## FORM ADV

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

		UNIFORM APPLICATIO	IN FOR INVESTIMENT A	DVISER REGISTRATION AN	D REPORT BY EXEMPT REPORT	NG ADVISERS
Prir	nary Bus	siness Name: BAML CAPITAL ACC	ESS FUNDS MANAGEMENT	, LLC		CRD Number: 15780
Oth	er-Than-	Annual Amendment - All Sections	<b>S</b>			Rev. 10/201
8/21	1/2015 3:	21:18 PM				
W	ARNING:	Complete this form truthfully. Fals			ation, revocation of your registration, or o	criminal prosecution. You must
Iten	n 1 Identi	ifying Information				
Re	sponses	to this Item tell us who you are, w	nere you are doing business	s, and how we can contact you.		
A.		ull legal name (if you are a sole pro	· · · · · · · · · · · · · · · · · · ·	niddle names):		
B.		under which you primarily conduct CAPITAL ACCESS FUNDS MANAG	<u>-</u>	ifferent from Item 1.A.:		
	List on	Section 1.B. of Schedule D any ac	lditional names under which	you conduct your advisory busine	ess.	
C.		iling is reporting a change in your legal name or ☐ your primary bu	-	nary business name (Item 1.B.), e	nter the new name and specify whether	the name change is of
D.		ou are registered with the SEC as a pure report to the SEC as an exempt	·			
E.	If you h	nave a number (" <i>CRD</i> Number") as	signed by the FINRA's CRD	system or by the IARD system, yo	our <i>CRD</i> number: <b>157801</b>	
	If your	firm does not have a CRD number	, skip this Item 1.Ε. Do not μ	provide the CRD number of one of	your officers, employees, or affiliates.	
F.	Princip	oal Office and Place of Business				
	Nu 13 Cit	ddress (do not use a P.O. Box): umber and Street 1: 5 SOUTH LASALLE STREET ty: HICAGO	State: Illinois	Number and St SUITE 740 Country: United States	reet 2: ZIP+4/Postal Code 60603	e:
	lf t	this address is a private residence,	check this box:			
	reg wh	gistration, or are registered, with or	ne or more state securities at applying for SEC registration	uthorities, you must list all of your o	at which you conduct investment advisor offices in the state or states to which you a SEC, or if you are reporting to the SEC a	are applying for registration or with
		ays of week that you normally cond Monday - Friday Other:	uct business at your <i>principa</i>	al office and place of business:		
	9 A	ormal business hours at this locati AM - 5 PM	on:			
		elephone number at this location: 2-828-6378				
	(4) Fa	acsimile number at this location: 2-453-5997				
G.	Mailing	address, if different from your <i>prir</i>	ncipal office and place of bus	siness address:		
	Numb	er and Street 1:		Number and Street 2:		
	City:	State:		Country:	ZIP+4/Postal Code:	
	If this	address is a private residence, che	eck this box: $\square$			
Н.	lf you ε	are a sole proprietor, state your full	residence address, if differe	ent from your <i>principal office and p</i>	lace of business address in Item 1.F.:	
	Numb	er and Street 1:		Number and Street 2:		
	City:	State:		Country:	ZIP+4/Postal Code:	

Yes No

I. Do you have one or more websites?

	If "yes," list all website addresses on Securyou may list the portal without listing addresses in response to the	resses for all of the other information							
J.		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.							
	Name:	•	Other titles, if any:						
	Telephone number:		Facsimile number:						
	·								
	Number and Street 1:		Number and Street 2:						
	City: State:	(	Country:	ZIP+4/Postal Code:					
	Electronic mail (e-mail) address, if Chie	f Compliance Officer has one:							
K.	Additional Regulatory Contact Person: If may provide that information here.	a person other than the Chief Comp	liance Officer is authorize	ed to receive information and re	spond to questions about this Form	ADV,	you		
	Name:	-	Titles:						
	Telephone number:	ı	Facsimile number:						
	Number and Street 1:		Number and Street 2:						
				ZIP+4/Postal Code:					
	City: State:	(	Country:	ZIP+4/Postal Code.					
	Electronic mail (e-mail) address, if conta	act person has one:							
						Yes	No		
L.	Do you maintain some or all of the books principal office and place of business?	and records you are required to kee	ep under Section 204 of t	he Advisers Act, or similar state	e law, somewhere other than your	0	•		
	If "yes," complete Section 1.L. of Schedul	le D.				Yes	No		
M.	Are you registered with a foreign financial	I regulatory authority?				0	•		
	Answer "no" if you are not registered with complete Section 1.M. of Schedule D.	a foreign financial regulatory author	ity, even if you have an a	ffiliate that is registered with a fo	oreign financial regulatory authority.				
						Yes	No		
N.	Are you a public reporting company unde	r Sections 12 or 15(d) of the Securiti	ies Exchange Act of 1934	?		$\circ$	$\odot$		
	If "yes," provide your CIK number (Centra	I Index Key number that the SEC as	signs to each public repo	rting company):					
						Yes	No		
O.	Did you have \$1 billion or more in assets	on the last day of your most recent	fiscal year?			0	•		
P.	Provide your Legal Entity Identifier if you I	nave one:							
	A <i>legal entity identifier</i> is a unique numbe still in development. You may not have a	· · · · · · · · · · · · · · · · · · ·	h other in the financial m	arketplace. In the first half of 20	11, the <i>legal entity identifier</i> standa	rd was	5		
SEC	TION 1.B. Other Business Names								
Lis	st your other business names and the juris	dictions in which you use them. You	ı must complete a separa	ate Schedule D Section 1.B. for	each business name.				
Na	nme: BANC OF AMERICA MANAGEMENT L	LC I (RELYING ADVISER)							
Ju	risdictions								
Г	AL	☑IL	□ NE		□sc				
	AK	□ IN	□ NV		□SD				
	AZ	□ IA	□ NH		□ TN				
	AR	□ KS	□ NJ		□TX				
	CA	□KY	□ NM		□UT				
	co	□ LA	□ NY		□VT				
	СТ	□ ME	□ NC		□VI				
	DE	□ MD	□ND		□vA				
	DC	□ MA	□он		□wa				
	FL	□ MI	□ ok		□w				

L GA	I MN	∥ L OR	L WI
□GU	☐ MS	□ PA	Cother:
□н	□мо	□ PR	
□ID	□мт	□ RI	
ECTION 1.F. Other Offices			
Complete the following information fo	r each office, other than your principal offi	ce and place of business, at which yo	u conduct investment advisory business. You must complete
separate Schedule D Section 1.F. for	each location. If you are applying for SEC	registration, if you are registered only	with the SEC, or if you are an exempt reporting adviser, list or
the largest five offices (in terms of nu			
(			
Number and Street 1:		Number and Street 2:	
7800 FORSYTH BLVD			
City:	State:	Country:	ZIP+4/Postal Code:
CLAYTON	Missouri	United States	63105
	Milosouri	ormod otatoo	00100
	_		
f this address is a private residence,	check this box:		
Telephone Number:	Facsimile Number	r·	
314-466-1040	i desimile i vamber		
314-400-1040			
Complete the following information to	er each office, other than your principal offi	ice and place of husiness at which yo	u conduct investment advisory business. You must complete
-			•
-		registration, if you are registered only	with the SEC, or if you are an exempt reporting adviser, list or
the largest five offices (in terms of nu	mbers of <i>employees</i> ).		
Number and Street 1:		Number and Str	reet 2:
730 15TH STREET NW			
			<b>TIP</b> 1/ <b>P</b> 1 1 2 1
City:	State:	Country:	ZIP+4/Postal Code:
WASHINGTON	District of Columbia	United States	20005
If this address is a private residence,	check this box:		
ii tiilo address is a private residence,	Chock the box.		
Telephone Number:	Facsimile Number:		
202-442-3931	202-416-2908		
Complete the following information fo	r each office, other than your principal offi	ce and place of business, at which yo	u conduct investment advisory business. You must complete
separate Schedule D Section 1.F. for	each location. If you are applying for SEC	registration, if you are registered only	with the SEC, or if you are an exempt reporting adviser, list or
the largest five offices (in terms of nu	mbers of employees).		
N 1 10: 14		N 1 10: 10	
Number and Street 1:		Number and Street 2:	
ONE BRYANT PARK			
City:	State:	Country:	ZIP+4/Postal Code:
NEW YORK	New York	United States	10036
If this address is a private residence,	check this box:		
Telephone Number:	Facsimile Number:	:	
646-855-1355	646-855-4866		
ECTION 1.I. Website Addresses			
LCTION I.I. Website Addresses			
List your wahsita addresses Vou mu	ist complete a separate Schedule D Section	on 1 L for each website address	
Liot your website addresses. Tou Mu	or complete a separate solieutile D section	on the facil website dutitess.	
Website Address: HTTP://WWW.BAI	NKOFAMERICA.COM/BAMLCAF		
ECTION 1.L. Location of Books and F	Records		
LOTION T.L. LOCATION OF BOOKS AND I	10001 40		

	No Information Filed	
es		
	No Information Filed	

SECT	ION	1.M.	Registration with Foreign Financial	Regulatory Authorities		
				No Informati	on Filed	
tem 2	2 SE	C Re	gistration/Reporting			
Resp	ons	es to			ne SEC. Complete this Item 2.A. only if you a	re applying for SEC registration or submitting
A. To register (or remain registered) with the SEC, you must check <b>at least one</b> of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an <i>annual updati</i> your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine affirmatively respond to each of these items.						
		•	adviser): are a <b>large advisory firm</b> that eithe	or-		
		(')		anagement of \$100 million (in U.S. dollars) o	or more, or	
				anagement of \$90 million (in U.S. dollars) or		nual updating amendment and is registered
		(2)		has regulatory assets under management o	f \$25 million (in U.S. dollars) or more but les	ss than \$100 million (in U.S. dollars) and you
			(a) not required to be registered as	s an adviser with the state securities authority	y of the state where you maintain your <i>princi</i> µ	pal office and place of business, or
			(b) not subject to examination by the	ne state securities authority of the state where	e you maintain your principal office and place	e of business;
			Click <b>HERE</b> for a list of states in	n which an investment adviser, if registered,	would not be subject to examination by the s	state securities authority.
		(3)	have your principal office and place	e of business in Wyoming (which does not re	egulate advisers);	
		(4)	have your principal office and place	e of business outside the United States;		
		(5)	are an investment adviser (or sub	-adviser) to an investment company registe	ered under the Investment Company Act of 1	940;
		(6)		mpany which has elected to be a business, and you have at least \$25 million of regulat		54 of the Investment Company Act of 1940
		(7)	are a pension consultant with resp	pect 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)		03A-2(b) that <i>controls</i> , is <i>controlled</i> by, or is usiness is the same as the registered advise	·	dviser that is registered with the SEC, and
			If you check this box, complete Se	ction 2.A.(8) of Schedule D.		
		(9)	are a newly formed adviser relying	g on rule 203A-2(c) because you expect to be	eligible for SEC registration within 120 days	3;
			If you check this box, complete Se	ction 2.A.(9) of Schedule D.		
		(10)	are a multi-state adviser that is re	quired to register in 15 or more states and is	relying on rule 203A-2(d);	
			If you check this box, complete Se	ction 2.A.(10) of Schedule D.		
		(11)	are an Internet adviser relying on	rule 203A-2(e);		
		(12)	have received an SEC order exem	pting you from the prohibition against registra	ation with the SEC;	
			If you check this box, complete Se	ction 2.A.(12) of Schedule D.		
		(13)	are <b>no longer eligible</b> to remain reg	gistered with the SEC.		
State	e Se	curit	ies Authority Notice Filings and St	ate Reporting by Exempt Reporting Advise	rs	
	are SE0 the	called C. If the SEC.	d notice filings. In addition, exempt in it is an initial application or report, or If this is an amendment to direct you	nay be required to provide to state securities reporting advisers may be required to provide theck the box(es) next to the state(s) that you ur notice filings or reports to additional state(s) to the SEC. If this is an amendment to your reference to the SEC.	e state securities authorities with a copy of re u would like to receive notice of this and all s s), check the box(es) next to the state(s) that	ports and any amendments they file with the ubsequent filings or reports you submit to
			check the box(es) next to those state	-	Service of the servic	and the second s
	Ju	isdic	tions			
		AL			□ NE	□ sc
		AK		□ IN	□ NV	□ SD
		AZ		□ и	□ NH	□ ти
		AR		□ KS	□ NJ	□ TX
		CA		□ KY	□ NM	□ ит

	□ co	LA	∥ □ NY	<b>□</b> ∨τ	
	□ ст	□ ME	□ NC		
	□ DE	□ MD	□ ND	□ VA	
	□ DC	□ MA	ОН	□ WA	
	□ FL	□ M	□ OK	∥ □ w	
	□ GA	☐ MN	□ OR	□ WI	
	□ GU	□ MS	□ PA		
	□н	□ мо	□ PR		
	□ ID	□ мт	□ RI		
ECTION If you that is	eport filing fee for the coming year, your amount of the second year.  ON 2.A.(8) Related Adviser  are relying on the exemption in rule 203A-2( a registered with the SEC and your principal of the second year.	endment must be filed before  (b) from the prohibition on reg	the end of the year (December 31).	s them and you do not want to pay that state's not led by, or are under common control with an invester, provide the following information:	-
CRDI	of Registered Investment Adviser  Number of Registered Investment Adviser  Number of Registered Investment Adviser				
ECTIO	ON 2.A.(9) Newly Formed Adviser				
				uired to make certain representations about your	eligibility for
	• • • • • • • • • • • • • • • • • • • •	-	·	u must make both of these representations:	
	-		urities authority and I have a reasonable e	xpectation that I will be eligible to register with the	SEC within
12	20 days after the date my registration with the	e SEC becomes effective.			
	andertake to withdraw from SEC registration om registering with the SEC.	if, on the 120th day after my re	egistration with the SEC becomes effective	e, I would be prohibited by Section 203A(a) of the	Advisers Act
ECTIO	ON 2.A.(10) Multi-State Adviser				
	· , ,	adviser exemption from the p	prohibition on registration, you are require	ed to make certain representations about your elig	aibility for SEC
-	ration. By checking the appropriate boxes, yo		-		,,
lf you	are applying for registration as an investme	nt adviser with the SEC, you r	nust make both of these representations:		
	have reviewed the applicable state and feder ecurities authorities in those states.	al laws and have concluded th	nat I am required by the laws of 15 or mo	re states to register as an investment adviser with	n the state
🗆 lu	indertake to withdraw from SEC registration	if I file an amendment to this	registration indicating that I would be req	uired by the laws of fewer than 15 states to registe	er as an
inv	vestment adviser with the state securities au	thorities of those states.			
lf you	are submitting your annual updating amend	lment, you must make this rep	presentation:		
	ithin 90 days prior to the date of filing this an ates to register as an investment adviser wit			ave concluded that I am required by the laws of a	t least 15
ECTIO	ON 2.A.(12) SEC Exemptive Order				
f you	are relying upon an SEC order exempting yo	ou from the prohibition on regi	stration, provide the following information	:	
Applic	eation Number:				
дрио 803-					
503-					
_					
Date o	of order.				
em 3	Form of Organization				
	-				
ч. н	ow are you organized?				
ч. п	ow are you organized?  Corporation				

	C Partnership								
	C Limited Partnership (LP) C Other (specify):								
	Other (specify):								
	If you are changing your response to this Item, see Part 1A Instruction 4.								
B.	3. 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 country where you reside.	of the state or							
	If you are changing your response to this Item, see Part 1A Instruction 4.								
Item	em 4 Successions								
A.	. Are you, at the time of this filing, succeeding to the business of a registered investment adviser?	Yes	No ⊙						
	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.								
SEC	ECTION 4 Successions								
SEC	ECTION 4 Successions  No Information Filed								
SEC									
Item	No Information Filed  em 5 Information About Your Advisory Business - Employees, Clients, and Compensation								
<b>Item</b>	No Information Filed	ry policy. Part 1	A						
Item Res Inst	No Information Filed  The second of the seco	ry policy. Part 1	A						
Res Inst	No Information Filed  Im 5 Information About Your Advisory Business - Employees, Clients, and Compensation  esponses 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 regulator struction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.								
Res Inst	No Information Filed  Im 5 Information About Your Advisory Business - Employees, Clients, and Compensation  esponses 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 regulator struction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.  Imployees  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								
Res Inst	No Information Filed  Im 5 Information About Your Advisory Business - Employees, Clients, and Compensation esponses 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 regulator struction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.  Imployees  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 han one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).  Approximately how many employees do you have? Include full- and part-time employees but do not include any clerical workers.								
Res Inst	No Information Filed  Im 5 Information About Your Advisory Business - Employees, Clients, and Compensation esponses 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 regulator istruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.  Imployees  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 han one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).  Approximately how many employees do you have? Include full- and part-time employees but do not include any clerical workers.  18  In Approximately how many of the employees reported in 5.A. perform investment advisory functions (including research)?  11  (2) Approximately how many of the employees reported in 5.A. are registered representatives of a broker-dealer?								
Res Inst	No Information Filed  In 5 Information About Your Advisory Business - Employees, Clients, and Compensation esponses 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 regulator struction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.  Imployees  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 in an one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (6).  Approximately how many employees do you have? Include full- and part-time employees but do not include any clerical workers.  18  In Approximately how many of the employees reported in 5.A. perform investment advisory functions (including research)?	performs more							
Res Inst	No Information About Your Advisory Business - Employees, Clients, and Compensation esponses 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 regulator istruction 6.a. provides additional guidance to newly formed advisers for completing this Item 5.  Imployees  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 han one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).  Approximately how many employees do you have? Include full- and part-time employees but do not include any clerical workers.  18  (1) Approximately how many of the employees reported in 5.A. perform investment advisory functions (including research)?  11  (2) Approximately how many of the employees reported in 5.A. are registered representatives of a broker-dealer?  2  (3) Approximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment advisor representative investment advisor other than you?	performs more							
Res Inst	In 5 Information About Your Advisory Business - Employees, Clients, and Compensation esponses 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 regulator struction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.  Imployees  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 in one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).  Approximately how many employees do you have? Include full- and part-time employees but do not include any clerical workers.  18  (1) Approximately how many of the employees reported in 5.A. perform investment advisory functions (including research)?  11  (2) Approximately how many of the employees reported in 5.A. are registered representatives of a broker-dealer?  2  (3) Approximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment advisor representative of Approximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment advisor representative of Approximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment advisor representative of Approximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment advisor representative of a proximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment advisor representative of a proximately how many of the employees reported in 5.A. are registered with one or more state securities authorities as investment advisor representative of the proximately how many of the employees reported in 5.A. are registered with one o	performs more							

Sole Proprietorship

C Limited Liability Partnership (LLP)

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.

