FORM ADV

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

Primary Business Name: APPOMATTOX ADVISORY, INC **CRD Number: 153731** Rev. 10/2021

Annual Amendment - All Sections

3/21/2024 1:28:51 PM

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

	General Instruction					
Iten	n 1 Identifying Informatior	ı				
regi		em 1 should be pro	_	w we can contact you. If you are filing an <i>umbrella</i> y. General Instruction 5 provides information to assist		
A.	Your full legal name (if you a APPOMATTOX ADVISORY,		r, your last, first, and middle n	ames):		
В.	(1) Name under which you p APPOMATTOX ADVISORY,		our advisory business, if differe	ent from Item 1.A.		
	List on Section 1.B. of Sched	ule D any additiona	al names under which you con	duct your advisory business.		
	(2) If you are using this Form	n ADV to register n	nore than one investment advi	ser under an <i>umbrella registration</i> , check this box \Box		
	If you check this box, comple	ete a Schedule R fo	r each relying adviser.			
C.	. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.(1)), enter the new name and specify whether the name change is of ☐ your legal name or ☐ your primary business name:					
D.	(2) If you report to the SEC	as an <i>exempt repo</i> i	estment adviser, your SEC file rting adviser, your SEC file nu numbers assigned by the SEC No Information Filed			
E.	(1) If you have a number ("0	CRD Number") assi	gned by the FINRA's CRD syst	em or by the IARD system, your <i>CRD</i> number: 153731		
	If your firm does not have a affiliates.	CRD number, skip	this Item 1.E. Do not provide	the CRD number of one of your officers, employees, or		
	(2) If you have additional <i>CR</i>	D Numbers, your a	additional <i>CRD</i> numbers: No Information Filed			
F.	Principal Office and Place of	Business				
	(1) Address (do not use a P. Number and Street 1: 551 5TH AVE	ŕ	Number and Street 2: 26TH FLOOR			
	City:	State:	Country:	ZIP+4/Postal Code:		
	NEW YORK	New York	United States	10176		
	If this address is a priva	te residence, check	this box:			

List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest twenty-five offices in terms of numbers of employees as of the end of your most recently completed fiscal year.

(2) Days of wee	k that you normal	y conduct business at	your <i>principa</i>	ai orrice and	place of business:
-----------------	-------------------	-----------------------	----------------------	---------------	--------------------

Omnday - Friday Other: TUESDAY, WEDNESDAY, THURSDAY

Normal business hours at this location:

9:00 AM - 5:00 PM

(3) Telephone number at this location:

212-895-3000

(4) Facsimile number at this location, if any:

212-895-3020

(5) What is the total number of offices, other than your principal office and place of business, at which you conduct investment advisory business as of the end of your most recently completed fiscal year?

		e of business address

Number and Street 1: Number and Street 2:

City: Country: ZIP+4/Postal Code:

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

H. If you are a sole proprietor, state your full residence address, if different from your principal office and place of business address in Item 1.F.:

Number and Street 1: Number and Street 2:

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

Yes No

Do you have one or more websites or accounts on publicly available social media platforms (including, but not limited to, Twitter, Facebook and LinkedIn)?

 \circ

If "yes," list all firm website addresses and the address for each of the firm's accounts on publicly available social media platforms on Section 1.I. of Schedule D. If a website address serves as a portal through which to access other information you have published on the web, you may list the portal without listing addresses for all of the other information. You may need to list more than one portal address. Do not provide the addresses of websites or accounts on publicly available social media platforms where you do not control the content. Do not provide the individual electronic mail (e-mail) addresses of employees or the addresses of employee accounts on publicly available social media platforms.

Chief Compliance Officer

(1) Provide the name and contact information of your Chief Compliance Officer. If you are an exempt reporting adviser, you must provide the contact information for your Chief Compliance Officer, if you have one. If not, you must complete Item 1.K. below.

Other titles, if any:

KRISTIN KOLONIARIS CFO

Telephone number: Facsimile number, if any:

2039124422 2128953020

Number and Street 1: Number and Street 2:

551 5TH AVENUE 26TH FLOOR

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

NEW YORK New York United States 10176

Electronic mail (e-mail) address, if Chief Compliance Officer has one:

KMELINO@APPOMATTOX.COM

(2) If your Chief Compliance Officer is compensated or employed by any person other than you, a related person or an investment company registered under the Investment Company Act of 1940 that you advise for providing chief compliance officer services to

	you, provide the <i>pers</i>	son's name and IRS Emp	loyer Identification Number (if a	ny):		
	Name: ABIDE					
	IRS Employer Identifi 92-3651923	ication Number:				
K.			rson other than the Chief Compl ou may provide that information	iance Officer is authorized to receive informathere.	tion and	d
	Name: SUSAN WEBB		Titles:			
	Telephone number: 2128953014		CEO/CIO Facsimile number, if any 2128953020	:		
	Number and Street 3 551 5TH AVENUE	1:	Number and Street 2: 26TH FLOOR			
	City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10176		
	Electronic mail (e-m SWEBB@APPOMATTO	ail) address, if contact po OX.COM	erson has one:			
					Yes	No
L.	•		records you are required to kee principal office and place of bus	ep under Section 204 of the Advisers Act, or siness?	•	0
	If "yes," complete Se	ction 1.L. of Schedule D.				
М.	Are you registered wi	ith a foreign financial reg	ulatory authority?		Yes O	No ⊙
			oreign financial regulatory authors," complete Section 1.M. of Scl	ority, even if you have an affiliate that is regis nedule D.	stered ı	with
					Yes	No
N.	Are you a public repo	rting company under Se	ctions 12 or 15(d) of the Securit	ties Exchange Act of 1934?	0	\odot
_					Yes	No
Ο.	If yes, what is the ap	on or more in assets on t proximate amount of you than \$10 billion	he last day of your most recent ur assets:	fiscal year?	0	•
	~	ss than \$50 billion				
	C \$50 billion or mo	ore				
				an the assets you manage on behalf of clients of for your most recent fiscal year end.	5.	
P.	Provide your <i>Legal Er</i>	ntity Identifier if you have	e one:			
	A legal entity identific a legal entity identific		at companies use to identify ead	ch other in the financial marketplace. You may	y not h	ave
SEC	TION 1.B. Other Bus	iness Names				
			No Information Filed			

SECTION 1.F. Other Offices

No Information Filed

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

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

Address of Website/Account on Publicly Available Social Media Platform: https://www.linkedin.com/company/appomattox-advisory-inc.

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:

CITCO FUND SERVICES (BERMUDA) LIMITED

Number and Street 1: Number and Street 2: WASHINGTON MALL WEST, 2ND FLOOR 7 REID STREET

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

HAMILTON Bermuda HM 11

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

Telephone Number: Facsimile number, if any:

4412957149

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 location.

CITCO SERVES AS THE ADMINISTRATOR TO CERTAIN PRIVATE FUNDS MANAGED BY THE ADVISER AND IN THAT CAPACITY MAINTAINS CERTAIN RECORDS OF THE ADVISER INCLUDING FINANCIAL RECORDS AND SUBSCRIPTION DOCUMENTS.

CENTAIN RECORDS OF THE ADVISEN INCESSING FINANCIAE RECORDS AND SOBSERIE TON DOCUMENTS.

Name of entity where books and records are kept:

HARBOUR FIDUCIARY SERVICES LIMITED

Number and Street 1: Number and Street 2: THISTLE HOUSE, 2ND FLOOR 4 BURNABY STREET

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

HAMILTON Bermuda HM 11

9/24, 1.30 PW	IAIND - All	i Sections (Oser Mairie, KK)	Johnans, Orgib. 199791]			
If this address is a private residence, check th	nis box:					
Telephone Number: 4412928041	Facsimil	e number, if any:				
This is (check one):						
O one of your branch offices or affiliates.						
a third-party unaffiliated recordkeeper.						
O other.						
Briefly describe the books and records kept at this location. HARBOUR SERVES AS ADMINISTRATOR TO CERTAIN PRIVATE FUNDS MANAGED BY THE ADVISER AND IN THAT CAPACITY MAINTAINS CERTAIN RECORDS OF THE ADVISER INCLUDING FINANCIAL RECORDS AND SUBSCRIPTION DOCUMENTS.						
Name of entity where books and records are I GLOBAL RELAY	kept:					
Number and Street 1: 121 W. WACKER DRIVE		Number and Street 2 33RD FLOOR	:			
City:	State:	Country:	ZIP+4/Postal Code:			
CHICAGO	Illinois	United States	60601			
If this address is a private residence, check th	nis box:					
Telephone Number: 8664846630	Facsimile num	nber, if any:				
This is (check one):						
O one of your branch offices or affiliates.						
C other.						
Briefly describe the books and records kept at GLOBAL RELAY SERVES AS THE EMAIL ARCHI		R.				

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

Item 2 SEC Registration/Reporting

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting an annual undating amendment to your SEC registration. If you are filing an umbrella

۹.	are che	subm ck Ite	er (or remain registered) with the SEC, you must check at least one of the Items 2.A.(1) through 2.A.(12), below. If you itting an <i>annual updating amendment</i> to your SEC registration and you are no longer eligible to register with the SEC, m 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you may affirmatively respond to nese items.
	You	(the	adviser):
	V	(1)	are a large advisory firm that either:
			(a) has regulatory assets under management of \$100 million (in U.S. dollars) or more; or
			(b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent annual updating amendment and is registered with the SEC;
		(2)	are a mid-sized advisory firm that has regulatory assets under management of \$25 million (in U.S. dollars) or more but less than \$100 million (in U.S. dollars) and you are either:
			(a) not required to be registered as an adviser with the <i>state securities authority</i> of the state where you maintain your <i>principal office and place of business</i> ; or
			(b) not subject to examination by the <i>state securities authority</i> of the state where you maintain your <i>principal office and place of business</i> ;
			Click HERE for a list of states in which an investment adviser, if registered, would not be subject to examination by the state securities authority.
		(3)	Reserved
		(4)	have your principal office and place of business outside the United States;
		(5)	are an investment adviser (or subadviser) to an investment company registered under the Investment Company Act of 1940;
		(6)	are an investment adviser to a company which has elected to be a business development company pursuant to section 54 of the Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under management;
		(7)	are a pension consultant with respect to assets of plans having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a);
		(8)	are a related adviser under rule 203A-2(b) that <i>controls</i> , is <i>controlled</i> by, or is under common <i>control</i> with, an investment adviser that is registered with the SEC, and your <i>principal office and place of business</i> is the same as the registered adviser;
			If you check this box, complete Section 2.A.(8) of Schedule D.
		(9)	are an adviser relying on rule 203A-2(c) because you expect to be eligible for SEC registration within 120 days;
			If you check this box, complete Section 2.A.(9) of Schedule D.
		(10)	are a multi-state adviser that is required to register in 15 or more states and is relying on rule 203A-2(d);
			If you check this box, complete Section 2.A.(10) of Schedule D.
		(11)	are an Internet adviser relying on rule 203A-2(e);
		(12)	have received an SEC order exempting you from the prohibition against registration with the SEC;
			If you check this box, complete Section 2.A.(12) of Schedule D.
		(13)	are no longer eligible to remain registered with the SEC.

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 <i>notice filings</i> 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	□ IN	□ NV	□ SD			
□ AZ	□ IA	□ NH	□ TN			
□ AR	□ KS	☑ NJ	□ тx			
□ CA	□ KY	□ NM	□ UT			
□ со	□ LA	☑ NY	□ VT			
 СТ	□ ME	□ NC	□ vi			
□ DE	□ MD	□ ND	□ va			
□ DC	□ MA	□ он	□ wa			
☑ FL	□ MI	□ ок	□ wv			
□ GA	□ MN	□ OR	□ wi			
□ GU	□ MS	□ PA	□ WY			
□ ні	□ мо	□ PR				
	□ MT	□ RI				
	nption in rule 203A-2(b) fro n investment adviser that i	is registered with the SEC and you	pecause you control, are controlled by, or an principal office and place of business is the			
me of Registered Investme	nt Adviser					
D Number of Registered In	vestment Adviser					
EC Number of Registered Investment Adviser						
ECTION 2.A.(9) Investment Adviser Expecting to be Eligible for Commission Registration within 120 Days						
you are relying on rule 203A-2(c), the exemption from the prohibition on registration available to an adviser that expects to be eligible in SEC registration within 120 days, you are required to make certain representations about your eligibility for SEC registration. By necking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these appresentations:						
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.						

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.

☐ I har regis	are applying for registration as an investment adviser with the SEC, you must make both of these representations: ve reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to ster as an investment adviser with the <i>state securities authorities</i> in those states. dertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the sof fewer than 15 states to register as an investment adviser with the <i>state securities authorities</i> of those states.
☐ With	ire submitting your annual updating amendment, you must make this representation: nin 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded I am required by the laws of at least 15 states to register as an investment adviser with the state securities authorities in those es.
SECTIO	N 2.A.(12) SEC Exemptive <i>Order</i>
If you a	re relying upon an SEC order exempting you from the prohibition on registration, provide the following information:
Applicat	tion Number:
803-	
Date of	order:

Item 3 Form of Organization

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

- A. How are you organized?

 - C Sole Proprietorship
 - C Limited Liability Partnership (LLP)
 - Partnership
 - C Limited Liability Company (LLC)
 - C Limited Partnership (LP)
 - Other (specify):

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

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

State Country

Delaware United States

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

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

Item 4 Successions

Yes No

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

•

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

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

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

SECTION 4 Successions

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

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

Employees

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

- A. Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.
- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
 - (2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?
 - (3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?
 - (4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?
 - (5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?
 - (6) Approximately how many firms or other persons solicit advisory clients on your behalf?
 0

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

Clients

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

- C. (1) To approximately how many clients for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?
 - (2) Approximately what percentage of your *clients* are non-*United States persons*? 47%
- D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

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

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

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

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

Type of <i>Client</i>	(1) Number of Client(s)	(2) Fewer than 5 <i>Clients</i>	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)			\$
(b) High net worth individuals	18		\$ 532,489,528
(c) Banking or thrift institutions			\$
(d) Investment companies			\$
(e) Business development companies] [\$
(f) Pooled investment vehicles (other than investment companies and business development companies)	8		\$ 26,772,595
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)			\$
(h) Charitable organizations	6		\$ 194,598,431
(i) State or municipal government entities (including government pension plans)			\$
(j) Other investment advisers			\$
(k) Insurance companies	İ		\$
(I) Sovereign wealth funds and foreign official institutions			\$
(m) Corporations or other businesses not listed above			\$
(n) Other:			\$

Compensation Arrangements

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

~	(1)	A percentage o	t assets	under y	our	management
-						

Hourly charges (2)

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

 $\overline{\mathbf{v}}$ (4) Fixed fees (other than subscription fees)

(5) Commissions

(6) Performance-based fees

Other (specify): (7)

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

Regulatory Assets Under Management

Yes No

- F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios?
- ⊙ ⊙
- (2) If yes, what is the amount of your regulatory assets under management and total number of accounts?

