffiliated recordkeeper. ${f C}$ other.			
Briefly describe the books and records kept at this ICAPTRUST ACQUIRED THE ASSETS OF AEVITAS WEA		C. THIS OFFICE MAY HAVE COPI	ES OF CONTRACTS AND CLIENT CORRESPONDENCE.
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC.			
Number and Street 1:		Number and Street 2:	
1640 CORPORATE WOODS CIRCLE	State:	Country	ZIP+4/Postal Code:
City: UNIONTOWN	Ohio	Country: United States	44685-7819
If this address is a private residence, check this box	c: 🗖		

330-896-6250	330-896-6295		
This is (check one): O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
~			
• other.			
Briefly describe the books and records kept at the CAPTRUST ACQUIRED THE ASSETS OF CORNERST CLIENT CORRESPONDENCE.		OFFICE MAY HAVE COPIES OF HIST	ORICAL RECORDS LIKE CONTRACTS AND
Name of entity where books and records are ke CAPFINANCIAL PARTNERS, LLC.	ot:		
Number and Street 1:		Number and Street 2:	
542 RUGH STREET		SUITE 1000	
City:	State:	Country:	ZIP+4/Postal Code:
GREENSBURG	Pennsylvania	United States	15601
If this address is a private residence, check this	box: 🗖		
Telephone Number: 412-931-2700	Facsimile number, if any: 412-931-2772		
This is (check one): one of your branch offices or affiliates.			
$_{\hbox{\scriptsize C}}$ a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at the CAPTRUST ACQUIRED THE ASSETS OF PWA WEAL BRANCH OFFICE.		DVISORY CONTRACTS AND CLIENT	CORRESPONDENCE MAY BE LOCATED IN THIS
Name of entity where books and records are ker TIERPOINT	ot:		
Number and Street 1: 5301 DEPARTURE DRIVE		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
RALEIGH	North Carolina	United States	27616
If this address is a private residence, check this	box: \square		
Telephone Number: (877) 621-666	Facsimile number, if any:		
This is (check one): one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at the COLOCATION FACILITY PROVIDING BACKUP FOR		DANCY AND CONNECTIVITY.	
Name of entity where books and records are ke CAPFINANCIAL PARTNERS, LLC.	ot:		

Number and Street 2:

Facsimile number, if any:

Telephone Number:

Number and Street 1:

345 CORPORATE CENTER COURT			
City: STOCKBRIDGE	State: Georgia	Country: United States	ZIP+4/Postal Code: 30281
If this address is a private residence, check this box:			
Telephone Number: 770-507-0025	Facsimile number, 770-507-1764	if any:	
This is (check one): one of your branch offices or affiliates.			
$_{ m C}$ a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this loc CAPTRUST ACQUIRED THE ASSETS OF STEWARDSHIP F CONTRACTS AND CLIENT CORRESPONDENCE.		S, LLC. THIS OFFICE MAY HAVE COPI	ES OF HISTORICAL RECORDS LIKE ADVISORY
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC.			
Number and Street 1: 400 N. TAMPA STREET		Number and Street 2: SUITE 1800	
City:	State:	Country:	ZIP+4/Postal Code:
TAMPA	Florida	United States	33602
If this address is a private residence, check this box:			
Telephone Number: 813-218-5000	Facsimile number, 919-870-8891	if any:	
This is (check one): O one of your branch offices or affiliates.			
o a third-party unaffiliated recordkeeper.			
other.			
Briefly describe the books and records kept at this loc CAPTRUST ACQUIRED THE ASSETS OF CAPTRUST ADVI CORRESPONDENCE.		FICE MAY HAVE COPIES OF HISTORIC	AL RECORDS LIKE CONTRACTS AND CLIENT
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC.			
Number and Street 1: 700 N. ST. MARY'S STREET		Number and Street 2: SUITE 100	
City:	State:		ZIP+4/Postal Code:
SAN ANTONIO	Texas	•	78205
If this address is a private residence, check this box:			
Telephone Number: 919-870-6822	Facsimile number,	if any:	
This is (check one): one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
O other.			

Briefly describe the books and records kept at this location.

CAPTRUST ACQUIRED THE ASSETS OF SOUTH TEXAS MONEY MANAGEMENT, LTD. COPIES OF ADVISORY CONTRACTS AND CLIENT CORRESPONDENCE MAY BE

LOCATED AT THIS BRANCH OFFICE.					
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC.					
Number and Street 1: 13961 S. MINUTEMAN DRIVE		Number and Street SUITE 300	2:		
City: DRAPER		Country: United States		ZIP+4/Postal Code: 84020	
If this address is a private residence, check this box:					
Telephone Number: 801-984-8000	Facsimile number, i 801-984-8008	f any:			
This is (check one): one of your branch offices or affiliates.					
o a third-party unaffiliated recordkeeper. o other.					
Briefly describe the books and records kept at this Ic CAPTRUST ACQUIRED THE ASSETS OF KNOX CAPITAL		OFFICE MAY HAVE (COPIES OF CON	ITRACTS AND CLIENT CORRESPONDE	NCE.
Name of entity where books and records are kept: GLOBAL RELAY COMMUNICATIONS, INC.					
Number and Street 1: WATERFRONT CENTER, 200 BURRARD STREET			Number and SUITE 375	Street 2:	
City: VANCOUVER	Star	te:	Country: Canada	ZIP+4/Postal Code: V6C 3L6	
If this address is a private residence, check this box:					
Telephone Number: 866.484.6630		simile number, if any 608-2941	y :		
This is (check one): one of your branch offices or affiliates.					
a third-party unaffiliated recordkeeper.other.					
Briefly describe the books and records kept at this logLOBAL RELAY IS THE VENDOR OF THE EMAIL SURVE ARCHIVE EMAIL/SOCIAL MEDIA FOR COMPLIANCE PU	ILLANCE AND ARCHIVI	ng management s'	YSTEM THAT CA	APFINANCIAL BEGAN USING ON JANU	ARY 1, 2013 TO
Name of entity where books and records are kept: 'CAPFINANCIAL PARTNERS, LLC.					
Number and Street 1: 333 SOUTH SEVENTH STREET		Number and St SUITE 2900	reet 2:		
	State: Minnesota	Country: United States		ZIP+4/Postal Code: 55402	
If this address is a private residence, check this box:					
· ·	Facsimile number, if ar 612-347-7983	ny:			
This is (check one):					

one of your branch offices or affiliates.

O a third-party unaffiliated recordkeeper.				
O other.				
Briefly describe the books and records kept CAPTRUST ACQUIRED THE ASSETS OF WINDS CORRESPONDENCE MAY BE LOCATED IN THIS	SOR FINANCIAL GROUP AN	D DEFINED CONTRIBUTION ADVISO	RS, INC. COPIES OF ADVISORY CONTRACTS A	AND CLIENT
Name of entity where books and records are CAPFINANCIAL PARTNERS, LLC.	e kept:			
Number and Street 1: 3600 N. CAPITAL OF TEXAS HWY		Number and Street 2: BUILDING B, SUITE 150		
City: AUSTIN	State: Texas	Country: United States	ZIP+4/Postal Code: 78746	
If this address is a private residence, check	this box:			
Telephone Number: 512-354-3965	Facsimile nun 888-463-016	•		
This is (check one): One of your branch offices or affiliates.				
o a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept CAPTRUST ACQUIRED THE ASSETS OF INTRU		S OFFICE MAY HAVE COPIES OF CO	NTRACTS AND CLIENT CORRESPONDENCE.	
Name of entity where books and records are CAPFINANCIAL PARTNERS, LLC.	e kept:			
Number and Street 1: 628 GREEN VALLEY ROAD, SUITE 206		Number and Street 2:		
City: GREENSBORO	State: North Carolina	Country: United States	ZIP+4/Postal Code: 27408	
If this address is a private residence, check	this box:			
Telephone Number: 3362948585	Facsimile number, if a	any:		
This is (check one): one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept CAPTRUST ACQUIRED THE ASSETS OF MORTO CLIENT CORRESPONDENCE.		LLC. THIS OFFICE MAY HAVE COPIE	S OF HISTORICAL RECORDS LIKE CONTRACT	S AND
Name of entity where books and records are CAPFINANCIAL PARTNERS, LLC.	e kept:			
Number and Street 1: 9892 ROSEMONT AVE.		Number and Street 2: SUITE 100		
City:	State:	Country:	ZIP+4/Postal Code:	
LONE TREE	Colorado	United States	80124	

If this address is a private residence, check this box:

Telephone Number: 303-740-8600	Facsimile number, if 303-290-0237	any:	
This is (check one): one of your branch offices or affiliates.			
$_{ m C}$ a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this lo CAPTRUST ACQUIRED THE ASSETS OF SHINE WEATH CLIENT CORRESPONDENCE.		ICE MAY HAVE COPIES OF HISTORIC	CAL RECORDS LIKE ADVISORY CONTRACTS AND
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC			
Number and Street 1: 1001 MCKINNEY, SUITE 1730		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
HOUSTON	Texas	United States	77002
If this address is a private residence, check this box:			
Telephone Number: 713-227-0100	Facsimile number, 713-227-0347	if any:	
This is (check one): one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
other.			
Briefly describe the books and records kept at this lo CAPTRUST ACQUIRED THE ASSETS OF MONROE VOS CCLIENT CORRESPONDENCE.		HIS LOCATION MAY HAVE COPIES OF	F HISTORICAL RECORDS LIKE CONTRACTS AND
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC.			
Number and Street 1: 3200 E. CAMELBACK ROAD		Number and Street 2: #300	
City:	State:	Country:	ZIP+4/Postal Code:
PHOENIX	Arizona	United States	85018
If this address is a private residence, check this box:			
Telephone Number: 602-468-1232	Facsimile number, i 919-870-8891	if any:	
This is (check one): one of your branch offices or affiliates. a third-party unaffiliated recordkeeper. other.			
Briefly describe the books and records kept at this lo CAPTRUST ACQUIRED THE ASSETS OF MRA ASSOCIAT CORRESPONDENCE.		MAY HAVE COPIES OF HISTORICAL F	RECORDS LIKE CONTRACTS AND CLIENT

Name of entity where books and records are kept:

CAPFINANCIAL PARTNERS, LLC

Number and Street 1: 10650 RED CIRCLE DRIVE		Number and Street 2: SUITE 303		
City:	State:	Country:	ZIP+4/Postal Code:	
MINNETONKA	Minnesota	United States	55343	
If this address is a private residence, check the	is box:			
Telephone Number: 952-767-8007	Facsimile number	, if any:		
This is (check one): one of your branch offices or affiliates.				
$oldsymbol{\mathbb{C}}$ a third-party unaffiliated recordkeeper.				
O other.				
Briefly describe the books and records kept at CAPTRUST ACQUIRED THE ASSETS OF QUANTIT THIS BRANCH OFFICE.		C. COPIES OF ADVISORY CONTRACT	S AND CLIENT CORRESPONDENCE MAY BE LO	CATED AT
Name of entity where books and records are k CAPFINANCIAL PARTNERS, LLC.	kept:			
Number and Street 1: 100 WILLIAM STREET		Number and Street 2 SUITE 215	2:	
City:	State:	Country:	ZIP+4/Postal Code:	
WELLESLY	Massachusetts	United States	02481	
If this address is a private residence, check the	is box:			
Telephone Number: 781-237-2291	Facsimile number, if 781-237-8536	any:		
This is (check one): one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
O other.				
Briefly describe the books and records kept at CAPTRUST ACQUIRED THE ASSETS OF CAMMAC AND CLIENT CORRESPONDENCE.		, LLC THIS OFFICE MAY HAVE COPIE	ES OF HISTORICAL RECORDS LIKE ADVISORY	CONTRACTS
Name of entity where books and records are k CAPFINANCIAL PARTNERS, LLC	kept:			
Number and Street 1: 4435 MAIN STREET		Number and Street 2: STE 650		
City:	State:	Country:	ZIP+4/Postal Code:	
KANSAS CITY	Missouri	United States	64111	
If this address is a private residence, check the	is box:			
Telephone Number: 816-753-5100	Facsimile numb 816-753-5101	er, if any:		
This is (check one): one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
other.				

CAPTRUST ACQUIRED THE ASSETS OF FRONTIER WEAL ADVISORY CONTRACTS AND CLIENT CORRESPONDENCE		LLC (FRONTIER). THIS OFFICE I	MAY HAVE COPIES OF HISTORICAL RECORDS LIKE
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC			
Number and Street 1: 4372 N. LOOP 1604W		Number and Street 2: SUITE 116	
City: SAN ANTONIO	State: Texas	Country: United States	ZIP+4/Postal Code: 78249
If this address is a private residence, check this box:			
Telephone Number: 210-403-5350	Facsimile number,	if any:	
This is (check one): one of your branch offices or affiliates.			
$_{\hbox{\scriptsize C}}$ a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this loc CAPTRUST ACQUIRED THE ASSETS OF COVENANT MUL CONTRACTS AND CLIENT CORRESPONDENCE.		, LLC (COVENANT). THIS LOCAT	ION MAY HAVE COPIES OF HISTORICAL RECORDS LIKE
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC			
Number and Street 1: 300 THROCKMORTON STREET		Number and Street 2: SUITE 1450	
City: FORT WORTH	State: Texas	Country: United States	ZIP+4/Postal Code: 76102
If this address is a private residence, check this box:			
Telephone Number: 817-335-5739	Facsimile number,	, if any:	
This is (check one): one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this loc CAPTRUST ACQUIRED THE ASSETS OF OMEGA WEALTH THIS BRANCH OFFICE.		OPIES OF ADVISORY CONTRAC	'S AND CLIENT CORRESPONDENCE MAY BE LOCATED AT
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC			
Number and Street 1: 801 INTERNATIONAL PKWY, SUITE 500		Number and Street	2:
City: LAKE MARY	State: Florida	Country: United States	ZIP+4/Postal Code: 32746
If this address is a private residence, check this box:			
Telephone Number: 407-878-1229	Facsimile r	number, if any:	

Briefly describe the books and records kept at this location.