Cli	en	ts

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 did you provide investment advisory services during your most recently completed fiscal year?

**11-25** 

C 26-100

More than 100
If more than 100, how many?
(round to the nearest 100)

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

0%

- D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships. The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, check "None" in response to Item 5.D.(1)(d) and do not check any of the boxes in response to Item 5.D.(2)(d).
  - (1) What types of *clients* do you have? Indicate the approximate percentage that each type of *client* comprises of your total number of *clients*. If a *client* fits into more than one category, check all that apply.

	<u>None</u>	<u>Up to 10%</u>	<u>11-25%</u>	<u>26-50%</u>	<u>51-75%</u>	<u>76-99%</u>	<u>100%</u>
(a) Individuals (other than high net worth individuals)	•	0	0	0	0	0	0
(b) High net worth individuals	•	0	0	0	0	0	0
(c) Banking or thrift institutions	•	0	0	0	0	0	0
(d) Investment companies	•	0	0	0	0	0	0
(e) Business development companies	•	0	0	0	0	0	0
(f) Pooled investment vehicles (other than investment companies)	0	0	0	0	0	•	0
(g) Pension and profit sharing plans (but not the plan participants)	•	0	0	0	0	0	0
(h) Charitable organizations	•	0	0	0	0	0	0
(i) Corporations or other businesses not listed above	•	0	0	0	0	0	0
(j) State or municipal government entities	•	0	0	0	0	0	0
(k) Other investment advisers	•	0	0	0	0	0	0
(I) Insurance companies	•	0	0	0	0	0	0
(m) Other: GOVERNMENT AGENCIES	0	•	0	0	0	0	0

2) Indicate the approximate amount of your regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of *client*. If a *client* fits into more than one category, check all that apply.

	<u>None</u>	<u>Up to 25%</u>	<u>Up to 50%</u>	<u>Up to 75%</u>	<u>&gt;75%</u>
(a) Individuals (other than high net worth individuals)	•	0	0	0	0
(b) High net worth individuals	•	0	0	0	0
(c) Banking or thrift institutions	•	0	0	0	0
(d) Investment companies	•	0	0	0	0
(e) Business development companies	•	0	0	0	0
(f) Pooled investment vehicles (other than investment companies)	0	0	0	0	•
(g) Pension and profit sharing plans (but not the plan participants)	•	0	0	0	0
(h) Charitable organizations	•	0	0	0	0
(i) Corporations or other businesses not listed above	•	0	0	0	0
(j) State or municipal government entities	•	0	0	0	0
(k) Other investment advisers	•	0	0	0	0
(I) Insurance companies	•	0	0	0	0
(m) Other:	•	0	0	0	0

## **Compensation Arrangements**

- E. You are compensated for your investment advisory services by (check all that apply):
  - (1) A percentage of assets under your management

	(2) Hourly charges				
	(3) Subscription fees (for a newsletter or periodical)				
	(4) Fixed fees (other than subscription fees)				
	(5) Commissions				
	(6) Performance-based fees				
	(7) Other (specify):				
lton	m 5 Information About Your Advisory Business - Regulatory	Assets Under Management			
	egulatory Assets Under Management	Assets Officer management			
IXC	Squatory Assets officer management				Yes No
_	(1) Do you provide continuous and regular supervisory or r	management corvince to coouritie	oo nortfolioo?		
F.		-	•		⊙ ○
	(2) If yes, what is the amount of your regulatory assets und	-	r of accounts?		
		U.S. Dollar Amount		Total Number of Accounts	
	Discretionary: (a)	) \$ 989,981,357	(d)	9	
	Non-Discretionary: (b)	) \$ 157,603,066	(e)	2	
	Total: (c)	\$ 1,147,584,423	(f)	11	
	Part 1A Instruction 5.b. explains how to calculate your	regulatory assets under manager	ment. You must follow the	ese instructions carefully when comp	leting this Item.
Iten	m 5 Information About Your Advisory Business - Advisory Ad	ctivities			
Ad	dvisory Activities				
G.	. What type(s) of advisory services do you provide? Check all	that apply.			
	(1) Financial planning services				
	(2) Portfolio management for individuals and/or sm	all businesses			
	(3) Portfolio management for investment companies	s (as well as "business developm	nent companies" that have	ve made an election pursuant to secti	ion 54 of the Investment
	Company Act of 1940)				
	<ul> <li>(4) Portfolio management for pooled investment veh</li> <li>(5) Portfolio management for businesses (other that</li> </ul>			vistored investment companies and	other peoled investment
	vehicles)	in small businesses) of institution	nai chems (other than reț	gistered investment companies and t	other pooled investment
	(6) Pension consulting services				
	(7) Selection of other advisers (including private fundamental fun	nd managers)			
	(8) Publication of periodicals or newsletters				
	(9) Security ratings or pricing services				
	(10) Market timing services				
	<ul><li>☐ (11) Educational seminars/workshops</li><li>☐ (12) Other(specify): EVALUATING INVESTMENTS BY</li></ul>	GOVERNMENT AGENCIES AND	PROVIDING INVESTMEN	IT EVALUATION TRAINING AND REL	ATED SERVICES
	(12) Other(specify): EVALUATING INVESTMENTS BY	OOVERNIMENT MOENCIES MAD	T NOVIDING INVESTIGE	TEVALOATION TRAINING AND INC.	DATED OFFICIOEO
	Do not check Item 5.G.(3) unless you provide advisory serv	vices pursuant to an investment a	dvisorv contract to an inv	estment company registered under t	the Investment Company
	Act of 1940, including as a subadviser. If you check Item 5.	-			
	in Section 5.G.(3) of Schedule D.				
H.	. If you provide financial planning services, to how many clier	nts did you provide these services	during your last fiscal ye	ear?	
	O 0				
	O 1-10				
	0 11 - 25				
	O 26 - 50				
	O 51 - 100				
	0 101 - 250				
	O 251 - 500				
	O More than 500				
	If more than 500, how many?				
	(round to the nearest 500)				
	In your responses to this Item 5.H., do not include as "client	ts" the investors in a private fund y	you advise, unless you ha	ave a separate advisory relationship	with those investors.
		•	•	,	
l.	If you participate in a wrap fee program, do you (check all the	at apply):			
	(1) sponsor the wrap fee program?				
	(2) act as a portfolio manager for the <i>wrap fee progra</i>	am?			
	If you are a portfolio manager for a wrap fee program, list th	ne names of the programs and the	eir sponsors in Section 5.	I.(2) of Schedule D.	
		,	,	. ,	
	If your involvement in a wrap fee program is limited to reco	ommending wrap fee programs to	your clients, or you advis	e a mutual fund that is offered throug	gh a wrap fee program,
	do not check either Item 5.I.(1) or 5.I.(2).	- · · ·		_	-

J. In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?	•	0
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		
Item 6 Other Business Activities In this Item, we request information about your firm's other business activities.		
A. You are actively engaged in business as a (check all that apply):		
(1) broker-dealer (registered or unregistered)		
<ul> <li>(2) registered representative of a broker-dealer</li> <li>(3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>		
(3) Commodity poor operator or commodity trading advisor (whether registered or exempt non registration)  (4) futures commission merchant		
(5) real estate broker, dealer, or agent		
<ul> <li>(6) insurance broker or agent</li> <li>(7) bank (including a separately identifiable department or division of a bank)</li> </ul>		
(8) trust company		
<ul> <li>(9) registered municipal advisor</li> <li>(10) registered security-based swap dealer</li> </ul>		
(11) major security-based swap participant		
<ul> <li>(12) accountant or accounting firm</li> <li>(13) lawyer or law firm</li> </ul>		
(14) other financial product salesperson (specify):		
If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B, complete Section 6.A. of Schedule D.		
B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?	Yes	
(2) If yes, is this other business your primary business?		•
If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.	0	0
ii yes, describe this other business on Section 6.b.(2) of Schedule D, and if you engage in this business drider a different fiame, provide that fiame.	Yes	No
(3) Do you sell products or provide services other than investment advice to your advisory clients?		•
If Illians II deposits this other hypiness on Costion C.D. (2) of Cohodula D. and if you appears in this hypiness under a different name may ide that name		
If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.		
SECTION 6.A. Names of Your Other Businesses		
No Information Filed		
SECTION 6.B.(2) Description of Primary Business		
Describe your primary business (not your investment advisory business):		
If you engage in that business under a different name, provide that name:		
SECTION 6.B.(3) Description of Other Products and Services		
Describe other products or services you sell to your <i>client</i> , You may omit products and services that you listed in Section 6.B.(2) above.		
If you engage in that business under a different name, provide that name.		
Item 7 Financial Industry Affiliations		

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

your clients.

Α.	This part of Item 7 requires you to provide information about you and your related persons, including foreign affiliates. Your related persons are all of your advisory a person that is under common control with you.	affiliates and any
	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)	
	(1) 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)	
	<ul><li>(7) futures commission merchant</li><li>(8) banking or thrift institution</li></ul>	
	(9) trust company	
	(10) accountant or accounting firm	
	(11) lawyer or law firm	
	(12) insurance company or agency	
	(13) pension consultant	
	<ul> <li>(14) real estate broker or dealer</li> <li>(15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>	
	(15) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	
	(1.5)	
	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 adv	isory 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	· ·
	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	pelieve 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 client	s (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 un	•
	206(4)-2 of the Advisers Act.	
SE	CTION 7.A. Financial Industry Affiliations	
Cc	emplete a separate Schedule D Section 7.A. for each <i>related person</i> listed in Item 7.A.	
	Implicte a coparatio constant 2 cookien i in iter cash related person indica in item i in it	
1.	Legal Name of Related Person:	
	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	
2.	Primary Business Name of Related Person:	
	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	
2	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	
J.	801 - 14235	
	or	
	Other	
4.	Related Person's CRD Number (if any):	
	7691	
_	Deleted Derson in Johnsk all that apply)	
5.	Related Person is: (check all that apply)  (a) Droker-dealer, municipal securities dealer, or government securities broker or dealer	
	<ul><li>(a) More broker-dealer, municipal securities dealer, or government securities broker or dealer</li><li>(b) Other investment adviser (including financial planners)</li></ul>	
	(c) registered municipal advisor	
	(d) registered security-based swap dealer	
	(e)  major security-based swap participant	
	(f) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)	
	(g) 🗹 futures commission merchant	
	(h)  banking or thrift institution	
	(i)  trust company	
	(j)  accountant or accounting firm	
	(k) ☐ lawyer or law firm	
	(I) Insurance company or agency	
	(m) Pension consultant	
	(n) real estate broker or dealer	
	(o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles	
	(p) $\square$ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	
		Yes No
6.	Do you control or are you controlled by the related person?	0 0

	7.	Are y	ou and the related person under common control?	⊙	C	)
	8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	_		
		(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0	
		(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:			
			Number and Street 1: Number and Street 2:			
			City: State: Country: ZIP+4/Postal Code:			
			If this address is a private residence, check this box: $\square$	<b>V</b>		
	۵	(2)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes		
	9.			0	•	)
		(b)	If the answer is yes, under what exemption?			
	10.	(a)	Is the related person registered with a foreign financial regulatory authority?	_	_	
			If the answer is yes, list the name and country, in English, of each foreign financial regulatory authority with which the related person is registered.	⊙	C	)
		(6)	Name of Country/Foreign Financial Regulatory Authority			
			Canada - Alberta Securities Commission			1
			Canada - British Columbia Securities Commission			
			Canada - Ontario Securities Commission			1
			Canada - Quebec, Financial Markets Authority			
			Other - DUBAI - DUBAI MERCANTILE EXCHANGE			1
	11	Do v	ou and the related person share any supervised persons?		_	_
	11.	БО у	ou and the related person share any supervised persons:	⊙	C	)
	12	Do v	ou and the <i>related person</i> share the same physical location?	_	_	
	12.	БО у	ou and the related person share the same physical location:	0	•	9
, L					_	=
		•	N Name of <i>Related Person</i> : K OF AMERICA, NATIONAL ASSOCIATION			
	2.	Prim	ary Business Name of Related Person:			
		BAN	K OF AMERICA, NATIONAL ASSOCIATION			
	3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
		or				
		Othe	r			
	4.	Rela	ted Person's CRD Number (if any):			
	5.	Rela	ted Person is: (check all that apply)			
	0.		broker-dealer, municipal securities dealer, or government securities broker or dealer			
		(b)	other investment adviser (including financial planners)			
		(c)	registered municipal advisor			
		(d)	registered security-based swap dealer			
		(e)	major security-based swap participant			
		(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			
		(3)	futures commission merchant			
		(h)	<ul><li>✓ banking or thrift institution</li><li>✓ trust company</li></ul>			
		(i) (j)	accountant or accounting firm			
			□ lawyer or law firm			
			insurance company or agency			
		` '	pension consultant			
		(n)	real estate broker or dealer			
		(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles			
		(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles			
				Yes	; N	O
	6.	Do y	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	0	•	Ò
	7.	Are y	ou and the related person under common control?	$\odot$	C	)
	_	, .				
		` ,	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	⊙	C	)
		(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not	•	-	8

		or securities that are maintained	. , . , . , , , , , , , , , , , , , , ,	from the related person and thus a	re not required to obtain a surprise examination for your <i>clients</i> i	unus		
	(c)		•	he location of the related person's o	ffice responsible for <i>custody</i> of your <i>clients'</i> assets:			
	(-)	Number and Street 1:	1	Number and Street 2:				
		1655 GRANT STREET		BUILDING A				
		City:	State:	Country:	ZIP+4/Postal Code:			
		CONCORD	California	United States	94250-2445			
		If this address is a private resi	dence, check this box:					
^	(-)	If the veleted never is an inves	aturant advisas in it avament for				s N	
9.		If the <i>related person</i> is an investigation	•	om registration?		С	) (	0
	(b)	If the answer is yes, under wha	at exemption?					
10	(-)		d with a familian financial manual	la tame a cutha wite o				
10.		Is the <i>related person</i> registered				e	) (	0
	(b)			each foreign financial regulatory au	thority with which the related person is registered.			
		Name of Country/Foreign Fina	es and Investments Commiss	zion				
		Belgium - Banking, Finance a		SIOTI				
		-						-
		Cayman Islands - Cayman Isla	·					_
		Japan - Financial Services Ag						
			LIAN PRUDENTIAL REGULAT					_
			THE SUPERINTENDENT OF					
		Other - CHINA - CHINA BANKI	NG REGULATORY COMMISSI	ION				
		Other - CHINA - HONG KONG	MONETARY AUTHORITY					
		Other - CHINA - PEOPLE'S BA	NK OF CHINA					
		Other - CHINA - STATE ADMIN	NISTRATION OF FOREIGN EXC	CHANGE				
		Other - FRANCE - CONTROL	AUTHORITY OF PRUDENTIAL	L (ACP)				
		Other - GERMANY - DEUTSC	HE BUNDESBANK					
		Other - GREECE - MINISTRY	OF DEVELOPMENT					
		Other - INDIA - RESERVE BAN	NK OF INDIA					
		Other - INDONESIA - BANK IN	IDONESIA					П
		Other - IRELAND - FINANCIAL	REGULATOR					
		Other - ITALY - BANK OF ITAL	Y					
		Other - KOREA - FINANCIAL S						
			OFFSHORE FINANCIAL SERVI	ICES AUTHORITY				$\dashv$
		Other - NETHERLANDS - DU		10107101111				
			RAL BANK OF THE PHILIPPIN	EQ				_
			-					
		Other - SPAIN - BANK OF SPA						
		Other - THAILAND - BANK OF						-
		Singapore - Monetary Authorit	· · · · · · · · · · · · · · · · · · ·					_
		Switzerland - Swiss Financial						
		Taiwan - Financial Superviso						
		Thailand - Securities and Exc						_
		United Kingdom - Financial Co	<u> </u>					
		United Kingdom - Prudential F	Regulation Authority					
11.	Do y	ou and the <i>related person</i> shar	e any supervised persons?			e	) (	0
12.	Do y	ou and the <i>related person</i> shar	e the same physical location?			e	) (	0
1	Logo	I Name of <i>Related Person</i> :						
١.	•	RILL LYNCH ALTERNATIVE IN	IVESTMENTS LLC					
2.	Prim	ary Business Name of Related	l Person:					
	MER	RILL LYNCH ALTERNATIVE IN	VESTMENTS LLC					
3.		ted Person's SEC File Number - 35676	(it any) (e.g., 801-, 8-, 866-, 80	02-)				
	or	- 55070						
	Othe	r						
4.	<i>Rela</i> 1050	<i>ted Person's CRD</i> Number (if a 167	.ny):					

5.	Re (a)	-	Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	-	other investment adviser (including financial planners)		
	(c)		registered municipal advisor		
	(d)		registered security-based swap dealer		
	(e)	-	major security-based swap participant		
	(t)	<b>Y</b>	commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant		
	(g) (h)	-	banking or thrift institution		
	(i)		trust company		
	(j)		accountant or accounting firm		
	(k)		lawyer or law firm		
	(I)		insurance company or agency		
	(m)	_	pension consultant		
	(n) (o)	-	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	you d	control or are you controlled by the related person?	0	$\odot$
7.	Are	you	and the related person under common control?	$\odot$	0
8.	(a)		es the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	$\odot$
	(b)	ope	ou are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not erationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If yo	ou have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:		
		Nu	Imber and Street 1: Number and Street 2:		
		Cit	· ·		
		II U	his address is a private residence, check this box:	Yes	No
9.	(a)	If th	ne related person is an investment adviser, is it exempt from registration?	0	
	(b)		ne answer is yes, under what exemption?		٠
	(-)				
10	. (a)	ls tl	he related person registered with a foreign financial regulatory authority?	0	•
	(b)	If th	ne answer is yes, list the name and country, in English, of each foreign financial regulatory authority with which the related person is registered.		
			No Information Filed		
11	. Do	you a	and the related person share any supervised persons?	0	$\odot$
40	D-				
12	. Do	you a	and the <i>related person</i> share the same physical location?	0	⊙
lter	n 7 <i>F</i>	Privat	te Fund Reporting		
				Yes	No
B.	Are v	vou a	n adviser to any <i>private fund</i> ?	_	_
	, 0	you u	madison to any private fana.	•	O
	Instr	ructioi	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 n 6 of the Instructions to Part 1A. If another 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. adviser), do not complete Section 7.B.(1) of Schedule D.	ı., if <sub>.</sub>	you
			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 on, 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 r		<u>م</u>
	uesi	griau	on, pursuant to rule 204-2(u), you may identify the private rund in Section 7.B.(1) or 7.B.(2) or Schedule D using the same code or designation in place of the rund's r	iaiii	<i>7.</i>
SE	חדים	N 7 R	s.(1) Private Fund Reporting		
<u> </u>	J110	IN 7.D	at the first temporaling		
Δ	. PR	IVATE	E FUND		
_					
<u>li</u>	ntorn	natio	n About the Private Fund		
	1.	` '	Name of the private fund:		
		В	BANC OF AMERICA CALIFORNIA COMMUNITY VENTURE FUND, LLC		