U.S. Dollar Amount

Total Number of Accounts

Discretionary:

(a) \$ 146,941,106

(d) 15

Non-Discretionary:

(b) \$606,919,448

(e) 17

Total:

(c) \$ 753,860,554

(f) 32

Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item.

(3) What is the approximate amount of your total regulatory assets under management (reported in Item 5.F.(2)(c) above) attributable to *clients* who are non-*United States persons*?

\$ 273,677,766

Item 5 Information About Your Advisory Business - Advisory Activities

Adv	ry Activities								
G.	nat type(s) of advisory services do you provide? Check all that apply.								
	(1) Financial planning services								
	(2) Portfolio management for individuals and/or small businesses								
	(3) Portfolio management for investment companies (as well as "business development companies" that have made	de an							
	election pursuant to section 54 of the Investment Company Act of 1940)								
	(4) Portfolio management for pooled investment vehicles (other than investment companies)								
	(5) Portfolio management for businesses (other than small businesses) or institutional clients (other than register	ed							
	investment companies and other pooled investment vehicles)								
	(6) Pension consulting services								
	(7) Selection of other advisers (including <i>private fund</i> managers)								
	(8) Publication of periodicals or newsletters								
	(9) Security ratings or pricing services								
	(10) Market timing services								
	(11) Educational seminars/workshops								
	(12) Other(specify):								
	not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an invest mpany registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), real or 814 number of the investment company or investment companies to which you provide advice in Section $5.G.(3)$ hedule $D.$	eport the							
н.	you provide financial planning services, to how many clients did you provide these services during your last fiscal year?	?							
	, 0								
	1 - 10								
	₅ 11 - 25								
	26 - 50								
	51 - 100								
	101 350								
	254 500								
	Mary New FOO								
	If more than 500, how many?								
	(round to the nearest 500)								
	your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you hav parate advisory relationship with those investors.	'e a							
_		Yes No							
I.) Do you participate in a <i>wrap fee program</i> ?	0 0							
	(2) If you participate in a wrap fee program, what is the amount of your regulatory assets under management attributable to acting as:								
	(a) sponsor to a wrap fee program \$								
	(b) portfolio manager for a <i>wrap fee program</i> ? \$								
	(c) sponsor to and portfolio manager for the same wrap fee program? \$								
	If you report an amount in Item $5.I.(2)(c)$, do not report that amount in Item $5.I.(2)(a)$ or Item $5.I.(2)(b)$.								
	If you are a portfolio manager for a wrap fee program, list the names of the programs, their sponsors and related information in Section $5.I.(2)$ of Schedule D.								
	your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise and that is offered through a wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I								

Yes No

J.	(1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?	⊙	О
	(2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management?	0	•
K.	Separately Managed Account <i>Clients</i>	V	NI.
	(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	O
	If yes, complete Section 5.K.(1) of Schedule D.		
	(2) Do you engage in borrowing transactions on behalf of any of the separately managed account <i>clients</i> that you advise?	0	•
	If yes, complete Section 5.K.(2) of Schedule D.		
	(3) Do you engage in derivative transactions on behalf of any of the separately managed account <i>clients</i> that you advise?	0	•
	If yes, complete Section 5.K.(2) of Schedule D.		
	(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management?	0	•
	If yes, complete Section 5.K.(3) of Schedule D for each custodian.		
L.	Marketing Activities		
L.	Marketing Activities (1) Do any of your <i>advertisements</i> include:	Yes	No
L.		Yes	No ⊙
L.	(1) Do any of your <i>advertisements</i> include:		
L.	(1) Do any of your <i>advertisements</i> include: (a) Performance results?		•
L.	(1) Do any of your <i>advertisements</i> include:(a) Performance results?(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?		•••
L.	 (1) Do any of your advertisements include: (a) Performance results? (b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))? (c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))? 	0 0	•••
L.	 (1) Do any of your advertisements include: (a) Performance results? (b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))? (c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))? (d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))? 	0 0	•••
L.	 (1) Do any of your advertisements include: (a) Performance results? (b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))? (c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))? (d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))? (e) Third-party ratings? (2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, 	0 0	•••
L.	 (1) Do any of your advertisements include: (a) Performance results? (b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))? (c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))? (d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))? (e) Third-party ratings? (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 testimonials, endorsements, or third-party ratings? 	0 0	

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

No Information Filed

SECTION 5.I.(2) Wrap Fee Programs

No Information Filed

SECTION 5.K.(1) Separately Managed Accounts

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

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

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

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

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

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

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

Generally describe any assets included in "Other"

(b)	Ass	et Type	End of year	
	(i)	Exchange-Traded Equity Securities	0 %	
	(ii) Non Exchange-Traded Equity Securities			
	(iii) U.S. Government/Agency Bonds		0 %	
	(iv)	U.S. State and Local Bonds	0 %	
	(v)	Sovereign Bonds	0 %	
	(vi)	Investment Grade Corporate Bonds	0 %	
	(vii)	Non-Investment Grade Corporate Bonds	0 %	

(viii)	Derivatives	0 %
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	0 %
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	100 %
(xi)	Cash and Cash Equivalents	0 %
(xii)	Other	0 %

Generally describe any assets included in "Other"

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

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

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

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

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

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

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

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

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

(i) Mid-Year

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

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

(ii) End of Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings	s (3) Derivative Exposures					
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative	(c) Credit 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

Iten	Item 6 Other Business Activities						
In tl	nis Ite	em, we request information about your firm's other business activities.					
A.	[] [] [] [] [] [] [] [] [] [] [] [] [] [are actively engaged in business as a (check all that apply): (1) broker-dealer (registered or unregistered) (2) registered representative of a broker-dealer (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (4) futures commission merchant (5) real estate broker, dealer, or agent (6) insurance broker or agent (7) bank (including a separately identifiable department or division of a bank) (8) trust company (9) registered municipal advisor (10) registered security-based swap dealer (11) major security-based swap participant (12) accountant or accounting firm (13) lawyer or law firm (14) other financial product salesperson (specify):	ectio	n			
	6.A.	. of Schedule D.	.	NI.			
В.	(1)	Are you actively engaged in any other hydrocs not listed in Item 6. A. (other than giving investment advice)?	es -				
	(2)	If you is this other hydroges your primary hydroge?	0	⊙ ≎			
	(-)		C cont	О			
		If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a differname, provide that name.	ent				
		Y	es (No			
	(3)	Do you sell products or provide services other than investment advice to your advisory <i>clients</i> ?	O	\odot			
		If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a differname, provide that name.	rent				
SEC	TION	N 6.A. Names of Your Other Businesses					
		No Information Filed					
SEC	TION	N 6.B.(2) Description of Primary Business					
Des	cribe	your primary business (not your investment advisory business):					
If y	ou en	ngage in that business under a different name, provide that name:					
SEC	TION	N 6.B.(3) Description of Other Products and Services					
_		e 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) a	bov	e.			
If y	ou en	ngage in that business under a different name, provide that name:					

Item 7 Financial Industry Affiliations

	nis Item, we request information about your financial industry affiliations and activities. This information identifies areas in which licts of interest may occur between you and your <i>clients</i> .
Α.	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 <i>related person</i> that is a (check all that apply):
	 □ (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered) ☑ (2) other investment adviser (including financial planners) □ (3) registered municipal advisor □ (4) registered security-based swap dealer □ (5) major security-based swap participant □ (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) □ (7) futures commission merchant □ (8) banking or thrift institution □ (9) trust company □ (10) accountant or accounting firm □ (11) lawyer or law firm □ (12) insurance company or agency □ (13) pension consultant □ (14) real estate broker or dealer □ (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles □ (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles
	Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).
	Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.
	For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.
	You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.
	You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

SECTION 7.A. Financial Industry Affiliations

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

- 1. Legal Name of Related Person: ARCHWAY INVESTMENT ADVISORS, LIMITED
- 2. Primary Business Name of Related Person: ARCHWAY INVESTMENT ADVISORS, LIMITED
- 3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

or

Other

4.	Rela	Related Person's						
	(a)	CRD Number (if any):						
	(I-)	CTIC Number of a Notice of the Company						
	(b) CIK Number(s) (if any): No Information Filed							
		THO INIGHING						
5.		ted Person is: (check all that apply)						
	(a)							
		other investment adviser (including financial planners)						
	(c)	registered municipal advisor						
	(d) (e)	registered security-based swap dealer major security-based swap participant						
	(e) (f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)						
	. ,	futures commission merchant						
		banking or thrift institution						
	(i)	☐ trust company						
	(j)	accountant or accounting firm						
	(k)	☐ lawyer or law firm						
	(1)	insurance company or agency						
	(m)	_ `						
	` ,	real estate broker or dealer						
	` '	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles						
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No				
6.	Do v	ou control or are you controlled by the related person?		_				
	υ,	ou control of the you controlled by the related person.	О	⊚				
7.	Are	you and the related person under common control?	⊚	o				
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	О	⊙				
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you	0	0				
	()	overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the	0	0				
		related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are						
		maintained at the related person?						
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for of your <i>clients'</i> assets:	:ustoa	ly				
		Number and Street 1: Number and Street 2:						
		City: State: Country: ZIP+4/Postal Code:						
		If this address is a private residence, check this box: \Box						
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	_				
	` ,		⊚	О				
	(5)	RELYING ADVISER						
10.	` ,	Is the related person registered with a foreign financial regulatory authority?	0	•				
	(D)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>person</i> is registered.	reiate	a				
		No Information Filed						
11.	Do y	ou and the related person share any supervised persons?	•	0				
			_					
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	⊙				

Item 7 Private Fund Reporting					
	Yes No				

B. Are you an adviser to any private fund?



If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.

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

	Funds per Page: 15 V Total Funds: 8
A. F	RIVATE FUND
Inf	ormation About the <i>Private Fund</i>
_	
1.	(a) Name of the <i>private fund</i> : ARCHWAY APPRECIATION FUND LIMITED
	(b) Private fund identification number:
	(include the "805-" prefix also)
	805-5280615767
2.	Under the laws of what state or country is the <i>private fund</i> organized:
	State: Country: Bermuda
	berniuda
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
	ARCHWAY INVESTMENT ADVISORS, LIMITED
	(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):
т.	(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.
	Name of Country/English Name of Foreign Financial Regulatory Authority
	Bermuda - Bermuda Monetary Authority
	Bermuda - Bermuda Monetary Authority Yes N

	No Information Filed		
		Yes	NI.
(c	:) Is this a "feeder fund" in a master-feeder arrangement?	res	140
	If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?	nd	•
	Name of <i>private fund</i> :		
	Private fund identification number: (include the "805-" prefix also)		
	OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single chedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.		
	you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to t ection 7.B.(1), for each of the feeder funds answer the following questions:	his	
	No Information Filed		
) Is this <i>private fund</i> a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in othe	⊙ r pool	C led
	OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in othe vestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	r pool	led
(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
	uring your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under le Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
. W	hat type of fund is the <i>private fund</i> ?		
	hedge fund $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capita other <i>private fund</i> :	ıl func	C
N	OTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
	urrent gross asset value of the <i>private fund</i> :		
\$	8,381,332		
<u>vne</u>	<u>rship</u>		
	inimum investment commitment required of an investor in the <i>private fund</i> : 250,000		
	OTE: Report the amount routinely required of investors who are not your related persons (even if different from the a		+

13.	App 4	roximate number of the <i>private fund's</i> beneficial owners:			
14.	Wh:	at is the approximate percentage of the <i>private fund</i> beneficially owners	ed by you and your related persons:		
15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially of	owned (in the aggregate) by funds of funds:		
				Yes	No
	(b)	If the private fund qualifies for the exclusion from the definition of in the Investment Company Act of 1940, are sales of the fund limited to		•	0
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owners	ed by non- <i>United States persons</i> :		
You	ur Ad	Ivisory Services			
		,		Yes	No
17.	(a)	Are you a subadviser to this <i>private fund</i> ?		•	0
		If the answer to question 17.(a) is "yes," provide the name and SEC	file number, if any, of the adviser of the priva		
	(-)	the answer to question 17.(a) is "no," leave this question blank.	,,		
		Name of adviser to private fund	SEC file number CRD numb	er	
		ARCHWAY INVESTMENT ADVISORS, LIMITED			
				Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed private fund?	ed in Section 7.B.(1).A.3.(b)) advise the	0	•
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC fund. If the answer to question 18.(a) is "no," leave this question bla		าe <i>priv</i>	ate
		No Information F	filed		
				Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?		•	_
		FE: For purposes of this question, do not consider feeder funds of the	private fund	·	О
	,,,,	2.7 or purposes or this question, as not consider recall runas or the	private randi		
20.	App	roximately what percentage of your clients has invested in the private	e fund?		
<u>Pri</u>	<u>vate</u>	<u>Offering</u>		.,	
21	۵aa	the private fund over relied on an exemption from registration of its	socurities under Regulation D of the	Yes	NO
21.		the <i>private fund</i> ever relied on an exemption from registration of its urities Act of 1933?	securities under Regulation D of the	•	0
22.	If y	es, provide the <i>private fund's</i> Form D file number (if any):			
	Fo	m D file number			
	02	1-252489			
B. S	ERVI	CE PROVIDERS			
Δ	ditor	s			
Au	aitOf	<u>=</u>		Yes	No
73	(۵)	(1) Are the <i>private fund's</i> financial statements subject to an annual a	audit?	_	.40
25.	(u)			•	O
		(2) If the answer to question 23.(a)(1) is "yes," are the financial stat GAAP?	tements prepared in accordance with U.S.	•	0

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

		ne answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> use than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	es	
	(b)	Name of the auditing firm:		
		DELOITTE LIMITED		
	(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: HAMILTON Bermuda		
			Yes	No
	(d)	Is the auditing firm an independent public accountant?	⊚	0
	(e)	Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
		If yes, Public Company Accounting Oversight Board-Assigned Number: 5230		
	(f)	If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
(h) [<i>privat</i> Do all	e private fund's audited financial statements for the most recently completed fiscal year distributed to the e fund's investors? of the reports prepared by the auditing firm for the private fund since your last annual updating amendment lified opinions?	nt cor	
	•	s O No O Report Not Yet Received		
		No - Report Not Tet Received	rocno	
I	when	check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your the report is available.	respo	nse
I v	when oker			
I v e Br	<u>oker</u>	the report is available.	Ye	s i
I v ne Br (a) [I	Does If the uses.		Ye C rivate	s I
I v ne Br (a) [I	Does If the uses.	the report is available. The private fund use one or more prime brokers? answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the p If the private fund uses more than one prime broker, you must complete questions (b) through (e) separate	Ye C rivate	s I

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

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

Additional Custodian Information: 1 Record(s) Filed.