This is (check one):			
one of your branch offices or affiliates.a third-party unaffiliated recordkeeper.			
other.			
Briefly describe the books and records kept at this le		OFFICE MAY HAVE COPIES (OF HISTORICAL RECORDS LIKE CONTRACTS AND CLIENT
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC.			
Number and Street 1: 15C NORTH RANDOLPH STREET		Number and Street 2:	
City: LEXINGTON	State: Virginia	Country: United States	ZIP+4/Postal Code: 24450
If this address is a private residence, check this box	. 🗆		
Telephone Number: 540-464-9100	Facsimile number, it 540-463-9105	any:	
This is (check one): one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this local CAPTRUST ACQUIRED THE ASSETS OF DAVIDSON & CORRESPONDENCE.		OCATION MAY HAVE COPIES	OF HISTORICAL RECORDS LIKE CONTRACTS AND CLIENT
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC			
Number and Street 1: 1100 POYDRAS STREET		Number and Street 2: SUITE 1350	
City: NEW ORLEANS	State: Louisiana	Country: United States	ZIP+4/Postal Code: 70163
If this address is a private residence, check this box			
Telephone Number: 504-207-8555	Facsimile number, if a	ny:	
This is (check one): ⊙ one of your branch offices or affiliates.			
$_{\hbox{\scriptsize C}}$ a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this local Captrust acquired the assets of crescent captracts and client correspondence.		.C (CRESCENT). THIS LOCAT	ON MAY HAVE COPIES OF HISTORICAL RECORDS LIKE
Name of entity where books and records are kept: CAPFINANCIAL PARTNERS, LLC			
Number and Street 1:		Number and Street 2:	

SUITE 200

100 COMMERCIAL STREET

City: PORTLAND	State: Maine	Country: United States	ZIP+4/Postal Code: 04101	
	Manie	omtou otatos		
If this address is a private residence	ce, check this box:			
Telephone Number: 207-517-7530	Facsimile numb	er, if any:		
This is (check one): one of your branch offices or af	filiates.			
$oldsymbol{\mathbb{C}}$ a third-party unaffiliated record	Ikeeper.			
other.				
Briefly describe the books and reco CAPTRUST AQUIRED THE ASSETS O CORRESPONDENCE AT THIS BRANC	F BOSTON FINANCIAL MANAGEMEN	T LLC. THIS LOCATION MAY HAVE I	HISTORICAL RECORDS LIKE CONTRACTS AND	CLIENT
Name of entity where books and re	ecords are kept:			
Number and Street 1: 101 FEDERAL STREET		Number and Street	2:	
City: BOSTON	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 02110	
If this address is a private residence	ce, check this box:			
Telephone Number: 617-488-2700	Facsimile number, if a	any:		
This is (check one): one of your branch offices or af	filiates.			
o a third-party unaffiliated record	Ikeeper.			
O other.				
Briefly describe the books and reco CAPTRUST ACQUIRED THE ASSETS CORRESPONDENCE.	•	ATION MAY HAVE COPIES OF HISTO	DRICAL RECORDS LIKE CONTRACTS AND CLIE	NT
ECTION 1.M. Registration with Fo	oreign Financial Regulatory Autho	rities		
		No Information Filed		
tem 2 SEC Registration/Reporting	9			
•			complete this Item 2.A. only if you are applying the substitution of the information in Item 2.5	-
updating amendment to your SI		er eligible to register with the SEG	rough 2.A.(12), below. If you are submitting C, check Item 2.A.(13). Part 1A Instruction 2 p	
(1) are a large advisory	firm that either:			
(a) has regulatory as	sets under management of \$100 m	illion (in U.S. dollars) or more; or		
	sets under management of \$90 mill s registered with the SEC;	ion (in U.S. dollars) or more at th	e time of filing its most recent <i>annual updatin</i>	g
\square (2) are a mid-sized advi	i sory firm that has regulatory asse	ts under management of \$25 mill	on (in U.S. dollars) or more but less than \$10	00 million (in

(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

U.S. dollars) and you are either:

(b) not subject to examination by the state securities authority of the state where you maintain your principal office and place of business; Click HERE for a list of states in which an investment adviser, if registered, would not be subject to examination by the state securities authority. (3) Reserved (4) have your principal office and place of business outside the United States; (5) are an investment adviser (or subadviser) to an investment company registered under the Investment Company Act of 1940; are an investment adviser to a company which has elected to be a business development company pursuant to section 54 of the Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under management; (7) are a pension consultant with respect to assets of plans having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a); (8) are a related adviser under rule 203A-2(b) that controls, is controlled by, or is under common control with, an investment adviser that is registered with the SEC, and your principal office and place of business is the same as the registered adviser; If you check this box, complete Section 2.A. (8) of Schedule D. (9) are an adviser relying on rule 203A-2(c) because you expect to be eligible for SEC registration within 120 days; If you check this box, complete Section 2.A. (9) of Schedule D. (10) are a multi-state adviser that is required to register in 15 or more states and is relying on rule 203A-2(d); If you check this box, complete Section 2.A. (10) of Schedule D. (11) are an Internet adviser relying on rule 203A-2(e); If you check this box, complete Section 2.A. (11) of Schedule D. (12) have **received an SEC order** exempting you from the prohibition against registration with the SEC; If you check this box, complete Section 2.A. (12) of Schedule D. (13) are no longer eligible to remain registered with the SEC. State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers C. Under state laws, SEC-registered advisers may be required to provide to state securities authorities a copy of the Form ADV and any amendments they file with the SEC. These are called notice filings. In addition, exempt reporting advisers may be required to provide state securities authorities with a copy of reports and any amendments they file with the SEC. If this is an initial application or report, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to direct your notice filings or reports to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to your registration to stop your notice filings or reports from going to state(s) that currently receive them, uncheck the box(es) next to those state(s). Jurisdictions ✓ AL **▽** IL ✓ NE ☑ SC ✓ AK ✓ NV **☑** SD ☑ IN **☑** AZ ✓ IA ✓ NH ▼ TN ✓ AR ✓ KS MJ ✓ TX ✓ KY CA ✓ NM ✓ UT ✓ NY ✓ LA ▼ co ✓ ✓ CT ✓ ME **☑** NC **☑** MD ✓ ND ✓ VA ☑ DF **☑** DC ✓ MA ✓ OH ✓ WA **▽** FL ✓ MI ✓ OK ✓ WV **☑** GA ✓ WI MN 🗹 ✓ OR ☐ GU ✓ MS ✓ PA ✓ WY ₽ HI ✓ MO ☑ PR ✓ ID ✓ MT ☑ RI

If you are amending your registration to stop your notice filings or reports from going to a state that currently receives them and you do not want to pay that state's notice filing or report filing fee for the coming year, your amendment must be filed before the end of the year (December 31).

SECTION 2.A.(8) Related Adviser

business; or

If you are relying on the exemption in rule 203A-2(b) from the prohibition on registration because you *control*, are *controlled* by, or are under common *control* with an investment adviser that is registered with the SEC and your *principal office and place of business* is the same as that of the registered adviser, provide the following information:

CRD Number of Registered Investment Adviser
SEC Number of Registered Investment Adviser
SECTION 2.A.(9) Investment Adviser Expecting to be Eligible for Commission Registration within 120 Days
If you are relying on rule 203A-2(c), the exemption from the prohibition on registration available to an adviser that expects to be eligible for SEC registration within 120 days, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these representations:
I am not registered or required to be registered with the SEC or a <i>state securities authority</i> and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective.
I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.
SECTION 2.A.(10) Multi-State Adviser
If you are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.
If you are applying for registration as an investment adviser with the SEC, you must make both of these representations:
I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the state securities authorities in those states.
I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the state securities authorities of those states.
If you are submitting your annual updating amendment, you must make this representation:
Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the <i>state securities authorities</i> in those states.
SECTION 2.A.(11) Internet Adviser
If you are relying on rule 203A-2(e), the Internet adviser exemption from the prohibition on registration, you are required to make a representation about your
eligibility for SEC registration. By checking the appropriate box, you will be deemed to have made the required representation.
If you are applying for registration as an investment adviser with the SEC or changing your existing Item 2 response regarding your eligibility for SEC registration, you must make this representation:
I will provide investment advice on an ongoing basis to more than one client exclusively through an operational interactive website.
If you are filing an annual updating amendment to your existing registration and are continuing to rely on the Internet adviser exemption for SEC registration, you must make this representation:
I have provided and will continue to provide investment advice on an ongoing basis to more than one client exclusively through an <i>operational interactive</i> website.
SECTION 2.A.(12) SEC Exemptive Order If you are relying upon an SEC order exempting you from the prohibition on registration, provide the following information:
Application Number: 803-
Date of order:
Item 3 Form of Organization
If you are filing an umbrella registration, the information in Item 3 should be provided for the filing adviser only.
A. How are you organized?
Corporation
O Sole Proprietorship
C Limited Liability Partnership (LLP)
Partnership
Limited Liability Company (LLC)
C Limited Partnership (LP)

	If yo	u are changing your response to this Item, see Part 1A Instruction 4.
B.		hat month does your fiscal year end each year? EMBER
C.	Unde	er the laws of what state or country are you organized?
	Sta	
	Nor	th Carolina United States
	-	u 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 state or country where you reside.
	If yo	u are changing your response to this Item, see Part 1A Instruction 4.
Ite	m 4 Si	uccessions Yes No
Α.	,	you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure gal status (e.g., form of organization or state of incorporation)?
	If "y	es", complete Item 4.B. and Section 4 of Schedule D.
B.	Date	of Succession: (MM/DD/YYYY)
	If yo	u 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.
SEC	CTION	4 Successions
		No Information Filed
		formation About Your Advisory Business - Employees, Clients, and Compensation
	•	s 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 y policy. Part 1A Instruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.
En	nploye	ees
_		e 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 more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).
Α.	Appr	oximately how many <i>employees</i> do you have? Include full- and part-time <i>employees</i> but do not include any clerical workers.
B.	(1)	Approximately how many of the <i>employees</i> reported in 5.A. perform investment advisory functions (including research)? 718
	(2)	Approximately how many of the <i>employees</i> reported in 5.A. are registered representatives of a broker-dealer? 407
	(3)	Approximately how many of the <i>employees</i> reported in 5.A. are registered with one or more <i>state securities authorities</i> as <i>investment adviser representatives</i> ? 718
	(4)	Approximately how many of the <i>employees</i> reported in 5.A. are registered with one or more <i>state securities authorities</i> as <i>investment adviser representatives</i> for an investment adviser other than you?
		0
	(5)	Approximately how many of the <i>employees</i> reported in 5.A. are licensed agents of an insurance company or agency? 182
	(6)	Approximately how many firms or other <i>persons</i> solicit advisory <i>clients</i> on your behalf? 24

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

Other (specify):

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?

C

- (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 (1)(d) or (3)(d) below.

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

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

If a *client* fits into more than one category, select one category that most accurately represents the *client* to avoid double counting *clients* and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

Type of <i>Client</i>	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)	17747		\$ 5,741,055,363
(b) High net worth individuals	11258		\$ 46,750,273,502
(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)	3008		\$ 750,199,891,297
(h) Charitable organizations	150		\$ 16,923,001,206
(i) State or municipal <i>government entities</i> (including government pension plans)	41		\$ 28,493,909,120
(j) Other investment advisers			\$
(k) Insurance companies	8		\$ 1,052,971,600
(I) Sovereign wealth funds and foreign official institutions			\$
(m) Corporations or other businesses not listed above	12		\$ 3,011,952,529
(n) Other:			\$

Compensation Arrangements

E.	You are compensated	for your in	vestment advisory	services by ((check all that	apply):
----	---------------------	-------------	-------------------	---------------	-----------------	---------

(2) Hourly charges

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

(4) Fixed fees (other than subscription fees)

(5) Commissions

(6) Performance-based fees

(7) Other (specify):

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

Regulatory Assets Under Management

Yes No

⊙ ⊙

F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios?

(2) If yes, what is the amount of your regulatory assets under management and total number of accounts?

	Non-Discretionary:	(b)	\$ 689,824,917,535	(e)	12,352	
	Total:	(c)	\$ 852,173,054,617	(f)	100,603	
	Part 1A Instruction 5.b. explains how to calcula this Item.	te ye	our regulatory assets under mai	nagement. You must	follow these instructions carefully when completing	
	(3) What is the approximate amount of your total non- <i>United States persons</i> ?	regu	ılatory assets under managem	ent (reported in Iter	m 5.F.(2)(c) above) attributable to <i>clients</i> who are	ì
	\$ 544,000,000					
em	5 Information About Your Advisory Business - A	dvi	sory Activities			
	sory Activities					
	What type(s) of advisory services do you provide?	Che	eck all that apply.			
	54 of the Investment Company Act of 19	omp 940)	anies (as well as "business dev		es" that have made an election pursuant to sectio	n
	 (4) Portfolio management for pooled investr (5) Portfolio management for businesses (o other pooled investment vehicles) (6) Pension consulting services 				ner than registered investment companies and	
	 (7) Selection of other advisers (including priority) (8) Publication of periodicals or newsletters 		e fund managers)			
	 (9) Security ratings or pricing services (10) Market timing services (11) Educational seminars/workshops 					
	(12) Other(specify):					
	Do not check Item 5.G.(3) unless you provide advisor Investment Company Act of 1940, including as a sub- companies to which you provide advice in Section 5.0	badı	riser. If you check Item 5.G.(3),	-		ıt
Ⅎ.	If you provide financial planning services, to how no 0	nany	<i>i clients</i> did you provide these	services during your	last fiscal year?	
	0 1 - 10					
	O 11 - 25					
	O 26 - 50					
	o 51 - 100					
	O 251 - 500					
	More than 500					
	If more than 500, how many?					
	2,500 (round to the nearest 500)					
	In your responses to this Item 5.H., do not include a those investors.	as "c	lients" the investors in a private	e fund you advise, un	nless you have a separate advisory relationship with	
					Yes	No
	(1) Do you participate in a wrap fee program?				•	\circ
	(2) If you participate in a wrap fee program, what is(a) sponsor to a wrap fee program\$ 0	s the	e amount of your regulatory as	sets under managei	ment attributable to acting as:	
	(b) portfolio manager for a <i>wrap fee program</i> ? \$ 0					
	(c) <i>sponsor</i> to and portfolio manager for the sar \$ 4,568,207,813	me i	wrap fee program?			
	If you report an amount in Item 5.1.(2)(c), do not re	port	that amount in Item 5.1.(2)(a)	or Item 5.I.(2)(b).		
	If you are a portfolio manager for a wrap fee program	n, lis	t the names of the programs, th	neir sponsors and rela	ated 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

Yes No

fee program, do not check Item 5.1.(1) or enter any amounts in response to Item 5.1.(2).

U.S. Dollar Amount

(a) \$ 162,348,137,082

Discretionary:

Total Number of Accounts

(d) 88,251

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?	0	•
	(2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management?	0	•
K.	Separately Managed Account Clients		
	(1) Do you have regulatory assets under management attributable to <i>clients</i> other than those listed in Item 5.D.(3)(d)-(f) (separately managed account <i>clients</i>)?	Yes ©	No
	If yes, complete Section 5.K.(1) of Schedule D.		
	(2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise?	0	•
	If yes, complete Section 5.K.(2) of Schedule D.		
	(3) Do you engage in derivative transactions on behalf of any of the separately managed account clients that you advise?	0	•
	If yes, complete Section 5.K.(2) of Schedule D.		
	(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management?	0	•
	If yes, complete Section 5.K.(3) of Schedule D for each custodian.		
L.	Marketing Activities		
	(1) Do any of your advertisements include:	Yes	No
	(a) Performance results?	•	0
	(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	•	0
	(c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	•	0
	(d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	•	0
	(e) Third-party ratings?	0	•
	(2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of <i>testimonials</i> , <i>endorsements</i> , or <i>third-party ratings</i> ?	•	0
	(3) Do any of your advertisements include hypothetical performance?	•	0
	(4) Do any of your advertisements include predecessor performance?	•	0
SEC	CTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies		
	No Information Filed		
SEC	CTION 5.1.(2) Wrap Fee Programs		

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

Name of Wrap Fee Program

PORTFOLIO MANAGEMENT ACCOUNT (PMA WRAP)

Name of Sponsor

CAPTRUST

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

Sponsor's CRD Number (if any):
175112
Name of <i>Wrap Fee Program</i>
SEPARATELY MANAGED ACCOUNT (SMA WRAP)
Name of Sponsor
CAPTRUST
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-): 801 - 62193

SECTION 5.K.(1) Separately Managed Accounts

Sponsor's CRD Number (if any):

175112

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

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

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

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

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

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

Asset Type	Mid-year	End of year
(i) Exchange-Traded Equity Securities	10 %	10 %
(ii) Non Exchange-Traded Equity Securities	0 %	0 %
(iii) U.S. Government/Agency Bonds	1 %	1 %
(iv) U.S. State and Local Bonds	1 %	1 %
(v) Sovereign Bonds	0 %	0 %
(vi) Investment Grade Corporate Bonds	0 %	0 %
(vii) Non-Investment Grade Corporate Bonds	0 %	0 %
(viii) Derivatives	0 %	0 %
(ix) Securities Issued by Registered Investment Companies or Business Development Companies	51 %	51 %
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)		19 %
(xi) Cash and Cash Equivalents	3 %	3 %
(xii) Other	15 %	15 %

Generally describe any assets included in "Other"

INSURANCE CONTRACTS SUCH AS GENERAL ACCOUNT, GROUP ANNUITY, INSURANCE SEPARATE ACCOUNTS, VARIABLE CONTRACTS.