	(include the "805-" prefix also) 805-9703080091		
	003-9703000091		
2.	Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country:		
	Delaware United States		
3	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):		
<i>.</i>	Name of General Partner, Manager, Trustee, or Director		
	BANC OF AMERICA MANAGEMENT LLC I		
4.	The private fund (check all that apply; you must check at least one):		
	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940		
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes	No
3.	(a) Is this a "master fund" in a master-feeder arrangement?	0	⊙
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?		
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?		•
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?		٠
	Name of the <i>Private Fund</i> :		
	Private Fund Identification Number:		
	(include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1). for the master	r-feede	er
	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 fund the following questions:	is ansv	wer
	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 sing	gle fun	nd
	("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	interes	sts,
	and each class (or series) invests substantially all of its assets in a single master fund.	Vaa	NI-
3	(a) Is this <i>private fund</i> a "fund of funds"?	Yes	_
J.	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	•	0
			•
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, whether or not also <i>private funds</i> , or registered investment companies.	tney a	ıre
		Yes	No
9.	During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other	0	•
	than "money market funds," to the extent provided in Instruction 6.e.)?		
1∩	What type of fund is the <i>private fund</i> ?		
ıU.			
	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 funds of funds, refer to the funds in which the <i>private fund</i> invests. For definitions of these fund types, please see Instruction 6 of the Instructions to Part	1Α	
	1.5. 2. 1 3. 13.130 of fands, folor to the fands in which the private fand invests. For definitions of these fand types, please see instruction of the instructions to Fait	.,	

\$ 6	8,371,890	
Owners	ship	
12. Mir	nimum investment commitment required of an investor in the <i>private fund</i> :	
	00,000,000	
NO fun	TE: 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 d).	9
13. App	proximate number of the <i>private fund</i> 's beneficial owners:	
6		
14. Wh	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :	
119	%	
15. Wh	at is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:	
0%		
	at is the approximate percentage of the private fund beneficially owned by non-United States persons:	
0%		
Your Ac	dvisory Services	
17. (a)	Are you a subadviser to this <i>private fund</i> ?	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 private fund. If the answer to question 17(a) is "no," leave this	_
	question blank.  No Information Filed	
	Yes	No
. ,		•
(b)	If the answer to question 18(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer to question 18(a) is "no," leave this question blank.	
	No Information Filed	
19 Are	Yes your <i>clients</i> solicited to invest in the <i>private fund</i> ?	
10. 7.10	your clients solicited to invest in the private fund?	•
20. App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?	
U 70		
<u>Private</u>	<u>Offering</u> Yes	No
21. Do	as the private fundraly on an examption from registration of its accurities under Degulation D of the Congrities Act of 10222	0
22 If w	as provide the private funda Form D file pumber (if apply	
_	es, provide the <i>private fund</i> 's Form D file number (if any):  rm D file number	
02	1-52493	
B. SERV	ICE PROVIDERS	
Auditor	<u>s</u>	
23. (a)	Yes  (1) Are the <i>private fund</i> 's financial statements subject to an annual audit?	_
<b>20.</b> (a)	(2) Are the financial statements prepared in accordance with U.S. GAAP?	0
	If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b)	-
	through (f) separately for each auditing firm.	
	Additional Auditor Information : 1 Record(s) Filed.	
	If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	

(b	,	•			
	PRICEWATERHOUSE COOPERS	S .			
(c	c) The location of the auditing firm's	office responsible for the private fund's	audit (city, state and country):		
	City:	State:	Country:		
	CHICAGO	Illinois	United States	Yes	
(c	d) Is the auditing firm an <i>independe</i> .	nt public accountant?		res	
	,	,,		· ·	(
(e	e) Is the auditing firm registered with	the Public Company Accounting Over	sight Board?	•	(
(f)	) If "yes" to (e) above, is the auditin	g firm subject to regular inspection by tl	ne Public Company Accounting Oversight Board in accordance with its	s rules? 👩	(
				Υe	es
g) Are	the private fund's audited financial s	tatements distributed to the private fun	d's investors?	•	)
n) Doe	es the report prepared by the auditing	g firm contain an unqualified opinion?			
•	Yes C No C Report Not Yet Recei	ved			
If yo	ou check "Report Not Yet Received,"	you must promptly file an amendment	to your Form ADV to update your response when the report is available	le.	
Broke	<u>er</u>			Υe	26
) Doe	es the <i>private fund</i> use one or more	orime brokers?			)
		o questions (b) through (e) below for ea ) through (e) separately for each prime	ach prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more the broker.	han one prime	
		No I	nformation Filed		
		No I	nformation Filed		
		No I	nformation Filed		
odian		No II	nformation Filed		
				Υє	es
a) Doe		ns (including the prime brokers listed al	pove) to hold some or all of its assets?	e	9
a) Doe	e answer to 25(a) is "yes," respond t	ns (including the prime brokers listed al o questions (b) through (f) below for ea		e	9
a) Doe	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian.	pove) to hold some or all of its assets?	e	9
a) Doe	e answer to 25(a) is "yes," respond t	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian.	pove) to hold some or all of its assets?	e	9
if the mus	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian. ecord(s) Filed.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
If the must	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?	one custodian	•) 1, )
) Doe If the mus	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian. ecord(s) Filed.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
) Doe If the mus	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding our must complete questions (b) through (b)  Legal name of custodian:	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responsou must complete questions (b) thro	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
) Doe  If the muse  Add  If you	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to the questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
) Doe  If the muse  Adde	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to must complete questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodians BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed all o questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund uses more that the fund assets (city, state and country):	one custodian	•) 1, )
If the muse Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodians BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	, <u>,</u>
) Doe If the mus  Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.  d) The location of the custodian's of City:	ns (including the prime brokers listed all o questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privative State:	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian	ia
Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.  d) The location of the custodian's of City:	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian	ia
) Doe If the mus  Add  If you (co	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian: BANK OF AMERICA, N.A.  c) Primary business name of custodian: BANK OF AMERICA, N.A.  d) The location of the custodian's of City: CONCORD	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian an one custodi	i, )
Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to understood the answer to 25(a) is "yes," responding to understood the stood to the	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that the fund's assets (city, state and country):  Country: United States	one custodian an one custodi	i, )
a) Doe If the mus  Add  If you (to	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to understood the answer to 25(a) is "yes," responding to understood the stood to the	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California  of your firm?	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that the fund's assets (city, state and country):  Country: United States	one custodian an one custodi	ialian

26.	(a) Does the <i>private fund</i> use an administrator other than your firm?	0 0
	If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questi (f) separately for each administrator.	ons (b) through
	No Information Filed	
	During your last fiscal year, what percentage of the <i>private fund</i> 's assets (by value) was valued by a <i>person</i> , such as an administrator, that is not your <i>related p</i> 0% Include only those assets where (i) such person carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes,	
,	valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined person.	
Mark	<u>keters</u>	Yes No
28.	(a) Does the private fund use the services of someone other than you or your employees for marketing purposes?	0 0
	You must answer "yes" whether the person acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar perso to 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 complete questions (b) through (g) separately for each marketer.	
	No Information Filed	
A. PR	IVATE FUND	
<u>Inforn</u>	mation About the <i>Private Fund</i>	
1.	(a) Name of the <i>private fund</i> :	
	CALSTRS CALIFORNIA IMPACT FUND, LLC	
	(b) Private fund identification number: (include the "805-" prefix also) 805-9746486781	
2.	Under the laws of what state or country is the <i>private fund</i> organized:	
	State: Country: Delaware United States	
	Delaware Officed States	
3.	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):	
	Name of General Partner, Manager, Trustee, or Director	
	BANC OF AMERICA MANAGEMENT LLC I	
4.	The private fund (check all that apply; you must check at least one):	
	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940	
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940	
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.	
	No Information Filed	
		Yes No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0 0
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?	
	No Information Filed	
		Yes No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0 0
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?  Name of the <i>Private Fund</i> :	
	Private Fund Identification Number:	

	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-ferangement or reporting on the funds separately.	eede	·r
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds the following questions:	ansv	ver
	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 ("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 integral and each class (or series) invests substantially all of its assets in a single master fund.		
0		Yes	No
8.	<ul><li>(a) Is this private fund a "fund of funds"?</li><li>(b) If yes, does the private fund invest in funds managed by you or by a related person?</li></ul>	⊙ -	
		0	_
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, whether or not the also <i>private funds</i> , or registered investment companies.	iey a	re
		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> ?		
	C hedge fund C liquidity fund P private equity fund real estate fund securitized asset fund venture capital fund C Other private fund		
	NOTE: For funds of funds, refer to the funds in which the <i>private fund</i> invests. For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A	۸.	
11.	Current gross asset value of the <i>private fund</i> :		
	\$ 52,884,013		
<u>Ow</u>	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :		
	\$ 75,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents fund).	of th	е
13.	Approximate number of the <i>private fund</i> 's beneficial owners:		
	6		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :  9%		
15.	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	0%		
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :  0%		
You	ur Advisory Services		
		Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	_
	(b) If the answer to question 17(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to question 17(a) is "no," lead question blank.	ve th	IIS
	No Information Filed		
		Yes	No
18.	(a) Do any other investment advisers advise the <i>private fund</i> ?  (b) If the answer to guestion 18(a) is "yes." provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer to guestion 18(a) is "	O no."	•

(include the "805-" prefix also)

	leave this question blank.			
	No Information Filed			
		Yes	s I	No
19. Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	1	•
20. App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?			
Private (	Offering			
21. Doe	es the <i>private fund</i> rely on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes		No C
22 If ve	no provide the private funda Form D file pumber (if only).	~		
_	es, provide the <i>private fund</i> 's Form D file number (if any):  rm D file number			
	1-5336			
B. SERVI	CE PROVIDERS			
Auditors	<u>3</u>	۷a	e	No
23. (a)	(1) Are the <i>private fund</i> 's financial statements subject to an annual audit?	œ.		0
	(2) Are the financial statements prepared in accordance with U.S. GAAP?	e		Ö
	If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one auditing firm, you must complete question through (f) separately for each auditing firm.	s (b)		
	Additional Auditor Information : 1 Record(s) Filed.			
	(b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:  PRICEWATERHOUSE COOPERS			
	(c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country):			
	City: State: Country:			
	CHICAGO Illinois United States	Yes	No	,
	(d) Is the auditing firm an independent public accountant?	<b>⊙</b>	0	
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0	1
	(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	J
		Ye	s	No
	Are the <i>private fund's</i> audited financial statements distributed to the <i>private fund's</i> investors?	e	)	0
	Does the report prepared by the auditing firm contain an unqualified opinion?			
	• Yes • No • Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.			
Prime B	roker			
		_		No
	Does the <i>private fund</i> use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one broker, you must complete questions (b) through (e) separately for each prime broker.	C prime	)	•
	No Information Filed			

	Additional Custodian Information : 1 Record(s	s) Filed.		
	If the answer to 25(a) is "yes," respond to que you must complete questions (b) through (f)	• • • • • • • • • • • • • • • • • • • •	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses m	ore than one custodian,
	(b) Legal name of custodian: BANK OF AMERICA, N.A.			
	(c) Primary business name of custodian: BANK OF AMERICA, N.A.			
	(d) The location of the custodian's office res	sponsible for <i>custody</i> of the <i>private</i>	fund's assets (city, state and country):	
	City:	State:	Country:	
	CONCORD	California	United States	Vac. No.
	(e) Is the custodian a related person of your	firm?		Yes No
	(,,			• •
	(f) If the custodian is a broker-dealer, provide	de its SEC registration number (if a	nny)	
	- CRD Number (if any):			
	Creation (in any).			
)		-	<i>ivate fund</i> uses more than one administrator, you must comp	0
)	Does the <i>private fund</i> use an administrator othe	tions (b) through (f) below. If the pa		
)	Does the <i>private fund</i> use an administrator other	tions (b) through (f) below. If the pa	vivate fund uses more than one administrator, you must comportation filed	0
ıri	Does the <i>private fund</i> use an administrator other.  If the answer to 26(a) is "yes," respond to quest (f) separately for each administrator.	tions (b) through (f) below. If the property of the property o		O elete questions (b) throug
ıri 6	Does the <i>private fund</i> use an administrator other.  If the answer to 26(a) is "yes," respond to quest (f) separately for each administrator.  In a your last fiscal year, what percentage of the particular of th	tions (b) through (f) below. If the properties of the properties o	ormation Filed	olete questions (b) through
ıri 6	Does the <i>private fund</i> use an administrator other.  If the answer to 26(a) is "yes," respond to quest (f) separately for each administrator.  In a your last fiscal year, what percentage of the particular of th	tions (b) through (f) below. If the properties of the properties o	ormation Filed  s valued by a <i>person</i> , such as an administrator, that is not you established for that asset, if any, including obtaining any relevant	olete questions (b) through
ri du u	Does the <i>private fund</i> use an administrator other. If the answer to 26(a) is "yes," respond to quest (f) separately for each administrator.  If the answer to 26(a) is "yes," respond to quest (f) separately for each administrator.  In gyour last fiscal year, what percentage of the particular of the	tions (b) through (f) below. If the properties of the properties o	ormation Filed  s valued by a <i>person</i> , such as an administrator, that is not you established for that asset, if any, including obtaining any relevant	olete questions (b) through
uri 6 clu lu rs	Does the <i>private fund</i> use an administrator other of the answer to 26(a) is "yes," respond to quest (f) separately for each administrator.  In a your last fiscal year, what percentage of the particular of the	no Info	es valued by a <i>person</i> , such as an administrator, that is not you established for that asset, if any, including obtaining any relevand fee calculations (including allocations) was the valuation	olete questions (b) through
uri 6 clu lu rs	Does the <i>private fund</i> use an administrator other. If the answer to 26(a) is "yes," respond to quest (f) separately for each administrator.  In a your last fiscal year, what percentage of the particular of the	No Info	es valued by a <i>person</i> , such as an administrator, that is not you established for that asset, if any, including obtaining any relevand fee calculations (including allocations) was the valuation	olete questions (b) throughour related person?  ant quotes, and (ii) the determined by such  Yes I
uri % clulu ers	Does the <i>private fund</i> use an administrator other. If the answer to 26(a) is "yes," respond to quest (f) separately for each administrator.  In a your last fiscal year, what percentage of the particular of the	No Info	established for that asset, if any, including obtaining any relevant fee calculations (including allocations) was the valuation eves for marketing purposes?	olete questions (b) throughour related person?  ant quotes, and (ii) the determined by such  Yes  Comilar person. If the answ

Yes No

Custodian

1. (a) Name of the private fund:

CALSTRS LOWER MIDDLE MARKET FUND III, LLC

	(include the "805-" prefix also)		
	805-2956204487		
2.	. Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country:		
	Delaware United Stat	es e	
3.	. Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a	similar capacity):	
	Name of General Partner, Manager, Trustee, or Director		
	BANC OF AMERICA MANAGEMENT LLC III		
4.	<ul> <li>The private fund (check all that apply; you must check at least one):</li> <li>(1) qualifies for the exclusion from the definition of investment company under set</li> </ul>	potion 2(a)(4) of the Investment Company Act of 1040	
	<ul> <li>(1) qualifies for the exclusion from the definition of investment company under set</li> <li>(2) qualifies for the exclusion from the definition of investment company under set</li> </ul>		
	(2) qualified for the exclusion from the definition of investment company under ex	odion s(e)(r) of the investment company for or re-re-	
5.	. List the name and country, in English, of each foreign financial regulatory authority w	vith which the <i>private fund</i> is registered.	
	No Info	rmation Filed	
		Yes N	ю
6.	. (a) Is this a "master fund" in a master-feeder arrangement?	0.6	•
	(b) If yes, what is the name and private fund identification number (if any) of the fee	der funds investing in this private fund?	
	No Info	rmation Filed	
		Yes No	Ю
	(c) Is this a "feeder fund" in a master-feeder arrangement?	O 6	9
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the ma	ster fund in which this <i>private fund</i> invests?	
	Name of the <i>Private Fund</i> :		
	Private Fund Identification Number:		
	(include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardle arrangement or reporting on the funds separately.	ess of whether you are filing a single Schedule D, Section 7.B.(1). for the master-feeder	
7.	. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangemen	t according to the instructions to this Section 7.B.(1), for each of the feeder funds answer	r
	the following questions:		
	No Info	rmation Filed	
		more funds ("feeder funds") invest all or substantially all of their assets in a single fund 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 for		
		Yes No	Ю
3.	. (a) Is this <i>private fund</i> a "fund of funds"?	⊙ (	0
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related pers</i>	on?	•
		at or more of its total assets in other pooled investment vehicles, whether or not they are	
	also private funds, or registered investment companies.	Yes N	<u>ام</u> ا
9	. During your last fiscal year, did the <i>private fund</i> invest in securities issued by investr	and an arranging an electronal and deaths. In an arrange Occasion was Act of 4040 (athors	
٠.	than "money market funds," to the extent provided in Instruction 6.e.)?	nent companies registered under the investment Company Act of 1940 (other C	•)
10.	What type of fund is the <i>private fund</i> ?		
	C hedge fund C liquidity fund C private equity fund C real estate fund C secur	itized asset fund C venture capital fund C Other <i>private fund</i>	
	NOTE: For funds of funds, refer to the funds in which the <i>private fund</i> invests. For de	initions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	

\$ 1	94,843,024		
Owners	ship		
12. Mir	nimum investment commitment required of an investor in the <i>private fund</i> :		
	200,000,000		
NO fun	TE: 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 ad).	of the	е
13. App	proximate number of the <i>private fund</i> 's beneficial owners:		
14. Wh	nat is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15. Wh	nat is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
16. Wh	nat is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
Your Ac	dvisory Services		
17 (2)	Are you a subadviser to this <i>private fund</i> ?	Yes	_
	If the answer to question 17(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to question 17(a) is "no," lead question blank.	C ave th	<b>⊙</b> nis
	No Information Filed		
		Yes	No
18. (a)	Do any other investment advisers advise the private fund?	0	•
(b)	If the answer to question 18(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer to question 18(a) is "leave this question blank.	no,"	
	No Information Filed		
		Yes	No
19. Are	e your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	•
20. App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
	~~ ·		
Private	Offering Control of the Control of t	Yes	No
21. Do	es the private fund rely on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	0
22. If y	es, provide the <i>private fund</i> 's Form D file number (if any):		
	orm D file number		
02	21-99104		
B. SERV	ICE PROVIDERS		
<u>Auditor</u>	<u>s</u>	Yes	No
23. (a)	(1) Are the <i>private fund</i> 's financial statements subject to an annual audit?	•	0
	(2) Are the financial statements prepared in accordance with U.S. GAAP?	•	o
	If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	၁)	
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions	S	

(b) through (f) separately for each auditing firm.