ead	es. If the <i>private fund</i> uses more than ch custodian.		must complete questions (b) tillou	3 (3) repairately
(b)	Legal name of custodian: CITCO GLOBAL CUSTODY (N.A.) N.	V.		
(c)	Primary business name of custodial CITCO GLOBAL CUSTODY (N.A.) N.			
(d)	The location of the custodian's offic	ce responsible for <i>cust</i> o	ody of the private fund's assets (c	ity, state and coun
	City: CURACAO	State:	Country: Curacao	
	CONTENTO		curacao	Ye
(e)	Is the custodian a related person of	f your firm?		c
(f)	If the custodian is a broker-dealer,	provide its SEC registi	ration number (if any):	
	- CRD Number (if any):			
(g)	If the custodian is not a broker-dea	aler, or is a broker-dea	ler but does not have an SEC regis	stration number, p
rato	its legal entity identifier (if any)			
	<u>or</u>			
Does		respond to questions	(b) through (f) below. If the <i>privat</i>	te fund uses more
oes f the	or the <i>private fund</i> use an administrato e answer to question 26.(a) is "yes,"	respond to questions (estions (b) through (f)	(b) through (f) below. If the <i>prival</i> separately for each administrator	te fund uses more
Poes f the one a Add If t	or the <i>private fund</i> use an administrator e answer to question 26.(a) is "yes," administrator, you must complete que	respond to questions estions (b) through (f) n: 1 Record(s) Filed r," respond to question	(b) through (f) below. If the <i>private</i> separately for each administrator . I Is (b) through (f) below. If the <i>private</i> is (b) through (f) below.	: vate fund uses mor
one a Add If the	the private fund use an administrate answer to question 26.(a) is "yes," administrator, you must complete questional Administrator Information the answer to question 26.(a) is "yes	respond to questions (estions (b) through (f) n: 1 Record(s) Filed n," respond to question (b) through (b) through (c)	(b) through (f) below. If the <i>private</i> separately for each administrator . I Is (b) through (f) below. If the <i>private</i> is (b) through (f) below.	te fund uses more : vate fund uses mor
opes of the annual of the annu	the private fund use an administrator answer to question 26.(a) is "yes," administrator, you must complete questional Administrator Information the answer to question 26.(a) is "yes an one administrator, you must composition of administrator:	respond to questions (estions (b) through (f) n: 1 Record(s) Filed r," respond to question (b) through (b) through (c) throu	(b) through (f) below. If the <i>private</i> separately for each administrator . I Is (b) through (f) below. If the <i>private</i> is (b) through (f) below.	te fund uses more : vate fund uses mor
opes of the annual of the annu	the private fund use an administrate answer to question 26.(a) is "yes," administrator, you must complete questional Administrator Information the answer to question 26.(a) is "yes an one administrator, you must compose the answer to question 26.(b) is "yes an one administrator, you must compose the compose of administrator: CITCO FUND SERVICES (BERMUDA)	respond to questions (estions (b) through (f) n: 1 Record(s) Filed r," respond to question (b) through (b) through (c) throu	(b) through (f) below. If the <i>private</i> separately for each administrator . I Is (b) through (f) below. If the <i>private</i> is (b) through (f) below.	te fund uses more: vate fund uses more
Add If the	the private fund use an administrator and an administrator answer to question 26.(a) is "yes," administrator, you must complete questional Administrator Information the answer to question 26.(a) is "yes an one administrator, you must compose Name of administrator: CITCO FUND SERVICES (BERMUDA Location of administrator (city, state City:	respond to questions restions (b) through (f) n: 1 Record(s) Filed n," respond to question olete questions (b) through (f) LIMITED te and country): State:	(b) through (f) below. If the <i>private</i> separately for each administrator l. Is (b) through (f) below. If the <i>private</i> supply the private separately for each administrator labeled the country:	te fund uses more : vate fund uses mor
opes f the pne a second of	the private fund use an administrator answer to question 26.(a) is "yes," administrator, you must complete questional Administrator Information the answer to question 26.(a) is "yes an one administrator, you must compose Name of administrator: CITCO FUND SERVICES (BERMUDA Location of administrator (city, state City: HAMILTON	respond to questions restions (b) through (f) n: 1 Record(s) Filed n: "respond to question olete questions (b) through (f) LIMITED te and country): State: State:	(b) through (f) below. If the <i>private</i> separately for each administrator l. Is (b) through (f) below. If the <i>private</i> bugh (f) separately for each admining Country: Bermuda	te fund uses more : vate fund uses more istrator. Yes

(f)	If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of
	the) private fund's investors? If investor account statements are not sent to the (rest of the) private fund's
	investors, respond "not applicable."

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

100%

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

Marketers

Yes No

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

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

No Information Filed

A. PRIVATE FUND

<u>Information About the Private Fund</u>

1. (a) Name of the private fund:

ARCHWAY LINSE CAP F1 L.P.

(b) *Private fund* identification number: (include the "805-" prefix also) 805-1759292241

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

State: Country:
Delaware United States

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

Name of General Partner, Manager, Trustee, or Director

APPOMATTOX MONTICELLO HOLDING 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*.

- 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
 - \square (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

No Information Filed		
	Yes	No
(a) Is this a "master fund" in a master-feeder arrangement?	\circ	•
(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private</i>	e 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 private fund identification number (if any) of the master fund in which this private fund invests?	nd	
Name of private fund:		
Private fund identification number: (include the "805-" prefix also)		
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to the section of		
Section 7.B.(1), for each of the feeder funds answer the following questions:		
No Information Filed		
No Information Filed		
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie invests substantially all of its assets in a single master fund.	aster es)	No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series)	aster	No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie invests substantially all of its assets in a single master fund.	ester es) Yes	•
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie 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	ester es) Yes	⊙ led
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie 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 othe investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	Yes C r pool	⊙ led
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie 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 othe investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	Yes C r pool	⊚ led
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie 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 othe investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	Yes Corpool	⊚ led
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie 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 othe investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under	Yes C Yes C	ed C
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie 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 othe investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	Yes C Yes C Yes C	oled C No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie 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 othe investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? Poivate equity fund of real estate fund continued asset fund of venture capital heads of the private fund?	Yes C Yes C Yes C	oled C No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie 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 othe investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? C hedge fund C liquidity fund P private equity fund real estate fund securitized asset fund venture capital other <i>private fund</i> :	Yes C Yes C Yes C	oled C No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serie 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 investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? © hedge fund © liquidity fund © private equity fund © real estate fund © securitized asset fund © venture capital Other <i>private fund</i> : NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	Yes C Yes C Yes C	© led C No

19. 20. Pri 21.	(a) Do any investment advisers (other than the investment adviser private fund? (b) If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question 18.(b) is "no," leave this question 18.(c) is "no," leave this question 18.(d) is "no," leave this question 18.(e) is "no," leave this question 19.(e) is "no," leave this question 19.(e) is "no," leave this question 18.(e) is "no," leave this qu	SEC file number, if any, of the on blank. SEC file number 801-71652 of the private fund. private fund?	CRD number 153731	⊙ he <i>priv</i>	: Ne
19. 20. Pri 21.	private fund? (b) If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question 18.(a) is "no," leave t	SEC file number, if any, of the on blank. SEC file number 801-71652 of the private fund. private fund?	CRD number 153731	he priv	C vate
19. 20.	private fund? (b) If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question 18.(a) is "no," leave this question 18.(a) is "no," leave this question 18.(a) is "no," leave the substitute of t	SEC file number, if any, of the on blank. SEC file number 801-71652 of the private fund. private fund?	CRD number 153731	he priv	C vate
19.	private fund? (b) If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "yes," provide the name and fund. If the private fund 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question 18.(a)	SEC file number, if any, of the on blank. SEC file number 801-71652 of the private fund.	e other advisers to t	he priv	vate
19.	private fund? (b) If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question. Name of Other Adviser to private fund. APPOMATTOX ADVISORY, INC. Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of the private funds of the private funds.	SEC file number, if any, of the on blank. SEC file number 801-71652 of the private fund.	e other advisers to t	he priv	vate
	private fund? (b) If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question Name of Other Adviser to private fund APPOMATTOX ADVISORY, INC Are your clients solicited to invest in the private fund?	SEC file number, if any, of the on blank. SEC file number 801-71652	e other advisers to t	he priv	vate
	private fund? (b) If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question Name of Other Adviser to private fund APPOMATTOX ADVISORY, INC	I SEC file number, if any, of the on blank. SEC file number	e other advisers to t	he priv	vate
18.	 private fund? (b) If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question Name of Other Adviser to private fund 	I SEC file number, if any, of the on blank. SEC file number	e other advisers to t	⊙ he <i>priv</i> er	c vate
18.	 private fund? (b) If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question Name of Other Adviser to private fund 	I SEC file number, if any, of the on blank. SEC file number	e other advisers to t	⊙ he <i>priv</i>	С
18.	private fund?(b) If the answer to question 18.(a) is "yes," provide the name and fund. If the answer to question 18.(a) is "no," leave this question 18.	I SEC file number, if any, of the on blank.	e other advisers to t	⊙ he <i>priv</i>	С
18.	private fund?			•	С
18.	(a) Do any investment advisers (other than the investment adviser	rs listed in Section 7.B.(1).A.3.	(b)) advise the		_
				Voc	
	No Informa	tion Filed			
	(b) If the answer to question 17.(a) is "yes," provide the name and the answer to question 17.(a) is "no," leave this question blank		e adviser of the <i>priv</i>	ate fun	nd. I
17.	(a) Are you a subadviser to this <i>private fund</i> ?			0	•
Yo	ur Advisory Services			Yes	. No
16.	What is the approximate percentage of the <i>private fund</i> beneficially 68%	owned by non-United States p	persons:		
	(b) If the private fund qualifies for the exclusion from the definition the Investment Company Act of 1940, are sales of the fund lim		r section 3(c)(1) of	0	С
13.	(a) What is the approximate percentage of the <i>private fund</i> benefic6%	lany owned (in the aggregate)	by fullus of fullus.	Yes	. N
	6%				
14.	What is the approximate percentage of the <i>private fund</i> beneficially	owned by you and your relate	ed persons:		
13.	Approximate number of the <i>private fund's</i> beneficial owners:				
	set forth in the organizational documents of the fund).	ot your <i>related persons</i> (even i	if different from the	amour	nt
	NOTE: Report the amount routinely required of investors who are n				

Auditor	<u>s</u>		
23 (a)	(1) Are the private fund's financial statements subject to an annual audit?	_	s No
25. (u)	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S.	•	_
	GAAP?	•	О
	If the answer to question $23.(a)(1)$ is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	more	than
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	es	
	(b) Name of the auditing firm:		
	PRICEWATERHOUSECOOPERS AG		
	(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:		
	ZURICH Switzerland	Yes	No
	(d) Is the auditing firm an <i>independent public accountant</i> ?	· · ·	0
		•	
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1358		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
(a)	And the private funds audited financial statements for the most recently completed fixed year distributed to the	Ye	s No
(9)	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	С	⊙
(h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> unqualified opinions?	nt cor	tain
	C Yes C No € Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your when the report is available.	respo	nse
Prime B	<u>sroker</u>		
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	_	s No
Z (u)	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>p</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate each prime broker.		
	No Information Filed		

Custodian

Yes No

Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private sund uses more than one custodian, you must complete questions (b) through (g) separate each custodian. (b) Legal name of custodian: CITY NATIONAL BANK (c) Primary business name of custodian: CITY NATIONAL BANK (d) The location of the custodian's office responsible for custody of the private fund's assets (city, state and contry: NEW YORK New York United States (e) Is the custodian a related person of your firm? (f) If the custodian is a broker-dealer, provide its SEC registration number (if any): - CRD Number (if any): (g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number its legal entity identifier (if any) **Trator** Does the private fund use an administrator other than your firm? If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses mone administrator, you must complete questions (b) through (f) below. If the private fund uses mone administrator, unust complete questions (b) through (f) below. If the private fund uses mone administrator, unust complete questions (b) through (f) below. If the private fund uses mone administrator, unust complete questions (b) through (f) below. If the private fund uses mone 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 in the none administrator in the private fund uses in the none administrator of the private fund uses in the none administrator of the private fund uses in the none administrator of the private fund uses in the none administrator of the private fund uses in the none administrator of the private fund uses in the none administrator of the private fund uses in the none administrator. Additional Administrator is the private fund uses in				ons (b) through (g) below for each custodia must complete questions (b) through (g) s	
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City: State: Country: HAMILTON Bermuda	Does If the one a	the private fund use an answer to question 26.0 dministrator, you must ditional Administrator I	administrator other than your (a) is "yes," respond to questic complete questions (b) through Information: 1 Record(s) Fi 6.(a) is "yes," respond to ques	firm? ons (b) through (f) below. If the <i>private fun</i> on (f) separately for each administrator. iled. tions (b) through (f) below. If the <i>private fun</i>	Y d uses more the
HAMILTON Bermuda	Does If the one an Addi If the than	the private fund use an answer to question 26.0 dministrator, you must continued the answer to question 20 n one administrator:	administrator other than your (a) is "yes," respond to questic complete questions (b) through (information: 1 Record(s) Fi (6.(a) is "yes," respond to ques unust complete questions (b)	firm? ons (b) through (f) below. If the <i>private fun</i> on (f) separately for each administrator. iled. tions (b) through (f) below. If the <i>private fun</i>	Y d uses more the
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(d) Is the administrator a <i>related person</i> of your firm?	Does If the one as Addi	the private fund use an answer to question 26.0 dministrator, you must ditional Administrator I he answer to question 20 n one administrator; HARBOUR FIDUCIARY SLOcation of administration:	administrator other than your (a) is "yes," respond to questic complete questions (b) through Information: 1 Record(s) Fi 6.(a) is "yes," respond to ques a must complete questions (b) ESERVICES LIMITED For (city, state and country):	firm? ons (b) through (f) below. If the <i>private fun</i> on (f) separately for each administrator. illed. tions (b) through (f) below. If the <i>private fi</i> through (f) separately for each administrat	Y d uses more the

private fund.