(b)	Asse	et Type	End of year
	(i)	Exchange-Traded Equity Securities	%
	(ii)	Non Exchange-Traded Equity Securities	%
	(iii)	U.S. Government/Agency Bonds	%
	(iv)	U.S. State and Local Bonds	%

(v)	Sovereign Bonds	%
(vi)	Investment Grade Corporate Bonds	%
(vii)	Non-Investment Grade Corporate Bonds	%
(viii)	Derivatives	%
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	%
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	%
(xi)	Cash and Cash Equivalents	%
(xii)	Other	%

Generally describe any assets included in "Other"

SECTION 5.K.(2) Separately Managed Accounts - Use of *Borrowings* and Derivatives

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

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

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

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

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

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

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

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

(i) Mid-Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings	ngs (3) 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 E	xposures		
			(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 No Information Filed

Iter	n 6 C	Other Business Activities		
In t	his It	tem, we request information about your firm's other business activities.		
Α.	You	are actively engaged in business as a (check all that apply): (1) broker-dealer (registered or unregistered) (2) registered representative of a broker-dealer (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (4) futures commission merchant (5) real estate broker, dealer, or agent (6) insurance broker or agent (7) bank (including a separately identifiable department or division of a bank) (8) trust company (9) registered municipal advisor (10) registered security-based swap dealer (11) major security-based swap participant (12) accountant or accounting firm (13) lawyer or law firm (14) other financial product salesperson (specify):		
	If yo	ou 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.	'es	Nο
B.	(1)	Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?		⊙
	(2)	If yes, is this other business your primary business?		0
	(-)	If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.		
	(2)		'es	
	(3)	Do you sell products or provide services other than investment advice to your advisory clients?	⊙	0
		If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.		

SECTION 6.A. Names of Your Other Businesses

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. CAPTRUST ALSO PROVIDES WEALTH MANAGEMENT SERVICES AND INCOME TAX CONSULTING, TAX PREPARATION/ACCOUNTING AND BILL PAY TO CLIENTS WHO HAVE ENGAGED US TO DO SO PER A SEPARATE WRITTEN AGREEMENT. If you engage in that business under a different name, provide that name:
Item 7 Financial Industry Affiliations
In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your <i>clients</i> .
A. This part of Item 7 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates. Your <i>related persons</i> are all of your <i>advisory affiliates</i> and any <i>person</i> that is under common <i>control</i> with you.
You have a related person that is a (check all that apply): (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)
(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
✓ (12) insurance company or agency✓ (13) pension consultant
(14) real estate broker or dealer
 (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles
Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).
Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.
For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.
You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.
You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.
SECTION 7.A. Financial Industry Affiliations
Complete a separate Schedule D Section 7.A. for each <i>related person</i> listed in Item 7.A.
Legal Name of Related Person: BOSTON FINANCIAL MANAGEMENT LLC
Primary Business Name of <i>Related Person</i> : BOSTON FINANCIAL MANAGEMENT LLC

SECTION 6.B.(2) Description of Primary Business

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

801 - 11178

	or Other		
4.	Related Person's (a) CRD Number (if any):		
	112360		
	(b) CIK Number(s) (if any):		
	No Information Filed		
5.	Related Person is: (check all that apply) (a) Droker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b) ✓ other investment adviser (including financial planners)		
	(c) \square 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		
	(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 		
	(b) Sponsor, general partner, managing member (or equivalent) or pooled investment vehicles	Ye	s 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 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 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> as:	sets:	
	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	s No
9.	(a) If the related person is an investment adviser, is it exempt from registration?	0	•
	(b) If the answer is yes, under what exemption?		
10.	(a) Is the related person registered with a foreign financial regulatory authority?	0	•
	(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	No Information Filed		
11.	Do you and the related person share any supervised persons?	•	0
12.	Do you and the related person share the same physical location?	•	0
1.	Legal Name of <i>Related Person</i> : CAPFINANCIAL SECURITIES, LLC.		
2.	Primary Business Name of <i>Related Person</i> : CAPFINANCIAL SECURITIES, LLC.		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 8 - 65870		
	or		
	Other		
4.	Related Person's		
	(a) CRD Number (if any):		
	126291		

	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o)	ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6.	Do y		Yes O	
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	•	С
8.	(a) (b) (c)		o o ts:	
9.	(a)	· ·	Yes	
/.		If the answer is yes, under what exemption?	0	•
10	. (a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	0	•
11	. Do y	you and the related person share any supervised persons?	•	С
12	. Do y	you and the <i>related person</i> share the same physical location?	•	С
	CAM	al Name of <i>Related Person</i> : PBELL WEALTH MANAGEMENT, INC.		
2.		pary Business Name of <i>Related Person</i> : PBELL WEALTH MANAGEMENT, INC.		
3.		ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 71121 er		
4.	(a)	ted Person's CRD Number (if any): 152956		
	(b)	CIK Number(s) (if any): No Information Filed		
5.	Relai	ted Person is: (check all that apply) Display the properties of the control of t		

	 (b) ✓ other investment adviser (including financial planners) (c) ☐ registered municipal advisor (d) ☐ registered security-based swap dealer (e) ☐ major security-based swap participant (f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) ☐ futures commission merchant (h) ☐ banking or thrift institution (i) ☐ trust company (j) ☐ accountant or accounting firm (k) ☐ lawyer or law firm (l) ☐ insurance company or agency (m) ☐ pension consultant (n) ☐ real estate broker or dealer (o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles 	Yes	Ne
6.	Do you control or are you controlled by the related person?	0	
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>? (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i>' funds or securities that are maintained at the <i>related person</i>? (c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i>'s office responsible for <i>custody</i> of your <i>clients</i>' ass Number and Street 1:	o o sets:	
	If this address is a private residence, check this box:	V	NI.
9.	(a) If the related person is an investment adviser, is it exempt from registration?	Yes	
	(b) If the answer is yes, under what exemption?		
10.	D. (a) Is the related person registered with a foreign financial regulatory authority? (b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed	0	•
11.	1. Do you and the related person share any supervised persons?	⊙	С
12.	2. Do you and the <i>related person</i> share the same physical location?	•	С
	Legal Name of <i>Related Person</i> : GRANDVIEW DELIGHT, LLC Primary Business Name of <i>Related Person</i> : GRANDVIEW DELIGHT, LLC		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 108277 or Other		
4.	(a) CRD Number (if any): 284807		
	(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		

	(1	banking or thrift institution		
	(i	trust company		
	(j	accountant or accounting firm		
	(1	□ lawyer or law firm		
	l) 1)	☐ insurance company or agency ☐ pension consultant		
	() ()	real estate broker or dealer		
	((sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(1	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	s No
6	. С	you control or are you controlled by the related person?	0	\odot
7	. А	e you and the <i>related person</i> under common <i>control</i> ?	•	0
8		Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?		⊙
	(1	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> ?	י ס	0
	(0	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients's</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	s No
9	. (a	If the related person is an investment adviser, is it exempt from registration?	0	\odot
	(1	If the answer is yes, under what exemption?		
	_ ,			
1	0. (Is the related person registered with a foreign financial regulatory authority?		\odot
	(1	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registere. No Information Filed	ed.	
1	1. D	you and the related person share any supervised persons?	•	0
1	2. D	you and the <i>related person</i> share the same physical location?	•	0
	. P V . R 8 o	291453		
5	(i) (i) (i) (i)	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		
	(l (l	□ lawyer or law firm□ insurance company or agency		
	1)			

	(n) L real estate broker or dealer		
	(o) \square sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p) \square sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
		Ye	s No
6.	Do you control or are you controlled by the related person?	0	•
7.	Are you and the <i>related person</i> under common <i>control</i> ?	•	0
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 operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	_	0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> as Number and Street 1:	sets:	
	City: State: Country: ZIP+4/Postal Code:		
	If this address is a private residence, check this box: \square		
	(a) If the related person is an investment advicer is it evernt from registration?		s No
9.		0	•
	(b) If the answer is yes, under what exemption?		
10	0. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	_	•
	(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed	_	٠
11	1. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
12	2. Do you and the <i>related person</i> share the same physical location?	⊙	0
Ite	em 7 <i>Private Fund</i> Reporting		
		Ye	s No
_		_	
В.	Are you an adviser to any <i>private fund</i> ?	⊙	0
	sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt repadviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead complete Section 7.B.(2) of Schedule D. In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designate place of the fund's name.) of d, al code	e, or
SE	ECTION 7.B.(1) <i>Private Fund</i> Reporting		
	Funds per Page: 15 💌 Total Funds: 8		
,	A. PRIVATE FUND		
<u> </u>	Information About the <i>Private Fund</i>		
	1. (a) Name of the <i>private fund</i> :		
	CAPTRUST 2022 HOMECOURT FUND LP		
	(b) Private fund identification number: (include the "805-" prefix also) 805-8579299817		
	 Under the laws of what state or country is the <i>private fund</i> organized: 		
	State: Country:		
	Delaware United States		
	3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):		

	Name of General Partner, Manager, Trustee, or Director		
	CAPTRUST 2022 HOMECOURT FUND GP LLC		
	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.		
	No Information Filed		
4.	The private fund (check all that apply; you must check at least one):		
	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940		
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes	No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	•
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?		
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	•
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?	~	
	Name of private fund:		
	Private fund identification number:		
	(include the "805-" prefix also)		
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions:	h of 1	the
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of the assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		No
8.	(a) Is this private fund a "fund of funds"?	•	0
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehi regardless of whether they are also <i>private funds</i> or registered investment companies.	cles,	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	•
		Yes	No
9.		0	
10.	What type of fund is the <i>private fund</i> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private fund ACCESS FUND INVESTING IN AN UNAFFILIATED LIMITED PARTNERSHIP	าd:	
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 16,025,290		

<u>Ownership</u>

	\$ 25	50,000		
		E: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the anizational documents of the fund).		
13.	Appr	roximate number of the <i>private fund's</i> beneficial owners:		
14.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your related persons:		
15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
			es M	O
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
<u>Υοι</u>	ır Ad	lvisory Services	_	
17	(a)		es N	
17.	(b)	Are you a subadviser to this <i>private fund</i> ? If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to question 17.(a) is "no," leave this question blank.		⊙ 1
		No Information Filed		
		· ·	es l	Vo
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	•
		If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer question 18.(a) is "no," leave this question blank.	⁻ to	
		No Information Filed		
			es N	Vo
19.			⊙	0
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Appr	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Priv	/ate (Offering		
21.	Has		es N	No C
22.		es, provide the <i>private fund's</i> Form D file number (if any):		
		m D file number		
	021	1-450013		
3. SI	ERVIC	CE PROVIDERS		
Auc	<u>litors</u>		'es l	No
23.	(a)	(1) Are the private fund's financial statements subject to an annual audit?	•	0
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?		Ö
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, must complete questions (b) through (f) separately for each auditing firm.	you	
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		

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

	(b)	Name of the auditing firm: EISNER AMPER LLP				
	(0)	The leastion of the auditing firm's office respon	cible for the private fundice	audit (aity, atata and acuntry).		
	(c)	The location of the auditing firm's office respon City:	State:	Country:		
		SAN FRANCISCO	California	United States		
	(d)	Is the auditing firm an independent public accou	ıntant?		Yes N ⊚ (_
	(e)	Is the auditing firm registered with the Public (Company Accounting Overs	ght Board?	· (0
		If yes, Public Company Accounting Oversight B	oard Assigned Number			
		274	odi u-Assiglieu Nullibei .			
	(f)	If "yes" to (e) above, is the auditing firm subje accordance with its rules?	ct to regular inspection by	the Public Company Accounting Oversight Board in	© (0
					Yes	No
		·		ed fiscal year distributed to the <i>private fund's</i> inves		0
(h)			the <i>private fund</i> since you	last <i>annual updating amendment</i> contain unqualifie	d opinions?	
		es C No C Report Not Yet Received				
	If you	u check "Report Not Yet Received," you must prom	ptly file an amendment to y	our Form ADV to update your response when the repo	rt is available.	
Prime	Broker	-				
					Yes	No
24. (a)		the <i>private fund</i> use one or more prime brokers				•
		e answer to question 24.(a) is "yes," respond to more than one prime broker, you must complete	•	below for each prime broker the <i>private fund</i> uses. I separately for each prime broker.	f the <i>private fu</i>	nd
			No Information	Filed		
Custod	<u>ian</u>					
					Yes	No
25. (a)		the <i>private fund</i> use any custodians (including t	·		0	⊙
		e answer to question 25.(a) is "yes," respond to more than one custodian, you must complete question 25.		below for each custodian the <i>private fund</i> uses. If the parately for each custodian.	ie private fund	
			No Information	Filed		
Admini	strato	<u>r</u>			Yes	Nc
26. (a)	Does	the <i>private fund</i> use an administrator other than	n your firm?		•	0
		e answer to question 26.(a) is "yes," respond to elete questions (b) through (f) separately for each		elow. If the <i>private fund</i> uses more than one admin	istrator, you m	ıust
	Add	itional Administrator Information : 1 Record(s) Filed.			
		he answer to question 26.(a) is "yes," respond to must complete questions (b) through (f) separ		below. If the <i>private fund</i> uses more than one adm	inistrator,	
	(b)	Name of administrator: NAV CONSULTING				
	(c)	Location of administrator (city, state and count	ry):			
		City: OAKBROOK TERRACE	State: Illinois	Country: United States		

	(d) Is the administrator a related person of your firm?	\circ	\odot	
	(e) Does the administrator prepare and send investor account statements to the private fund's investors?			
	• Yes (provided to all investors) • Some (provided to some but not all investors) • No (provided to no investors)			
	(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable."			
27.	During your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as an administrator, that is related person? 100%	not	your	
	Include only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including obtaining any quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocathe valuation determined by such <i>person</i> .	-		
Ma	rketers			
			Yes	No
28.	(a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?		_	\odot
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.			
	No Information Filed			
4. P	RIVATE FUND			
Info	ormation About the <i>Private Fund</i>			
	Thatien research in a river of the research			
1.	(a) Name of the private fund:			
	MR INVESTMENT FUND I LLC-CLASS 2			
	(b) Private fund identification number: (include the "805-" prefix also)			
	805-1038796316			
2.	Under the laws of what state or country is the <i>private fund</i> organized: State: Country:			
	Arizona United States			
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): Name of General Partner, Manager, Trustee, or Director			
	PPB MRIF I MGT LLC			
	(b) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> . No Information Filed			
4.	The <i>private fund</i> (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940			
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940			
5.	List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.			
	No Information Filed			
6.	(a) Is this a "master fund" in a master-feeder arrangement?	`	Yes	
J.	(a) Is this a "master fund" in a master-feeder arrangement?(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i>?			
	, , , ,			

No Information Filed

Yes No

	(c) is this a reeder rund in a master-reeder arrangement?	0	⊙
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		
	Private fund identification number: (include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B. (the master-feeder arrangement or reporting on the funds separately.	(1) fo	or
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for eac feeder funds answer the following questions:	:h of f	the
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of the assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	\odot	0
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment veh regardless of whether they are also <i>private funds</i> or registered investment companies.	icles,	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	•
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type of fund is the private fund?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other <i>private fun</i> HEALTHCARE ROYALTIES	าd:	
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> :		
	\$ 4,959,594		
<u>Ow</u>	nership_		
12.	Minimum investment commitment required of an investor in the private fund:		
	\$ 100,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 49		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 2%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes	No O

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

Yes No

Your A	dvisory Services	Υє	es No
17. (a)	Are you a subadviser to this <i>private fund</i> ?		_
(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to 17.(a) is "no," leave this question blank.		_
	No Information Filed		
		Υe	es No
8. (a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	C	•
(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the an question 18.(a) is "no," leave this question blank.	swer	to
	No Information Filed		
		Υe	es No
9. Are	e your <i>clients</i> solicited to invest in the <i>private fund</i> ?	C	•
NC	OTE: For purposes of this question, do not consider feeder funds of the private fund.		
20. Ap	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
rivate	e Offering		
1. Ha	s the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Ye	es No
:2. If y	yes, provide the <i>private fund's</i> Form D file number (if any):		
	orm D file number 21-203392		
23. (a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?		es No
23. (a)	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	_	9 O
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm.	_	
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	3	
	(b) Name of the auditing firm:		
	SPICER JEFFRIES LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country:		
	DENVER Colorado United States	V	NI -
	(d) Is the auditing firm an independent public accountant?	Yes ©	O
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 349		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	О

roker	r				
oker	<u>.</u>				Ye
Does	s the <i>private fund</i> use one or more prim	e brokers?			0
	e answer to question 24.(a) is "yes," re more than one prime broker, you mus	•	•	pelow for each prime broker the <i>private</i> separately for each prime broker.	fund uses. If the private i
		No	Information I	Filed	
<u>an</u>					Ye
Does	s the <i>private fund</i> use any custodians (ir	ncluding the prime broke	rs listed abov	ve) to hold some or all of its assets?	re •
	e answer to question 25.(a) is "yes," remore than one custodian, you must co	•		pelow for each custodian the <i>private fun</i> parately for each custodian.	nd uses. If the <i>private fund</i>
Addi	itional Custodian Information : 1 Rec	ord(s) Filed.			
	the answer to question 25.(a) is "yes," es more than one custodian, you must	·		below for each custodian the <i>private fu</i> separately for each custodian.	und uses. If the private fu
(b)	Legal name of custodian: MILLENNIUM TRUST COMPANY LLC				
(c)	Primary business name of custodian: MILLENNIUM TRUST COMPANY				
(d)			of the <i>private</i>	fund's assets (city, state and country):	
	City: OAK BROOK	State: Illinois		Country: United States	
					Yes
(e)	Is the custodian a related person of you	our firm?			0
(f)	If the custodian is a broker-dealer, pr	ovide its SEC registration	າ number (if	any):	
	CRD Number (if any):				
(g)	If the custodian is not a broker-deale (if any)	r, or is a broker-dealer b	out does not l	have an SEC registration number, prov	ide its <i>legal entity identifi</i> c
trator	<u>or</u>				Ye
Does	s the <i>private fund</i> use an administrator of	other than your firm?			e
	e answer to question 26.(a) is "yes," re plete questions (b) through (f) separate	•	•	elow. If the <i>private fund</i> uses more thar	n one administrator, you
Addi	itional Administrator Information : 1	Record(s) Filed.			