(b	,	•			
	PRICEWATERHOUSE COOPERS	S .			
(c	c) The location of the auditing firm's	office responsible for the private fund's	audit (city, state and country):		
	City:	State:	Country:		
	CHICAGO	Illinois	United States	Yes	
(c	d) Is the auditing firm an <i>independe</i> .	nt public accountant?		res	
	,	,,		· ·	(
(e	e) Is the auditing firm registered with	the Public Company Accounting Over	sight Board?	•	(
(f)	) If "yes" to (e) above, is the auditin	g firm subject to regular inspection by tl	ne Public Company Accounting Oversight Board in accordance with its	s rules? 👩	(
				Υe	es
g) Are	the private fund's audited financial s	tatements distributed to the private fun	d's investors?	•	)
n) Doe	es the report prepared by the auditing	g firm contain an unqualified opinion?			
•	Yes C No C Report Not Yet Recei	ved			
If yo	ou check "Report Not Yet Received,"	you must promptly file an amendment	to your Form ADV to update your response when the report is available	le.	
Broke	<u>er</u>			Υe	26
) Doe	es the <i>private fund</i> use one or more	orime brokers?			)
		o questions (b) through (e) below for ea ) through (e) separately for each prime	ach prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more the broker.	han one prime	
		No I	nformation Filed		
		No I	nformation Filed		
		No I	nformation Filed		
odian		No II	nformation Filed		
				Υє	es
a) Doe		ns (including the prime brokers listed al	pove) to hold some or all of its assets?	e	9
a) Doe	e answer to 25(a) is "yes," respond t	ns (including the prime brokers listed al o questions (b) through (f) below for ea		e	9
a) Doe	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian.	pove) to hold some or all of its assets?	e	9
a) Doe	e answer to 25(a) is "yes," respond t	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian.	pove) to hold some or all of its assets?	e	9
if the mus	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian. ecord(s) Filed.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
If the must	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?	one custodian	•) 1, )
) Doe If the mus	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian. ecord(s) Filed.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
) Doe If the mus	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding our must complete questions (b) through (b)  Legal name of custodian:	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responsou must complete questions (b) thro	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
) Doe  If the muse  Add  If you	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to the questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
) Doe  If the muse  Adde	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to must complete questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodians BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed all o questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund uses more that the fund assets (city, state and country):	one custodian	•) 1, )
If the muse Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodians BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	, <u>,</u>
) Doe If the mus  Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.  d) The location of the custodian's of City:	ns (including the prime brokers listed all o questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privative State:	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian	ia
Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.  d) The location of the custodian's of City:	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian	ia
) Doe If the mus  Add  If you (co	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian: BANK OF AMERICA, N.A.  c) Primary business name of custodian: BANK OF AMERICA, N.A.  d) The location of the custodian's of City: CONCORD	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian an one custodi	i, )
Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to understood the answer to 25(a) is "yes," responding to understood the stood to the	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that the fund's assets (city, state and country):  Country: United States	one custodian an one custodi	i, )
a) Doe If the mus  Add  If you (to	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to understood the answer to 25(a) is "yes," responding to understood the stood to the	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California  of your firm?	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that the fund's assets (city, state and country):  Country: United States	one custodian an one custodi	ialian

26.	(a) Does the <i>private fund</i> use an administrator other than your firm?	0
	If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (f) separately for each administrator.	(b) throug
	No Information Filed	
27.	During your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as an administrator, that is not your <i>related person</i> on the value only those assets where (i) such person carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and	d (ii) the
	valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by person.	such
<u>Mar</u>	<u>rketers</u>	Yes
28.	(a) Does the private fund use the services of someone other than you or your employees for marketing purposes?	0
	You must answer "yes" whether the person acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar person. If to 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 complete questions (b) through (g) separately for each marketer.	
	No Information Filed	
A. PF	RIVATE FUND	
Infor	mation About the <i>Private Fund</i>	
1.	(a) Name of the <i>private fund</i> :	
	CALSTRS LOWER MIDDLE MARKET FUND IV, LLC	
	(b) Private fund identification number:   (include the "805-" prefix also)   805-1390815778	
2.	Under the laws of what state or country is the <i>private fund</i> organized:	
	State: Country:	
	Delaware United States	
3.	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):	
	Name of General Partner, Manager, Trustee, or Director	
	BANC OF AMERICA MANAGEMENT LLC III	
4.	The private fund (check all that apply; you must check at least one):	
	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940	
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940	
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.	
	No Information Filed	
_		Yes 1
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?  No Information Filed	
		Yes 1
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?  Name of the <i>Private Fund</i> :	
	Private Fund Identification Number:	

	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-ferangement or reporting on the funds separately.	eede	·r
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds the following questions:	ansv	ver
	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 ("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 integral and each class (or series) invests substantially all of its assets in a single master fund.		
0		Yes	No
8.	<ul><li>(a) Is this private fund a "fund of funds"?</li><li>(b) If yes, does the private fund invest in funds managed by you or by a related person?</li></ul>	⊙ -	
		0	_
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, whether or not the also <i>private funds</i> , or registered investment companies.	іеу а	ıe
		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> ?		
	C hedge fund C liquidity fund P private equity fund C real estate fund C securitized asset fund C venture capital fund C Other private fund		
	NOTE: For funds of funds, refer to the funds in which the <i>private fund</i> invests. For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A	۸.	
11.	Current gross asset value of the <i>private fund</i> :		
	\$ 212,089,552		
<u>Ow</u>	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :		
	\$ 100,000,000  NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents	of th	
	fund).	OI III	C
13.	Approximate number of the <i>private fund</i> 's 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%		
15.	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	0%		
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :  0%		
You	ur Advisory Services		
		Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	_
	(b) If the answer to question 17(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to question 17(a) is "no," lead question blank.	ive th	IIS
	No Information Filed		
40		Yes	No
18.	(a) Do any other investment advisers advise the <i>private fund</i> ?  (b) If the answer to guestion 18(a) is "yes." provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer to guestion 18(a) is "	O no."	•

(include the "805-" prefix also)

	I	eave this question blank.		
		No Information Filed		
			Yes	s No
19.	Are y	our clients solicited to invest in the private fund?	0	•
20.	Appr	oximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	ate O	offering The Control of the Control		
21	Does	s the <i>private fund</i> rely on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?		No.
۷۱.	Doce	s the private rand toly off all exemption from registration of its securities and of regulation B of the securities role of 1999:	•	0
22.	_	s, provide the <i>private fund</i> 's Form D file number (if any):		
		n D file number -138242		
	02.			
B. SI	ERVIC	CE PROVIDERS		
Auc	<u>litors</u>		Ye	s No
23.	(a) (	(1) Are the private funds financial statements subject to an annual audit?	•	C
	(	(2) Are the financial statements prepared in accordance with U.S. GAAP?	•	C
		If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions through (f) separately for each auditing firm.	(b)	
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete question	ns	
		(b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm:		
		PRICEWATERHOUSE COOPERS		
		(c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country):		
		City: State: Country: CHICAGO Illinois United States		
			Yes	No
		(d) Is the auditing firm an independent public accountant?	•	0
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
		(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
			Vo	s No
	(g) /	Are the <i>private fund</i> 's audited financial statements distributed to the <i>private fund</i> 's investors?	(O	
	(h) I	Does the report prepared by the auditing firm contain an unqualified opinion?	•	•
	ı	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.		
<u>Prir</u>	ne Br	<u>oker</u>		
			Ye	s No
24.		Does the private fund use one or more prime brokers?  If the answer to 24(a) is "yes " respect to questions (b) through (c) below for each prime broker the private fund uses. If the private fund uses more than one p	O	•
		If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one poroker, you must complete questions (b) through (e) separately for each prime broker.	irne	
		No Information Filed		
		INO IIIIOIIIIation Filed		

	Additional Custodian Information : 1 Record(s) F	Filed.		
	If the answer to 25(a) is "yes," respond to quest you must complete questions (b) through (f) sep	• • • • • • • • • • • • • • • • • • • •	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> us	es more than one custodian,
	(b) Legal name of custodian: BANK OF AMERICA, N.A.			
	(c) Primary business name of custodian: BANK OF AMERICA, N.A.			
	(d) The location of the custodian's office respo	onsible for <i>custody</i> of the <i>private</i>	fund's assets (city, state and country):	
	City:	State:	Country:	
	CONCORD	California	United States	V N-
	(e) Is the custodian a <i>related person</i> of your fire	rm?		Yes No
	(b) is the suctodian a related percent of your int			• 0
	(f) If the custodian is a broker-dealer, provide i	its SEC registration number (if a	any)	
	CRD Number (if any):			
	trator  Does the <i>private fund</i> use an administrator other the answer to 26(a) is "yes," respond to question (f) separately for each administrator.	•	rivate fund uses more than one administrator, you must o	O
	Does the <i>private fund</i> use an administrator other t	ns (b) through (f) below. If the pr		0
	Does the <i>private fund</i> use an administrator other t	ns (b) through (f) below. If the pr	rivate fund uses more than one administrator, you must o	0
ri	Does the <i>private fund</i> use an administrator other to the answer to 26(a) is "yes," respond to question (f) separately for each administrator.	ns (b) through (f) below. If the pr		complete questions (b) throug
rii lu	Does the <i>private fund</i> use an administrator other to answer to 26(a) is "yes," respond to question (f) separately for each administrator.  If the answer to 26(a) is "yes," respond to question (f) separately for each administrator.	No Info	ormation Filed	complete questions (b) through
i u	Does the <i>private fund</i> use an administrator other to answer to 26(a) is "yes," respond to question (f) separately for each administrator.  If the answer to 26(a) is "yes," respond to question (f) separately for each administrator.  In gyour last fiscal year, what percentage of the <i>private</i> only those assets where (i) such person carried ation used for purposes of investor subscriptions,	No Info	ormation Filed  as valued by a <i>person</i> , such as an administrator, that is necessarily established for that asset, if any, including obtaining any	complete questions (b) through
rilu urs	Does the <i>private fund</i> use an administrator other to answer to 26(a) is "yes," respond to question (f) separately for each administrator.  If the answer to 26(a) is "yes," respond to question and the answer to 26(a) is "yes," respond to question when the action used for purposes of investor subscriptions, on.	No Info	ormation Filed  as valued by a <i>person</i> , such as an administrator, that is nestablished for that asset, if any, including obtaining any and fee calculations (including allocations) was the valua	complete questions (b) through
ri u u rs	Does the <i>private fund</i> use an administrator other to answer to 26(a) is "yes," respond to question (f) separately for each administrator.  If the answer to 26(a) is "yes," respond to question (f) separately for each administrator.  In gyour last fiscal year, what percentage of the <i>private</i> only those assets where (i) such person carried ation used for purposes of investor subscriptions, on.  It is not private fund use the services of someoner of the private fund use the services of someoner to must answer "yes" whether the person acts a	No Info	ormation Filed  as valued by a <i>person</i> , such as an administrator, that is nestablished for that asset, if any, including obtaining any and fee calculations (including allocations) was the valua	complete questions (b) throughout your related person?  relevant quotes, and (ii) the ation determined by such  Yes I
uri 6 clu lu ers	Does the <i>private fund</i> use an administrator other to answer to 26(a) is "yes," respond to question (f) separately for each administrator.  In a your last fiscal year, what percentage of the <i>private</i> and the only those assets where (i) such person carried ation used for purposes of investor subscriptions, on.  In a your last fiscal year, what percentage of the <i>private</i> ation used for purposes of investor subscriptions, on.  In a your last fiscal year, what percentage of the <i>private</i> ation used for purposes of investor subscriptions, on.  In a your last fiscal year, what percentage of the <i>private</i> ation used for purposes of investor subscriptions, on.	No Info	ormation Filed  as valued by a <i>person</i> , such as an administrator, that is not established for that asset, if any, including obtaining any and fee calculations (including allocations) was the valuations of the calculations (including allocations) was the valuations (including allocations).	complete questions (b) throughout your related person?  relevant quotes, and (ii) the ation determined by such  Yes  Cor similar person. If the answ

Yes No

Custodian

1. (a) Name of the private fund:

CALSTRS LOWER MIDDLE MARKET FUND V, L.P.

	(include the "805-" prefix also)		
	805-1369166023		
2.	Under the laws of what state or country is the private fund organized:		
	State: Country		
	Delaware United	States	
3.	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving	g in a similar capacity):	
	Name of General Partner, Manager, Trustee, or Director		
	BAMLCAF CALSTRS GP, LLC		
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 und	Nor specian 3(a)(1) of the Investment Company Act of 1040	
	(1) qualifies for the exclusion from the definition of investment company und		
	(2) qualifies for the exclusion from the definition of investment company und	er section 3(c)(7) of the investment Company Act of 1940	
5.	List the name and country, in English, of each foreign financial regulatory autho	prity with which the private fund is registered.	
	No	Information Filed	
		Yes 1	No
ŝ.	(a) Is this a "master fund" in a master-feeder arrangement?	0 0	•
	(b) If yes, what is the name and private fund identification number (if any) of the	e feeder funds investing in this private fund?	
	No	Information Filed	
		Yes M	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 Name of the Private Fund:	e master fund in which this <i>private fund</i> invests?	
	Private Fund Identification Number: (include the "805-" prefix also)		
	(include the 603- prefix also)		
	· · · · · · · · · · · · · · · · · · ·	gardless 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 arrange	ement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer	er
	the following questions:		
	No	Information Filed	
		e or more funds ("feeder funds") invest all or substantially all of their assets in a single fund d" 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 mas		-,
		Yes M	Yes No C G feeder  answer  e fund terests,  Yes No C G G G G
3.	(a) Is this private fund a "fund of funds"?	<b>⊙</b> (	0
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related</i>	person?	•
		ercent or more of its total assets in other pooled investment vehicles, whether or not they are	)
	also private funds, or registered investment companies.	Voc. 1	NI.
2	During your last fiscal year, did the private fund invest in securities issued by in-	and the section of the section of the least the least the section of the section	
J.	than "money market funds," to the extent provided in Instruction 6.e.)?	resultent companies registered under the investment company Act of 1940 (other	⊚
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 $^{f C}$ s	securitized asset fund C venture capital fund C Other private fund	
	NOTE: For funds of funds, refer to the funds in which the <i>private fund</i> invests. For	or definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	

\$ 1	00,662,892	
Owners	ship	
12. Mir	nimum investment commitment required of an investor in the <i>private fund</i> :	
\$ 1	00,000,000	
NC fun	TE: 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 d).	
13. Ap	proximate number of the <i>private fund</i> 's beneficial owners:	
7		
14. Wh	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :	
1%		
15. Wh	at is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:	
0%		
16. Wh	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :	
0%		
Your Ad	dvisory Services	
	Yes No	
	Are you a subadviser to this <i>private fund</i> ?  (5) (6) (1) (1) (1) (1) (1) (1) (1) (1) (1) (1	
(a)	If the answer to question 17(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to question 17(a) is "no," leave this question blank.	
	No Information Filed	
40 (-)	Yes No	
` '	Do any other investment advisers advise the <i>private fund</i> ?  If the answer to question 18(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer to question 18(a) is "no,"	
(6)	leave this question blank.	_
	No Information Filed	
19 Δrc	Yes No expour <i>clients</i> solicited to invest in the <i>private fund</i> ?	
15. 746	e your <i>clients</i> solicited to invest in the <i>private fund?</i>	
	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?	
0%		
<u>Private</u>	Offering	
24 Da	Yes No	
21. DO	es the private fund rely on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	
22. If y	es, provide the <i>private fund</i> 's Form D file number (if any):	.
	rm D file number	.
02	1-215927	l
B. SERV	ICE PROVIDERS	
Auditor		
23. (a)	Yes No. (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	
	(2) Are the financial statements prepared in accordance with U.S. GAAP?	
	If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b)	
	through (f) separately for each auditing firm.	
	Additional Auditor Information : 1 Record(s) Filed.	
	If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	