4, 1:50 PM	IARD - All Sections [User Name: kkoloniaris, OrgID: 153731]
	(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?
ļ	(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."
admi 100%	ng your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as an nistrator, that is not your <i>related person</i> ? 6 6 de only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including
	ning any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, fee calculations (including allocations) was the valuation determined by such <i>person</i> .
<u>Markete</u>	r <u>s</u>
	Yes No
28. (a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?
(You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for
	each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.
	(b) through (g) separately for each marketer.
	(b) through (g) separately for each marketer. No Information Filed
	(b) through (g) separately for each marketer. No Information Filed
A. PRIVAT	(b) through (g) separately for each marketer. No Information Filed
A. PRIVAT	(b) through (g) separately for each marketer. No Information Filed E FUND ion About the <i>Private Fund</i>
A. PRIVAT	(b) through (g) separately for each marketer. No Information Filed FUND Ion About the Private Fund Name of the private fund:
A. PRIVAT	(b) through (g) separately for each marketer. No Information Filed FUND ion About the Private Fund Name of the private fund: BH FEEDER, INC.
1. (a) (b)	(b) through (g) separately for each marketer. No Information Filed FUND Ion About the Private Fund Name of the private fund:
1. (a) (b) /	No Information Filed FUND ion About the Private Fund Name of the private fund: BH FEEDER, INC. Private fund identification number:
1. (a) (b) /	No Information Filed FUND ion About the Private Fund Name of the private fund: BH FEEDER, INC. Private fund identification number: (include the "805-" prefix also)
PRIVAT nformat 1. (a)	No Information Filed FUND Ion About the Private Fund Name of the private fund: BH FEEDER, INC. Private fund identification number: (include the "805-" prefix also) 805-6627624369
1. (a) (b) (c) (2. Unde	No Information Filed FUND Ion About the Private Fund Name of the private fund: BH FEEDER, INC. Private fund identification number: (include the "805-" prefix also) 805-6627624369 For the laws of what state or country is the private fund organized:
1. (a) (b) /	No Information Filed FUND Sion About the Private Fund Name of the private fund: BH FEEDER, INC. Private fund identification number: (include the "805-" prefix also) 305-6627624369 For the laws of what state or country is the private fund organized: State: Country: British Virgin Islands
1. (a) (b) (c) (2. Under 1993)	No Information Filed FUND Ion About the Private Fund Name of the private fund: BH FEEDER, INC. Private fund identification number: (include the "805-" prefix also) 305-6627624369 For the laws of what state or country is the private fund organized: State: Country: British Virgin Islands Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):
1. (a) (b) (b) (c) (a) (a) (a) (a) (b) (a) (b) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	No Information Filed FUND Sion About the Private Fund Name of the private fund: BH FEEDER, INC. Private fund identification number: (include the "805-" prefix also) 305-6627624369 For the laws of what state or country is the private fund organized: State: Country: British Virgin Islands

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

	\square (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment C Act of 1940	ompa	iny			
١	ist the name and country, in English, of each foreign financial regulatory authority with which the private fund is regist	ered				
	No Information Filed					
		Yes	No			
((a) Is this a "master fund" in a master-feeder arrangement?	\circ	\odot			
((b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private</i>	func	?			
	No Information Filed					
		Yes	No			
1	(c) Is this a "feeder fund" in a master-feeder arrangement?	•	0			
((d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fun</i> invests?	nd	~			
	Name of private fund:					
	BREVAN HOWARD MASTER FUND LIMITED, VIA BREVAN HOWARD FUND LTD.					
	Private fund identification number: (include the "805-" prefix also)					
	805-8180846603					
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.					
If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:						
	No Information Filed					
f	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest a substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "ma fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series nvests substantially all of its assets in a single master fund.	ster	No			
1	(a) Is this <i>private fund</i> a "fund of funds"?	0	•			
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in othe nvestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.					
٠	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	О	0			
(Yes	No			
(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 O	No ⊙			
(_			
(t	the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	0			
(I	The Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? • hedge fund • liquidity fund • private equity fund • real estate fund • securitized asset fund • venture capita	0	0			

\$ 26,700,556

Ownership	0	w	ne	rs	h	i	D
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	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 related persons (even if different from the amount set forth in the organizational documents of the fund).

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

9

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*: 4%

15. (a) What is the approximate percentage of the private fund beneficially owned (in the aggregate) by funds of funds: 4%

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 qualified clients?

 \circ

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*: 19%

Your Advisory Services

Yes No

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

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

Name of adviser to private fund	SEC file number	CRD number
ARCHWAY INVESTMENT ADVISORS, LIMITED		

Yes No

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

No Information Filed

Yes No

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

③ \circ

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

20. Approximately what percentage of your clients has invested in the private fund? 22%

Private Offering

Yes No

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

 \circ

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

Form D file number

021-252479

Auditors

_	CEDVIC		O 1 /T	DEDC
B.	SERVIC	_ PK	(()(/)	IJFKS

a)	(1) Are the private fund's financial statements subject to an annual audit?	•	5
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	more	e t
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	es	
	(b) Name of the auditing firm: PRICEWATERHOUSECOOPERS AG		
	(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:		
	ZURICH Switzerland		
		Yes	N
	(d) Is the auditing firm an independent public accountant?	•	•
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	1
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1358		
	(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?	⊙	•
		Ye	es
	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	•)
h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmer</i> unqualified opinions?	nt cor	nt
	€ Yes C No C Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your when the report is available.	respo	on
e B	<u>roker</u>	V-	
a)	Does the <i>private fund</i> use one or more prime brokers?	Ye	9
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the process. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separate each prime broker.		
	No Information Filed		

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('II	ısto	וחר	an

asse	e answer to direction 20	5 (a) is "yes " respond t	o questions (b) through (g) below for each custodian the <i>private fur</i>
uses			dian, you must complete questions (b) through (g) separately for ea
Add	ditional Custodian Inf	formation : 1 Record(s) Filed.
us	•		d to questions (b) through g) below for each custodian the <i>private fo</i> todian, you must complete questions (b) through (g) separately for
(b)) Legal name of custod VP BANK AG	lian:	
(c)) Primary business nan VP BANK AG	ne of custodian:	
(d	l) The location of the cu	ıstodian's office respons	sible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country
	City:	State:	Country:
	VADUZ		Liechtenstein Yes
(e)	e) Is the custodian a <i>rel</i>	lated person of your firm	
(f)) If the custodian is a b	oroker-dealer, provide it	s SEC registration number (if any):
			. ,,
	- CRD Number (if any)	:	
(g		t a broker-dealer, or is a	a broker-dealer but does not have an SEC registration number, prov
(g	If the custodian is no its <i>legal entity identif</i>	t a broker-dealer, or is a	
strate	i) If the custodian is no its <i>legal entity identif</i>	t a broker-dealer, or is a lier (if any)	a broker-dealer but does not have an SEC registration number, prov
strate Does	n) If the custodian is no its <i>legal entity identif</i> or s the <i>private fund</i> use a see answer to question 26	t a broker-dealer, or is a lier (if any) n administrator other the 5.(a) is "yes," respond t	a broker-dealer but does not have an SEC registration number, prov
Does If the one	n) If the custodian is no its <i>legal entity identif</i> or s the <i>private fund</i> use a see answer to question 26	t a broker-dealer, or is a fier (if any) n administrator other the field of the fi	Ye nan your firm? To questions (b) through (f) below. If the <i>private fund</i> uses more that through (f) separately for each administrator.
Does If the one Add	i) If the custodian is no its legal entity identification. Sor Is the private fund use a see answer to question 26 administrator, you must ditional Administrator.	t a broker-dealer, or is a fier (if any) n administrator other the folia is "yes," respond to the templete questions (but a complete questions is "responded to the folia is "yes," responded to the	Ye nan your firm? To questions (b) through (f) below. If the <i>private fund</i> uses more that through (f) separately for each administrator.
Does If the one Add	i) If the custodian is no its legal entity identification. Sor Is the private fund use a see answer to question 26 administrator, you must ditional Administrator.	t a broker-dealer, or is a fier (if any) n administrator other the factor of the fact	Ye nan your firm? o questions (b) through (f) below. If the private fund uses more that through (f) separately for each administrator. ord(s) Filed.
strate Does If the one Add If the (b)	is the private fund use a see answer to question an one administrator, you must the answer to question an one administrator, you must be answer to question an one administrator, you must be answer to question an one administrator, you must be answer to question an one administrator, you must be answer to question an one administrator, you must be answer to question an one administrator, you must be answer to question an one administrator, you must be answer to question an one administrator, you must be answer to question and the	t a broker-dealer, or is a fier (if any) In administrator other the factor of the fac	Ye nan your firm? To questions (b) through (f) below. If the <i>private fund</i> uses more that through (f) separately for each administrator. Tord(s) Filed. If the <i>private fund</i> uses more that through (f) separately for each administrator.
strate Does If the one Add If the (b)	its legal entity identification state private fund use a see answer to question 26 administrator, you must ditional Administrator the answer to question an one administrator, you was a second control of the control	t a broker-dealer, or is a fier (if any) In administrator other the factor of the fac	Ye nan your firm? To questions (b) through (f) below. If the <i>private fund</i> uses more that through (f) separately for each administrator. Tord(s) Filed. If the <i>private fund</i> uses more that through (f) separately for each administrator.

			Yes	N)				
		(d) Is the administrator a <i>related person</i> of your firm?	0	©	.				
		(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?							
		(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rethe) private fund's investors? If investor account statements are not sent to the (rest of the) private fund investors, respond "not applicable."		:					
27.		ng your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such a inistrator, that is not your <i>related person</i> ? %	ıs an						
	obta	ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if ar ining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or diffee calculations (including allocations) was the valuation determined by such <i>person</i> .							
Ma	rkete	<u>ers</u>							
				Yes	s No				
28.	(a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?		0	•				
		You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete (b) through (g) separately for each marketer.) belo	ow f	or				
		No Information Filed							
A. Pl	RIVAT	'E FUND		_					
Info	ormat	tion About the <i>Private Fund</i>							
1.	(a)	Name of the <i>private fund</i> : BHM ARCHWAY FEEDER L.P.							
	. ,	Private fund identification number: (include the "805-" prefix also) 805-8708285178							
2.	Und	er the laws of what state or country is the <i>private fund</i> organized:							
		State: Country: Delaware United States							
3.	(a)	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):							
	Nar	ne of General Partner, Manager, Trustee, or Director		_					
	APP	POMATTOX ADVISORY, INC.							
		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 private fund.	(s) th	าis					
		No Information Filed							

\square (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the company of the exclusion from the definition of investment company under section 3(c)(7) of the company of the exclusion from the definition of investment company under section 3(c)(7) of the exclusion from the definition of investment company under section 3(c)(7) of the exclusion from the definition of investment company under section 3(c)(7) of the exclusion from the definition of investment company under section 3(c)(7) of the exclusion from the definition of investment company under section 3(c)(7) of the exclusion from the definition of investment company under section 3(c)(7) of the exclusion from the definition of investment company under section 3(c)(7) of the exclusion from the exclus	he Investment Comp	anv
Act of 1940	ne investment comp	u,
List the name and country, in English, of each foreign financial regulatory authority with which the priva	ate 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 investig	ng in this <i>private fund</i>	<i>d</i> ?
No Information Filed		
(a) Table a life and a foundli in a greater foundly assume that	Yes	No
(c) Is this a "feeder fund" in a master-feeder arrangement?	•	0
(d) If yes, what is the name and private fund identification number (if any) of the master fund in which invests?	h this <i>private fund</i>	
Name of <i>private fund</i> :		
BREVAN HOWARD MASTER FUND LIMITED, VIA BREVAN HOWARD LP.		
Private fund identification number: (include the "805-" prefix also)		
805-8180846603		
Section 7.B.(1), for each of the feeder funds answer the following questions:		
No Information Filed		
THE THE THE		
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" in fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and ear invests substantially all of its assets in a single master fund.	vesting in a "master ch class (or series)	
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" in fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and ea invests substantially all of its assets in a single master fund.	vesting in a "master ch class (or series)	s No
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" in fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and ea 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 tot	vesting in a "master ch class (or series) Yes C al assets in other poo	0
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" in fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and ea invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"?	vesting in a "master ch class (or series) Yes C al assets in other poonies.	⊙ oled
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" in fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and ear 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 tot investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment compa	vesting in a "master ch class (or series) Yes C al assets in other poo	0
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" in fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and ear 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 tot investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment compa	vesting in a "master ch class (or series) Yes Chall assets in other poonies.	⊙ oled
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" in fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and ear 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 tot investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment compa	Yesting in a "master ch class (or series) Yes al assets in other poonies. Yes Grant of the poonies. Yes Grant of the poonies.	oled ○
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" in fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and ear 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 tot investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment compared (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies re	Yesting in a "master ch class (or series) Yes al assets in other poonies. Yes Grant of the poonies. Yes Grant of the poonies.	oled O
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" in fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and ea 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 tot investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment compared (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies re the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Institute of the private funds in the private fund invest in securities issued by investment companies re the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Institute funds in the private funds in the p	Yes al assets in other poonies. Yes gistered under truction 6.e.)?	⊙ olled C S No

	Current gross asset value of the <i>private fund</i> : \$ 22,742,525		
<u>Owr</u>	<u>nership</u>		
	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 <i>related persons</i> (even if different from the a set forth in the organizational documents of the fund).	moun	it
13.	Approximate number of the <i>private fund's</i> beneficial owners: 8		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 2%		
	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%	W = =	N 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> ?	Yes	C
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
<u>You</u>	r Advisory Services	W	.
17.	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	NO ⊙
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>privat</i> the answer to question 17.(a) is "no," leave this question blank.	e fund	d. If
	No Information Filed		
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	Yes O	No ⊙
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the fund. If the answer to question 18.(a) is "no," leave this question blank.	e priva	ate
	No Information Filed		
		Yes	No
	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	\odot	\circ
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 25%		
Priv	vate Offering	V	NI.~
	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes	O
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		

	Form D file number		
	021-252466		
B. SE	EVICE PROVIDERS		
<u>Aud</u>	<u>tors</u>		
		Ye	s 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 one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	more	than
	Additional Auditor Information: 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	es	
	(b) Name of the auditing firm: PRICEWATERHOUSECOOPERS AG		
	(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: ZURICH Switzerland		
	ZORICII	Yes	No
	(d) Is the auditing firm an independent public accountant?	•	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1358		
	(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?	•	o
		Ye	s No
	g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	©	0
	h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment unqualified opinions?	nt cor	ıtain
	• Yes ○ No ○ Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your when the report is available.	respo	nse
Prin	e Broker		
24	a) Deep the private fund use one or more prime brokens?	Ye	s No
24.	a) Does the <i>private fund</i> use one or more prime brokers? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>p</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate each prime broker.		fund

No Information Filed

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·	u	3	L	u	а	п	a	1

Yes No

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

• 0

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

Additional Custodian Information: 1 Record(s) Filed.

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:

CITY NATIONAL BANK

(c) Primary business name of custodian:

CITY NATIONAL BANK

(d) The location of the custodian's office responsible for custody of the private fund's assets (city, state and country):

City: State: Country: NEW YORK New York United States

Yes No

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

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

CRD Number (if any):

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

Administrator

Yes No

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

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

Additional Administrator Information: 1 Record(s) Filed.