NAV CONSULTING

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

⊙ ⊙

	(c) Location of administrator (city, state and country	'):							
	City: OAKBROOK TERRACE	State: Illinois	Country: United States						
				Yes No					
	(d) Is the administrator a <i>related person</i> of your firm?	?		○ ⊙					
	(e) Does the administrator prepare and send investor • Yes (provided to all investors) • Some (provided)			rs)					
	(f) If the answer to question 26.(e) is "no" or "sominvestors? If investor account statements are no			• •					
27.	During your last fiscal year, what percentage of the <i>private</i> related person? 100%	fund's assets (by value) was	valued by a <i>person</i> , such as an adı	ministrator, that is not your					
	Include only those assets where (i) such <i>person</i> carried our quotes, and (ii) the valuation used for purposes of investor the valuation determined by such <i>person</i> .	•	•						
Mar	<u>rketers</u>			Yes N					
28.	(a) Does the <i>private fund</i> use the services of someone other	er than you or your <i>employees</i>	for marketing purposes?	0 6					
	You must answer "yes" whether the <i>person</i> acts as a person. If the answer to question 28.(a) is "yes," responsible to the fund uses more than one marketer you must continue to the person acts as a person.	and to questions (b) through (g) below for each such marketer t						
		No Information Filed							
. PF	RIVATE FUND								
nfo	ormation About the <i>Private Fund</i>								
1.	(a) Name of the private fund:								
•	MR INVESTMENT FUND I LLC-CLASS1								
	(b) <i>Private fund</i> identification number: (include the "805-" prefix also) 805-7929339553								
2.	Under the laws of what state or country is the private fund	organized:							
		untry: ited States							
	Alizona	neu States							
3.	(a) Name(s) of General Partner, Manager, Trustee, or Direction		similar capacity):						
	Name of General Partner, Manager, Trustee, or Director PPB MRIF I MGT LLC								
	(b) If filing an umbrella registration, identify the filing advise	b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.							
		No Information Filed							
4.	The private fund (check all that apply; you must check at lea	ast one):							
	(1) qualifies for the exclusion from the definition of inve	•	n 3(c)(1) of the Investment Compa	any Act of 1940					
	\square (2) qualifies for the exclusion from the definition of inve	estment company under section	n 3(c)(7) of the Investment Compa	any Act of 1940					
5.	List the name and country, in English, of each foreign finance	cial regulatory authority with wh	nich the <i>private fund</i> is registered.						

No Information Filed

6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	\odot
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?		
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	\odot
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		
	Private fund identification number: (include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B. the master-feeder arrangement or reporting on the funds separately.	(1) fo	r
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions:	ch of t	he
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of tassets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issu multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	ed	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	Yes	NO
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment veh regardless of whether they are also <i>private funds</i> or registered investment companies.		~
	(b) If yes, does the private fund invest in funds managed by you or by a related person?	0	•
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	Yes	No ©
10.	. What type of fund is the <i>private fund</i> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other <i>private fu</i> EQUIPMENT LEASING, DISTRESSED DEBT, LIFE SETTLEMENTS	ınd:	
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 550,987		
<u>Ow</u>	vnership		
12.	. Minimum investment commitment required of an investor in the <i>private fund</i> :		
	\$ 100,000 NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund).		
13.	. Approximate number of the <i>private fund's</i> beneficial owners: 36		
14.	. What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 3%		
15.	. (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		•
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company	Yes	

		Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?		
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
You	ur Ad	lvisory Services		
17	(2)	Are you a subadviser to this <i>private fund</i> ?	Yes	_
17.		If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to c 17.(a) is "no," leave this question blank.	C uesti	on
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	•
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answertion 18.(a) is "no," leave this question blank.	/er to	1
		No Information Filed		
			Yes	No
19.		your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	•
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App	proximately what percentage of your clients has invested in the private fund?		
Pri	vate	Offering		
			Yes	No
21.	Has	the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	0
22.	If y	es, provide the <i>private fund's</i> Form D file number (if any):		
		m D file number 1-203392		
B. S	ERVI	CE PROVIDERS		
Aud	ditors			
			Yes	No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	•	0
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm	. © n. voi	J J
		must complete questions (b) through (f) separately for each auditing firm.	., , , .	
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm: SPICER JEFFRIES LLP		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
		City: State: Country:		
		DENVER Colorado United States	'es N	do.
		(d) to the auditing fine on independent nublic accountant?	_	0
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	⊙ (0
		If yes, Public Company Accounting Oversight Board-Assigned Number: 349		
		(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in	⊙ (0

(h)	Do all of the reports prepared by the auc	iting firm for the private fund s	since your last annual updating amendment contain unqualified opin	nions?
	• Yes • No • Report Not Yet Receive	d		
	If you check "Report Not Yet Received," yo	u must promptly file an amendr	lment to your Form ADV to update your response when the report is a	vailable.
<u>rime</u>	<u>Broker</u>			
4 (a`	Does the <i>private fund</i> use one or more price to the private fund use one or more price.	rime hrokers?		Yes N
+. (a,	If the answer to question 24.(a) is "yes,	respond to questions (b) thro	rough (e) below for each prime broker the <i>private fund</i> uses. If the parough (e) separately for each prime broker.	C G private fund
		No Inf	formation Filed	
ustoc	<u>ian</u>			
- /-		Charles allow the continue to be a leave to		Yes N
o. (a _.	,	respond to questions (b) thro	listed above) to hold some or all of its assets? ough (g) below for each custodian the <i>private fund</i> uses. If the <i>priv</i> ugh (g) separately for each custodian.	⊙ C vate fund
	Additional Custodian Information : 1 F	Record(s) Filed.		
	(b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodia MILLENNIUM TRUST COMPANY	ın:		
	(d) The location of the custodian's offi	ce responsible for <i>custody</i> of th	the private fund's assets (city, state and country):	
	City: OAK BROOK	State: Illinois	Country: United States	
				Yes No
	(e) Is the custodian a related person o	f your firm?		0 0
	(f) If the custodian is a broker-dealer,	provide its SEC registration no	umber (if any):	
	CRD Number (if any):			
	(g) If the custodian is not a broker-de (if any)	aler, or is a broker-dealer but	does not have an SEC registration number, provide its legal entity	identifier
<u>dmin</u>	strator			Yes N

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator,

Yes No

accordance with its rules?

Additional Administrator Information: 1 Record(s) Filed.

you must complete questions (b) through (f) separately for each administrator.

	(b) Name of administrator: NAV CONSULTING			
	(c) Location of administrator (city, state and country):			
	City: OAKBROOK TERRACE	State: Illinois	Country: United States	
	(d) Is the administrator a <i>related person</i> of your firm?			Yes No ○ •
	(e) Does the administrator prepare and send investor according Yes (provided to all investors) Some (provided to	•		s)
	(f) If the answer to question 26.(e) is "no" or "some," who investors? If investor account statements are not sent			
27.	During your last fiscal year, what percentage of the <i>private fund's related person</i> ? 100% Include only those assets where (i) such <i>person</i> carried out the valuation, and (ii) the valuation used for purposes of investor subscitue valuation determined by such <i>person</i> .	aluation procedure estal	olished for that asset, if any, includ	ling obtaining any relevant
Mar	<u>rketers</u>			Yes No
28.	(a) Does the <i>private fund</i> use the services of someone other than	n you or your <i>employees</i>	for marketing purposes?	0 0
	You must answer "yes" whether the <i>person</i> acts as a placement person. If the answer to question 28.(a) is "yes," respond to a private fund uses more than one marketer you must complete	questions (b) through (g) below for each such marketer th	
		No Information Filed		
A. PF	RIVATE FUND			
<u>Info</u>	rmation About the <i>Private Fund</i>			
1.	(a) Name of the <i>private fund</i> : MRA CREDIT STRATEGIES FUND I-A LP			
	(b) <i>Private fund</i> identification number: (include the "805-" prefix also) 805-2787694133			
2.	Under the laws of what state or country is the <i>private fund</i> organi	ized:		
		ountry: nited States		
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (c	or <i>persons</i> serving in a s	milar capacity):	
	Name of General Partner, Manager, Trustee, or Director PPB MRA CS I-A MGT LLC			
	(b) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/o	or <i>relying adviser(s)</i> that No Information Filed	sponsor(s) or manage(s) this <i>priva</i>	ate fund.
4.	The <i>private fund</i> (check all that apply; you must check at least one (1) qualifies for the exclusion from the definition of investment (2) qualifies for the exclusion from the definition of investment	t company under section	•	•

5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes	No
6.	(a) Is this a "master fund" in a master-feeder arrangement? (b) If you what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?	0	⊙
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	\circ	•
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		
	Name of private rund.		
	Private fund identification number: (include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B the master-feeder arrangement or reporting on the funds separately.	5.(1) fc)r
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions:	ach of	the
	No Information Filed		
8.	assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issumultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment veregardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	Yes © hicles,	0
		Yes	Nc
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?		•
10.	What type of fund is the private fund?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private for PERFORMING LOANS, MIDDLE MARKET LENDING, COMMERCIAL AIRCRAFT LEASING	und: N	ON-
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 27,285,769		
<u>Ow</u>	vnership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 100		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		

2%

	what is the approximate percentage of the <i>private runa</i> beneficially owned (in the aggregate) by funds of funds.					
Ü		Yes	s No			
(I	b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	•	0			
	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :					
Your	Advisory Services					
		Yes	s No			
	a) Are you a subadviser to this <i>private fund</i> ?	0	\odot			
(I	b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to 17.(a) is "no," leave this question blank.	quest	ion			
	No Information Filed					
		Yes	s No			
	a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	•			
(1	b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the ans question 18.(a) is "no," leave this question blank.	swer to	0			
	No Information Filed					
		Yes	s No			
	are your <i>clients</i> solicited to invest in the <i>private fund?</i>	0	•			
Λ	IOTE: For purposes of this question, do not consider feeder funds of the private fund.					
	approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? %					
Priva	te Offering					
		Yes	s No			
21. H	las the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	\odot	0			
22 If	f yes, provide the <i>private fund's</i> Form D file number (if any):					
	Form D file number					
(021-326223					
3. SER	VICE PROVIDERS					
Audit	Orc.					
Addit		Yes	s No			
23. (a	a) (1) Are the private fund's financial statements subject to an annual audit?	•	0			
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	0			
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm must complete questions (b) through (f) separately for each auditing firm.	rm, yo	u			
Additional Auditor Information: 1 Record(s) Filed.						
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	ļ				
	(b) Name of the auditing firm: SPICER JEFFRIES LLP					
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):					
	City: State: Country:					
	DENVER Colorado United States		_			
	(d) Is the auditing firm an independent public accountant?	Yes				
	(a) is the additing firm an independent public accountant:	⊙				
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0			

	(f) If "yes" to (e) above, is the auditing firm subjet accordance with its rules?	ect to regular inspecti	on by the Public Company Accounting Oversight Board in	© ()
				Yes	No
	Are the <i>private fund's</i> audited financial statements for	r the most recently co	ompleted fiscal year distributed to the private fund's investors?	_	0
	Do all of the reports prepared by the auditing firm fo	r the <i>private fund</i> sind	e your last <i>annual updating amendment</i> contain unqualified op		
	f you check "Report Not Yet Received," you must prom	nptly file an amendmei	nt to your Form ADV to update your response when the report is	available.	
Bı	<u>oker</u>				
	Does the private fundues one or more prime brokers	.a		Yes	
	Does the <i>private fund</i> use one or more prime brokers f the answer to question 24.(a) is "yes," respond to uses more than one prime broker, you must complet	questions (b) throug	h (e) below for each prime broker the <i>private fund</i> uses. If the gh (e) separately for each prime broker.	_	o Ind
		No Inforr	nation Filed		
		questions (b) throug	h (g) below for each custodian the private fund uses. If the pr		
	f the answer to question 25.(a) is "yes," respond to uses more than one custodian, you must complete questional Custodian Information: 1 Record(s) File	questions (b) through led. to questions (b) through	h (g) below for each custodian the <i>private fund</i> uses. If the <i>pr</i> (g) separately for each custodian. ugh g) below for each custodian the <i>private fund</i> uses. If the <i>p</i>	⊙ ivate fund	C
	f the answer to question 25.(a) is "yes," respond to uses more than one custodian, you must complete questional Custodian Information: 1 Record(s) Fill If the answer to question 25.(a) is "yes," respond uses more than one custodian, you must complete	questions (b) through led. to questions (b) through	h (g) below for each custodian the <i>private fund</i> uses. If the <i>pr</i> (g) separately for each custodian. ugh g) below for each custodian the <i>private fund</i> uses. If the <i>p</i>	⊙ ivate fund	C
	f the answer to question 25.(a) is "yes," respond to uses more than one custodian, you must complete questional Custodian Information: 1 Record(s) Fill If the answer to question 25.(a) is "yes," respond uses more than one custodian, you must complete (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian:	questions (b) through uestions (b) through led. to questions (b) through the questions (b) through through the questions (b) through the questions (c) through the questions	h (g) below for each custodian the <i>private fund</i> uses. If the <i>pr</i> (g) separately for each custodian. ugh g) below for each custodian the <i>private fund</i> uses. If the particle (g) separately for each custodian.	⊙ ivate fund	C
	f the answer to question 25.(a) is "yes," respond to uses more than one custodian, you must complete questional Custodian Information: 1 Record(s) Fill If the answer to question 25.(a) is "yes," respond uses more than one custodian, you must complete (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsible City:	questions (b) through uestions (b) through led. to questions (b) through the questions (b) through the questions (b) through the state:	h (g) below for each custodian the <i>private fund</i> uses. If the <i>pr</i> (g) separately for each custodian. ugh g) below for each custodian the <i>private fund</i> uses. If the private fund uses if the private fund uses if the private fund's assets (city, state and country): Country:	⊙ ivate fund	C
	f the answer to question 25.(a) is "yes," respond to uses more than one custodian, you must complete questional Custodian Information: 1 Record(s) Fill If the answer to question 25.(a) is "yes," respond uses more than one custodian, you must complete (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsible.	questions (b) through uestions (b) through led. to questions (b) through the questions (b) through the questions (b) through the left of the questions (b) through the left of the questions (b) through the questions (b) through the left of the questions (b) through the questions (c) through the question	h (g) below for each custodian the <i>private fund</i> uses. If the <i>pr</i> (g) separately for each custodian. ugh g) below for each custodian the <i>private fund</i> uses. If the private fund uses if the pri	ivate fund	d
	f the answer to question 25.(a) is "yes," respond to uses more than one custodian, you must complete questional Custodian Information: 1 Record(s) Fill If the answer to question 25.(a) is "yes," respond uses more than one custodian, you must complete (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsible City:	questions (b) through uestions (b) through led. to questions (b) through the questions (b) through the questions (b) through the state:	h (g) below for each custodian the <i>private fund</i> uses. If the <i>pr</i> (g) separately for each custodian. ugh g) below for each custodian the <i>private fund</i> uses. If the private fund uses if the private fund uses if the private fund's assets (city, state and country): Country:	⊙ ivate fund	d
	f the answer to question 25.(a) is "yes," respond to uses more than one custodian, you must complete questional Custodian Information: 1 Record(s) Fill If the answer to question 25.(a) is "yes," respond uses more than one custodian, you must complete (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsibility: OAK BROOK	questions (b) through uestions (b) through led. to questions (b) through the questions (c) through the questions (c) through the questions (d) through the questions (e) thro	h (g) below for each custodian the <i>private fund</i> uses. If the <i>pr</i> (g) separately for each custodian. ugh g) below for each custodian the <i>private fund</i> uses. If the particle (g) separately for each custodian. private fund's assets (city, state and country): Country: United States	ivate fund	d
	f the answer to question 25.(a) is "yes," respond to uses more than one custodian, you must complete question and the custodian information in the custodian is "yes," responding uses more than one custodian, you must complete (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsible City: OAK BROOK (e) Is the custodian a related person of your firm?	questions (b) through uestions (b) through led. to questions (b) through the questions (c) through the questions (c) through the questions (d) through the questions (e) thro	h (g) below for each custodian the <i>private fund</i> uses. If the <i>pr</i> (g) separately for each custodian. ugh g) below for each custodian the <i>private fund</i> uses. If the particle (g) separately for each custodian. private fund's assets (city, state and country): Country: United States	ivate fund	d