(b	,	•			
	PRICEWATERHOUSE COOPERS	S .			
(c	c) The location of the auditing firm's	office responsible for the private fund's	audit (city, state and country):		
	City:	State:	Country:		
	CHICAGO	Illinois	United States	Yes	
(c	d) Is the auditing firm an <i>independe</i> .	nt public accountant?		res	
	,	,,		· ·	(
(e	e) Is the auditing firm registered with	the Public Company Accounting Over	sight Board?	•	(
(f)	) If "yes" to (e) above, is the auditin	g firm subject to regular inspection by tl	ne Public Company Accounting Oversight Board in accordance with its	s rules? 👩	(
				Υe	es
g) Are	the private fund's audited financial s	tatements distributed to the private fun	d's investors?	•	)
n) Doe	es the report prepared by the auditing	g firm contain an unqualified opinion?			
•	Yes C No C Report Not Yet Recei	ved			
If yo	ou check "Report Not Yet Received,"	you must promptly file an amendment	to your Form ADV to update your response when the report is available	le.	
Broke	<u>er</u>			Υe	26
) Doe	es the <i>private fund</i> use one or more	orime brokers?			)
		o questions (b) through (e) below for ea ) through (e) separately for each prime	ach prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more the broker.	han one prime	
		No I	nformation Filed		
		No I	nformation Filed		
		No I	nformation Filed		
odian		No II	nformation Filed		
				Υє	es
a) Doe		ns (including the prime brokers listed al	pove) to hold some or all of its assets?	e	9
a) Doe	e answer to 25(a) is "yes," respond t	ns (including the prime brokers listed al o questions (b) through (f) below for ea		e	9
a) Doe	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian.	pove) to hold some or all of its assets?	e	9
a) Doe	e answer to 25(a) is "yes," respond t	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian.	pove) to hold some or all of its assets?	e	9
if the mus	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian. ecord(s) Filed.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
If the must	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?	one custodian	•) 1, )
) Doe If the mus	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian. ecord(s) Filed.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
) Doe If the mus	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding our must complete questions (b) through (b)  Legal name of custodian:	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responsou must complete questions (b) thro	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
) Doe  If the muse  Add  If you	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to the questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
) Doe  If the muse  Adde	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to must complete questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodians BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed all o questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund uses more that the fund assets (city, state and country):	one custodian	•) 1, )
If the muse Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodians BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	, <u>,</u>
) Doe If the mus  Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.  d) The location of the custodian's of City:	ns (including the prime brokers listed all o questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privative State:	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian	ia
Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.  d) The location of the custodian's of City:	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian	ia
) Doe If the mus  Add  If you (co	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian: BANK OF AMERICA, N.A.  c) Primary business name of custodian: BANK OF AMERICA, N.A.  d) The location of the custodian's of City: CONCORD	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian an one custodi	i, )
Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to understood the answer to 25(a) is "yes," responding to understood the stood to the	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that the fund's assets (city, state and country):  Country: United States	one custodian an one custodi	i, )
a) Doe If the mus  Add  If you (to	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to understood the answer to 25(a) is "yes," responding to understood the stood to the	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California  of your firm?	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that the fund's assets (city, state and country):  Country: United States	one custodian an one custodi	ialian

26. (	(a) Does the <i>private fund</i> use an administrator other than your firm?	0 0
	If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questi (f) separately for each administrator.	ons (b) through
	No Information Filed	
( I	During your last fiscal year, what percentage of the <i>private fund</i> 's assets (by value) was valued by a <i>person</i> , such as an administrator, that is not your <i>related p</i> oly.  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 person.	by such
<u>Mark</u>	<u>keters</u>	Yes N
28. (	(a) Does the private fund use the services of someone other than you or your employees for marketing purposes?	0 0
	You must answer "yes" whether the person acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar person to 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 complete questions (b) through (g) separately for each marketer.	
	No Information Filed	
A. PRI	VATE FUND	
nforn	nation About the Private Fund	
1. (	(a) Name of the <i>private fund</i> :	
	HORIZON IMPACT FUND, L.P.	
(	(b) Private fund identification number: (include the "805-" prefix also)	
	805-2615301739	
2. l	Under the laws of what state or country is the <i>private fund</i> organized:	
	State: Country:	
	Delaware United States	
	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):	
	Name of General Partner, Manager, Trustee, or Director	
	BAMLCAF HIF GP, LLC	
4.	The private fund (check all that apply; you must check at least one):	
_	<ul> <li>(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> </ul>	
,	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940	
5. l	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.	
	No Information Filed	
		Yes No
	(a) Is this a "master fund" in a master-feeder arrangement?	0 0
[	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?  No Information Filed	
L		
,	(c) Is this a "fooder fund" in a master-feeder arrangement?	Yes No
	(c) Is this a "feeder fund" in a master-feeder arrangement?  (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?	0 @
(	Name of the <i>Private Fund</i> :	
	Private Fund Identification Number:	

	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-ferrangement or reporting on the funds separately.	eede	·r
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds the following questions:	ansv	ver
	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 ("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 in and each class (or series) invests substantially all of its assets in a single master fund.		
0		Yes	No
8.	<ul><li>(a) Is this private fund a "fund of funds"?</li><li>(b) If yes, does the private fund invest in funds managed by you or by a related person?</li></ul>	•	
		0	_
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, whether or not the also <i>private funds</i> , or registered investment companies.	еу а	ıe
		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> ?		
	C hedge fund C liquidity fund P private equity fund real estate fund securitized asset fund venture capital fund C Other private fund		
	NOTE: For funds of funds, refer to the funds in which the <i>private fund</i> invests. For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1.6	٨.	
11.	Current gross asset value of the <i>private fund</i> :		
	\$ 50,337,207		
<u>Ow</u>	<u>rnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :		
	\$ 50,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents fund).	of th	е
13.	Approximate number of the <i>private fund</i> 's 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> :  1%		
15.	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	0%		
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :  0%		
You	ur Advisory Services		
		Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	_
	(b) If the answer to question 17(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to question 17(a) is "no," lead question blank.	ave th	ııs
	No Information Filed		
40		Yes	No
18.	(a) Do any other investment advisers advise the <i>private fund</i> ?  (b) If the answer to guestion 18(a) is "yes." provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer to guestion 18(a) is "	no."	•

(include the "805-" prefix also)

	I	eave this question blank.			
		No Information Filed			
			Yes	s No	o
19.	Are y	our clients solicited to invest in the private fund?	0	•	þ
20.	Appr	oximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?			
<u>Priv</u>	ate O	offering Control of the Control of t			
21.	Does	s the <i>private fund</i> rely on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes	s No	
22.	If yes	s, provide the <i>private fund</i> 's Form D file number (if any):			
	Forr	m D file number			
	021	-220718		_	
B. SE	ERVIC	CE PROVIDERS			
Aud	<u>litors</u>		Ye	s N	lo
23.	(a) (	(1) Are the private fund's financial statements subject to an annual audit?	•		_
	(	(2) Are the financial statements prepared in accordance with U.S. GAAP?	•	(	)
		If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions through (f) separately for each auditing firm.	s (b)		
		Additional Auditor Information : 1 Record(s) Filed.			
		If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one auditing firm, you must complete question (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:	ons		
		PRICEWATERHOUSE COOPERS			
		(c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country):			
		City: State: Country: CHICAGO Illinois United States			
			Yes	No	
		(d) Is the auditing firm an independent public accountant?	•	0	
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0	
		(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	
			Ye	s N	lo
	(g) /	Are the <i>private fund</i> 's audited financial statements distributed to the <i>private fund</i> 's investors?	•	(	)
		Does the report prepared by the auditing firm contain an unqualified opinion?			
		● Yes ● No ● Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.			
Di.					
	ne Br		Ye	s N	ю
24.		Does the private fund use one or more prime brokers?  If the angular to 24(a) is "ves " respond to questions (b) through (c) below for each prime broker the private fund uses. If the private fund uses more than one re-	C	6	Ò
		If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one poroker, you must complete questions (b) through (e) separately for each prime broker.	rime		
		No Information Filed			

	Additional Custodian Information : 1 Record(s	s) Filed.		
	If the answer to 25(a) is "yes," respond to qu you must complete questions (b) through (f)	. , ,	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses n	more than one custodian,
	(b) Legal name of custodian: BANK OF AMERICA, N.A.			
	(c) Primary business name of custodian: BANK OF AMERICA, N.A.			
	(d) The location of the custodian's office res	sponsible for <i>custody</i> of the <i>private</i>	fund's assets (city, state and country):	
	City:	State:	Country:	
	CONCORD	California	United States	Vac No
	(e) Is the custodian a <i>related person</i> of you	r firm?		Yes No ⊙ ○
	(,,			<b>⊙</b> ○
	(f) If the custodian is a broker-dealer, provide	de its SEC registration number (if a	ny)	
	- CRD Number (if any):			
		•	<i>ivate fund</i> uses more than one administrator, you must com	0
	Does the <i>private fund</i> use an administrator oth	etions (b) through (f) below. If the pr		_
	Does the <i>private fund</i> use an administrator other.  If the answer to 26(a) is "yes," respond to ques	etions (b) through (f) below. If the pr	ivate fund uses more than one administrator, you must com	0
)	Does the <i>private fund</i> use an administrator oth If the answer to 26(a) is "yes," respond to ques (f) separately for each administrator.	tions (b) through (f) below. If the property No Info		oplete questions (b) throug
uri 6	Does the <i>private fund</i> use an administrator oth If the answer to 26(a) is "yes," respond to ques (f) separately for each administrator.	No Info	ormation Filed	our related person?
ıri 6 clu	Does the <i>private fund</i> use an administrator oth If the answer to 26(a) is "yes," respond to ques (f) separately for each administrator.  If the answer to 26(a) is "yes," respond to ques (f) separately for each administrator.	No Info	ormation Filed s valued by a <i>person</i> , such as an administrator, that is not ye	our related person?
ıri 6 Clu	Does the <i>private fund</i> use an administrator oth If the answer to 26(a) is "yes," respond to ques (f) separately for each administrator.  If the answer to 26(a) is "yes," respond to ques (f) separately for each administrator.  In gyour last fiscal year, what percentage of the lade only those assets where (i) such person call ation used for purposes of investor subscription.	No Info	ormation Filed s valued by a <i>person</i> , such as an administrator, that is not you	our <i>related person</i> ?  vant quotes, and (ii) the determined by such
uri 6 clu lu ers	Does the <i>private fund</i> use an administrator oth If the answer to 26(a) is "yes," respond to ques (f) separately for each administrator.  In your last fiscal year, what percentage of the lade only those assets where (i) such person called ation used for purposes of investor subscriptions on.	No Info	s valued by a <i>person</i> , such as an administrator, that is not your stablished for that asset, if any, including obtaining any relevand fee calculations (including allocations) was the valuation	our related person?
uri % colulu ers	Does the <i>private fund</i> use an administrator oth If the answer to 26(a) is "yes," respond to ques (f) separately for each administrator.  In your last fiscal year, what percentage of the lade only those assets where (i) such person callation used for purposes of investor subscriptions on.  In your last fiscal year, what percentage of the lade only those assets where (ii) such person callation used for purposes of investor subscriptions on.  In your last fiscal year, what percentage of the lade only those assets where (iii) such person callation used for purposes of investor subscriptions on.	No Info	s valued by a <i>person</i> , such as an administrator, that is not your stablished for that asset, if any, including obtaining any relevand fee calculations (including allocations) was the valuation	our related person?  vant quotes, and (ii) the determined by such  Yes I
uri % cli klu teers	Does the <i>private fund</i> use an administrator oth If the answer to 26(a) is "yes," respond to ques (f) separately for each administrator.  In your last fiscal year, what percentage of the ade only those assets where (i) such person called a considerable of the purposes of investor subscriptions on.  In your last fiscal year, what percentage of the ade only those assets where (ii) such person called only those assets where (iii) such person called only those assets where (iiii) such person called only those assets where (iiii) such person called only those assets where (iiii) such person called only those assets where (iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii	No Info	s valued by a <i>person</i> , such as an administrator, that is not you stablished for that asset, if any, including obtaining any relevant fee calculations (including allocations) was the valuation rees for marketing purposes?	our related person?  vant quotes, and (ii) the determined by such  Yes  imilar person. If the answ

Yes No

Custodian

1. (a) Name of the private fund:

NYSCRF PIONEER PARTNERSHIP FUND A, L.P.

	(include the "805-" prefix also)	
	805-4963106112	
2.	2. Under the laws of what state or country is the <i>private fund</i> organized:	
	State: Country:	
	Delaware United States	
3.	3. Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):	
	Name of General Partner, Manager, Trustee, or Director	
	BANC OF AMERICA CAPITAL ACCESS FUNDS MANAGEMENT A, L.P.	
4.	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	
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the	Investment Company Act of 1940
5.	5. List the name and country, in English, of each foreign financial regulatory authority with which the priva	te fund is registered.
	No Information Filed	
		Yes No
<b>3</b> .	6. (a) Is this a "master fund" in a master-feeder arrangement?	0.0
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing	
	No Information Filed	
		Yes No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0 @
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which the Name of the <i>Private Fund</i> :	his <i>private fund</i> invests?
	Private Fund Identification Number:	
	(include the "805-" prefix also)	
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you	are filing a single Schedule D, Section 7.B.(1), for the master-feeder
	arrangement or reporting on the funds separately.	
7.	7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the the following questions:	nstructions to this Section 7.B.(1), for each of the feeder funds answer
	and remaining quantum	
	No Information Filed	
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feede	r 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 of	uestion 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.	3. (a) Is this <i>private fund</i> a "fund of funds"?	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	© C
		C C
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total also <i>private funds</i> , or registered investment companies.	il assets in other pooled investment vehicles, whether of hot they are
		Yes No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies re than "money market funds," to the extent provided in Instruction 6.e.)?	gistered under the Investment Company Act of 1940 (other C
10.	10. What type of fund is the <i>private fund</i> ?	
	C hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund	venture capital fund Other <i>private fund</i>
	NOTE: For funds of funds, refer to the funds in which the private fund invests. For definitions of these funds in the second sec	nd types, please see Instruction 6 of the Instructions to Part 1A.

\$ 2	13,515,453	
Owners	ship	
12. Mir	nimum investment commitment required of an investor in the <i>private fund</i> :	
	00,000,000	
NO fun	TE: 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 different from the amount set forth in the organizational documents of the different from the amount set forth in the organizational documents of the different from the amount set forth in the organizational documents of the different from 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 different from the amount set forth in the organizational documents of the different from the amount set forth in the organizational documents of the different from the amount set forth in the organizational documents of the different from the amount set forth in the organization of the different from the different	ie
13. App	proximate number of the <i>private fund</i> 's beneficial owners:	
14. Wh	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :	
15. Wh	at is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:	
16. Wh	at is the approximate percentage of the private fund beneficially owned by non-United States persons:	
Your Ac	dvisory Services	Na
17. (a)	Yes Are you a subadviser to this <i>private fund</i> ?	NO ©
	If the answer to question 17(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to question 17(a) is "no," leave to question blank.	_
	No Information Filed	
	Yes	No
` '	Do any other investment advisers advise the <i>private fund</i> ?  If the answer to question 18(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer to question 18(a) is "no," leave this question blank.	•
	leave this question blank.  No Information Filed	
	Yes	No
19. Are	your clients solicited to invest in the private fund?	•
	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?	
0%		
Private	<u>Offering</u>	
21. Do	Yes es the <i>private fund</i> rely on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	No C
22. If y	es, provide the <i>private fund</i> 's Form D file number (if any):	
Fo	rm D file number	
02	1-126564	
B. SERV	ICE PROVIDERS	
Auditor		
23. (a)	(4) Are the private funds financial statements subject to an appual sudit?	No
(ω)	(2) Are the financial statements prepared in accordance with U.S. GAAP?	0
	If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	V
	Additional Auditor Information : 1 Record(s) Filed.	
	If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions	

(b) through (f) separately for each auditing firm.

(b	,	•			
	PRICEWATERHOUSE COOPERS	S .			
(c	c) The location of the auditing firm's	office responsible for the private fund's	audit (city, state and country):		
	City:	State:	Country:		
	CHICAGO	Illinois	United States	Yes	
(c	d) Is the auditing firm an <i>independe</i> .	nt public accountant?		res	
	,	,,		· ·	(
(e	e) Is the auditing firm registered with	the Public Company Accounting Over	sight Board?	•	(
(f)	) If "yes" to (e) above, is the auditin	g firm subject to regular inspection by tl	ne Public Company Accounting Oversight Board in accordance with its	s rules? 👩	(
				Υe	es
g) Are	the private fund's audited financial s	tatements distributed to the private fun	d's investors?	•	)
n) Doe	es the report prepared by the auditing	g firm contain an unqualified opinion?			
•	Yes C No C Report Not Yet Recei	ved			
If yo	ou check "Report Not Yet Received,"	you must promptly file an amendment	to your Form ADV to update your response when the report is available	le.	
Broke	<u>er</u>			Υe	26
) Doe	es the <i>private fund</i> use one or more	orime brokers?			)
		o questions (b) through (e) below for ea ) through (e) separately for each prime	ach prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more the broker.	han one prime	
		No I	nformation Filed		
		No I	nformation Filed		
		No I	nformation Filed		
odian		No II	nformation Filed		
				Υє	es
a) Doe		ns (including the prime brokers listed al	pove) to hold some or all of its assets?	e	9
a) Doe	e answer to 25(a) is "yes," respond t	ns (including the prime brokers listed al o questions (b) through (f) below for ea		e	9
a) Doe	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian.	pove) to hold some or all of its assets?	e	9
a) Doe	e answer to 25(a) is "yes," respond t	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian.	pove) to hold some or all of its assets?	e	9
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) Doe If the mus	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian. ecord(s) Filed.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
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If the muse Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodians BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	, <u>,</u>
) Doe If the mus  Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.  d) The location of the custodian's of City:	ns (including the prime brokers listed all o questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privative State:	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian	ia
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) Doe If the mus  Add  If you (co	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to unust complete questions (b) through (b) Legal name of custodian: BANK OF AMERICA, N.A.  c) Primary business name of custodian: BANK OF AMERICA, N.A.  d) The location of the custodian's of City: CONCORD	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian an one custodi	i, )
Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to understood the answer to 25(a) is "yes," responding to understood the stood to the	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that the fund's assets (city, state and country):  Country: United States	one custodian an one custodi	i, )
a) Doe If the mus  Add  If you (to	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to understood the answer to 25(a) is "yes," responding to understood the stood to the	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California  of your firm?	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that the fund's assets (city, state and country):  Country: United States	one custodian an one custodi	iai

26.	(a) Does the <i>private fund</i> use an administrator other than your firm?	0	$\odot$
	If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete question (f) separately for each administrator.	ıs (b) throu	ıgh
	No Information Filed		
	During your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , such as an administrator, that is not your <i>related person</i> , and the person is a person is a person is a person in the person in the person is a person in the person in the person is a person in the person in the person is a person in the person in the person is a person in the person in the person is a person in the perso		
	Include only those assets where (i) such person carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, at valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined be person.		
Mar	<u>keters</u>	Yes	No
28.	(a) Does the private fund use the services of someone other than you or your employees for marketing purposes?	0	•
	You must answer "yes" whether the person acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar person. to 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 complete questions (b) through (g) separately for each marketer.		ver
	No Information Filed		
A. PR	RIVATE FUND		
Infor	mation About the <i>Private Fund</i>		
1.	(a) Name of the <i>private fund</i> :		
••	NYSCRF PIONEER PARTNERSHIP FUND A-II, L.P.		
	(b) Private fund identification number:  (include the "805-" prefix also)		
	805-9190885561		
2.	Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country:		
	Delaware United States		
3.	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):		
	Name of General Partner, Manager, Trustee, or Director  BAMLCAF NPPF A-II GP, LLC		
	BAIVILGAF INFFF A-II GF, LLC		
	The private fund (check all that apply; you must check at least one):		
	<ul> <li>(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> </ul>		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed		
	No illiomation riled	Vaa	
6.	(a) Is this a "master fund" in a master-feeder arrangement?	Yes	_
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?		•
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	•
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?  Name of the <i>Private Fund</i> :	_	
	Private Fund Identification Number:		