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

(b) Name of administrator:

HARBOUR FIDUCIARY SERVICES LTD

(•	c) Location of administrator (city	, state and country):		
	City:	State:	Country:	
	HAMILTON		Bermuda	Voc No
	d) Is the administrator a <i>related</i>	nerson of your firm?		Yes No
	a) is the daministrator a related	person or your min.		C
	e) Does the administrator prepar	e and send investor accoun	statements to the private fund's	investors?
	• Yes (provided to all investo no investors)	rs) 「Some (provided to so	me but not all investors) $^{f C}$ No (p	provided to
(1	f) If the answer to question 26.(the) <i>private fund's</i> investors? investors, respond "not applic	If investor account stateme	ends the investor account statements are not sent to the (rest of the	
adminis 100% Include	your last fiscal year, what percent strator, that is not your <i>related pe</i> only those assets where (i) such ng any relevant quotes, and (ii) th	rson? person carried out the value	ation procedure established for th	at asset, if any, including
	calculations (including allocations	s) was the valuation determ	ned by such <i>person</i> .	
arketers				Yes M
. (a) Do	os the private fund use the service	as of sameans other than w		n a numne coe 2
. ,	es the private rund use the service	es of someone other than yo	ou or your <i>employees</i> for marketi	ing purposes?
You oth eac	u must answer "yes" whether the service services answer "yes" whether the service services and services are services and services and services and services and services are services and services and services and services are services and services and services and services are services are services and services are services are services and services are services.	person acts as a placement ne answer to question 28.(a uses. If the private fund us	agent, consultant, finder, introdu) is "yes," respond to questions (cer, municipal advisor or b) through (g) below for
You oth eac	u must answer "yes" whether the der solicitor, or similar <i>person</i> . If the th such marketer the <i>private fund</i>	person acts as a placement ne answer to question 28.(a uses. If the private fund us	agent, consultant, finder, introdu) is "yes," respond to questions (es more than one marketer you r	cer, municipal advisor or b) through (g) below for
You oth eac	u must answer "yes" whether the der solicitor, or similar <i>person</i> . If the th such marketer the <i>private fund</i>	person acts as a placement ne answer to question 28.(a uses. If the private fund us narketer.	agent, consultant, finder, introdu) is "yes," respond to questions (es more than one marketer you r	cer, municipal advisor or b) through (g) below for
You oth eac (b)	u must answer "yes" whether the der solicitor, or similar <i>person</i> . If the such marketer the <i>private fund</i> through (g) separately for each r	person acts as a placement ne answer to question 28.(a uses. If the private fund us narketer.	agent, consultant, finder, introdu) is "yes," respond to questions (es more than one marketer you r	cer, municipal advisor or b) through (g) below for
You oth eac (b)	u must answer "yes" whether the der solicitor, or similar <i>person</i> . If the such marketer the <i>private fund</i> through (g) separately for each r	person acts as a placement ne answer to question 28.(a uses. If the private fund us narketer.	agent, consultant, finder, introdu) is "yes," respond to questions (es more than one marketer you r	cer, municipal advisor or b) through (g) below for
You oth eac (b) PRIVATE F	u must answer "yes" whether the per solicitor, or similar person. If the such marketer the private fund through (g) separately for each results.	person acts as a placement ne answer to question 28.(a uses. If the private fund us narketer.	agent, consultant, finder, introdu) is "yes," respond to questions (es more than one marketer you r	cer, municipal advisor or b) through (g) below for
You oth eac (b) PRIVATE F	u must answer "yes" whether the per solicitor, or similar person. If the such marketer the private fund through (g) separately for each results.	person acts as a placement ne answer to question 28.(a uses. If the private fund us narketer.	agent, consultant, finder, introdu) is "yes," respond to questions (es more than one marketer you r	cer, municipal advisor or b) through (g) below for
You oth eac (b) PRIVATE F Formation (a) Nar	u must answer "yes" whether the per solicitor, or similar person. If the such marketer the private fund through (g) separately for each result of the private fund. Support the private fund fund fund fund fund fund fund fund	person acts as a placement ne answer to question 28.(a uses. If the private fund us narketer.	agent, consultant, finder, introdu) is "yes," respond to questions (es more than one marketer you r	cer, municipal advisor or b) through (g) below for
You oth eac (b) PRIVATE F ormation (a) Nar HAT	u must answer "yes" whether the per solicitor, or similar person. If the such marketer the private fund through (g) separately for each result of the private fund me of the private fund: TCHLINGS FUND LTD.	person acts as a placement ne answer to question 28.(a uses. If the private fund us narketer.	agent, consultant, finder, introdu) is "yes," respond to questions (es more than one marketer you r	cer, municipal advisor or b) through (g) below for
You oth eac (b) PRIVATE F ormation (a) Nar HAT (b) Priv (inc	u must answer "yes" whether the per solicitor, or similar person. If the such marketer the private fund through (g) separately for each result of the private fund. TOHLINGS FUND LTD. Wate fund identification number:	person acts as a placement ne answer to question 28.(a uses. If the private fund us narketer.	agent, consultant, finder, introdu) is "yes," respond to questions (es more than one marketer you r	cer, municipal advisor or b) through (g) below for
You oth each (b) PRIVATE F Formation (a) Nar HAT (b) Priv (inc. 805	u must answer "yes" whether the per solicitor, or similar person. If the such marketer the private fund through (g) separately for each result of the private fund. TOHLINGS FUND LTD. Evate fund identification number: clude the "805-" prefix also) 5-4453610360	person acts as a placement ne answer to question 28.(a uses. If the private fund us marketer. No Informat	agent, consultant, finder, introdu) is "yes," respond to questions (i es more than one marketer you r on Filed	cer, municipal advisor or b) through (g) below for
You oth each (b) PRIVATE F Formation (a) Nar HAT (b) Priv (inc. 805)	in must answer "yes" whether the per solicitor, or similar person. If the such marketer the private fund through (g) separately for each result of the private fund. TOHLINGS FUND LTD. Wate fund identification number: clude the "805-" prefix also) 5-4453610360 The laws of what state or country in the such country in the su	person acts as a placement ne answer to question 28.(a uses. If the private fund us marketer. No Informat	agent, consultant, finder, introdu) is "yes," respond to questions (i es more than one marketer you r on Filed	cer, municipal advisor or b) through (g) below for
You oth each (b) PRIVATE F Formation (a) Nar HAT (b) Priv (inc. 805	in must answer "yes" whether the per solicitor, or similar person. If the such marketer the private fund through (g) separately for each result of the private fund. TOHLINGS FUND LTD. Wate fund identification number: clude the "805-" prefix also) 5-4453610360 The laws of what state or country in the: Country	person acts as a placement ne answer to question 28.(a uses. If the private fund us marketer. No Informat	agent, consultant, finder, introdu) is "yes," respond to questions (i es more than one marketer you r on Filed	cer, municipal advisor or b) through (g) below for
You oth each (b) PRIVATE F Ormation (a) Nar HAT (b) Priv (inc. 805) Under the Sta	in must answer "yes" whether the per solicitor, or similar person. If the such marketer the private fund through (g) separately for each result of the private fund. TOHLINGS FUND LTD. Wate fund identification number: clude the "805-" prefix also) 5-4453610360 The laws of what state or country in the: Country	person acts as a placement ne answer to question 28.(a uses. If the private fund us marketer. No Informat s the private fund organized y: Virgin Islands	agent, consultant, finder, introductions (is "yes," respond to questions (is more than one marketer you respond to guestions (is more than one marketer you respond to guestions).	cer, municipal advisor or b) through (g) below for must complete questions

	(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) <i>private fund</i> .	this	
	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 CAct of 1940	Compa	iny
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment C Act of 1940	Compa	iny
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is regis	tered.	
	No Information Filed		
		Yes	No
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	e funa	?
	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?	nd	
	Name of private fund:		
	Private fund identification number: (include the "805-" prefix also)		
7.	Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to 8 Section 7.B.(1), for each of the feeder funds answer the following questions: No Information Filed	:his	
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "mufund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serient invests substantially all of its assets in a single master fund.	aster	
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	\odot	\circ
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	r poo	led
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	•	О
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type of fund is the <i>private fund</i> ?		

	• hedge fund • liquidity fund • private equity fund • real estate fund • securitized asset fund • venture capital of the private fund:	fund	О
	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> : \$ 18,728,448		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the am set forth in the organizational documents of the fund).	iouni	t
13.	Approximate number of the <i>private fund's</i> beneficial owners:		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	•	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 100%		
Υοι	ur Advisory Services		
17	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	
17.	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private</i> the answer to question 17.(a) is "no," leave this question blank.	C fund	⊙ d. If
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	0
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the fund. If the answer to question 18.(a) is "no," leave this question blank.	priva	ate
	No Information Filed		
	•	Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	\odot	O
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 9%		
<u>Priv</u>	vate Offering	Yes	No

	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-252473		
B. SE	RVICE PROVIDERS		
<u>Aud</u>	<u>itors</u>	Ye	s No
23.	(a) (1) Are the private fund's financial statements subject to an annual audit?	6	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 one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	more	than
	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> us more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	es	
	(b) Name of the auditing firm: PRICEWATERHOUSECOOPERS		
	(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: ZURICH Switzerland		
		Yes	No
	(d) Is the auditing firm an independent public accountant?	•	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1358		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
	(g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?	Ye:	s No
	(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendme</i> unqualified opinions?	<i>nt</i> con	tain
	C Yes ○ No C Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your when the report is available.	respo	nse
<u>Prin</u>	ne Broker	٧a	s No
24.	(a) Does the <i>private fund</i> use one or more prime brokers?	0	• 140

		f the <i>private fund</i> uses more rime broker.	than one prime broker, you must o	complete questions (b) through (e) separa	ately for
			No Information Fil	ed	
stodi	an_				Van A
(a)	Does the	·	odians (including the prime brokers	s listed above) to hold some or all of its	Yes N
		f the <i>private fund</i> uses more		ough (g) below for each custodian the <i>pri</i> nplete questions (b) through (g) separate	
	Addit	ional Custodian Informati	on : 2 Record(s) Filed.		
	uses			hrough g) below for each custodian the p omplete questions (b) through (g) separa	
		Legal name of custodian: STATE STREET			
	11 ' '	Primary business name of cu STATE STREET	stodian:		
				the <i>private fund's</i> assets (city, state and	country):
		City: SOUTH WINDSOR	State: Connecticut	Country: United States	
	(e) 1	Is the custodian a <i>related pe</i>	rson of your firm?		Yes No
	(f)	If the custodian is a broker-d	lealer, provide its SEC registration	number (if any):	
		- CRD Number (if any):			
	11 1-7	If the custodian is not a brok its <i>legal entity identifier</i> (if an		does not have an SEC registration numb	er, provide
	uses			hrough g) below for each custodian the <i>p</i> omplete questions (b) through (g) separa	

(c) Primary business name of custodian:

VP BANK AG

	(a) The location of the	custodian's office respoi	nsible for <i>custody</i> of the <i>private fu</i>	ind 3 dassets (city, state at	iu count	гу):
	City:	State:	Country:			
	VADUZ		Liechtenstein			
	(e) Is the custodian a <i>i</i>	related person of your fir	·m?		Ye O	s N
	(f) If the custodian is a	a broker-dealer, provide	its SEC registration number (if an	ıy):		
	- CRD Number (if an	y):				
(g) If the custodian is i its legal entity iden		a broker-dealer but does not hav	ve an SEC registration nur	nber, pr	ovic
ninistra	<u>ator</u>					
					•	Yes
(a) Do	es the <i>private fund</i> use	an administrator other	than your firm?			•
			to questions (b) through (f) below b) through (f) separately for each		s more t	har
011			, , , , ,			
	dditional Administrat	or Information : 1 Rec	cord(s) Filed.			
Ac I	if the answer to questic	on 26.(a) is "yes," respor you must complete que	nd to questions (b) through (f) be stions (b) through (f) separately f	elow. If the <i>private fund</i> us	ses more	e
A c	If the answer to questic than one administrator, (b) Name of administra	on 26.(a) is "yes," respor you must complete que	nd to questions (b) through (f) be	elow. If the <i>private fund</i> us	ses more	e
Add I t	If the answer to questic than one administrator, (b) Name of administra HARBOUR FIDUCIA	on 26.(a) is "yes," respor you must complete ques ator: RY SERVICES LIMITED	nd to questions (b) through (f) be stions (b) through (f) separately f	elow. If the <i>private fund</i> us	ses more	e
Add I t	If the answer to questic than one administrator, (b) Name of administra HARBOUR FIDUCIA	on 26.(a) is "yes," respor you must complete ques ator: RY SERVICES LIMITED	nd to questions (b) through (f) be stions (b) through (f) separately f	elow. If the <i>private fund</i> us for each administrator.	ses more	e
Ac I t	if the answer to questic than one administrator, (b) Name of administra HARBOUR FIDUCIA (c) Location of adminis	on 26.(a) is "yes," respor you must complete ques ator: RY SERVICES LIMITED	nd to questions (b) through (f) be stions (b) through (f) separately f ountry):	elow. If the <i>private fund</i> us for each administrator.	ses more	e
Ac I t	if the answer to questic than one administrator, (b) Name of administra HARBOUR FIDUCIA (c) Location of adminis City:	on 26.(a) is "yes," respor you must complete ques ator: RY SERVICES LIMITED	and to questions (b) through (f) be stions (b) through (f) separately for the stions (b) through (f) separately for the stide (b) through (f) separately for the stide (b) through (f) separately for the stide (b) through (f) be stide (b) through (f) be stide (f) through (f) through (f) be stide (f) through (f) through (f) be stide (f) through (f)	elow. If the <i>private fund</i> us for each administrator.	ses more	
Add I t	if the answer to questic than one administrator, (b) Name of administra HARBOUR FIDUCIA (c) Location of adminis City: HAMILTON	on 26.(a) is "yes," respor you must complete ques ator: RY SERVICES LIMITED	nd to questions (b) through (f) be stions (b) through (f) separately for the stions (b) through (f) be stions (b) through (f) separately for the stions (b) separately for the stions (b) through (f) separately for the stions (b) separate	elow. If the <i>private fund</i> us for each administrator.		
Add I to the total	if the answer to questic than one administrator, (b) Name of administra HARBOUR FIDUCIA (c) Location of adminis City: HAMILTON	on 26.(a) is "yes," respon you must complete ques ator: RY SERVICES LIMITED strator (city, state and co S	nd to questions (b) through (f) be stions (b) through (f) separately for the stions (b) through (f) be stions (b) through (f) separately for the stions (b) separately for the stions (b) through (f) separately for the stions (b) separate	elow. If the <i>private fund</i> us for each administrator. : :	Yes	No
Add I to the total	(c) Location of administrator, City: HAMILTON (d) Is the administrator (e) Does the administrator	on 26.(a) is "yes," respon you must complete ques ator: RY SERVICES LIMITED strator (city, state and co S r a <i>related person</i> of you ator prepare and send in	nd to questions (b) through (f) be stions (b) through (f) separately fountry): State: Country Bermud:	elow. If the <i>private fund</i> us for each administrator. : : a	Yes	No

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

100%

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

Marketers

		Yes	No
28.	(a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	0	•
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal a other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete (b) through (g) separately for each marketer.	below fo	r
	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> :		
	MCP LINSE CAPITAL FUND 1		
	(b) Private fund identification number:		
	(include the "805-" prefix also)		
	805-2205850609		
2.	Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country:		
	Bermuda		
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		
	ARCHWAY INVESTMENT ADVISORS, LIMITED		
	(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(sprivate fund.	s) this	
	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 Act of 1940	t Compa	ny
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Act of 1940	t Compa	ny
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is reg	gistered.	
	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Bermuda - Bermuda Monetary Authority		
		Yes	No
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	ate fund	?
	No Information Filed		
		Yes	Nο
	(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</i> invests?	⊙ fund	U

Name of *private fund*: ARCHWAY LINSE CAP F1 Private fund identification number: (include the "805-" prefix also) 805-1759292241

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

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Yes No 8. (a) Is this *private fund* a "fund of funds"? \circ NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person? \circ Yes No During your last fiscal year, did the private fund invest in securities issued by investment companies registered under 0 ⊙ the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? 10. What type of fund is the *private fund*? C hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital fund C Other *private fund*: NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. 11. Current gross asset value of the *private fund*: \$ 11,091,305 **Ownership** 12. Minimum investment commitment required of an investor in the private fund: \$ 50,000 NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount

set forth in the organizational documents of the fund).