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator, you must

⊙ ⊙

26. (a) Does the *private fund* use an administrator other than your firm?

Additional Administrator Information: 1 Record(s) Filed.

complete questions (b) through (f) separately for each administrator.

	If the answer to question 26.(a) is "yes you must complete questions (b) throug		O	ow. If the <i>private fund</i> uses more than or	ne administrator,			
	(b) Name of administrator: NAV CONSULTING							
	(c) Location of administrator (city, state	e and country):						
	City: OAKBROOK TERRACE		State: Illinois	Country: United States				
	(d) Is the administrator a related person	a of your firm?			Yes No			
	(e) Does the administrator prepare and Yes (provided to all investors)			private fund's investors? prs) O No (provided to no investors)				
				count statements to the (rest of the) private fund's investors, respond "not applic				
27.	During your last fiscal year, what percentage related person? 100% Include only those assets where (i) such person quotes, and (ii) the valuation used for purpos the valuation determined by such person.	on carried out the valuation	n procedure esta	blished for that asset, if any, including o	obtaining any relevant			
Mar	rketers_							
28.	(a) Does the <i>private fund</i> use the services of a You must answer "yes" whether the <i>persoperson</i> . If the answer to question 28.(a) is private fund uses more than one marketer	on acts as a placement ages s "yes," respond to questio	ent, consultant, f ons (b) through (inder, introducer, municipal advisor or ot g) below for each such marketer the <i>pri</i>				
		No	Information Filed	l				
DI	DIVATE FUND							
ı. PF	RIVATE FUND							
nfo	ormation About the Private Fund							
1.	(a) Name of the <i>private fund</i> :							
	MRA CREDIT STRATEGIES FUND I-B LP							
	(b) Private fund identification number: (include the "805-" prefix also)							
	805-5112395187							
2.	Under the laws of what state or country is the	e <i>private fund</i> organized:						
	State: Delaware	Country: United St	tatos					
	Delaware	offited 31	iales					
3.	(a) Name(s) of General Partner, Manager, Trustee		ons serving in a s	similar capacity):				
	Name of General Partner, Manager, Trustee PPB MRA CS I-B MGT LLC	e, or Director						
	(b) If filing an umbrella registration, identify the	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.						
		No Inf	formation Filed					

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

	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940					
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.					
	No Information Filed					
		Yes	No			
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	•			
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?					
	No Information Filed					
	(a) La thia a "feeder fund" in a meeter feeder enrangement?	Yes	No			
	(c) Is this a "feeder fund" in a master-feeder arrangement?(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?	0	⊙			
	Name of private fund:					
	Private fund identification number: (include the "805-" prefix also)					
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B. the master-feeder arrangement or reporting on the funds separately.	(1) fo)r			
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions:	ch of	the			
	No Information Filed					
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of t assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issumultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	ied	NI-			
8.	(a) Is this <i>private fund</i> a "fund of funds"?		No O			
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment veh regardless of whether they are also <i>private funds</i> or registered investment companies.					
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	•			
		Yes	No			
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•			
10.	What type of fund is the private fund?					
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private fund PERFORMING LOANS, MIDDLE MARKET LENDING, COMMERCIAL AIRCRAFT LEASING	ınd: N	ON-			
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.					
11.	Current gross asset value of the <i>private fund</i> : \$ 22,776,481					
<u>Ow</u>	<u>nership</u>					
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0					
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).					

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

14.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
		If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes	No O
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
<u>You</u>	ur Ad	visory Services	V	NI-
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	Yes	INO
		If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to 0.17.(a) is "no," leave this question blank.	_	
		No Information Filed		
			Yes	No
18.	(b)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ? If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answerion 18.(a) is "no," leave this question blank.	o wer to	•
		No Information Filed		
			Yes	No
19.		your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	\odot
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Appı	roximately what percentage of your clients has invested in the private fund?		
<u>Pri</u>	vate	Offering Control of the Control of t		
21.	Has	the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes ©	No O
22.		es, provide the <i>private fund's</i> Form D file number (if any): m D file number		
		1-333997		
B. S	ERVIC	CE PROVIDERS		
Aud	ditors		Ves	. No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	•	0
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	0
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm must complete questions (b) through (f) separately for each auditing firm.	n, yoı	u
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm: SPICER JEFFRIES LLP		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
		City: State: Country:		
		DENVER Colorado United States	Yes N	\le
			res r	

	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	⊙	
	If yes, Public Company Accounting Oversight Board-Assigned Number: 349		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	C
(g)	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?		es
	Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opini		•
	• Yes • No • Report Not Yet Received	0113.	
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is av	ailahl	<u></u>
	in you cheek. Report Not Yet Received, you must promptly me arrament to your remind to update your response when the report is av-	andon	
ne B	<u>roker</u>		
(0)	Does the <i>private fund</i> use one or more prime brokers?		es -
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>p</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.		5 fur
	No Information Filed		
	n Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>priva</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	(•
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>priva</i>	(•
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>priva</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	(te fui	•nd
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses. If the <i>private fund</i> uses.	(te fui	•nd
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian:	(te fui	•nd
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian:	(te fui	nd
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country): City: State: Country:	(te fui	•nd
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>privates</i> more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund</i> 's assets (city, state and country):	vate f	• nd
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country): City: State: Country:	(te fui	nd iunc
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country): City: State: Country: OAK BROOK IIIinois United States	vate for	• nd
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>private</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country): City: State: Country: OAK BROOK IIIinois United States	vate for	nd iunc
(a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private ses</i> more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>private ses</i> more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: MILLENNIUM TRUST COMPANY LLC (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund</i> 's assets (city, state and country): City: State: Country: OAK BROOK Illinois United States (e) Is the custodian a <i>related person</i> of your firm?	vate for	nd iunc

26. (a) Does the *private fund* use an administrator other than your firm?

Yes No

⊙ ⊙

	Additional Administrator Information : 1 Record(s) Fil	led.		
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) separately		v. If the <i>private fund</i> uses more than o	one administrator,
	(b) Name of administrator: NAV CONSULTING			
	(c) Location of administrator (city, state and country): City: OAKBROOK TERRACE	State: Illinois	Country: United States	
	(d) Is the administrator a <i>related person</i> of your firm?			Yes No ○ •
	(e) Does the administrator prepare and send investor • Yes (provided to all investors) • Some (provided)	·		
	(f) If the answer to question 26.(e) is "no" or "some," investors? If investor account statements are not s			
quo the	ude only those assets where (i) such <i>person</i> carried out tes, and (ii) the valuation used for purposes of investor s valuation determined by such <i>person</i> .	•		cluding allocations) was
Incli quo the rkete	ude only those assets where (i) such <i>person</i> carried out tes, and (ii) the valuation used for purposes of investor s valuation determined by such <i>person</i> .	than you or your <i>employees</i> tacement agent, consultant, fired to questions (b) through (g	distributions, and fee calculations (in for marketing purposes? Inder, introducer, municipal advisor or one below for each such marketer the p	Yes No O C other solicitor, or similar
Incli quo the rkete	ude only those assets where (i) such <i>person</i> carried out totes, and (ii) the valuation used for purposes of investor so valuation determined by such <i>person</i> . Does the <i>private fund</i> use the services of someone other. You must answer "yes" whether the <i>person</i> acts as a pla <i>person</i> . If the answer to question 28.(a) is "yes," response.	than you or your <i>employees</i> tacement agent, consultant, fired to questions (b) through (g	distributions, and fee calculations (in for marketing purposes? Inder, introducer, municipal advisor or one below for each such marketer the p	Yes No O C other solicitor, or similar
Incli quo the rkete	ude only those assets where (i) such <i>person</i> carried out totes, and (ii) the valuation used for purposes of investor so valuation determined by such <i>person</i> . Does the <i>private fund</i> use the services of someone other. You must answer "yes" whether the <i>person</i> acts as a pla <i>person</i> . If the answer to question 28.(a) is "yes," response.	than you or your <i>employees</i> tacement agent, consultant, fird to questions (b) through (guplete questions (b) through (distributions, and fee calculations (in for marketing purposes? Inder, introducer, municipal advisor or one below for each such marketer the p	Yes No O C other solicitor, or similar
Incliquo the rkete (a)	ude only those assets where (i) such <i>person</i> carried out totes, and (ii) the valuation used for purposes of investor so valuation determined by such <i>person</i> . Does the <i>private fund</i> use the services of someone other You must answer "yes" whether the <i>person</i> acts as a pla <i>person</i> . If the answer to question 28.(a) is "yes," responding private fund uses more than one marketer you must compare the person of the person of the private fund uses more than one marketer you must compare the person of the	than you or your <i>employees</i> tacement agent, consultant, fird to questions (b) through (guplete questions (b) through (distributions, and fee calculations (in for marketing purposes? Inder, introducer, municipal advisor or one below for each such marketer the p	Yes No O C other solicitor, or similar
Incliquothe the rkete (a) RIVAT prmat (a) (b)	ude only those assets where (i) such <i>person</i> carried out totes, and (ii) the valuation used for purposes of investor so valuation determined by such <i>person</i> . Does the <i>private fund</i> use the services of someone other. You must answer "yes" whether the <i>person</i> acts as a plate person. If the answer to question 28.(a) is "yes," responding private fund uses more than one marketer you must compare the person of the person of the person acts as a plate person. If the answer to question 28.(a) is "yes," responding private fund uses more than one marketer you must compare the person of the person acts as a plate person.	than you or your <i>employees</i> tacement agent, consultant, fird to questions (b) through (guplete questions (b) through (distributions, and fee calculations (in for marketing purposes? Inder, introducer, municipal advisor or one below for each such marketer the p	Yes No O C other solicitor, or similar
Incliquothe the rkete (a) RIVAT ormat (a) (b)	ude only those assets where (i) such person carried out to tes, and (ii) the valuation used for purposes of investor so valuation determined by such person. Does the private fund use the services of someone other. You must answer "yes" whether the person acts as a plate person. If the answer to question 28.(a) is "yes," responding private fund uses more than one marketer you must comparise fund uses more fund uses fund	than you or your employees to acement agent, consultant, fired to questions (b) through (guplete questions (b) through (distributions, and fee calculations (in for marketing purposes? Inder, introducer, municipal advisor or one below for each such marketer the p	Yes No O C other solicitor, or similar

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

	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
,		Yes	
6.	(a) Is this a "master fund" in a master-feeder arrangement?(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i>?	0	•
	No Information Filed		
	(c) Is this a "feeder fund" in a master-feeder arrangement?	Yes	No.
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		**
	Private fund identification number: (include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B. the master-feeder arrangement or reporting on the funds separately.	(1) for	-
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for eac feeder funds answer the following questions:	ch of th	he
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of the assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
8.	(a) Is this <i>private fund</i> a "fund of funds"?	Yes	No
0.	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles.	icles,	C
	regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	_	_
	(b) If yes, does the private rand invest in rands managed by you of by a related person.	0	e
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	•	С
10	What type of fund is the <i>private fund</i> ?		
10.	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private fund	ınd:	
	PRIVATE DEBT; DIRECT LENDING FUNDS		
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 21,954,949		
<u>Ow</u>	<u>rnership</u>		

NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the

organizational documents of the fund).