	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-fearrangement or reporting on the funds separately.	eede	r
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds the following questions:	ansv	ver
	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 ("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 integral and each class (or series) invests substantially all of its assets in a single master fund.		
0		Yes	No
8.	<ul><li>(a) Is this private fund a "fund of funds"?</li><li>(b) If yes, does the private fund invest in funds managed by you or by a related person?</li></ul>	•	
		0	
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, whether or not the also <i>private funds</i> , or registered investment companies.	iey a	·e
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type of fund is the <i>private fund</i> ?		
	C hedge fund C liquidity fund F private equity fund C real estate fund C securitized asset fund C venture capital fund C Other private fund		
	NOTE: For funds of funds, refer to the funds in which the <i>private fund</i> invests. For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A	١.	
11.	Current gross asset value of the <i>private fund</i> :		
	\$ 151,500,000		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :		
	\$ 150,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents fund).	of th	е
13.	Approximate number of the <i>private fund</i> 's beneficial owners:		
	9		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :  1%		
15.	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	0%		
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :  0%		
Yo	ur Advisory Services		
		Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	_
	(b) If the answer to question 17(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to question 17(a) is "no," lead question blank.	ve th	ıis
	No Information Filed		
4.5		Yes	No
18.	(a) Do any other investment advisers advise the <i>private fund</i> ?  (b) If the answer to question 18(a) is "yes." provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer to question 18(a) is "	O	•

(include the "805-" prefix also)

20. Agricultants solicited to invest in the private kind?  21. Does the private fund's from D tile number (if any):  22. If yes, provide the private fund's From D tile number (if any):  23. Exercice PROVIDERS  24. (a) (1) Are the private fund's from D tile number (if any):  25. (a) (1) Are the private fund's from D tile number (if any):  26. (a) (2) Are the functional statements subject to an annual audit?  27. (a) (1) Are the private fund's financial statements aubject to an annual audit?  28. (a) (1) Are the private fund's financial statements aubject to an annual audit?  29. (a) (1) Are the private fund's financial statements aubject to an annual audit?  29. (a) (1) Are the private fund's financial statements preserved in accordance with U.S. GAAP?  29. (a) (1) Are the private fund's financial statements preserved in accordance with U.S. GAAP?  20. (a) (1) Are the annual to 2(3(4)) is 'yes, 'respond to questions (it) through (it) below. If the private fund uses more than one auditing firm, you must complete questions (b) intrough (i) below. If the private fund uses more than one auditing firm, you must complete questions (b) intrough (i) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (i) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (i) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (i) separately for each auditing firm.  20. (a) The function of the auditing firms office responsible for the private fund uses more than one auditing firm, you must complete questions (b) through (i) separately for each auditing firm.  21. (a) The function of the auditing firms office responsible for the private fund audit private fund uses more than one auditing firm, you must complete questions (b) through (i) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (ii) below. If the private fund uses more than one auditin		le	ave this question blank.			
Approximately what percentage of your clients state invested in the private fund?				No Information Filed		
20. Approximately what percentage of your clients has invested in the private fund?  21. Does the private fund elver an exemption from registration of its securities under Regulation D of the Securities Act of 1933?  22. If yes, provide the private fund's from D file number (if any):    Form D file number					Yes	No
Private Offening  21. Does the private fund sy on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?  22. If yes, provide the private fund's Form D file number (of any):    Form D file number	19.	Are yo	ur clients solicited to invest in th	ne private fund?	0	•
Yes    Proceedings   Procedure fund relation of the securities and its securities under Regulation D of the Securities Act of 1933?			ximately what percentage of you	ur clients has invested in the private fund?		
2. If you, provide that private fund's from D file number (if any):    Security   Securi	<u>Priv</u>	ate Off	fering			
22. If yes, provide the private fund's Form D file number (if any):    Form D file number	21.	Does	the <i>private fund</i> rely on an exen	nption from registration of its securities under Regulation D of the Securities Act of 1933?		
## Service PROVIDERS  Auditors  ## 23. (a) (1) Are the private funds financial statements subject to an annual audit?  (2) Are the financial statements prepared in accordance with U.S. GAAR?  ## the answer to 23(a)(1) is 'yes,' respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information : Record(s) Filed.  ## the answer to 23(a)(1) is 'yes,' respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information : Record(s) Filed.  ### the answer to 24(a)(1) is 'yes,' respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Insure of the auditing firms a office responsible for the private fund's audit (ely, state and country):  Oily Common firm an independent public accountant?  (c) The location of the auditing firm an independent public accountant?  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm an independent public accountant?  (f) If 'yes' to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (g) Yes In G' Report Not Yet Received  (f) Yes On G' Report Not Yet Received 'you must promptly file an amendment to your Form ADV to update your response when the report is available.  **Yes**  The Broker  **Yes**  The Broker  **Yes**  The Broker File private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (e) through (e	22	If you	provide the private funds Form	D file number (if any):		~
B. SERVICE PROVIDERS  Auditions  Yes  (2). (a) (1) Are the private funds financial statements subject to an annual audit?  (2) Are the financial statements prepared in accordance with U.S. GAAP?  (3) If the ensemble to 23(d)(1 is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information: I Record(c) Filed.  If the answer to 23(d)(1 is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) horough (f) separately for each auditing firm.  (c) hrough (f) separately for each auditing firm.  (d) Name of the auditing firm's office responsible for the private funds audit (city, state and country):  City:  C	22.	_	•	Differ fulfiber (if arry).		
23. (a) (1) Are the private fund's financial statements subject to an annual audit?  (2) Are the financial statements proposed in accordance with U.S. GAAP?  (3) If the answer to 23(a)(1) is 'yes' respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information : 1 Record(s) Filed.  If the answer to 23(a)(1) is 'yes', respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:  PRICEWATERHOUSE COOPERS  (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):  City:  Chick Country  Chick Country  (d) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (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?  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  C 'Yes C No © Report Not Yet Received 'you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prima Brober  Yes  24. (a) Does the private fund use one or more prime brokers?  It the answer to 24(a) is 'yes', 'respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.						
23. (a) (1) Are the private fund's financial statements subject to an annual audit?  (2) Are the financial statements prepared in accordance with U.S. GAAP?  If the answer to 23(a)(1) is 'yes,' respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Audition Information : 1 Record(s) Filed.  If the answer to 23(a)(1) is 'yes,' respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:  PRICEWATERHOUSE COOPERS  (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):  City:  City:  CHICAGO Illinois United States  Yes N  (d) is the auditing firm registered with the Public Company Accounting Oversight Board?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (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? ©  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  © Yes  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  © Yes  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  If you check "Report Not Yet Received." you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  (a) Does the private fund use one or more prime brokers?  If the answer to 24(a) is 'yes,' respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker the private fund uses. If the private fund use	B. SE	ERVICE	PROVIDERS			
23. (a) (1) Are the private fund's financial statements subject to an annual audit?  (2) Are the financial statements prepared in accordance with U.S. GAAP?  (3) If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information: 1 Record(s) Filed.  If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  PRICEWATERHOUSE COOPERS  (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):  City.  CHICAGO  Illinois  United States  (e) Is the auditing firm an independent public accountant?  (e) Is the auditing firm an independent public accountant?  (g) Are the private fund's auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  (g) Are the private fund's auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  (g) Are the private fund's auditing firm contain an unqualified opinion?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  (h) Yes O No O Report Not Yet Received. You must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  (a) Does the private fund use one or more prime brokers?  (b) Boes the private fund use one or more prime brokers?  (c) The subject of each auditing firm ontain an unqualified opinion?  (d) It is private fund use one or more prime brokers?  (e) The subject of each auditing firm ontain an unqualified opinion?  (e) Yes O No O Report Not Yet Received. You must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker	Aud	<u>litors</u>		Invest in the private fund?  Yes No category of your clients has invested in the private fund?  Yes No can an exemption from registration of its securities under Regulation D of the Securities Act of 1933?  Yes No can an exemption from registration of its securities under Regulation D of the Securities Act of 1933?  Yes No categories prepared in accordance with U.S. GARP?  Categories prepared in accordance with U.S. GARP?  Chis's yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) for each auditing firm.  Internation: 1 Record(s) Fled.  Al(1) is 'ves," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) to each auditing firm.  Internation: 1 Record(s) Fled.  Al(1) is 'ves," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) to each auditing firm.  Internation: 1 Record(s) Fled.  State:  Country:  Illinois United States  Yes No  Cutty:  Illinois United States  Yes No  Country:  Item an independent public accountent?  Country:  Item registered with the Public Company Accounting Oversight Board?  Sove, is the auditing firm subject to regular inapection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes No  Level Vet Received		
If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  Additional Auditor Information : 1 Record(s) Filed.  If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm:  PRICEWATERHOUSE COOPERS  (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):  City:  State:  Country:  ChicAGO  Illinois  United States  Yes N  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  Yes  (a) Are the private fund's audited financial statements distributed to the private fund's investors?  (b) Does the report prepared by the auditing firm contain an unqualified opinion?  Yes  Yes  Yes  Yes  Yes  Yes  Yes  Ye	23.	(a) (1	) Are the <i>private fund</i> 's financial	I statements subject to an annual audit?	_	_
Additional Auditor Information : 1 Record(s) Filed.    If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.    (b) Name of the auditing firm: PRICEWATERHOUSE COOPERS		(2	) Are the financial statements pr	repared in accordance with U.S. GAAP?	•	0
If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.  (b) Name of the auditing firm: PRICEWATERHOUSE COOPERS  (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: City: CHICAGO Illinois United States  Yes. N  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  Yes  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  Yes  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the private fund was one or more prime brokers?  Yes  24. (a) Does the private fund use one or more prime brokers?  Yes  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.			. , . ,		_	
(b) through (f) separately for each auditing firm.  (b) Name of the auditing firm: PRICEWATERHOUSE COOPERS  (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: CHICAGO Illinois United States  Yes N  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules? (c)  Yes  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  24. (a) Does the private fund use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) below for each prime broker.		A	additional Auditor Information :	1 Record(s) Filed.		
PRICEWATERHOUSE COOPERS  (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):  City: City: CHICAGO Illinois United States  Yes N  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?    (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  Yes O No O Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  24. (a) Does the private fund use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.					ions	
City: State: Country: CHICAGO Illinois United States  Yes N  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  Yes  Yes  Yes  Yes  An O Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  1 He answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.			•			
CHICAGO Illinois United States  Yes N  (d) Is the auditing firm an independent public accountant?  (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?    (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  Yes  Yes  Yes  Yes  1. O Does the report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.			(c) The location of the auditing	g firm's office responsible for the <i>private fund</i> 's audit (city, state and country):		
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(d) Is the auditing firm an <i>independent public accountant?</i> (e) Is the auditing firm registered with the Public Company Accounting Oversight Board?  (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  (g) Are the <i>private fund</i> s audited financial statements distributed to the <i>private fund</i> s investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  (g) Yes O No O Report Not Yet Received  If you check "Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  24. (a) Does the <i>private fund</i> use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.			CHICAGO	Illinois United States		_
(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?  Yes  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  Yes No Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  24. (a) Does the private fund use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.			(d) Is the auditing firm an inde	ependent public accountant?		
Yes  (g) Are the private fund's audited financial statements distributed to the private fund's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  Yes No Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  24. (a) Does the private fund use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.			(e) Is the auditing firm register	red with the Public Company Accounting Oversight Board?	•	0
(g) Are the <i>private fund's</i> audited financial statements distributed to the <i>private fund's</i> investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  (r) Yes No Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  24. (a) Does the <i>private fund</i> use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.			(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 <i>private fund</i> 's audited financial statements distributed to the <i>private fund</i> 's investors?  (h) Does the report prepared by the auditing firm contain an unqualified opinion?  (r) Yes No Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  24. (a) Does the <i>private fund</i> use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.						
(h) Does the report prepared by the auditing firm contain an unqualified opinion?  ○ Yes ○ No ○ Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  24. (a) Does the private fund use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.		(a) Ar	e the <i>private funds</i> audited fina	ancial statements distributed to the <i>private fund</i> 's investors?		
Yes No Report Not Yet Received  If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.  Prime Broker  Yes  24. (a) Does the private fund use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.			•	·	•	О
Prime Broker  Yes  24. (a) Does the <i>private fund</i> use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.						
Yes  24. (a) Does the <i>private fund</i> use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.						
24. (a) Does the <i>private fund</i> use one or more prime brokers?  If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	<u>Prin</u>	ne Bro	<u>ker</u>			
If the answer to 24(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	24.	(a) D	oes the <i>private fund</i> use one or	more prime brokers?	_	No @
		If	the answer to 24(a) is "yes," res	spond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more than one		•
			· ·			

	Additional Custodian Information : 1 Record(s) Filed.		
	If the answer to 25(a) is "yes," respond to questions (b) through (f) below for each custodian the <i>private for</i> you must complete questions (b) through (f) separately for each custodian.	und uses. If the <i>private fund</i> uses more than one cust	todian,
	(b) Legal name of custodian: BANK OF AMERICA, N.A.		
	(c) Primary business name of custodian: BANK OF AMERICA, N.A.		
	(d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund</i> 's assets (city, state a	and country):	
	City: State: Country		
	CONCORD California United		es No
	(e) Is the custodian a <i>related person</i> of your firm?		03 140
		`	
	(f) If the custodian is a broker-dealer, provide its SEC registration number (if any)		
	- CDD Niverb or (if area):		
	CRD Number (if any):		
	Does the <i>private fund</i> use an administrator other than your firm?  If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than	one administrator, you must complete questions (b)	0
	If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than (f) separately for each administrator.	one administrator, you must complete questions (b)	0
	<ul> <li>a) Does the private fund use an administrator other than your firm?</li> <li>If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than</li> </ul>	one administrator, you must complete questions (b)	0
a) Our	If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than (f) separately for each administrator.  No Information Filed  During your last fiscal year, what percentage of the <i>private fund</i> 's assets (by value) was valued by a <i>person</i> , suc		C through
a) Our oncl oralu	Does the <i>private fund</i> use an administrator other than your firm?  If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than (f) separately for each administrator.  No Information Filed  During your last fiscal year, what percentage of the <i>private fund</i> 's assets (by value) was valued by a <i>person</i> , such the private only those assets where (i) such person carried out the valuation procedure established for that asset, in aluation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (include)	h as an administrator, that is not your <i>related person</i> if any, including obtaining any relevant quotes, and (ii	C through
a) Our O% ncl valu	Does the <i>private fund</i> use an administrator other than your firm?  If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than (f) separately for each administrator.  No Information Filed  During your last fiscal year, what percentage of the <i>private fund</i> 's assets (by value) was valued by a <i>person</i> , such private only those assets where (i) such person carried out the valuation procedure established for that asset, include only those assets where (ii) such person carried out the valuation or distributions, and fee calculations (include person).	h as an administrator, that is not your <i>related person</i> if any, including obtaining any relevant quotes, and (ii	through
Our O% ncl valu pers	a) Does the <i>private fund</i> use an administrator other than your firm?  If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than (f) separately for each administrator.  No Information Filed  During your last fiscal year, what percentage of the <i>private fund</i> 's assets (by value) was valued by a <i>person</i> , suc 20%  Include only those assets where (i) such person carried out the valuation procedure established for that asset, it valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (include person).  Eters	h as an administrator, that is not your <i>related person</i> if any, including obtaining any relevant quotes, and (iiding allocations) was the valuation determined by such	? ) the ch
Dur 0% Incl valu pers	a) Does the <i>private fund</i> use an administrator other than your firm?  If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than (f) separately for each administrator.  No Information Filed  During your last fiscal year, what percentage of the <i>private fund</i> 's assets (by value) was valued by a <i>person</i> , suc 20%  Include only those assets where (i) such person carried out the valuation procedure established for that asset, is valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (include person).  Eters	h as an administrator, that is not your <i>related person</i> of any, including obtaining any relevant quotes, and (iiding allocations) was the valuation determined by success?	? ) the ch  Yes C e answ
Dur Dw ncl valu	a) Does the <i>private fund</i> use an administrator other than your firm?  If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than (f) separately for each administrator.  No Information Filed  During your last fiscal year, what percentage of the <i>private fund</i> 's assets (by value) was valued by a <i>person</i> , suc 10%  Include only those assets where (i) such person carried out the valuation procedure established for that asset, it valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (include person).  Eters  a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purpose You must answer "yes" whether the person acts as a placement agent, consultant, finder, introducer, munic to 28(a) is "yes", respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses. I	h as an administrator, that is not your <i>related person</i> of any, including obtaining any relevant quotes, and (iiding allocations) was the valuation determined by success?	? ) the ch  Yes C e answ

Yes No

Custodian

1. (a) Name of the private fund:

THE FIRST CAPITAL ACCESS FUND, L.P.

	(include the "805-" prefix also)		
	805-7738495187		
2.	Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country:		
	Delaware United States		
3.	Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):		
	Name of General Partner, Manager, Trustee, or Director		
	BAMLCAF FIRST CAPITAL GP, LLC		
4.	The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940		
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes	No
3.	(a) Is this a "master fund" in a master-feeder arrangement?	0	$\odot$
	(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 fund</i> ?		
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?		•
	(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?	~	~
	Name of the Private Fund:		
	Private Fund Identification Number: (include the "805-" prefix also)		
	(include the ede 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	-feede	∍r
	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 fundament	s ansv	wer
	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 sing ("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 i		
	and each class (or series) invests substantially all of its assets in a single master fund.		
		Yes	No
3.	(a) Is this private fund a "fund of funds"?	$\odot$	0
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	•
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, whether or not also <i>private funds</i> , or registered investment companies.	they a	ıre
	also private funds, of registered investment companies.	Yes	No
9.	During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other		•
	than "money market funds," to the extent provided in Instruction 6.e.)?	~	~
10	What time a of five die the aminote five d		
10.	. What type of fund is the <i>private fund</i> ?		
	C hedge fund C liquidity fund fund private equity fund real estate fund securitized asset fund venture capital fund other private fund		
	NOTE: For funds of funds, refer to the funds in which the <i>private fund</i> invests. For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1	ΙΔ	
	TO 12. For lands of funds, force to the funds in which the private fund invests. For definitions of these fund types, please see instruction of the instructions to Fall I	73.	