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

13

14. What is the approximate percentage of the private fund beneficially owned by you and your related persons: 9%

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

24, 1:	50 PI	I IARD - All Sections [User Name: kkoloniaris, OrgID: 153731]			
	9%				
				Yes	s No
	(b)	If the private fund qualifies for the exclusion from the definition of investment Company Act of 1940, are sales of the fund limited to $q_{\rm c}$		3(c)(1) of 🕝	0
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned b	y non- <i>United States persons</i> :		
You	ır Ac	<u>lvisory Services</u>		V-	
17.	(a)	Are you a subadviser to this <i>private fund</i> ?			s No
17.		If the answer to question 17.(a) is "yes," provide the name and SEC file	number, if any, of the adviser	of the <i>private fur</i>	C nd. If
		the answer to question 17.(a) is "no," leave this question blank.	I I -		
		Name of adviser to private fund	SEC file number	RD number	
		ARCHWAY INVESTMENT ADVISORS, LIMITED			
				Yes	s No
18.	(a)	Do any investment advisers (other than the investment advisers listed i $\ensuremath{\textit{private fund}}$?	n Section 7.B.(1).A.3.(b)) advis	se the C	•
	(b)	If the answer to question $18.(a)$ is "yes," provide the name and SEC file $fund$. If the answer to question $18.(a)$ is "no," leave this question blank.	· · · · · ·	lvisers to the <i>pri</i>	vate
		No Information Filed			
				Yer	s No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?			
		TE: For purposes of this question, do not consider feeder funds of the pri	vate fund.	•	0
20.	App	roximately what percentage of your clients has invested in the private fu	nd?		
Pri	vate	Offering			
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities Act of 1933?	urities under Regulation D of th		s No ⊙
22.	If y	es, provide the <i>private fund's</i> Form D file number (if any):			
		No Information Filed			
B. S	ERVI	CE PROVIDERS			
Aud	ditor	<u>s</u>			
				Yes	s No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual aud	t?	•	\circ
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statem $GAAP$?	ents prepared in accordance w	ith U.S. 👩	О
		If the answer to question $23.(a)(1)$ is "yes," respond to questions (b) thone auditing firm, you must complete questions (b) through (f) separate		fund uses more	than
		Additional Auditor Information : 1 Record(s) Filed.			
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) more than one auditing firm, you must complete questions (b) throug			

 $https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=\&viewChanges=N\&FLNG_PK=1851106$

(b) Name of the auditing firm:

		PRICEWAI ERHOUSECOOPERS AG		
	(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:		
		ZURICH Switzerland		
	(4)	Is the auditing firm an independent public accountant?	Yes	
	(u)	is the additing initial independent public accountant:	⊙	О
	(e)	Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
		If yes, Public Company Accounting Oversight Board-Assigned Number: 1358		
	(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
			Υє	es No
(g)		ne private fund's audited financial statements for the most recently completed fiscal year distributed to the refund's investors?	e	0
(h)		of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendme</i> alified opinions?	nt cor	ntain
	⊙ Ye	s C No C Report Not Yet Received		
		check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your the report is available.	· respo	onse
Prime B	Broker		Va	N.
24. (a)	Does	the <i>private fund</i> use one or more prime brokers?	7	es No
	If the uses.	answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the part of the private fund uses more than one prime broker, you must complete questions (b) through (e) separate prime broker.		e fund
		No Information Filed		
Custodi	an			
Custour	<u>an</u>		Υє	s No
25. (a)	Does assets	the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its s?	•	0
		answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>priv</i> . If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately dian.		
	Addi	tional Custodian Information : 1 Record(s) Filed.		
	use	ne answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>pri</i> s. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separate h custodian.		
	(b)	Legal name of custodian: CLARIEN BANK LIMITED		

(c) Primary business name of custodian:

				-: - - <i></i>				
	(d)	The location of the custodi	an's office respons	sible for <i>custoa</i>)	of the <i>private fund's</i> asset	ts (city, state and	d count	ry):
		City:	S	state:	Country:			
		HAMILTON			Bermuda			
							Ye	s N
	(e)	Is the custodian a related	<i>person</i> of your firr	n?			0	G
	(f)	If the custodian is a broke	r-dealer, provide it	ts SEC registrati	on number (if any):			
		- CRD Number (if any):						
	(g)	If the custodian is not a br its <i>legal entity identifier</i> (if		a broker-dealer	but does not have an SEC	registration num	ber, pr	ovid
inistr	rato	<u>r</u>						
							•	Yes
(a) D	oes	the <i>private fund</i> use an adr	ninistrator other t	han your firm?				⊚
(4)								I
If		answer to question 26.(a) dministrator, you must com					more t	nan
If or	ne a		plete questions (b) through (f) se			more t	nan
If or	ne ad	dministrator, you must com	plete questions (bormation : 1 Reco	o) through (f) second(s) Filed. d to questions (parately for each administronics of through (f) below. If the	rator. e private fund use		
If or	Addi If th	tional Administrator Info	plete questions (bormation : 1 Reco	o) through (f) second(s) Filed. d to questions (parately for each administronics of through (f) below. If the	rator. e private fund use		
If or	Addi If th	tional Administrator Info	plete questions (bormation : 1 Reco	o) through (f) second(s) Filed. d to questions (parately for each administronics of through (f) below. If the	rator. e private fund use		
If or	Addi If th than (b)	tional Administrator Info ne answer to question 26.(an one administrator, you mu	plete questions (bormation : 1 Reco	o) through (f) second(s) Filed. d to questions (tions (b) throug	parately for each administronics of through (f) below. If the	rator. e private fund use		
If on	Addi If th than (b)	tional Administrator Info ne answer to question 26.(an one administrator, you mu Name of administrator:	plete questions (bormation : 1 Reconstruction : 1 R	o) through (f) second(s) Filed. d to questions (tions (b) throug	parately for each administronics of through (f) below. If the	rator. e private fund use		
If on	Addi If th than (b)	tional Administrator Info ne answer to question 26.(an one administrator, you mu Name of administrator: HARBOUR FIDUCIARY SER	plete questions (bormation : 1 Reconstruction : 1 R	o) through (f) second(s) Filed. d to questions (tions (b) through	parately for each administr b) through (f) below. If the h (f) separately for each ac	rator. e private fund use		
If on	Addi If th than (b)	tional Administrator Info me answer to question 26.(an one administrator, you mu Name of administrator: HARBOUR FIDUCIARY SER Location of administrator (City:	plete questions (bormation : 1 Reconstruction : 1 R	o) through (f) second(s) Filed. d to questions (tions (b) through	parately for each administration of through (f) below. If the h (f) separately for each according to the country:	rator. e private fund use		e
If on	If the than (b)	tional Administrator Info me answer to question 26.(an one administrator, you mu Name of administrator: HARBOUR FIDUCIARY SER Location of administrator (City:	plete questions (bormation : 1 Reco	o) through (f) second(s) Filed. d to questions (tions (b) through through through through through through the second through t	parately for each administration of through (f) below. If the h (f) separately for each according to the country:	rator. e private fund use	es more	e
If on	If the than (b)	tional Administrator Info ne answer to question 26.(an one administrator, you mu Name of administrator: HARBOUR FIDUCIARY SER Location of administrator (City: HAMILTON	plete questions (bormation : 1 Reconstruction : 1 R	o) through (f) second(s) Filed. d to questions (tions (b) through through through through through through the second through t	parately for each administration of through (f) below. If the h (f) separately for each an Country: Bermuda	e <i>private fund</i> used	es more	e No
If on	If the than (b)	tional Administrator Info	plete questions (bormation : 1 Reconstruction : 1 R	o) through (f) second(s) Filed. d to questions (tions (b) through through through through through the second through the secon	parately for each administration of through (f) below. If the h (f) separately for each an each accordance of the country: Bermuda	e private fund used dministrator.	es more	e No

administrator, that is not your related person?

100%

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

	and	fee calculations (including allocations) was the valuation determined by such <i>person</i> .
Maı	rket	
		Yes No
28.	(a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?
		You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.
		No Information Filed
A. PI	RIVA	TE FUND
Info	rma	tion About the <i>Private Fund</i>
1.	(a)	Name of the <i>private fund</i> :
		MONTICELLO CAPITAL PARTNERS LIMITED -SEGREGATED ACCOUNT MCP - TIGER PIP XV
	(b)	Private fund identification number: (include the "805-" prefix also)
		805-6833645843
		003 0033043043
2.	Und	ler the laws of what state or country is the <i>private fund</i> organized:
		State: Country:
		Bermuda
3.	(a)	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
	Na	me of General Partner, Manager, Trustee, or Director
	AR	CHWAY INVESTMENT ADVISORS, LIMITED
	(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	private fund (check all that apply; you must check at least one):
	✓	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company of 1940
		(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company of 1940
5.	List	the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.
	-	me of Country/English Name of Foreign Financial Regulatory Authority
	Bei	rmuda - Bermuda Monetary Authority
		Yes No
6.	(a)	Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

3

		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 fu</i> invests?	nd	
	Name of private fund:		
	TIGER GLOBAL PRIVATE INVESTMENT PARTNERS XI, LP		
	Private fund identification number:		
	(include the "805-" prefix also) 805-9214570901		
	003 5214570501		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	9	
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to Section 7.B.(1), for each of the feeder funds answer the following questions:	this	
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "m fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serient invests substantially all of its assets in a single master fund.	aster	
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	•
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	er poc	led
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	O
		Yes	. No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type of fund is the <i>private fund</i> ?		
	$^{f C}$ hedge fund $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital Other <i>private fund</i> :	al fun	O b
	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> : \$ 2,374,175		
<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 110,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the asset forth in the organizational documents of the fund).	amour	nt
13.	Approximate 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 related persons	; :		
15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially ov	vned (in the aggregate) by funds	of funds:		
	0 70			Y	es	No
	(b)	If the private fund qualifies for the exclusion from the definition of inve the Investment Company Act of 1940, are sales of the fund limited to		2(a)(1) of	•	0
16.	Wh	at is the approximate percentage of the $\emph{private fund}$ beneficially owned $^{9}\%$	by non-United States persons:			
<u> Υοι</u>	ır A	<u>dvisory Services</u>				
				Ye	es	No
17.		Are you a subadviser to this <i>private fund</i> ?			•	\circ
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC fithe answer to question 17.(a) is "no," leave this question blank.	le number, if any, of the adviser	of the <i>private f</i>	unc	/. If
		Name of adviser to private fund	SEC file number C	RD number		
		ARCHWAY INVESTMENT ADVISORS, LIMITED				
				Ye	es	No
18.	(a)	Do any investment advisers (other than the investment advisers listed private fund?	in Section 7.B.(1).A.3.(b)) advis	se the	0	•
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC fi $\it fund$. If the answer to question 18.(a) is "no," leave this question blan		ivisers to the <i>pi</i>	riva	ate
		No Information File	ed			
				Ye	es	No
19.	Are	your clients solicited to invest in the private fund?		(•	O
	NO	TE: For purposes of this question, do not consider feeder funds of the p	rivate fund.			
20.	App	proximately what percentage of your <i>clients</i> has invested in the <i>private</i>	fund?			
Priv	/ate	Offering				
				Ye	es	No
21.		the <i>private fund</i> ever relied on an exemption from registration of its securities Act of 1933?	ecurities under Regulation D of th	ie (•	0
22.	If y	es, provide the <i>private fund's</i> Form D file number (if any):				
	Fo	rm D file number				
	02	1-419314				
B. SI	ERVI	CE PROVIDERS				
Aud	litor	<u>s</u>				
22	(-)	(1) And the contract of the Co	4112	Ye	es	No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual au(2) If the answer to question 23.(a)(1) is "yes," are the financial state		i+h II C	•	0
		GAAP?		`	•	О
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) one auditing firm, you must complete questions (b) through (f) separate	= , ,	fund uses more	e th	nan

11	the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> use ore than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	es	
71-			
	Name of the auditing firm: PRICEWATERHOUSECOOPERS AG		
	THE CENTRE IN THE FIRST TH		
(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:		
	ZURICH Switzerland	Yes	Nο
(d)	Is the auditing firm an independent public accountant?	·•	0
(e)	Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1358		
(f)	If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
priva (h) Do a unqu	he <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the ite fund's investors? If of the reports prepared by the auditing firm for the <i>private fund</i> since your last annual updating amendmentalified opinions? Solve the report Not Yet Received	e)
priva (h) Do a unqu • Y If yo	te fund's investors? Il of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i> alified opinions?	nt coi	ntai
priva (h) Do a unqu (c) Y If yo when	It of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> alified opinions? The solution of the report Not Yet Received The solution of the report Not Yet Received are the solution of the report Not Yet Received," you must promptly file an amendment to your Form ADV to update your on the report is available.	nt coi	ntai
priva (h) Do a unqu • Y If yo	It of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> alified opinions? The solution of the report Not Yet Received The solution of the report Not Yet Received are the solution of the report Not Yet Received," you must promptly file an amendment to your Form ADV to update your on the report is available.	nt coi	ntai
priva (h) Do a unqu (i) Y If yo when the broken the	It of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> alified opinions? The solution of the report Not Yet Received The solution of the report Not Yet Received are the solution of the report Not Yet Received," you must promptly file an amendment to your Form ADV to update your on the report is available.	nt coi	ntai
priva (h) Do a unqu F Y If yo when (a) Does If the uses	Il of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i> lalified opinions? The solution of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> lalified opinions? The solution of the report Not Yet Received with the solution of the report Not Yet Received," you must promptly file an amendment to your Form ADV to update your on the report is available.	respo	ntai onse s I
priva (h) Do a unqu F Y If yo when (a) Does If the uses	Il of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i> lalified opinions? Les O No O Report Not Yet Received Let the check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your in the report is available. Let the private fund use one or more prime brokers? Let answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the p. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separate	respo	ntai onse s I
priva (h) Do a unqu F Y If yo when (a) Does If the uses	If the private fund uses one or more prime brokers? If the private fund uses one or more prime brokers? If the private fund uses more than one prime broker, you must complete questions (b) through (e) separate prime broker.	respo	ntai onse s I
priva (h) Do a unqu If yo when (a) Does If the uses each	If the private fund uses one or more prime brokers? If the private fund uses one or more prime brokers? If the private fund uses more than one prime broker, you must complete questions (b) through (e) separate prime broker.	Ye Crivate ely fo	ntai nnse s I
priva (h) Do a unqu (f) Y If you when (a) Does If the uses each	It is fund's investors? If of the reports prepared by the auditing firm for the private fund since your last annual updating amendment alified opinions? The set of the private fund use one or more prime brokers? The private fund uses more than one prime broker, you must complete questions (b) through (e) separate prime broker. No Information Filed The private fund use any custodians (including the prime brokers listed above) to hold some or all of its	Ye Crivate ely fo	es l

City:

HAMILTON

no investors)

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

ι	If the answer to question 25.(a) is "yes uses. If the <i>private fund</i> uses more that each custodian.		, , ,	·
	(b) Legal name of custodian: CLARIEN BANK LIMITED			
	(c) Primary business name of custodia CLARIEN BANK LIMITED	n:		
	(d) The location of the custodian's office			state and country):
	City: HAMILTON	State:	Country: Bermuda	
				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 registrat	ion number (if any):	
	- CRD Number (if any):			
(g) If the custodian is not a broker-dea its <i>legal entity identifier</i> (if any)	aler, or is a broker-dealer	but does not have an SEC registra	ation number, provide
Administra	<u>itor</u>			Yes No
26. (a) Do	es the <i>private fund</i> use an administrate	or other than your firm?		⊙ ○
	the answer to question 26.(a) is "yes," e administrator, you must complete qu			und uses more than
Ac	dditional Administrator Information	n: 1 Record(s) Filed.		
	If the answer to question 26.(a) is "yes Than one administrator, you must comp			
	(b) Name of administrator:			
	HARBOUR FIDUCIARY SERVICES LT	ΓD		
	c) Location of administrator (city, stat	te and country):		

investors, respond "not applicable."