No Information Filed

13.	Approximate number of the <i>private fund's</i> beneficial owners: 100		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 2%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes ©	No O
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
You	ur Advisory Services	Vaa	NI-
17.	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	⊙
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to 0.17.(a) is "no," leave this question blank.		
	No Information Filed		
10		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B. (1).A.3. (b)) advise the <i>private fund</i>?(b) If the answer to question 18. (a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i>. If the answeriton 18. (a) is "no," leave this question blank.	C wer to	•
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	\odot
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund?</i> 1%		
<u>Pri</u>	vate Offering	Yes	Nο
21.	Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	⊙	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-249190		
B. S	ERVICE PROVIDERS		
Aud	ditor <u>s</u>		
		Yes	No
23.	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	\odot	\circ
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	⊙	0
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm must complete questions (b) through (f) separately for each auditing firm.	n, you	ı
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm: SPICER JEFFRIES LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country:		

			103	No
(d) Is the auditing firm an indepen	dent public accountant?		•	0
(e) Is the auditing firm registered	with the Public Company Accountin	g Oversight Board?	•	0
If yes, Public Company Accoun	ting Oversight Board-Assigned Num	nber:		
(f) If "yes" to (e) above, is the au accordance with its rules?	diting firm subject to regular inspec	ction by the Public Company Accounting Oversight Boa	rd in 👩	0
			Ye	es l
Are the private fund's audited financia	al statements for the most recently	completed fiscal year distributed to the $\ensuremath{\textit{private fund's}}$	investors?	5
Do all of the reports prepared by the	auditing firm for the private fund si	nce your last <i>annual updating amendment</i> contain unq	ualified opinions?	
	eived			
If you check "Report Not Yet Received,	" you must promptly file an amendm	nent to your Form ADV to update your response when the	e report is available	9.
<u>Broker</u>				
Does the <i>private fund</i> use one or mor	e prime brokers?		Ye	es N
If the answer to question 24.(a) is "y	ves," respond to questions (b) thro	ugh (e) below for each prime broker the <i>private fund</i> uough (e) separately for each prime broker.	ses. If the <i>private</i>	fund
	No Info	ormation Filed		
ian				
ian			Ye	es N
	ians (including the prime brokers li	sted above) to hold some or all of its assets?	Ye @	es M
Does the <i>private fund</i> use any custod	ves," respond to questions (b) thro	ugh (g) below for each custodian the <i>private fund</i> uses	6)
Does the <i>private fund</i> use any custod If the answer to question 25.(a) is "y	ves," respond to questions (b) throughout complete questions (b) throug	ugh (g) below for each custodian the <i>private fund</i> uses	6)
Does the <i>private fund</i> use any custod of the answer to question 25.(a) is "y uses more than one custodian, you read and the custodian Information in the answer to question 25.(a) is	ves," respond to questions (b) throughout complete questions (c) throughout Complete questions (d) throughou	ugh (g) below for each custodian the <i>private fund</i> uses the private fund uses the priva	i. If the <i>private fur</i>	nd
Does the <i>private fund</i> use any custod of the answer to question 25.(a) is "y uses more than one custodian, you read and the custodian Information in the answer to question 25.(a) is	ves," respond to questions (b) throughout complete questions (c) throughout Complete questions (d) throughou	ugh (g) below for each custodian the <i>private fund</i> uses the private fund uses the priva	i. If the <i>private fur</i>	nd
Does the <i>private fund</i> use any custod of the answer to question 25.(a) is "y uses more than one custodian, you read and the custodian Information in the answer to question 25.(a) is	res," respond to questions (b) throughout complete questions (b) throughout complete questions (b) throughout TRecord(s) Filed. "yes," respond to questions (b) the must complete questions (b) throughout the properties of the pr	ugh (g) below for each custodian the <i>private fund</i> uses the private fund uses the priva	i. If the <i>private fur</i>	nd
Does the <i>private fund</i> use any custod of the answer to question 25.(a) is "y uses more than one custodian, you remark the answer to question 1 formation is uses more than one custodian, you (b) Legal name of custodian:	ves," respond to questions (b) throughout complete questions (b) throughout complete questions (b) throughout TRecord(s) Filed. "yes," respond to questions (b) the must complete questions (b) throughout the properties of the pr	ugh (g) below for each custodian the <i>private fund</i> uses the private fund uses the priva	i. If the <i>private fur</i>	ond
Does the <i>private fund</i> use any custod of the answer to question 25.(a) is "you uses more than one custodian, you remark that are to question 25.(a) is uses more than one custodian, you (b) Legal name of custodian: MILLENNIUM TRUST COMPANY (c) Primary business name of custodian and custodian are than one custodian.	res," respond to questions (b) throughout complete questions (b) throughout complete questions (b) throughout TRecord(s) Filed. "yes," respond to questions (b) the must complete questions (b) throughout CLCC codian:	ugh (g) below for each custodian the <i>private fund</i> uses the private fund uses the priva	i. If the <i>private fur</i>	b) and
Does the <i>private fund</i> use any custod of the answer to question 25.(a) is "y uses more than one custodian, you read a ditional Custodian Information: If the answer to question 25.(a) is uses more than one custodian, you (b) Legal name of custodian: MILLENNIUM TRUST COMPANY (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's City:	res," respond to questions (b) throughout complete questions (b) throughout complete questions (b) throughout TRecord(s) Filed. "yes," respond to questions (b) the must complete questions (b) throughout CLCC codian:	ugh (g) below for each custodian the <i>private fund</i> uses th (g) separately for each custodian. rough g) below for each custodian the <i>private fund</i> use ugh (g) separately for each custodian. e <i>private fund's</i> assets (city, state and country): Country:	i. If the <i>private fur</i>	nd
Does the <i>private fund</i> use any custod of the answer to question 25.(a) is "y uses more than one custodian, you re additional Custodian Information: If the answer to question 25.(a) is uses more than one custodian, you uses more than one custodian: (b) Legal name of custodian: MILLENNIUM TRUST COMPANY (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's	ves," respond to questions (b) throughout complete questions (b) throughout complete questions (b) throughout TRecord(s) Filed. "yes," respond to questions (b) throughout complete questions (b) throughout the properties of the complete questions (b) throughout the complete questions (c) throughout the complete questions (d) throughou	ugh (g) below for each custodian the <i>private fund</i> uses the (g) separately for each custodian. rough g) below for each custodian the <i>private fund</i> used ugh (g) separately for each custodian.	es. If the <i>private fur</i>	and
Does the <i>private fund</i> use any custod of the answer to question 25.(a) is "y uses more than one custodian, you read a ditional Custodian Information: If the answer to question 25.(a) is uses more than one custodian, you (b) Legal name of custodian: MILLENNIUM TRUST COMPANY (c) Primary business name of custodian: MILLENNIUM TRUST COMPANY (d) The location of the custodian's City:	res," respond to questions (b) throughout complete questions (b) throughout complete questions (b) throughout TRecord(s) Filed. "yes," respond to questions (b) throughout complete questions (c) throughout complete questions (d) throughout comp	ugh (g) below for each custodian the <i>private fund</i> uses th (g) separately for each custodian. rough g) below for each custodian the <i>private fund</i> use ugh (g) separately for each custodian. e <i>private fund's</i> assets (city, state and country): Country:	i. If the <i>private fur</i>	and
Does the <i>private fund</i> use any custod of the answer to question 25. (a) is "yuses more than one custodian, you rate and the private fund uses more than one custodian. If the answer to question 25. (a) is uses more than one custodian, you (b) Legal name of custodian: MILLENNIUM TRUST COMPANY (c) Primary business name of custodian trust Company of the custodian to City: OAK BROOK (e) Is the custodian a <i>related perse</i>	res," respond to questions (b) throughout complete questions (b) throughout complete questions (b) throughout TRecord(s) Filed. "yes," respond to questions (b) throughout complete questions (c) throughout complete questions (d) throughout comp	ugh (g) below for each custodian the <i>private fund</i> uses the (g) separately for each custodian. rough g) below for each custodian the <i>private fund</i> used ugh (g) separately for each custodian. e <i>private fund's</i> assets (city, state and country): Country: United States	es. If the <i>private fur</i>	nd
Does the <i>private fund</i> use any custod of the answer to question 25. (a) is "yuses more than one custodian, you rate and the private fund uses more than one custodian. If the answer to question 25. (a) is uses more than one custodian, you (b) Legal name of custodian: MILLENNIUM TRUST COMPANY (c) Primary business name of custodian trust Company of the custodian to City: OAK BROOK (e) Is the custodian a <i>related perse</i>	res," respond to questions (b) throughout complete questions (b) throughout complete questions (b) throughout respond to questions (b) the must complete questions (b) throughout complete questions (c) throughout complete questions (d) throughou	ugh (g) below for each custodian the <i>private fund</i> uses the (g) separately for each custodian. rough g) below for each custodian the <i>private fund</i> used ugh (g) separately for each custodian. e <i>private fund's</i> assets (city, state and country): Country: United States	es. If the <i>private fur</i>	nd und
Does the <i>private fund</i> use any custod of the answer to question 25.(a) is "y uses more than one custodian, you read a ditional Custodian Information: If the answer to question 25.(a) is uses more than one custodian, you does not consider that the custodian is a broker-dead of	res," respond to questions (b) throughout complete questions (b) throughout complete questions (b) throughout respond to questions (b) the must complete questions (b) throughout complete questions (c) throughout complete questions (d) throughou	ugh (g) below for each custodian the <i>private fund</i> uses the (g) separately for each custodian. rough g) below for each custodian the <i>private fund</i> used ugh (g) separately for each custodian. e <i>private fund's</i> assets (city, state and country): Country: United States	es. If the <i>private fur</i>	nd
Does the <i>private fund</i> use any custod If the answer to question 25.(a) is "y uses more than one custodian, you r Additional Custodian Information: If the answer to question 25.(a) is uses more than one custodian, you (b) Legal name of custodian: MILLENNIUM TRUST COMPANY (c) Primary business name of cust MILLENNIUM TRUST COMPANY (d) The location of the custodian's City: OAK BROOK (e) Is the custodian a <i>related perse</i> (f) If the custodian is a broker-deal - CRD Number (if any):	res," respond to questions (b) throughout complete questions (b) throughout complete questions (b) throughout respond to questions (b) the must complete questions (b) throughout complete questions (c) throughou	ugh (g) below for each custodian the <i>private fund</i> uses the (g) separately for each custodian. rough g) below for each custodian the <i>private fund</i> used ugh (g) separately for each custodian. e <i>private fund's</i> assets (city, state and country): Country: United States	es. If the <i>private fur</i> Yes	nd No •

United States

DENVER

Colorado

If the answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one admit complete questions (b) through (f) separately for each administrator. Additional Administrator Information: 1 Record(s) Filed. If the answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one add you must complete questions (b) through (f) separately for each administrator. (b) Name of administrator: NAV CONSULTING (c) Location of administrator (city, state and country): City: OKBROOK TERRACE Illinois United States (d) Is the administrator a related person of your firm? (e) Does the administrator prepare and send investor account statements to the private fund's investors? • Yes (provided to all investors) • Some (provided to some but not all investors) • No (provided to no investors) (f) If the answer to question 26. (e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's investors, respond "not applicable." During your last fiscal year, what percentage of the private fund's assets (by value) was valued by a person, such as an administrator,	•
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one addryou must complete questions (b) through (f) separately for each administrator. (b) Name of administrator: NAV CONSULTING (c) Location of administrator (city, state and country): City: State: Country: OAKBROOK TERRACE Illinois United States (d) Is the administrator a <i>related person</i> of your firm? (e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors? Yes (provided to all investors) Some (provided to some but not all investors) O No (provided to no investors) (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) <i>private fund's</i> investors, respond "not applicable."	Yes
you must complete questions (b) through (f) separately for each administrator. (b) Name of administrator: NAV CONSULTING (c) Location of administrator (city, state and country): City: OAKBROOK TERRACE (d) Is the administrator a related person of your firm? (e) Does the administrator prepare and send investor account statements to the private fund's investors? Yes (provided to all investors) Some (provided to some but not all investors) No (provided to no investors) (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's investors, respond "not applicable."	Yes
(c) Location of administrator (city, state and country): City: State: Country: OAKBROOK TERRACE Illinois United States (d) Is the administrator a related person of your firm? (e) Does the administrator prepare and send investor account statements to the private fund's investors? Yes (provided to all investors) Some (provided to some but not all investors) No (provided to no investors) (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's investors, respond "not applicable."	_
City: OAKBROOK TERRACE Illinois United States (d) Is the administrator a related person of your firm? (e) Does the administrator prepare and send investor account statements to the private fund's investors? • Yes (provided to all investors) • Some (provided to some but not all investors) • No (provided to no investors) (f) If the answer to question 26. (e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's investors, respond "not applicable."	_
OAKBROOK TERRACE Illinois United States (d) Is the administrator a <i>related person</i> of your firm? (e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors? • Yes (provided to all investors) • Some (provided to some but not all investors) • No (provided to no investors) (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) <i>private fund's</i> investors? If investor account statements are not sent to the (rest of the) <i>private fund's</i> investors, respond "not applicable."	_
 (e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors? Yes (provided to all investors) Some (provided to some but not all investors) No (provided to no investors) (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) <i>private fund's</i> investors? If investor account statements are not sent to the (rest of the) <i>private fund's</i> investors, respond "not applicable." 	_
Yes (provided to all investors) Some (provided to some but not all investors) No (provided to no investors) (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private for investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable."	
Yes (provided to all investors) Some (provided to some but not all investors) No (provided to no investors) (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable."	
investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable."	
a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	Y
You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other so <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.	
No Information Filed	
VATE FUND	
VATE FUND mation About the <i>Private Fund</i>	
mation About the Private Fund (a) Name of the private fund: MRA OPPORTUNITIES FUND I-B LP-CLASS 1 (b) Private fund identification number:	
nation About the Private Fund a) Name of the private fund: MRA OPPORTUNITIES FUND I-B LP-CLASS 1	
nation About the Private Fund a) Name of the private fund: MRA OPPORTUNITIES FUND I-B LP-CLASS 1 b) Private fund identification number: (include the "805-" prefix also)	

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

Name of General Partner, Manager, Trustee, or Director

Administrator

	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. No Information Filed		
	The private fund (check all that apply; you must check at least one):		
	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
).	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes	No
).	(a) Is this a "master fund" in a master-feeder arrangement?	0	•
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed		
	No mioritation i ned		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	•
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		
	Private fund identification number: (include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B. the master-feeder arrangement or reporting on the funds separately.	(1) fc	ır
7 .	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions:		
7.	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each		
7.	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions:	ch of	
	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of the assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	ch of	the
3.	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of the assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"?	heir ed Yes	N _C
	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of the assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles.	heir ed Yes	N _C
	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of the assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"?	heir ed Yes icles,	No.
3.	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for eac feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of t assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment veh regardless of whether they are also private funds or registered investment companies.	heir ed Yes icles,	No.
	the master-feeder arrangement or reporting on the funds separately. If you are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for eac feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of t assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment veh regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person?	heir ed Yes icles,	No.
3.	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for eac feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of t assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment veh regardless of whether they are also private funds or registered investment companies.	heired Yes icles,	No.
33.	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for eac feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of t assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment veh regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person?	heired Yes icles,	No.
). O.	the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D. Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of it assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment veh regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person? During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	heir ed Yes icles, C	N C
3.	the master-feeder arrangement or reporting on the funds separately. If you are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for eac feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of t assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment veh regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person? During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the private fund? C hedge fund C liquidity fund C private equity fund C real estate fund S securitized asset fund C venture capital fund G Other private fund.	heir ed Yes icles, C	No.

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

MRA OPP I-B MGT LLC

	\$ 0		
	NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 54		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 2%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
You	ur Advisory Services		
17		Yes	
17.	(a) Are you a subadviser to this <i>private fund</i>?(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i>. If the answer to question, "leave this question blank."	C uesti	⊙ on
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	\circ	\odot
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer question 18.(a) is "no," leave this question blank.	er to	
	No Information Filed		
10		Yes	
19.	Are your <i>clients</i> solicited to invest in the <i>private fund?</i> NOTE: For purposes of this question, do not consider feeder funds of the private fund.	0	⊙
	NOTE. For purposes of this question, do not consider reeder runds of the private rund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 1%		
Priv	vate Offering		
		Yes	No
21.	Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-249193		
B. S	ERVICE PROVIDERS		
Aud	<u>ditors</u>	Yes	No
23.	(a) (1) Are the private fund's financial statements subject to an annual audit?	⊙	0
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	0
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm must complete questions (b) through (f) separately for each auditing firm.		
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm:		

SPICER JEFFRIES LLP			
(c) The location of the aud	diting firm's office responsible for the	the <i>private fund's</i> audit (city, state and country):	
City:	State:	Country:	
DENVER	Colorado	United States	Yes No
(d) Is the auditing firm an	independent public accountant?		• c
(e) Is the auditing firm re	gistered with the Public Company A	Accounting Oversight Board?	• o
If yes, Public Company	y Accounting Oversight Board-Assig	gned Number:	
(f) If "yes" to (e) above, accordance with its ru		ular inspection by the Public Company Accounting Oversight Board in	© 0
			Yes No
(g) Are the <i>private fund's</i> audited	d financial statements for the most	t recently completed fiscal year distributed to the <i>private fund's</i> investors	? • •
		ate fund since your last annual updating amendment contain unqualified op	oinions?
⊙ Yes C No C Report Not			
If you check "Report Not Yet .	Received," you must promptly file an	n amendment to your Form ADV to update your response when the report is	available.
<u>ne Broker</u>			Yes No
(a) Does the <i>private fund</i> use on	·		0 0
•	•	s (b) through (e) below for each prime broker the <i>private fund</i> uses. If the ns (b) through (e) separately for each prime broker.	private fund
		No Information Filed	
todian			Yes No
(a) Does the <i>private fund</i> use an	y custodians (including the prime b	brokers listed above) to hold some or all of its assets?	O
•	•	s (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>pr</i> (b) through (g) separately for each custodian.	rivate fund
Additional Custodian Infor	mation : 1 Record(s) Filed.		
1		ons (b) through g) below for each custodian the <i>private fund</i> uses. If the part is (b) through (g) separately for each custodian.	private fund
(b) Legal name of custodi MILLENNIUM TRUST Co			
(c) Primary business nam MILLENNIUM TRUST Co			
(d) The location of the cu	stodian's office responsible for <i>cust</i>	stody of the private fund's assets (city, state and country):	
City: OAK BROOK	State: Illinois	Country: United States	
O/W BROOK	minors	Office States	Yes No
(e) Is the custodian a rela	ated person of your firm?		0 0
(f) If the custodian is a bi	roker-dealer, provide its SEC regist	tration number (if any):	
-	.,		
CRD Number (if any):			