(b) Private fund identification number:

11. Current gross asset value of the private fund:

<u>Ownership</u>
12. Minimum investment commitment required of an investor in the <i>private fund</i> :
\$ 100,000,000
NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund).
13. Approximate number of the <i>private fund</i> 's 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> :
1%
15. What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:
0%
16. What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :
0%
Your Advisory Services
Yes No  17. (a) Are you a subadviser to this <i>private fund</i> ?
(b) If the answer to question 17(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer to question 17(a) is "no," leave this
question blank.  No Information Filed
Yes No
18. (a) Do any other investment advisers advise the <i>private fund</i> ?
(b) If the answer to question 18(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer to question 18(a) is "no," leave this question blank.
No Information Filed
Yes No
19. Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?
20. Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?
0%
Private Offering
Yes No 21. Does the <i>private fund</i> rely on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?
22. If yes, provide the <i>private fund</i> 's Form D file number (if any):
Form D file number 021-177843
B. SERVICE PROVIDERS
Auditors
Yes No
23. (a) (1) Are the <i>private fund</i> 's financial statements subject to an annual audit?
23. (a) (1) Are the <i>private fund</i> 's financial statements subject to an annual audit?  (2) Are the financial statements prepared in accordance with U.S. GAAP?
23. (a) (1) Are the <i>private fund</i> 's financial statements subject to an annual audit?  (3) Are the financial statements prepared in generating with U.S. CAAR3
23. (a) (1) Are the <i>private fund</i> 's financial statements subject to an annual audit?  (2) Are the financial statements prepared in accordance with U.S. GAAP?  If the answer to 23(a)(1) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b)

(b	,	•			
	PRICEWATERHOUSE COOPERS	S .			
(c	c) The location of the auditing firm's	office responsible for the private fund's	audit (city, state and country):		
	City:	State:	Country:		
	CHICAGO	Illinois	United States	Yes	
(c	d) Is the auditing firm an <i>independe</i> .	nt public accountant?		res	
	,	,,		· ·	(
(e	e) Is the auditing firm registered with	the Public Company Accounting Over	sight Board?	•	(
(f)	) If "yes" to (e) above, is the auditin	g firm subject to regular inspection by tl	ne Public Company Accounting Oversight Board in accordance with its	s rules? 👩	(
				Υe	es
g) Are	the private fund's audited financial s	tatements distributed to the private fun	d's investors?	•	)
n) Doe	es the report prepared by the auditing	g firm contain an unqualified opinion?			
•	Yes C No C Report Not Yet Recei	ved			
If yo	ou check "Report Not Yet Received,"	you must promptly file an amendment	to your Form ADV to update your response when the report is available	le.	
Broke	<u>er</u>			Υe	26
) Doe	es the <i>private fund</i> use one or more	orime brokers?			)
		o questions (b) through (e) below for ea ) through (e) separately for each prime	ach prime broker the <i>private fund</i> uses. If the <i>private fund</i> uses more the broker.	han one prime	
		No I	nformation Filed		
		No I	nformation Filed		
		No I	nformation Filed		
odian		No II	nformation Filed		
				Υє	es
a) Doe		ns (including the prime brokers listed al	pove) to hold some or all of its assets?	e	9
a) Doe	e answer to 25(a) is "yes," respond t	ns (including the prime brokers listed al o questions (b) through (f) below for ea		e	9
a) Doe	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian.	pove) to hold some or all of its assets?	e	9
a) Doe	e answer to 25(a) is "yes," respond t	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian.	pove) to hold some or all of its assets?	e	9
if the mus	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian. ecord(s) Filed.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
If the must	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?	one custodian	•) 1, )
) Doe If the mus	e answer to 25(a) is "yes," respond to the complete questions (b) through (f) ditional Custodian Information: 1 R	ns (including the prime brokers listed al o questions (b) through (f) below for ea separately for each custodian. ecord(s) Filed.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
) Doe If the mus	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding our must complete questions (b) through (b)  Legal name of custodian:	ns (including the prime brokers listed all o questions (b) through (f) below for ea separately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) 1, )
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) Doe  If the muse  Add  If you	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to the questions (b) through (b) Legal name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	pove) to hold some or all of its assets?  ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than	one custodian	•) i, )
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Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.	ns (including the prime brokers listed all o questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund uses more that the fund assets (city, state and country):	one custodian	•) 1, )
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) Doe If the mus  Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.  d) The location of the custodian's of City:	ns (including the prime brokers listed all o questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privative State:	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian	ia
Add	e answer to 25(a) is "yes," respond to the complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," responding to understood the custodian:  b) Legal name of custodian:  BANK OF AMERICA, N.A.  c) Primary business name of custodian:  BANK OF AMERICA, N.A.  d) The location of the custodian's of City:	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the private fund uses. If the private fund uses more than each custodian the private fund uses. If the private fund uses more that each custodian the private fund uses. If the private fund uses more that the fund's assets (city, state and country):  Country:	one custodian	ia
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Add	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to understood the answer to 25(a) is "yes," responding to understood the stood to the	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that the fund's assets (city, state and country):  Country: United States	one custodian an one custodi	i, )
a) Doe If the mus  Add  If you (to	e answer to 25(a) is "yes," respond to st complete questions (b) through (f)  ditional Custodian Information: 1 R  the answer to 25(a) is "yes," respond to understood the answer to 25(a) is "yes," responding to understood the stood to the	ns (including the prime brokers listed also questions (b) through (f) below for easeparately for each custodian.  ecord(s) Filed.  d to questions (b) through (f) below for ugh (f) separately for each custodian.  dian:  fice responsible for custody of the privations State: California  of your firm?	ch custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more that the fund's assets (city, state and country):  Country: United States	one custodian an one custodi	iai

			0 (	
		If the answer to 26(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) the (f) separately for each administrator.	nroug	h
		No Information Filed		
	0º In va pe	uring your last fiscal year, what percentage of the <i>private fund</i> 's assets (by value) was valued by a <i>person</i> , such as an administrator, that is not your <i>related person</i> ?  "Clude 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 aluation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such the erson.  "Exters		
		Y	es N	<b>l</b> o
28	s. (a	Noes 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 person acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar person. If the at to 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.	ınswe	<b>⊙</b> er
		No Information Filed		
SECT	ION	7.B.(2) Private Fund Reporting		
		No Information Filed		
tem S	R Pa	rticination or Interest in <i>Client</i> Transactions		
		rticipation or Interest in <i>Client</i> Transactions  rm, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest m	nay o	ccur
In thi	s Ite	rticipation or Interest in Client Transactions  m, we request information about your participation and interest in your clients' transactions. This information identifies additional areas in which conflicts of interest m you and your clients.	nay o	ccur
In this	s Ite een	m, we request information about your participation and interest in your clients' transactions. This information identifies additional areas in which conflicts of interest m	nay o	ccur
In this betwo	s Ite een	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .	nay o	ccur
In this between	s Ite een Item	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.	nay o	
In this between Like In the Property A.	s Ite een Item orieta Do y	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest me you and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions		
In this between Like I Prop A.	s Ite een Item orieta Do y	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest may you and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  For any Interest in Client Transactions  For you or any related person:	Yes	No
In this between Like I Prop A.	s Ite een Item orieta Do y (1)	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest meaning you and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  For any <i>related person</i> :  buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?	Yes	No ©
In thin thin thin thin thin thin thin thi	s Ite eeen the litem Do y (1) (2)	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions ou or any <i>related person</i> : buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)? buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ? 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	Yes O	No ©
In thin thin thin thin thin thin thin thi	s Ite eeen Trieta Do y (1) (2) (3)	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions you or any <i>related person</i> : buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)? buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ? 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))?	Yes O	No ⊙ ⊙
In this between the Like I Propper A. I Sale B.	s Iteeen statement of the statement of t	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions you or any <i>related person</i> : buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)? buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ? 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))?	Yes O	No ⊙ ⊙
In this between the between th	s Ite een y Item orieta Do y (1) (2) (3) s Int Do y (1)	we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest means you and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions you or any <i>related person</i> : buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)? buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ? 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))?  Referent in <i>Client</i> Transactions you or any <i>related person</i> : 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	Yes  O  O	No © © No
In thin thin thin thin thin thin thin thi	s Ite een ; filtem frieta Do y (1) (2) (3) s Int Do y (1) (2)	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions  You or any <i>related person</i> :  buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?  buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?  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))?  Referst in <i>Client</i> Transactions  You or any <i>related person</i> :  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)?  recommend purchase of securities to advisory <i>clients</i> for which you or any <i>related person</i> serves as underwriter, general or managing partner, or purchaser	Yes O O Yes	No ⊙ ⊙ No
In thin thin thin thin thin thin thin thi	s Ite een y forieta Do y forieta forie	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions you or any related person: buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)? buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ? 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))?  Referst in <i>Client</i> Transactions you or any <i>related person</i> : 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)? recommend purchase of securities to advisory <i>clients</i> for which you or any <i>related person</i> serves as underwriter, general or managing partner, or purchaser representative? 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	Yes O O	No © C ©
In thin thin thin thin thin thin thin thi	s Ite een y (1) (2) (3) s Int (2) (2) (3)	m, we request information about your participation and interest in your <i>clients'</i> transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions  You or any related person:  buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?  buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?  Trecommend securities (or other investment products) to advisory <i>clients</i> in which you or any related person has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?  **Retest in Client Transactions**  You or any related person:  as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>clients</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?  Trecommend purchase of securities to advisory <i>clients</i> for which you or any related person serves as underwriter, general or managing partner, or purchaser representative?  Trecommend purchase or sale of securities to advisory <i>clients</i> for which you or any related person has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	Yes O O	No
In this between the between th	s Ite een y Item orieta Do y (1) (2) (3) S Int (2) (3)	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions  You or any <i>related person</i> :  buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?  buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?  Trecommend 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))?  **Referst in <i>Client</i> Transactions**  You or any <i>related person</i> :  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)?  Trecommend purchase of securities to advisory <i>clients</i> for which you or any <i>related person</i> serves as underwriter, general or managing partner, or purchaser representative?  Trecommend 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)?	Yes O O	No
In this between the between th	s Ite een y forieta Do y forieta forie	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions  ou or any <i>related person</i> : buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)? buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?  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))?  Retest in <i>Client</i> Transactions  ou or any <i>related person</i> :  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)?  recommend purchase 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)?  ent or Brokerage Discretion  you or any <i>related person</i> have <i>discretionary authority</i> to determine the:	Yes O O Yes O	No
In this between the between th	s Ite een y frieta Do y frieta Do y frieta f	m, we request information about your participation and interest in your <i>clients'</i> transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions  ou or any <i>related person</i> : buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)? buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?  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))?  The example of the company of the	Yes O O Yes O O	No ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) (
Saler C.	s Ite een ; ltem rieta Do y (1) (2) (3) s Int (2) (3) sstme Do y (1) (2) (3)	m, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in which conflicts of interest myou and your <i>clients</i> .  7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.  ary Interest in <i>Client</i> Transactions  You or any <i>related person</i> :  buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?  buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?  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))?  **Retest in <i>Client</i> Transactions**  You or any <i>related person</i> :  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)?  recommend purchase of securities to advisory <i>clients</i> for which you or any <i>related person</i> serves as underwriter, general or managing partner, or purchaser representative?  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)?  **Ent or Brokerage Discretion**  You or any <i>related person</i> have <i>discretionary authority</i> to determine the:  securities to be bought or sold for a <i>client's</i> account?  amount of securities to be bought or sold for a <i>client's</i> account?	Yes O O Yes O	No

O

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

F.	If yo	ou answer "yes" to E above, are any of the brokers or dealers <i>related persons</i> ?	•	0
G.		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	•
		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	0
Н.	Do y	you or any related person, directly or indirectly, compensate any person for client referrals?	0	•
l.	Do y	you or any related person, directly or indirectly, receive compensation from any person for client referrals?	0	•
		esponding to Items 8.H and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H) or received from (in answ any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.	ering	ltem
tem	9 Cu	ustody		
		em, we ask you whether you or a related person has custody of client (other than clients that are investment companies registered under the Investment Company Act about your custodial practices.	t of 19	40)
A.	(1)	Do you have <i>custody</i> of any advisory <i>clients</i> ':	Yes	No
		(a) cash or bank accounts?	$\odot$	$\circ$
		(b) securities?	⊙	0
	clier	ou are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from nts' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption of not operationally independent (pursuant to Advisers Act rule 206(4)-(2)(d)(5)) from the related person.		ou
	(2)	If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for which you have <i>custody</i> :		
		U.S. Dollar Amount Total Number of <i>Clients</i>		
		(a) \$ 1,147,584,423 (b) 9		
	of th	ou are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the hose assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services your lients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.1	ou pro	
В.	(1)	In connection with advisory services you provide to clients, do any of your related persons have custody of any of your advisory clients':	Yes	No
		(a) cash or bank accounts?	$\odot$	$\circ$
		(b) securities?	0	•
	You	are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b).		
		If you checked "yes" to Item 9.B.(1)(a) or (b), what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for which your <i>related persons custody</i> :	have	
		U.S. Dollar Amount Total Number of <i>Clients</i>		
		(a) \$ 1,147,584,423 (b) 9		
C.	(1) (2)	ou or your <i>related persons</i> have <i>custody</i> of <i>client</i> funds or securities in connection with advisory services you provide to <i>clients</i> , check all the following that apply:  A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage.  An <i>independent public accountant</i> audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools.		
		An independent public accountant conducts an annual surprise examination of client funds and securities.		
	(4)	An <i>independent public accountant</i> prepares an internal control report with respect to custodial services when you or your <i>related persons</i> are qualified custodians for <i>client</i> funds and securities.		
	repo	ou checked Item 9.C.(2), C.(3) or C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal cort. (If you checked Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the price ds you advise in Section 7.B.(1) of Schedule D).		ol
D.	Do y	you or your related person(s) act as qualified custodians for your clients in connection with advisory services you provide to clients?	Yes	No
	(1)	you act as a qualified custodian	0	•
	(2)	your related person(s) act as qualified custodian(s)	•	0

If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be

	identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 200(4)-2 of the Advisers 7	ACI.	
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 to date (MM/YYYY) the examination commenced:	he	
F.	If you or your <i>related persons</i> have <i>custody</i> of <i>client</i> funds or securities, how many persons, including, but not limited to, you and your <i>related persons</i> , act as qualified custo for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?  1	dia	าร
SEC	CTION 9.C. Independent Public Accountant		
	bu must complete the following information for each independent public accountant engaged to perform a surprise examination, perform an audit of a pooled investment vehical transfer of the surprise of the following information for each independent public accountant.	icle	
(1	1) Name of the independent public accountant: PRICEWATERHOUSECOOPERS		
(2	2) The location of the <i>independent public accountant's</i> office responsible for the services provided:		
(2	Number and Street 1:  Number and Street 2:		
	1 NORTH WACKER DRIVE		
	City: State: Country: ZIP+4/Postal Code:		
	CHICAGO Illinois United States 60606		
		s N	.lo
(3	2) Is the independent public accountant registered with the Public Company Accounting Oversight Reard?		_
(5	S) Is the <i>independent public accountant</i> registered with the Fublic Company Accounting Oversight Board:	•	
(4	4) If yes to (3) above, is the <i>independent public accountant</i> subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	(	0
(5	5) The <i>independent public accountant</i> is engaged to:		
(-	A. ✓ audit a pooled investment vehicle		
	B. perform a surprise examination of <i>clients'</i> assets		
	C. ☐ prepare an internal control report		
(6	6) Does any report prepared by the independent public accountant that audited the pooled investment vehicle or that examined internal controls contain an unqualified opinion	on?	
	⊙ Yes		
	C No		
	C Report Not Yet Received		
	If you check "Report Not Yet Received", you must promptly file an amendment to your Form ADV to update your response when the accountant's report is available.		
	If you oncor Report Not Fet Received , you must promptly life air amendment to your Form No update your response when the accountants report is available.		
Item	n 10 Control Persons		
In th	his Item, we ask you to identify every person that, directly or indirectly, controls you.		
Sch	vou 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 office the bedule 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) are liked with your initial application or report, you must complete Schedule C.		
, ~		'es	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	•
	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 19 please complete Section 10.B. of Schedule D.	34,	
SEC	CTION 10.A. Control Persons		
	No Information Filed		
SEC	CTION 10.B. Control Person Public Reporting Companies		
B.	If any person named in Schedules A, B, or C, or in Section 10 A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of	193	4,

	please provide the following information (you must complete a separate Schedule D Section 10.B. for each public reporting company):		
	(1) Full legal name of the public reporting company:  BANK OF AMERICA CORPORA  (2) The public reporting company of CIV number (Control Index Key number that the SEC assigns to each reporting company).  70559	ATION	N
	(2) The public reporting company's CIK number (Central Index Key number that the SEC assigns to each reporting company): 70858		
Item	11 Disclosure Information		
	is Item, we ask for information about your disciplinary history and the disciplinary history of all your advisory affiliates. We use this information to determine whether to grain	nt voi	ur
арр	ication for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem are son during our on-site examinations. One event may result in "yes" answers to more than one of the questions below.	-	
part	r 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 ners, 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 artment or division" (SID) of a bank, see the Glossary of Terms to determine who your advisory affiliates are.		
the eve	ou are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date not only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date are judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.	of an	)
	must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.		
Do	any of the events below involve you or any of your supervised persons?	Yes	s No
	"yes" answers to the following questions, complete a Criminal Action DRP:		
	In the past ten years, have you or any advisory affiliate:	Yes	s No
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?	0	•
	(2) been charged with any felony?	0	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are cupending.	ırrent	tly
B.	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	0	•
	(2) been charged with a misdemeanor listed in Item 11.B.(1)?	0	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are cupending.	ırrent	tly
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	s No
	(1) found you or any advisory affiliate to have made a false statement or omission?	$\circ$	⊙
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	$\odot$	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?	$\odot$	$\circ$
	(5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity?	•	0
D.	Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:		
	(1) ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical?	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?	Ö	⊙
	(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 advisory affiliate's registration or license, or otherwise prevented you or any advisory affiliate, by order, from associating with an investment-related business or restricted your or any advisory affiliate's activity?	Ö	0
E.	Has any self-regulatory organization or commodities exchange ever:		
	(1) found you or any advisory affiliate to have made a false statement or omission?	$\circ$	$\odot$
	(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	•

ltem	12 Small Businesses			Ī
				_
	(2) Are you or any advisory affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of Item 11.H.(1)?	•	0	
	(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against you or any advisory affiliate by a state or foreign financial regulatory authority?	•	0	
	(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?	$\odot$	$\circ$	
	(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	$\circ$	$\odot$	
H.	(1) Has any domestic or foreign court:	Yes	No	
For	"yes" answers to the following questions, complete a Civil Judicial Action DRP:			
G.	Are you or any advisory affiliate now the subject of any regulatory proceeding that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?	0	•	
F.	Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or suspended?	0	•	
	(4) disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities?	0	•	

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

For purposes of this Item 12 only:

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

		Yes	No
A.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	0	0
If '	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	0	0

# Schedule A

### **Direct Owners and Executive Officers**

fiscal year?