(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

(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

State:

Country:

Bermuda

Yes No

 \circ

27.	uring your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such	as an
	dministrator, that is not your related person?	

100%

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

Marketers

Yes No

- 28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?
 - You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for

other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

No Information Filed

A. PRIVATE FUND

Information About the Private Fund

1. (a) Name of the private fund:

MONTICELLO CAPITAL PARTNERS, LTD -SEGREGATED ACCOUNT MCP - TIGER PIP XI

(b) Private fund identification number:

(include the "805-" prefix also)

805-1817130603

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

State:

Country:

Bermuda

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

Name of General Partner, Manager, Trustee, or Director

ARCHWAY INVESTMENT ADVISORS, LIMITED

(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
 - \square (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.

Name of Country/English Name of Foreign Financial Regulatory Authority

Bermuda - Bermuda Monetary Authority

Yes No

Ì	b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private</i> No Information Filed		
	No Information Filed		
		Yes	N
(c) Is this a "feeder fund" in a master-feeder arrangement?	⊚	C
(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?	nd	
	Name of private fund:		
	TIGER GLOBAL PRIVATE INVESTMENT PARTNERS XI, LP		
	Private fund identification number: (include the "805-" prefix also)		
	805-9214570901		
	OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single chedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.		
	f you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to tection 7.B.(1), for each of the feeder funds answer the following questions:	:his	
	No Information Filed		
	und" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or serinvests substantially all of its assets in a single master fund.		N
ir (a	nvests substantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"?	Yes	G
ir (a	nvests substantially all of its assets in a single master fund.	Yes	G
ir (a N ir	nvests substantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other	Yes	oled
ir (a N ir	nvests substantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other overstment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	Yes C er poo	e oled
ir (; N ir (!	nvests substantially all of its assets in a single master fund. a) Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other overstment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	Yes Cer poo	e oled C
irr (((N irr (I	Is this <i>private fund</i> a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other exestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	Yes Cer poo	eled C
irr (i N ir (I	Is this <i>private fund</i> a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other exestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? Puring 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 Corpoo	e C S N
ir (i N ir (I th	Is this <i>private fund</i> a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other experiment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. Diff yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? Diversity of 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 <i>private fund</i> ? Diversity of hedge fund Company Act of 1940 (other than "company act o	Yes Corpoo	e C S N
ir (i N ir (l th	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 exestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? Puring your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? The hedge fund C liquidity fund P private equity fund C real estate fund S securitized asset fund V venture capital other <i>private fund</i> :	Yes Corpoo	© oled C : N•
ir (; N ir () tt	Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? In the private fund is the <i>private fund</i> ? In hedge fund C liquidity fund Private equity fund C real estate fund Securitized asset fund C venture capital other <i>private fund</i> :	Yes Corpoo	e olled C : N
ir (i	Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other neestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? Puring your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? The hedge fund C liquidity fund Private equity fund C real estate fund Securitized asset fund V venture capital other <i>private fund</i> : OTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	Yes Corpoo	© oled C : N•
ir (; (; N) ir () () () () () () () () () () () () ()	Is this <i>private fund</i> a "fund of funds"? IOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other exestment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? Puring your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? In hedge fund I liquidity fund Private equity fund real estate fund securitized asset fund venture capital other <i>private fund</i> : OTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	Yes Corpoo	© oled C : N•
ir (4 No 1	Is this <i>private fund</i> a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other exists to the fund investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? Puring your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? One hedge fund One liquidity fund One private equity fund One real estate fund One securitized asset fund One venture capital other <i>private fund</i> : OTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. For the private fund: OUTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. For the private fund: OUTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	Yes Corpoo	e olled C : N

13.	App 3	proximate number of the private fund's beneficial owners:				
14.	Wh.	at is the approximate percentage of the <i>private fund</i> beneficially owned b	y you and your <i>related p</i>	persons:		
15.	(a) 5%	What is the approximate percentage of the <i>private fund</i> beneficially own	ed (in the aggregate) by	y funds of funds:		
	(b)	If the private fund qualifies for the exclusion from the definition of investment Company Act of 1940, are sales of the fund limited to q_0		ection 3(c)(1) of	Yes ⊙	No C
16.	Wh.	at is the approximate percentage of the <i>private fund</i> beneficially owned b	y non- <i>United States per</i>	sons:		
<u> Υοι</u>	ır A	dvisory Services			Yes	No
17.	(a)	Are you a subadviser to this <i>private fund</i> ?			0	0
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file the answer to question 17.(a) is "no," leave this question blank.	number, if any, of the a	dviser of the <i>priva</i>		
		Name of adviser to private fund	SEC file number	CRD numbe	er	
		ARCHWAY INVESTMENT ADVISORS, LIMITED				
18.		Do any investment advisers (other than the investment advisers listed in private fund? If the answer to question 18.(a) is "yes," provide the name and SEC file fund. If the answer to question 18.(a) is "no," leave this question blank.	number, if any, of the o		C ne <i>priva</i>	⊙ ate
		No Information Filed	1			
10	۸ ۳۵	vous diants solicited to invest in the private fund?			Yes	No
19.		your clients solicited to invest in the private fund? TE: For purposes of this question, do not consider feeder funds of the priv	vato fund		⊙	0
	App 3%	proximately what percentage of your <i>clients</i> has invested in the <i>private fu</i>				
Priv	<u>rate</u>	<u>Offering</u>			Yes	No
21.		s the <i>private fund</i> ever relied on an exemption from registration of its secturities Act of 1933?	urities under Regulation	D of the	•	0
22.		es, provide the <i>private fund's</i> Form D file number (if any):				
	_	rm D file number 1-326490				_
	02	1-320490				
B. SI	ERVI	CE PROVIDERS				
Aud	litor	<u>'s</u>			Var	NI.~
22	(e)	(1) Are the private fund's financial statements subject to an appual and	i+2		Yes	_
۷٥.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audi	ıt:		⊚	О

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

	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> use more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	es	
	(b) Name of the auditing firm:		
	PRICEWATERHOUSECOOPERS AG		
	(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:		
	ZURICH Switzerland	Yes	No
	(d) Is the auditing firm an independent public accountant?	•	O
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	С
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1358		
	(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
h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendmen</i> unqualified opinions?	nt co	nta
	€ Yes C No C Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your when the report is available.	resp	ons
е В	<u>roker</u>		
۵)	Door the private fund use one or more prime brokers?	Ye	es
a)	Does the <i>private fund</i> use one or more prime brokers? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separate each prime broker.	rivat	
	No Information Filed		
<u>odi</u>		Ye	es

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

custodian.

use			s (b) through g) below for each cu nust complete questions (b) throug	
(b)	Legal name of custodian: CLARIEN BANK LIMITED			
(c)	Primary business name of cu CLARIEN BANK LIMITED	ustodian:		
(d)			dy of the private fund's assets (ci	ty, state and country):
	City: HAMILTON	State:	Country: Bermuda	
	HAMILION		Dermada	Yes N
(e)	Is the custodian a <i>related pe</i>	erson of your firm?		
	15 the eastodian a related pe	arson or your min.		0 @
(f)	If the custodian is a broker-o	dealer, provide its SEC registra	ation number (if any):	
	- CRD Number (if any):			
	its <i>legal entity identifier</i> (if a		er but does not have an SEC regis	tration number, provid
trato	its legal entity identifier (if a		er but does not have an SEC regis	
	its legal entity identifier (if a	iny)		
Does If the	its legal entity identifier (if a private fund use an admine answer to question 26.(a) is	nistrator other than your firm' "yes," respond to questions (l		Yes ©
Does If the one a	its legal entity identifier (if a private fund use an admine answer to question 26.(a) is	nistrator other than your firm "yes," respond to questions (I ete questions (b) through (f)	? b) through (f) below. If the <i>privat</i> separately for each administrator.	Yes ⊙
Does If the one a Add If the	its legal entity identifier (if a	nistrator other than your firm? "yes," respond to questions (lete questions (b) through (f) mation: 1 Record(s) Filed. is "yes," respond to questions	? b) through (f) below. If the <i>privat</i> separately for each administrator.	Yes e fund uses more than ate fund uses more
Does If the one a Add If the	its legal entity identifier (if a	nistrator other than your firm "yes," respond to questions (I ete questions (b) through (f) mation: 1 Record(s) Filed. is "yes," respond to questions t complete questions (b) through	? b) through (f) below. If the <i>privat</i> , separately for each administrator. s (b) through (f) below. If the <i>priv</i>	Yes e fund uses more than ate fund uses more
Does If the one a Add If the that (b)	its legal entity identifier (if a private fund use an adminer answer to question 26.(a) is administrator, you must complete answer to question 26.(a) is administrator Informational Administrator Information and one administrator, you must be an one administrator, you must be Name of administrator:	nistrator other than your firm' "yes," respond to questions (lete questions (b) through (f) mation: 1 Record(s) Filed. is "yes," respond to questions t complete questions (b) through the complete questions (c) through the complete questions (b) through the complete questions (c) through the co	? b) through (f) below. If the <i>privat</i> , separately for each administrator. s (b) through (f) below. If the <i>priv</i>	Yes e fund uses more than ate fund uses more
Does If the one a Add If the that (b)	its legal entity identifier (if a	nistrator other than your firm' "yes," respond to questions (lete questions (b) through (f) mation: 1 Record(s) Filed. is "yes," respond to questions t complete questions (b) through the complete questions (c) through the complete questions (b) through the complete questions (c) through the co	? b) through (f) below. If the <i>privat</i> , separately for each administrator. s (b) through (f) below. If the <i>priv</i>	Yes e fund uses more than ate fund uses more
Does If the one a Add If the that (b)	its legal entity identifier (if a private fund use an administrator and its administrator, you must complete answer to question 26.(a) is administrator, you must complete answer to question 26.(a) an one administrator, you must one administrator; HARBOUR FIDUCIARY SERVI	nistrator other than your firm "yes," respond to questions (lete questions (b) through (f) mation: 1 Record(s) Filed. is "yes," respond to questions to complete questions (b) through the complete questions (c) through the co	b) through (f) below. If the <i>private</i> separately for each administrator. (b) through (f) below. If the <i>priv</i> ugh (f) separately for each admini	Yes e fund uses more than ate fund uses more
Does If the one a Add If the that (b)	its legal entity identifier (if a private fund use an administrator and its administrator, you must complete answer to question 26.(a) is administrator, you must complete answer to question 26.(a) an one administrator, you must one administrator; HARBOUR FIDUCIARY SERVICE Location of administrator (cit City:	nistrator other than your firm "yes," respond to questions (lete questions (b) through (f) mation: 1 Record(s) Filed. is "yes," respond to questions to complete questions (b) through the complete questions (c) through the co	b) through (f) below. If the <i>private</i> separately for each administrator. (b) through (f) below. If the <i>priv</i> ugh (f) separately for each adminitional country:	Yes e fund uses more than ate fund uses more
Does If the one a Add If t that that (b)	its legal entity identifier (if a private fund use an administrator and its administrator, you must complete answer to question 26.(a) is administrator, you must complete answer to question 26.(a) an one administrator, you must one administrator; HARBOUR FIDUCIARY SERVICE Location of administrator (cit City:	nistrator other than your firm? "yes," respond to questions (lete questions (b) through (f) mation: 1 Record(s) Filed. is "yes," respond to questions to complete questions (b) through the complete questions (complete questions (do not the complete questions (do not the complet	b) through (f) below. If the <i>private</i> separately for each administrator. (b) through (f) below. If the <i>priv</i> ugh (f) separately for each adminitional country:	Yes e fund uses more than ate fund uses more strator.
Does If the one a Add If t that that (b) (c)	its legal entity identifier (if a private fund use an administrator and its administrator, you must complete answer to question 26.(a) is administrator, you must complete answer to question 26.(a) an one administrator, you must an one administrator; HARBOUR FIDUCIARY SERVITE Location of administrator (cit City: HAMILTON)	nistrator other than your firm? "yes," respond to questions (lete questions (b) through (f) mation: 1 Record(s) Filed. is "yes," respond to questions to complete questions (b) through the complete questions (complete questions) ICES LTD ty, state and country): State: d person of your firm?	b) through (f) below. If the <i>private</i> separately for each administrator. (b) through (f) below. If the <i>priv</i> ugh (f) separately for each adminitional country:	Yes e fund uses more than ate fund uses more strator. Yes No

ng s,
No
⊙
r S
•

SECTION 7.B.(2) Private Fund Reporting

No Information Filed

Funds per Page: 15 ➤ Total Funds: 8

Item 8 Participation or Interest in Client Transactions

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

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

Pro	priet	ary Interest in <i>Client</i> Transactions		
A.	Do y	ou or any related person:	Yes	No
	(1)	buy securities for yourself from advisory $\it clients$, or sell securities you own to advisory $\it clients$ (principal transactions)?	0	\odot
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	•	0
	(3)	recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	0	•
Sale	es In	terest in <i>Client</i> Transactions		
В.	Do y	you or any related person:	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	⊙
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	•	О
	(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	0	•
Inv	estm	ent or Brokerage Discretion		
C.	Do y	ou or any related person have discretionary authority to determine the:	Yes	No
	(1)	securities to be bought or sold for a <i>client's</i> account?	•	0
	(2)	amount of securities to be bought or sold for a client's account?	•	0
	(3)	broker or dealer to be used for a purchase or sale of securities for a client's account?	0	0
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	0	•
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	0
E.	Do y	you or any related person recommend brokers or dealers to clients?	О	\odot
F.	If yo	ou answer "yes" to E. above, are any of the brokers or dealers related persons?	0	0
G.	(1)	Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	0	•
	(2)	If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	0	O
Н.	(1)	Do you or any <i>related person</i> , directly or indirectly, compensate any <i>person</i> that is not an <i>employee</i> for <i>client</i> referrals?	О	•
	(2)	Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)?	0	•
I.		you or any <i>related person</i> , including any <i>employee</i> , directly or indirectly, receive compensation from any <i>person</i> (other a you or any <i>related person</i>) for <i>client</i> referrals?	0	•
	In y	our response to Item 8.I., do not include the regular salary you pay to an employee.		
	ansv	esponding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in wering Item 8.H.) or received from (in answering Item 8.I.) any person in exchange for client referrals, including any bo ased, at least in part, on the number or amount of client referrals.		that