	<u> </u>			,
Admir	istrator			
26 (2) Does the <i>private fund</i> use an administrator other than your fi	rm?		Yes No
20. (6	If the answer to question 26.(a) is "yes," respond to question		If the <i>private fund</i> uses more than one	
	complete questions (b) through (f) separately for each admir	nistrator.		
	Additional Administrator Information : 1 Record(s) Filed.			
	If the answer to question 26.(a) is "yes," respond to questi you must complete questions (b) through (f) separately for		w. If the <i>private fund</i> uses more than o	ne administrator,
	(b) Name of administrator: NAV CONSULTING			
	(a) Location of administrator (city, state and country).			
	(c) Location of administrator (city, state and country): City:	State:	Country:	
	OAKBROOK TERRACE	Illinois	United States	
	(d) Is the administrator a <i>related person</i> of your firm?			Yes No
	(a) 13 the administrator a related person or your firm:			○ ●
	(e) Does the administrator prepare and send investor acco	ount statements to the μ	orivate fund's investors?	
	• Yes (provided to all investors) • Some (provided to	some but not all investo	rs) No (provided to no investors)	
	(f) If the answer to question 26.(e) is "no" or "some," wh investors? If investor account statements are not sent		•	
<i>re</i>	uring your last fiscal year, what percentage of the <i>private fund's</i> lated person? 90% clude only those assets where (i) such <i>person</i> carried out the v			•
qı	notes, and (ii) the valuation used for purposes of investor subsceevaluation determined by such <i>person</i> .	•	3	0 0
Marke	<u>ters</u>			
28. (a) Does the <i>private fund</i> use the services of someone other than	n you or your <i>employees</i>	for marketing purposes?	Yes No
	You must answer "yes" whether the <i>person</i> acts as a placem <i>person</i> . If the answer to question 28.(a) is "yes," respond to <i>private fund</i> uses more than one marketer you must complete	questions (b) through (g	g) below for each such marketer the <i>pr</i>	
		No Information Filed		
A. PRIV	ATE FUND			
Inform	ation About the <i>Private Fund</i>			
1. (a) Name of the <i>private fund</i> :			
•	MRA OPPORTUNITIES FUND I-B LP-CLASS 2			
(b) <i>Private fund</i> identification number: (include the "805-" prefix also)			

805-8539956423

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

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

	State: Delaware	Country: United States		
3.	· · · · · · · · · · · · · · · · · · ·	stee, or Directors (or <i>persons</i> serving in a similar capacity):		
	Name of General Partner, Manager, Trustee,	or Director		
	MRA OPP I-B MGT LLC			_
	(h) 16 6111a a car combant a mariatorita a la califa de l			
	(b) If filing an <i>umbrella registration</i> , identify the	e filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.		
		No Information Filed		_
4.	The private fund (check all that apply; you must	t chock at loast one):		
4.		nition of investment company under section 3(c)(1) of the Investment Company Act of 1940		
		nition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
5.	List the name and country, in English, of each t	foreign financial regulatory authority with which the private fund is registered.		
		No Information Filed		
			Yes	Ν
6.	(a) Is this a "master fund" in a master-feeder		\circ	6
	(b) If yes, what is the name and <i>private fund</i> ic	dentification number (if any) of the feeder funds investing in this private fund?		
		No Information Filed		
			Yes	N
	(c) Is this a "feeder fund" in a master-feeder a		0	
		dentification number (if any) of the master fund in which this <i>private fund</i> invests?		*.
	Name of <i>private fund</i> :			
	Private fund identification number:			
	(include the "805-" prefix also)			
7.	the master-feeder arrangement or reporting or	master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1 n the funds separately. B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each		
		No Information Filed		
	assets in a single fund ("master fund"). A fund	master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of the would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued ts, and each class (or series) invests substantially all of its assets in a single master fund.	d	
0	(a) Is this private fund a "fixed of fixeda"?		Yes	
8.	(a) Is this <i>private fund</i> a "fund of funds"?		© clos	(
	regardless of whether they are also <i>private fur</i>	ver "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehic ands or registered investment companies.	nes,	
	(b) If yes, does the <i>private fund</i> invest in funds		0	G
			_	
		· ·	Yes	N
9.	During your last fiscal year, did the private fund	Invest in securities issued by investment companies registered under the Investment Company	•	C
	Act of 1940 (other than "money market funds,"	to the extent provided in Instruction 6.e.)?		
10	What type of fund is the <i>private fund</i> ?			
10.	,		,	
	PRIVATE DEBT; DIRECT LENDING FUNDS	ity fund $^{f O}$ real estate fund $^{f O}$ securitized asset fund $^{f O}$ venture capital fund $^{f O}$ Other <i>private fund</i>	u:	
	NOTE: For definitions of those fund turner also	use see Instruction 6 of the Instructions to Part 1A.		
	NOTE. FOR Geniminons of these fund types, plea	SC SCC HISTINGUIGH OUT THE HISTINGUIGH TO FAIT TA.		
11.	Current gross asset value of the private fund:			

\$ 9,242,391

<u>Ow</u>	ners	<u>ship</u>		
12.	Min	imum investment commitment required of an investor in the private fund:		
	\$ 0 NO	TE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the		
	org	anizational documents of the fund).		
13.	Арр 56	proximate number of the <i>private fund's</i> beneficial owners:		
14.	Wh	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes O	
16.	Wh	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
<u>You</u>	ır Ac	dvisory Services		
17	(0)		Yes	
17.		Are you a subadviser to this <i>private fund</i> ? If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to question 17.(a) is "no," leave this question blank.	_	on
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	•
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer question 18.(a) is "no," leave this question blank.	er to	
		No Information Filed		
10			Yes	No
19.		your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	⊙
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App	proximately what percentage of your clients has invested in the private fund?		
	1%			
Pri	vate	Offering		
21.	Has	the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes ©	No O
22	If v	es, provide the <i>private fund's</i> Form D file number (if any):		
22.		rm D file number		
	02	1-249193		
B. S	ERVI	CE PROVIDERS		
Aud	ditor	<u>s</u>		
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	Yes	No
	ν- /	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	0
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm must complete questions (b) through (f) separately for each auditing firm.		_

Additional Auditor Information: 1 Record(s) Filed.

		ne answer to question , you must complete (•	•		· ·	<i>ivate fund</i> uses more t	han one auditing	3	
	(b)	Name of the auditing SPICER JEFFRIES LLP	firm:							
	(c)	The location of the au	diting firm's office res	sponsible for the <i>pri</i> v	vate fund's aud	lit (city, state and	country):			
		City:	State:			ountry:				
		DENVER	Colorac	lo	U	nited States			Yes	No
	(d)	Is the auditing firm a	n independent public a	ccountant?					•	0
	(e)	Is the auditing firm re	egistered with the Pub	lic Company Accoun	nting Oversigh	t Board?			•	0
		If yes, Public Compar 349	y Accounting Oversigl	nt Board-Assigned N	lumber:					
		If "yes" to (e) above, accordance with its re	· ·	ubject to regular ins	spection by the	Public Company	Accounting Oversight	Board in	•	0
(g) (h)	Do all	of the reports prepares	ed by the auditing firn	n for the <i>private fund</i>	d since your la	st annual updating	uted to the private fur g amendment contain of ate your response wher	unqualified opini	⊙ ons?	, ~
Prime	<u>Broker</u>									
24 (a)	Does	the <i>private fund</i> use o	ne or more nrime hrol	vers?						es No
24. (u)	If the	•	4.(a) is "yes," respon	d to questions (b) th	•	·	e broker the <i>private fui</i> prime broker.	nd uses. If the p	c rivate	_
				No I	Information Fil	ed				
Custod	<u>ian</u>								V.	
25. (a)	Does	the <i>private fund</i> use a	ny custodians (includi	ng the prime brokers	rs listed above) to hold some or	all of its assets?		re ©	s No
		answer to question 2 more than one custod		•			dian the <i>private fund</i> u stodian.	uses. If the <i>priva</i>	~	_ ~
	Addit	tional Custodian Info	rmation : 1 Record(s) Filed.						
		ne answer to question s more than one custo		•			rodian the <i>private fund</i> custodian.	uses. If the <i>pri</i> v	⁄ate fu	ınd
	' '	Legal name of custod MILLENNIUM TRUST (
		Primary business nan MILLENNIUM TRUST C								
	(d)	The location of the cu	stodian's office respo	nsible for <i>custody</i> of	f the <i>private fu</i>	und's assets (city,	state and country):			
		City: OAK BROOK		State: Illinois		Country: United States				
		ON DIVOOR		minols		Jimou Jiaics			Yes	No
	(e)	Is the custodian a rea	ated person of your fir	m?					0	•
	(f)	If the custodian is a b	roker-dealer, provide	its SEC registration	number (if an	y):				

tra	<u>ator</u>			١
Do	oes the private fund use an administrator other than your firm?			
	the answer to question 26.(a) is "yes," respond to questions (b) thromplete questions (b) through (f) separately for each administrator.	ough (f) below	v. If the <i>private fund</i> uses more than one	administrator, yo
Ac	additional Administrator Information : 1 Record(s) Filed.			
	If the answer to question 26.(a) is "yes," respond to questions (b) tyou must complete questions (b) through (f) separately for each add	O	ow. If the <i>private fund</i> uses more than or	ne administrator,
((b) Name of administrator: NAV CONSULTING			
((c) Location of administrator (city, state and country):			
	City: OAKBROOK TERRACE	State: Illinois	Country: United States	
	O/INDICON TENINGE	11111013	Critical States	Yes
((d) Is the administrator a related person of your firm?			0
((f) If the answer to question 26.(e) is "no" or "some," who sends to investors? If investor account statements are not sent to the (r		· ·	
ted % ude	g your last fiscal year, what percentage of the <i>private fund's</i> assets (<i>d person</i> ? Ile only those assets where (i) such <i>person</i> carried out the valuation s, and (ii) the valuation used for purposes of investor subscriptions, aluation determined by such <i>person</i> .	procedure esta	ablished for that asset, if any, including o	obtaining any rele
<u>rs</u>				٧
Do	oes the <i>private fund</i> use the services of someone other than you or y	your <i>employee</i> s	s for marketing purposes?	·
per	ou must answer "yes" whether the <i>person</i> acts as a placement agenerson. If the answer to question 28.(a) is "yes," respond to question in the fund uses more than one marketer you must complete question in the fund uses more than one marketer you must complete question.	s (b) through ((g) below for each such marketer the <i>pri</i>	
	No In	formation Filed	d	
			nds: 8	

SEC

1. Name of the private fund: COVENANT GLOBAL EQUITIES FUND SERIES INTERESTS OF THE SALI MULTI-SERIES FUND II 3(C)(1), LP

	(include the "805-" prefix also) 805-2581175015
3.	Name and SEC File number of adviser that provides information about this <i>private fund</i> in Section 7.B.(1) of Schedule D of its Form ADV filing Name:
	SALI FUND SERVICES SEC File Number: 801 - 61702
	Yes No
4.	Are your <i>clients</i> solicited to invest in this <i>private fund</i> ?
	In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.
1.	Name of the <i>private fund</i> : COVENANT GLOBAL EQUITIES FUND SERIES INTERESTS OF THE SALI MULTI-SERIES FUND II, L.P.
2.	Private fund identification number: (include the "805-" prefix also) 805-6769581351
3.	Name and SEC File number of adviser that provides information about this <i>private fund</i> in Section 7.B.(1) of Schedule D of its Form ADV filing Name: SALI FUND SERVICES SEC File Number: 801 - 61702
	Yes No
4.	Are your <i>clients</i> solicited to invest in this <i>private fund</i> ? In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.
1.	Name of the <i>private fund</i> :
	ONE BRICK SELECT PRIVATE CREDIT FUND I, LP
2.	Private fund identification number: (include the "805-" prefix also) 805-2885543117
3.	Name and SEC File number of adviser that provides information about this <i>private fund</i> in Section 7.B.(1) of Schedule D of its Form ADV filing Name: PPB ADVISORS, LLC SEC File Number:
	801 - 96194
1	Yes No
4.	Are your <i>clients</i> solicited to invest in this <i>private fund</i> ? In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

2. Private fund identification number:

1.	Nar	me of the <i>private fund</i> :		
	TRU	JSTCORE PRIVATE OPPORTUNITIES FUND LP		
2.	(inc	vate fund identification number: clude the "805-" prefix also)		
	805	5-7259788753		
3.	Nar Nar	me and SEC File number of adviser that provides information about this <i>private fund</i> in Section 7.B.(1) of Schedule D of its Form ADV filing me:		
	PPE	B ADVISORS, LLC		
		C File Number:		
	801	1 - 96194	W = =	NI -
4.	Δra	your <i>clients</i> solicited to invest in this <i>private fund</i> ?	Yes	
7.	In a mo	answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, o re funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" inveraster fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substants assets in a single master fund.	sting i	
Iter	n 8 P	articipation or Interest in <i>Client</i> Transactions		
of i	ntere	tem, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which st may occur between you and your <i>clients</i> . Newly-formed advisers should base responses to these questions on the types of participation and expect to engage in during the next year.		
Like	Item	n 7, Item 8 requires you to provide information about you and your related persons, including foreign affiliates.		
Pro	priet	ary Interest in <i>Client</i> Transactions		
A.	Do y	you or any <i>related person</i> :	Yes	No
	(1)	buy securities for yourself from advisory clients, or sell securities you own to advisory clients (principal transactions)?	\circ	\odot
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	\odot	\circ
	(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	nterest in <i>Client</i> Transactions		
B.	Do y	you or any <i>related person</i> :	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	⊙
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	•	0
	(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	0	0
Inv	estm	nent or Brokerage Discretion		
C.	Do y	you or any <i>related person</i> have <i>discretionary authority</i> to determine the:	Yes	No
	(1)	securities to be bought or sold for a <i>client's</i> account?	\odot	\circ
	(2)	amount of securities to be bought or sold for a <i>client's</i> account?	\odot	\circ
	(3)	broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?	~	_

(1) Do you or any related person receive research or other products or services other than execution from a broker-dealer or a third party ("soft

(2) If "yes" to G.(1) above, are all the "soft dollar benefits" you or any related persons receive eligible "research or brokerage services" under

 \odot

 \circ

 \circ

 \odot

(4) commission rates to be paid to a broker or dealer for a *client's* securities transactions?

If you answer "yes" to C.(3) above, are any of the brokers or dealers related persons?

If you answer "yes" to E. above, are any of the brokers or dealers related persons?

Do you or any related person recommend brokers or dealers to clients?

dollar benefits") in connection with *client* securities transactions?

G.

		section 28(e) of the Securities Exchange Act of	1934?		
Н.	(1)	Do you or any related person, directly or indirect	tly, compensate any person that is not an employee for client referrals?	•	0
	(2)	Do you or any <i>related person</i> , directly or indirect (cash or non-cash compensation in addition to	tly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm the <i>employee's</i> regular salary)?	•	0
I.		you or any <i>related person</i> , including any <i>employed</i> son) for <i>client</i> referrals?	e, directly or indirectly, receive compensation from any person (other than you or any related	•	0
	In y	our response to Item 8.I., do not include the regu	lar salary you pay to an employee.		
			n and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or receive lient referrals, including any bonus that is based, at least in part, on the number or amount of client re		
Ltor	m 0 C	ustody			
		ustody	a has gustady of gliant (other than gliants that are investment companies registered under the Inv	voot m	ont
		y Act of 1940) assets and about your custodial p	has <i>custody</i> of <i>client</i> (other than <i>clients</i> that are investment companies registered under the Invoractices.	estine	SIII
Α.	(1)	Do you have <i>custody</i> of any advisory <i>clients'</i> :		Yes	No
		(a) cash or bank accounts?		0	•
		(b) securities?		0	•
	fron	n your clients' accounts, or (ii) a related person ha	ver "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fee s custody of client assets in connection with advisory services you provide to clients, but you have ov endent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.		-
	(2)	If you checked "yes" to Item 9.A.(1)(a) or (b), have <i>custody</i> :	what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for whic	h you	I
			Total Number of <i>Clients</i>		
		(a) \$	(b)		
	incli coni	ude the amount of those assets and the number of	you have custody solely because you deduct your advisory fees directly from your clients' accounts, do of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in ts, do not include the amount of those assets and number of those clients in your response to 9.A.(2, Item 9.B.(2).	7	
В.	(1)	In connection with advisory services you provide	de to clients, do any of your related persons have custody of any of your advisory clients':	Yes	No
		(a) cash or bank accounts?		•	0
		(b) securities?		•	0
	You	are required to answer this item regardless of hov	v you answered Item 9.A.(1)(a) or (b).		
	(2)	If you checked "yes" to Item 9.B.(1)(a) or (b), related persons have custody:	what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for whic	h you	ır
		U.S. Dollar Amount	Total Number of Clients		
		(a) \$ 616,111,099	(b) 225		
C.	If yo		funds or securities in connection with advisory services you provide to <i>clients</i> , check all the follow	/ing th	nat
	(1)		ents at least quarterly to the investors in the pooled investment vehicle(s) you manage.		
	(2)		ly the pooled investment vehicle(s) that you manage and the audited financial statements are		
	(3)	An independent public accountant conducts an a	nnual surprise examination of <i>client</i> funds and securities.	~	
	(4)	An independent public accountant prepares an in qualified custodians for client funds and securit	nternal control report with respect to custodial services when you or your <i>related persons</i> are ies.		
	inte		tion 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepa you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this info n 7.B.(1) of Schedule D).		
D.	Do :	you or your <i>related person(s)</i> act as qualified cus	todians for your clients in connection with advisory services you provide to clients?	Yes	No
	(1)	you act as a qualified custodian		0	\odot
	(2)	your related person(s) act as qualified custodian	n(s)	0	•

	If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b) (1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.									
E.	If you are filing your <i>annual updating amendment</i> and you were subject to a surprise examination by an <i>independent public accountant</i> during your last fiscal year, provide the date (MM/YYYY) the examination commenced: 09/2023									
F.		_	unds or securities, how many <i>perso</i> th advisory services you provide to	ons, including, but not limited to, you and your relate clients?	ed persons, act as					
SEC	CTION 9.C. Independent i	Public Accountant								
inv	· ·	•		d to perform a surprise examination, perform an au ete a separate Schedule D Section 9.C. for each <i>ind</i>	•					
(1	Name of the <i>independer</i> MARCUM LLP	nt public accountant:								
(2	2) The location of the <i>inde</i>	pendent public accountant's c	office responsible for the services pr	ovided:						
	Number and Street 1:		Number and Street 2:							
	730 THIRD AVE		730							
	City:	State:	Country:	ZIP+4/Postal Code:						
	NEW YORK	New York	United States	10017						
(3	3) Is the <i>independent publi</i>	<i>ic accountant</i> registered with	the Public Company Accounting Ov	versight Board?	Yes No					
	If "yes," Public Compan 688	y Accounting Oversight Boar	d-Assigned Number:							
(4	4) If "yes" to (3) above, is accordance with its rule	· · · · · · · · · · · · · · · · · · ·	untant subject to regular inspection	by the Public Company Accounting Oversight Board	d in O					
(5	5) The <i>independent public a</i>	accountant is engaged to:								
	A. ☐ audit a pooled inve B. ☑ perform a surprise C. ☐ prepare an interna	e examination of <i>clients</i> ' asse	ets							
(6	_	updating amendment, did all and controls contain unqualifi		pendent public accountant that audited the pooled in	ivestment vehicle					
	C Yes									
	O No									
	C Report Not Yet Rece	ived								
	If you check "Report Not Y available.	'et Received", you must prom	optly file an amendment to your Form	n ADV to update your response when the accountant's	report is					
Iter	m 10 Control Persons									
	this Item, we ask you to id provided for the <i>filing advis</i>	• • •	ectly or indirectly, <i>controls</i> you. If yo	ou are filing an <i>umbrella registration</i> , the information	in Item 10 should					
exe	ecutive officers. Schedule E	B asks for information about	·	edule B. Schedule A asks for information about your amendment and you are updating information you roust complete Schedule C.						
					Yes No					
Α.	Does any <i>person</i> not nam	ned in Item 1.A. or Schedule	es A, B, or C, directly or indirectly, <i>co</i>	entrol your management or policies?	○ ⊙					
	If yes, complete Section 1	'O.A. of Schedule D.								
B.	If any person named in S	Schedules A, B, or C or in Sec	ction 10.A. of Schedule D is a public	reporting company under Sections 12 or 15(d) of the	ne Securities					

Exchange Act of 1934, please complete Section 10.B. of Schedule D.

SEC	TION 10.A. Control Persons		
	No Information Filed		
SEC	TION 10.B. <i>Control Person</i> Public Reporting Companies		
	No Information Filed		
Iter	n 11 Disclosure Information		
whe	his Item, we ask for information about your disciplinary history and the disciplinary history of all your advisory affiliates. We use this information to detect to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the queek. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the filing adviser and all relying advisers under an umbrella registration.	nt adv	iser,
you	r advisory affiliates are: (1) all of your current employees (other than employees performing only clerical, administrative, support or similar functions); (ar officers, partners, or directors (or any person performing similar functions); and (3) all persons directly or indirectly controlling you or controlled by you a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your advisory affiliates are.		
follo ten yea	ou 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 you are registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosuring the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgment rees lapsed.	sclosur ig this	ten-
You	must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.		
		Yes	No
Do	any of the events below involve you or any of your <i>supervised persons</i> ?	0	\odot
	"yes" answers to the following questions, complete a Criminal Action DRP:		
A.	In the past ten years, have you or any advisory affiliate:	Yes	No
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any <i>felony</i> ?	0	⊙
	(2) been <i>charged</i> with any <i>felony</i> ?	0	⊙
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to cathat are currently pending.	าarges	6
В.	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	0	•
	(2) been charged with a misdemeanor listed in Item 11.B.(1)?	0	\odot
	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 calculate that are currently pending.	narges	6
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?	0	\odot
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	0	\odot
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	0	⊙
	(5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity?	0	•
D.	Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:		
٥.	(1) ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical?	0	6
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	0	0
	(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,	0	•
	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?	0	\odot
	(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?	0	•

	(1) found you or any advisory affiliate to have made a false statement or omission?	0	\odot
	(2) found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	0	•
	(3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities?	0	•
F.	Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or suspended?	0	•
G.	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.?	0	•
	"yes" answers to the following questions, complete a Civil Judicial Action DRP:		
H.	(1) Has any domestic or foreign court:	Yes	No
	(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	0	⊙
	(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?	0	⊙
	(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 financial regulatory authority?	0	•
	(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)?	0	•
•	40 Constitution		
	n 12 Small Businesses		
	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 we meet the definition of "small business" or "small organization" under rule 0-7.	пеш	ਹ।
man	wer 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 assenagement 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 content of less than \$25 million. SEC to state registration.		
or	purposes of this Item 12 only:		
	 Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of <i>clients</i>. In determining your or another <i>person's</i> total you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries if that amount is larger). Control means the power to direct or cause the direction of the management or policies of a <i>person</i>, whether through ownership of securities, by concording or otherwise. Any <i>person</i> that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or the profits, of another <i>person</i> is presumed to <i>control</i> the other <i>person</i>. 	incluc ontra	ded, ct,
		Yes	No
A.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	0	0
If "y	yes," you do not need to answer Items 12.B. and 12.C.		
В.	Do you:		
	(1) control another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0
C.	Are you:		
	(1) controlled by or under common control with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0
iche	edule A		
	ect Owners and Executive Officers		
	Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive Use Schedule C to amend this information.	office	ers.
	Direct Owners and Executive Officers. List below the names of:		

(a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer is

reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);

(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

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

E. Has any *self-regulatory organization* or commodities exchange ever:

functions;

Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.

- (c) if you are organized as a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
- (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
- (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
- 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	DE/FE/I	Title or Status	Date Title or Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date
Name, First Name, Middle Name)			Acquired MM/YYYY	Code	Person		of Birth, IRS Tax No. or Employer ID
							No.
MILLER, JAMES, FIELDING	I	CHIEF EXECUTIVE OFFICER	02/2003	NA	Υ	N	1587301
THE CAPFINANCIAL GROUP, LLC	DE	MEMBER	05/2015	Е	Υ	N	
HOYLE, WILSON, SMITH	I	MANAGING DIRECTOR	12/2009	NA	Υ	N	2444392
GOLDSTEIN, BENJAMIN, STUART	1	PRESIDENT	04/2010	NA	Υ	N	1613111
BUCHANAN, DENISE, MCGEE	I	SENIOR DIRECTOR, COMPLIANCE	09/2023	NA	Υ	N	1284353
SHOFF, DERICK, DON	1	MANAGING DIRECTOR	12/2009	NA	N	N	1140640
MATHESON, SCOTT, THOMAS	1	MANAGING DIRECTOR	04/2017	NA	Υ	N	4992054
Markell-Balleza, Christina	I	MANAGING DIRECTOR, GENERAL COUNSEL	01/2022	NA	Υ	N	5993913
Meyer, Jonathan, Seth	I	CHIEF TECHNOLOGY OFFICER	01/2020	NA	N	N	6635770
FRANCHER, MARK, JOHN	I	CHIEF HUMAN RESOURCES OFFICER	01/2020	NA	N	N	6999878
VOGELZANG, MICHAEL, JAMES	I	MANAGING DIRECTOR, CHIEF INVESTMENT OFFICER	06/2021	NA	N	N	2186136
MILLER, ROBERT, A	1	CHIEF FINANCIAL OFFICER	08/2021	NA	Υ	N	4676260
Welch, Edward, Virgil	1	MANAGING DIRECTOR	01/2021	NA	N	Ν	1290275
JAROCKI, MARGARET, A	1	SENIOR DIRECTOR	01/2022	NA	N	N	5404373
Leddy, Ann	I	CHIEF COMPLIANCE OFFICER	09/2023	NA	Υ	N	5024384

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

(c) Complete each column.	DE 455 11		0	D		a .	-	ODDAL ISM ODDAL IT
FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Entity in Which Interest is Owned	Status	Date Status Acquired MM/YYYY	•	Control Person		of Birth, IRS Tax No. or Employer ID No.
MILLER, JAMES, FIELDING	I	CAPFINANCIAL HOLDINGS, INC.	DIRECTOR	05/2015	С	Υ	N	1587301
CAPFINANCIAL HOLDINGS, INC.	DE	THE CAPFINANCIAL GROUP, LLC	MEMBER	05/2015	С	Υ	N	
MILLER, JAMES, FIELDING	I	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS	05/2015	F	Υ	N	1587301
SOLOMON, ROBERT, G	I	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS	05/2015	F	N	N	6509498
HOYLE, WILSON, SMITH	I	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS	05/2015	F	Υ	N	2444392
HALFTIME HOLDINGS LLC	DE	THE CAPFINANCIAL GROUP, LLC	MEMBER	08/2020	С	Υ	N	
GTCR FUND XII/B LP	DE	HALFTIME HOLDINGS LLC	MEMBER	06/2020	Е	Υ	N	
GOLDSTEIN, BENJAMIN, STUART	I	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS	04/2010	F	Υ	N	1613111
ROCHE, COLLIN, EDWARD	I	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS	06/2020	F	N	N	2529107
SMITH, DASHA, MARIE	I	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS	08/2020	F	N	N	6026873
Wilson, Mark, Sanford	1	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS		F	N	N	7555611
HOLLANDER, MICHAEL, S	I	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS	06/2020	F	N	N	6001293
Markell-Balleza, Christina	I	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS		F	Υ	N	5993913
Burr, James	I	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS		F	N	N	6632799
REDETT, JOHN, CHRISTOPHER	I	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS	11/2023	F	N	N	2354558
MCCONNELL, KALEN, JAMES	1	THE CAPFINANCIAL GROUP, LLC	BOARD OF MANAGERS	10/2023	F	N	N	5578562

Schedule D - Miscellaneous

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

Item 5E(6)"Compensation Arrangements" indicate that CAPTRUST may be compensated with "performance fees" because CAPTRUST has been engaged to act as subadvisor to three private funds ("Excelsior Funds") that carry a management fee structure that includes a "performance" fee component. Background: In 3Q18 The CapFinancial Group, LLC (parent of CAPTRUST) acquired the assets of First Capital Consulting ("FCE Group"). FCE Group acts as investment adviser to the Excelsior Funds and new employees of CAPTRUST, who are the former owners of FCE Group, act as portfolio managers (under the aforementioned sub-advisory agreement) to Excelsior Funds. Since the compensation structure includes performance based fees, and since some of FCE Group's clients are now clients of CAPTRUST are invested in the Excelsior Funds, and under the subadvisory arrangement CAPTRUST can receive 50% of the management fees as compensation for subadvisory services. CAPTRUST client assets invested in the Excelsior funds represent less than .0287% of all client assets under advisement by CAPTRUST and

less than 0.5% of total we	ealth client asset under CAPTRUST advisement.		
Schedule R			
	No Information	Filed	
DRP Pages			
CRIMINAL DISCLOSURE	REPORTING PAGE (ADV)		
No Information Filed			
REGULATORY ACTION DI	ISCLOSURE REPORTING PAGE (ADV)		
No Information Filed			
CIVIL JUDICIAL ACTION	DISCLOSURE REPORTING PAGE (ADV)		
No Information Filed			
Part 2			
SEC rules exempt SEC-reç	re delivery requirements for SEC-registered advisers gistered advisers from delivering a firm brochure to some kinents, you do not have to prepare a brochure.	nds of clients. If these exemptions excuse you fror	n delivering a brochure
	vering a brochure to all of your clients under these rules?		Yes No
If no, complete the ADV Pa			
Amend, retire or file new b	prochures:		
Part 3			
CRS	Type(s)	Affiliate Info	Retire
	Investment Advisor		
Execution Pages	ADVISER EXECUTION PAGE		
	llowing Execution Page to Form ADV. This execution page mu	ust be signed and attached to your initial submission	on of Form ADV to the
Appointment of Agent	for Service of Process		
state in which you mainta service, and agree that su arbitration, or other proce administrative proceeding	Execution Page, you, the undersigned adviser, irrevocably a ain your <i>principal office and place of business</i> and any other statuch <i>persons</i> may accept service on your behalf, of any notice ess or papers, and you further agree that such service may be or arbitration brought against you in any place subject to the vity in connection with your investment advisory business that	ate in which you are submitting a <i>notice filing</i> , as you, subpoena, summons, <i>order</i> instituting <i>proceeding</i> be made by registered or certified mail, in any feder e jurisdiction of the United States, if the action, <i>proceeding</i> and the control of the united States.	our agents to receive gs, demand for eral or state action, roceeding, or arbitration

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

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

of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

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

Signature: Date: MM/DD/YYYY DENISE M BUCHANAN 01/15/2025

Printed Name: Title:
DENISE M BUCHANAN SENIOR DIRECTOR, COMPLIANCE

Adviser CRD Number:

175112

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

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

1. Appointment of Agent for Service of Process

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

2. Appointment and Consent: Effect on Partnerships

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

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

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

Signature

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

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

Signature: Date: MM/DD/YYYY

Printed Name: Title:

Adviser *CRD* Number:

175112