Iten	n 9 C	ustody			
			verson has custody of client (other than clients that are investment companies 040) assets and about your custodial practices.	;	
Α.	(1)	Do you have custody of any advisory clier	nts':	Yes	No
		(a) cash or bank accounts?		•	0
		(b) securities?		\odot	0
	ded advi	uct your advisory fees directly from your cl	FC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because lients' accounts, or (ii) a related person has custody of client assets in connect bu have overcome the presumption that you are not operationally independent from the related person.	tion v	
	(2)	If you checked "yes" to Item 9.A.(1)(a) or of clients for which you have custody:	r (b), what is the approximate amount of <i>client</i> funds and securities and total	num	ber
		U.S. Dollar Amount Total	tal Number of <i>Clients</i>		
		(a) \$ 194,714,976 (b)) 11		
	you If you amo	r clients' accounts, do not include the amou our related person has custody of client ass	C and you have custody solely because you deduct your advisory fees directly unt of those assets and the number of those clients in your response to Item sets in connection with advisory services you provide to clients, do not include the lients in your response to 9.A.(2). Instead, include that information in your response to 9.A.(2).	9.A.(. e the	2).
В.	(1)	In connection with advisory services you pyour advisory <i>clients</i> ':	provide to <i>clients</i> , do any of your <i>related persons</i> have <i>custody</i> of any of	Yes	No
		(a) cash or bank accounts?		•	0
		(b) securities?		•	0
	You	are required to answer this item regardless	s of how you answered Item 9.A.(1)(a) or (b).		
	(2)	If you checked "yes" to Item 9.B.(1)(a) or of <i>clients</i> for which your <i>related persons</i> h	r (b), what is the approximate amount of <i>client</i> funds and securities and total nave <i>custody</i> :	num	iber
		U.S. Dollar Amount Total	tal Number of <i>Clients</i>		
		(a) \$ 56,600,761 (b)) 5		
C.		ou or your <i>related persons</i> have <i>custody</i> of ck all the following that apply:	client funds or securities in connection with advisory services you provide to	client	ts,
	(1)	A qualified custodian(s) sends account stavehicle(s) you manage.	atements at least quarterly to the investors in the pooled investment	✓	
	(2)	An independent public accountant audits a financial statements are distributed to the	annually the position in commence, that you mainage and the dualities	ᅜ	
	(3)	An independent public accountant conduc	ts an annual surprise examination of client funds and securities.		
	(4)	An independent public accountant prepare your related persons are qualified custodia	es an internal control report with respect to custodial services when you or ans for <i>client</i> funds and securities.		
	or e	xamination or prepare an internal control r	t in Section 9.C. of Schedule D the accountants that are engaged to perform report. (If you checked Item 9.C.(2), you do not have to list auditor information ded this information with respect to the private funds you advise in Section 7	on in	
D.		you or your related person(s) act as qualification vide to clients?	ed custodians for your <i>clients</i> in connection with advisory services you	Yes	No
	(1)	you act as a qualified custodian		0	•
	(2)	your related person(s) act as qualified cus	stodian(s)	o	•

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

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

 5

SECTION 9.C. Independent Public Accountant

No Information Filed

Item 10 Control Persons

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

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

Yes No

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

0 0

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

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

SECTION 10.A. Control Persons

No Information Filed

SECTION 10.B. Control Person Public Reporting Companies

No Information Filed

Item 11 Disclosure Information

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

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

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

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

		Yes	No
Do	any of the events below involve you or any of your supervised persons?	\odot	0
For	"yes" answers to the following questions, complete a Criminal Action DRP:		
A.	In the past ten years, have you or any advisory affiliate:	Yes	No
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?	0	•
	(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 you response to Item 11.A.(2) to charges that are currently pending.	r	
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	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit you response to Item 11.B.(2) to charges that are currently pending.	r	
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	⊙
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	•	0
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	0	•
	(5) imposed a civil money penalty on you or any <i>advisory affiliate</i> , or <i>ordered</i> you or any <i>advisory affiliate</i> to cease and desist from any activity?	•	0
D.	Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:		
	(1) ever <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission, or been dishonest, unfair, or unethical?	0	0
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	0	•

,		[- , -]		
	(3)	ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4)	in the past ten years, entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with an <i>investment-related</i> activity?	0	•
	(5)	ever denied, suspended, or revoked your or any <i>advisory affiliate's</i> registration or license, or otherwise prevented you or any <i>advisory affiliate</i> , by <i>order</i> , from associating with an <i>investment-related</i> business or restricted your or any <i>advisory affiliate's</i> activity?	О	•
E.	Has	any self-regulatory organization or commodities exchange ever:		
	(1)	found you or any advisory affiliate to have made a false statement or omission?	0	\odot
	(2)	found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	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 <i>advisory affiliate</i> by expelling or suspending you or the <i>advisory affiliate</i> from membership, barring or suspending you or the <i>advisory affiliate</i> from association with other members, or otherwise restricting your or the <i>advisory affiliate's</i> activities?	0	•
F.		an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever n revoked or suspended?	0	•
G.		you or any <i>advisory affiliate</i> now the subject of any regulatory <i>proceeding</i> that could result in a "yes" answer to any t of Item 11.C., 11.D., or 11.E.?	0	•
For	"yes	answers to the following questions, complete a Civil Judicial Action DRP:		
Н.	(1)	Has any domestic or foreign court:	Yes	No
		(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	0	•
		(b) ever <i>found</i> that you or any <i>advisory affiliate</i> were <i>involved</i> in a violation of <i>investment-related</i> statutes or regulations?	0	•
		(c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any <i>advisory affiliate</i> by a state or <i>foreign financial regulatory authority</i> ?	0	•
	(2)	Are you or any <i>advisory affiliate</i> now the subject of any civil <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.H.(1)?	0	•

Item 12 Small Businesses

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

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

For purposes of this Item 12 only:

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

		Yes	No
Α.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	0	\circ
If "	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	О
	(2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0

Schedule A

Direct Owners and Executive Officers

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

FULL LEGAL NAME	DE/FE/I	Title or Status	Date Title or	Ownership	Control	PR	CRD No. If None: S.S. No.
(Individuals: Last Name,			Status Acquired	Code	Person		and Date of Birth, IRS Tax
First Name, Middle Name)			MM/YYYY				No. or Employer ID No.
WEBB, SUSAN, PATTERSON	I	CEO & CIO	09/2005	E	Υ	N	1649517
KOLONIARIS, KRISTIN,	I	CHIEF	05/2022	NA	N	N	2907260
MARIE		COMPLIANCE					
		OFFICER					

Schedule B

Indirect Owners

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

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

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

No Information Filed

Schedule D - Miscellaneous

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

The registrant, Appomattox Advisory, Inc ("Registrant"), has a related person that serves as the sponsor to private funds as included in item 7.A. of Schedule D, to the extent required. Such sponsor is under common control with the Registrant and, along with the Registrant, conducts a single advisory business subject to a unified compliance program. The registrant and its relying adviser are together filing a single Form ADV in reliance on the no-action position expressed by the staff of the SEC to the American Bar Association, Business Law section on January 18, 2012. Subsequent to December 31, 2023, certain of the advisory clients included herein, are no longer clients of Appomattox.

Schedule R
No Information Filed

DRP Pages									
CRIMINAL DISCLOSURE REPORTING PAGE (ADV)									
	No Information Filed								
DECILI ATORY ACT	FION DISCLOSURE REPOR	OTING DAGE (ADV)							
REGULATORT ACT	TION DISCLOSURE REPOR								
		GENERAL INSTRUC							
	DOPTING PAGE (DRP ADV) IS A .D., 11.E., 11.F. or 11.G. of		DED response used to repo	rt details for affirmative responses					
Check item(s) bein	ig responded to:	Regulatory Act	ion						
□ 11.C(1)	☑ 11.C(2)	□ 11.C(3)	□ 11.C(4)	☑ 11.C(5)					
□ 11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	☐ 11.D(5)					
□ 11.E(1)	☐ 11.E(2)	□ 11.E(3)	□ 11.E(4)						
□ 11.F.	□ 11.G.								
	L 11.0.								
	P for each event or <i>proceeds</i> with a completed Execution		ceeding may be reported for	or more than one <i>person</i> or entity					
				G. Use only one DRP to report de details for each action on a					
separate DRP.		,	5						
PART I									
A. The person(s) or entity(ies) for whom th	is DRP is being filed is (are)	:						
• You (the a	advisory firm)								
C You and o	one or more of your <i>advisor</i> y	v affiliates							
	·								
One or m	ore of your <i>advisory affiliate</i>	25							
If this DRP is	being filed for an advisory a	affiliate, give the full name o	of the <i>advisory affiliate</i> belo	ow (for individuals, Last name,					
First name, M	-								
box.	<i>y arrillate</i> has a CRD number	er, provide that number. If n	ot, indicate "non-registered	d" by checking the appropriate					
ADV DRP - A	ADVISORY AFFILIATE								
		No Informatio	on Filed						
_									
				ger associated with the adviser.					
				curred more than ten years ago or					
				mpt reporting adviser with the					
SEC and t	the event was resolved in th	le duviser's or <i>auvisory armi</i>	ale's lavor.						
If you are re	gistered or registering with	a state securities authority	, you may remove a DRP fo	or an event you reported only in					
				registered or registering with the					
SEC, you ma	ay remove a DRP for any eve	ent listed in Item 11 that oc	curred more than ten years	ago.					
This DDD	should be removed from the	ADV record bacques it was	s filed in error such as due	to a clarical or data-ontry					
	should be removed from the Explain the circumstances:	E ADV TECOTO DECOUSE IL WAS	sineu ni erroi, sucii as due	to a cierical of uala-eillry					
B. If the advisor	ry affiliate is registered thro	ugh the IARD system or <i>CRI</i>	D system, has the <i>advisory</i>	affiliate submitted a DRP (with					
	D or U-4) to the IARD or <i>CR</i>								
provided.									

	C Yes C No
	NOTE: The completion of this form does not relieve the <i>advisory affiliate</i> of its obligation to update its IARD or <i>CRD</i> records.
PAR	ГІІ
1.	Regulatory Action initiated by:
	● SEC Other Federal O State O SRO O Foreign (Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) SECURITIES AND EXCHANGE COMMISSION
2.	Principal Sanction: Cease and Desist Other Sanctions:
3.	Date Initiated (MM/DD/YYYY):
	09/29/2023
4.	Docket/Case Number: 3-21774
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type: Direct Investment(s) - DPP & LP Interest(s) Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): IN OCTOBER OF 2021, APPOMATTOX SELF-REPORTED AN ISSUE TO THE SEC IN CONNECTION WITH CERTAIN IRREGULAR MOVEMENTS OF MONEY FROM AND TO A PRIVATE CLIENT FUND. IN CONNECTION THEREWITH, APPOMATTOX PLACED ITS THEN- CEO/CCO ON IMMEDIATE LEAVE. AS A RESULT, ON SEPTEMBER 29, 2023, THE SEC ISSUED AN ORDER (INVESTMENT ADVISERS ACT OF 1940, RELEASE NO. 6451) REQUIRING, INTER ALIA, THE FIRM TO PAY A CIVIL MONETARY PENALTY. THE REFERENCED CEO/CCO, WHO WAS AN EQUITY OWNER OF APPOMATTOX, WAS DIVESTED OF HIS EQUITY INTERESTS AND DISCHARGED. IN CONNECTION WITH THE PRECEDING, APPOMATTOX HAS TAKEN APPROPRIATE STEPS TO ENHANCE INTERNAL CONTROLS AND ITS COMPLIANCE PROGRAM.
8.	Current Status? C Pending C On Appeal © Final
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
If F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved: Decision & Order of Offer of Settlement
11.	Resolution Date (MM/DD/YYYY):
	09/29/2023
12.	Resolution Detail:
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?
	✓ Monetary/Fine Amount: \$ 150,000.00

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

Part 2

Exemption from brochure delivery requirements for SEC-registered advisers

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

Yes No

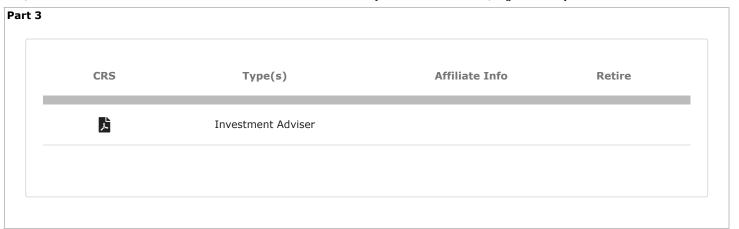
Are you exempt from delivering a brochure to all of your clients under these rules?

 \circ

If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
389319	APPOMATTOX ADVISORY INC PART 2 BROCHURE	Individuals, High net worth individuals, Pension plans/profit sharing plans, Foundations/charities, Other institutional,
394975	APPOMATTOX ADVISORY INC PART 2	Private funds or pools
394973	BROCHURE	Individuals, High net worth individuals, Pension plans/profit sharing plans, Foundations/charities, Other institutional,
		Private funds or pools



Execution Pages

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

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

Appointment of Agent for Service of Process

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

Signature

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

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

Signature: Date: MM/DD/YYYY
SUSAN P. WEBB 03/21/2024

Printed Name: Title: SUSAN P. WEBB CEO, CIO

Adviser CRD Number:

153731

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:

153731

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