1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.

(2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent

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

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

- (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal 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, all 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% of more or 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?  $_{\bigodot}$  Yes  $_{\bigodot}$  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%
  - less than 5% B 10% but less than 25%
- D 50% but less than 75%
- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
  - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
  - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last	DE/FE/I	Status	Date Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date of
Name, First Name, Middle Name)			Acquired MM/YYYY	Code	Person		Birth, IRS Tax No. or Employer ID No.
BANC OF AMERICA STRATEGIC INVESTMENTS CORPORATION	DE	MEMBER OF REGISTRANT	09/2006	E	Υ	N	
POWERS, EDWARD, JOHN	I	PRESIDENT AND MEMBER OF BOARD OF MANAGERS OF REGISTRANT AND RELYING ADVISER	09/2006	NA	Y	N	5619722
SMITH JR, GEORGE, W	I	MEMBER OF BOARD OF MANAGERS OF REGISTRANT AND RELYING ADVISER	11/2011	NA	Υ	N	5135360
FOWLER, CRAIG, CAMERON	I	MANAGING DIRECTOR OF REGISTRANT AND RELYING ADVISER	02/2003	NA	Υ	N	5932142
HOGANBRUEN, MATTHEW, GREGORY	I	MANAGING DIRECTOR OF REGISTRANT AND RELYING ADVISER	02/2003	NA	Y	N	5932147
PHILLIPS, JAMES, WILLIAM	I	ASSISTANT CONTROLLER OF REGISTRANT AND RELYING ADVISER	09/2006	NA	Υ	N	6057044
SHAH, SANJIV, KANU	I	MANAGING DIRECTOR OF REGISTRANT AND RELYING ADVISER	02/2003	NA	Y	N	5932151
BANC OF AMERICA STRATEGIC INVESTMENTS CORPORATION	DE	MEMBER OF RELYING ADVISER	10/2006	E	Υ	N	
BEALE, STEPHANIE, TERESE	I	TREASURER OF REGISTRANT AND RELYING ADVISER	05/2007	NA	Υ	N	5619655
BEALE, STEPHANIE, TERESE	I	CONTROLLER OF REGISTRANT	04/2013	NA	Υ	N	5619655
BEALE, STEPHANIE, TERESE	I	CONTROLLER OF RELYING ADVISER	04/2013	NA	Υ	N	5619655
COSTIGAN, GREGORY, VINCENT	I	CHIEF COMPLIANCE OFFICER OF REGISTRANT AND RELYING ADVISER	08/2013	NA	Υ	N	6005166
FOWLER, CRAIG, CAMERON	I	MEMBER OF BOARD OF MANAGERS OF REGISTRANT	11/2013	NA	Υ	N	5932142
HOGANBRUEN, MATTHEW, GREGORY	I	MEMBER OF BOARD OF MANAGERS OF REGISTRANT	11/2013	NA	Υ	N	5932147
SHAH, SANJIV, KANU	I	MEMBER OF BOARD OF MANAGERS OF REGISTRANT	11/2013	NA	Υ	N	5932151
BRINKMAN, DANIEL, JOSEPH	I	SENIOR RISK PARTNER FOR BUSINESS BANKING OF REGISTRANT	11/2013	NA	Υ	N	1259259
LIM, DANIEL, SAE WHAN	I	MEMBER OF BOARD OF MANAGERS AND SENIOR RISK EXECUTIVE OF REGISTRANT	10/2014	NA	Υ	N	5315821

#### Schedule B

#### **Indirect Owners**

- 1. Complete Schedule B only if you are submitting an initial application. 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.

	•	•	wner's status as partner, trustee, elec	cted manager, shar	eholder, or men	nber; and for	shareho	lder	s or members, the class of
	curities owned (if more than one is	,							
6. Ow	vnership codes are: C - 25% bu D - 50% bu		an 50% E - 75% or more an 75% F - Other (general partner,	trustee, or elected i	manager)				
7. (a)	In the Control Person column, ent	er "Yes"	if the <i>person</i> has <i>control</i> as defined in officers and all 25% owners, general properties of the control of t	n the Glossary of Te	rms to Form AD	•		•	
(b)	In the PR column, enter "PR" if th	e owner	is a public reporting company under S	Sections 12 or 15(d)	of the Exchange	e Act.			
(c)	Complete each column.								
FULL L	EGAL NAME (Individuals: Last	DE/FE/I	Entity in Which Interest is Owned	Status	Date Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date
	First Name, Middle Name)				Acquired MM/YYYY	Code	Person		of Birth, IRS Tax No. or Employer ID No.
BANK (	OF AMERICA CORPORATION	DE	BANC OF AMERICA STRATEGIC INVESTMENTS CORPORATION	SHAREHOLDER	06/2005	Е	Y	Υ	
	ıle D - Miscellaneous		nse to an Item or to provide any other						
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No Info	ormation Filed								
140 11110	ormation rilea								
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011011			Pog	ulatory Action					
Check	k item(s) being responded to:		Neg	diatory Action					
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□ 11		11.D(2)	□ 11.D(3)		<b>☑</b> 11.D(4)				11.D(5)
<b>1</b> 11					, ,			•	
□ 11		11.E(2) 11.G.	□ 11.E(3)		□ 11.E(4)				
	separate DRP for each event or $p$	roceedir	ng . The same event or <i>proceeding</i> ma	y be reported for m	ore than one <i>pe</i>	erson or entity	using o	ne D	RP. File with a completed
	-		e answer to Items 11.C., 11.D., 11.E., le details to each action on a separate		only one DRP to	o report detail	s related	l to t	he same event. If an event gives
PART	I								
	The person(s) or entity(ies) for who	m this D	RP is being filed is (are):						
	O You (the advisory firm) O You and one or more of your ac	h i o o m i o o	Ffiliates						
	One or more of your advisory at		milates						
	·								
	_	-	liate, give the full name of the advisory provide that number. If not, indicate "n	•			name, M	liddl	e name).
	ADV DRP - ADVISORY AFFILIATE								
	CRD Number:		This advisory affiliate is .	a Firm C an Indi	vidual				
	Registered: O Yes O No								

	CORPORATION  (Facility divides la Land First Middle)
	(For individuals, Last, First, Middle)
	☐ This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	C Yes © No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR	T II
1.	
	O SEC Other Federal O State O SRO O Foreign  (Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)  FEDERAL RESERVE BANK OF RICHMOND (THE "RESERVE BANK")
2.	Principal Sanction: Undertaking Other Sanctions:
3.	Date Initiated (MM/DD/YYYY):
	12/06/2010 © Exact C Explanation  If not exact, provide explanation:
4.	Docket/Case Number: 10-240-WA/RB-HC
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type: Derivative(s) Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided):  THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM CONDUCTED A REVIEW CONCERNING VARIOUS TYPES OF ANTI-COMPETITIVE ACTIVITY BY CERTAIN BANK OF AMERICA CORPORATION (THE "BANK") EMPLOYEES IN CONJUNCTION WITH THE SALE OF CERTAIN DERIVATIVE FINANCIAL PRODUCTS TO MUNICIPALITIES AND NON-PROFIT ORGANIZATIONS VARIOUSLY BETWEEN 1998 AND 2003. FOLLOWING THE REVIEW, THE BANK AND THE RESERVE BANK ENTERED INTO A FORMAL WRITTEN AGREEMENT TO ENSURE THAT THE BANK PROACTIVELY AND APPROPRIATELY MANAGES ITS COMPLIANCE RISK RELATED TO CERTAIN COMPETITIVELY BID TRANSACTIONS.
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: Settled
11.	Resolution Date (MM/DD/YYYY):
	12/06/2010 © Exact C Explanation
	If not exact, provide explanation:

Name:

BANK OF AMERICA

A. Were an	y of the following Sanctions Ordered (ch	neck all appropriate items)?		
☐ Mon	etary/Fine Amount: \$			
☐ Rev	ocation/Expulsion/Denial		Disgorgement/Restitution	
Cen	sure		Cease and Desist/Injunction	
☐ Bar		Е	Suspension	
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	registration with the SEC and the event was resolved in the adviser's or advisory affilia	ate's favor.
	If you are registered or registering with a <i>state securities authority</i> , you may remove a DR occurred more than ten years ago. If you are registered or registering with the SEC, you rago.	
	$\square$ This DRP should be removed from the ADV record because it was filed in error, such	as due to a clerical or data-entry mistake. Explain the circumstances:
В.	If the <i>advisory affiliate</i> is registered through the IARD system or <i>CRD</i> system, has the <i>adv</i> event? If the answer is "Yes," no other information on this DRP must be provided.	visory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the
	C Yes • No	
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to	o update its IARD or <i>CRD</i> records.
PAR	ут II	
1.	Regulatory Action initiated by:	
	C SEC Other Federal O State O SRO O Foreign  (Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)	
	INTERNAL REVENUE SERVICE ("IRS")	
2.	Principal Sanction: Restitution	
	Other Sanctions:	
3.	Date Initiated (MM/DD/YYYY):	
	12/08/2010 © Exact C Explanation If not exact, provide explanation:	
4.	Docket/Case Number: NONE	
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action	(if applicable):
6.	Principal Product Type: Derivative(s)	
	Other Product Types:	
7.	Describe the allegations related to this regulatory action (your response must fit within the	e space provided):
	BANK OF AMERICA CORPORATION (THE "BANK") VIOLATED CERTAIN BIDDING REQUINVESTMENT CONTRACTS, AND ENTERED INTO CERTAIN INVESTMENT AND/OR SWADID NOT REFLECT THE FAIR MARKET VALUE OF THOSE CONTRACTS.	
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 A	Appeal Filed:
lf F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.	
10.	How was matter resolved: Settled	
11.	Resolution Date (MM/DD/YYYY):	
	12/08/2010 © Exact C Explanation	
	If not exact, provide explanation:	
12.	Resolution Detail:	
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?	
	Monetary/Fine Amount: \$	
	Revocation/Expulsion/Denial	Disgorgement/Restitution
	☐ Censure ☐ Bar	☐ Cease and Desist/Injunction ☐ Suspension
	B. Other Sanctions <i>Ordered:</i>	E Gasponsion

#### RESTITUTION IN THE AMOUNT OF \$25,000,000

Sanction detail: if suspended, *enjoined* or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an *advisory affiliate* date paid and if any portion of penalty was waived:

ON DECEMBER 8, 2010, THE BANK ENTERED INTO A CLOSING AGREEMENT WITH THE IRS THAT ADDRESSED THE BANK'S VIOLATION OF CERTAIN BIDDING REQUIREMENTS SET FORTH IN THE TREASURY REGULATIONS RELATED TO CERTAIN INVESTMENT CONTRACTS, AND THE BANK'S ENTERING INTO CERTAIN INVESTMENT AND/OR SWAP CONTRACTS (OR PROVIDING BIDS TO ENTER INTO SUCH CONTRACTS) THAT DID NOT REFLECT THE FAIR MARKET VALUE OF THOSE CONTRACTS. THE BANK AGREED TO PAY THE IRS \$25,000,000 AS RESTITUTION FOR ARBITRAGE REBATE PAYMENTS AND OTHER AMOUNTS THAT WOULD HAVE BEEN PAYABLE TO THE IRS AS A RESULT OF THE CONDUCT AND THE BANK RECEIVED A RELEASE RELATED TO ITS PARTICIPATION IN, BIDS FOR, OR STATEMENTS OR OMISSIONS RELATED TO ANY CONTRACTS THAT THE BANK BID ON FROM 1998 THROUGH 2006.

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).

ON DECEMBER 8, 2010, THE BANK ENTERED INTO A CLOSING AGREEMENT WITH THE IRS THAT ADDRESSED THE BANK'S VIOLATION OF CERTAIN BIDDING REQUIREMENTS SET FORTH IN THE TREASURY REGULATIONS RELATED TO CERTAIN INVESTMENT CONTRACTS, AND THE BANK'S ENTERING INTO CERTAIN INVESTMENT AND/OR SWAP CONTRACTS (OR PROVIDING BIDS TO ENTER INTO SUCH CONTRACTS) THAT DID NOT REFLECT THE FAIR MARKET VALUE OF THOSE CONTRACTS. THE BANK AGREED TO PAY THE IRS \$25,000,000 AS RESTITUTION FOR ARBITRAGE REBATE PAYMENTS AND OTHER AMOUNTS THAT WOULD HAVE BEEN PAYABLE TO THE IRS AS A RESULT OF THE CONDUCT AND THE BANK RECEIVED A RELEASE RELATED TO ITS PARTICIPATION IN, BIDS FOR, OR STATEMENTS OR OMISSIONS RELATED TO ANY CONTRACTS THAT THE BANK BID ON FROM 1998 THROUGH 2006.

		GENERAL INSTRU	ICTIONS	
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check item(s) being	☐ 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)	L 11.D(3)
11.E(1)	□ 11.G.	L 11.L(3)	L 11.L(4)	
	P for each event or <i>proceeding</i> . The same	e event or <i>proceeding</i> may be repor	ted for more than one <i>person</i> or entit	y using one DRP. File with a completed
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	or entity(ies) for whom this DRP is being f	filed is (are):		
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If you are registered or registering with a *state securities authority*, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years

This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.			
	C Yes O No			
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.			
PAR	ГІІ			
1.	Regulatory Action initiated by:  O SEC Other Federal O State O SRO O Foreign			
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM			
2.	Principal Sanction: Cease and Desist Other Sanctions: REMEDIATION ACTIONS			
3.	Date Initiated (MM/DD/YYYY):			
	04/13/2011 © Exact C Explanation			
	If not exact, provide explanation:			
4.	Docket/Case Number: 11-029-B-HC			
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):			
6.	Principal Product Type: Other Other Product Types:			
	RESIDENTIAL MORTGAGE LOAN SERVICING			
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided):  ON APRIL 13, 2011, THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM ("FEDERAL RESERVE") ISSUED A CEASE AND DESIST CONSENT ORDER ("CONSENT ORDER") AGAINST BANK OF AMERICA CORPORATION ("BAC"). THE CONSENT ORDER MAKES NO FINDING ON ANY ISSUES OF FACT OR LAW OR ANY EXPLICIT ALLEGATION CONCERNING BAC. THE CONSENT ORDER DESCRIBES A CONSENT ORDER THAT THE OFFICE OF THE COMPTROLLER OF THE CURRENCY ("OCC") AND BANK OF AMERICA, N.A. (THE "BANK"), WHICH IS OWNED AND CONTROLLED BY BAC, ENTERED INTO ADDRESSING AREAS OF WEAKNESS IDENTIFIED BY THE OCC IN LOAN SERVICING, LOSS MITIGATION, FORECLOSURE ACTIVITIES, AND RELATED FUNCTIONS BY THE BANK. THE CONSENT ORDER ALSO STATES THAT THE OCC'S FINDINGS RAISED CONCERNS THAT BAC DID NOT ADEQUATELY ASSESS THE POTENTIAL RISKS ASSOCIATED WITH SUCH ACTIVITIES OF THE BANK. THE CONSENT ORDER DIRECTS THE BOARD OF DIRECTORS OF BAC TO TAKE APPROPRIATE STEPS TO ENSURE THAT THE BANK COMPLIES WITH THE OCC CONSENT ORDER.			
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:			
lf Fi	nal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.			
10.	How was matter resolved: Order			
11.	Resolution Date (MM/DD/YYYY):			
	04/13/2011 © Exact C Explanation			
	If not exact, provide explanation:			
12.	Resolution Detail:			
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?			
	☐ Monetary/Fine Amount: \$ ☐ Poyagetion/Fygulaign/Deniel ☐ Diagorgament/Restitution			
	☐ Revocation/Expulsion/Denial ☐ Disgorgement/Restitution ☐ Censure ☐ Cease and Desist/Injunction			
	,			
	·			
	B. Other Sanctions Ordered:			

### REMEDIATION ACTIONS

Sanction detail: if suspended, *enjoined* or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an *advisory affiliate* date paid and if any portion of penalty was waived:

THE CONSENT ORDER REQUIRES BAC AND ITS INSTITUTION-AFFILIATED PARTIES TO CEASE AND DESIST AND TAKE SPECIFIED AFFIRMATIVE ACTION, INCLUDING THAT BAC OR ITS BOARD: (1) TAKE STEPS TO ENSURE THE BANK COMPLIES WITH THE OCC ORDER; (2) SUBMIT WRITTEN PLANS TO STRENGTHEN THE BOARD'S OVERSIGHT OF RISK MANAGEMENT, INTERNAL AUDIT, AND COMPLIANCE PROGRAMS CONCERNING CERTAIN MORTGAGE LOAN SERVICING, LOSS MITIGATION, AND FORECLOSURE ACTIVITIES CONDUCTED THROUGH THE BANK; AND (3) PERIODICALLY SUBMIT WRITTEN PROGRESS REPORTS DETAILING THE FORM AND MANNER OF ALL ACTIONS TAKEN TO SECURE COMPLIANCE WITH THE CONSENT ORDER.

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).

BAC SUBMITTED AN OFFER OF SETTLEMENT TO THE FEDERAL RESERVE. IN THE OFFER OF SETTLEMENT, BAC AGREED TO CONSENT TO THE ENTRY OF THE CONSENT ORDER, WITHOUT THE CONSENT ORDER CONSTITUTING AN ADMISSION BY BAC OR ANY OF ITS SUBSIDIARIES OF ANY ALLEGATION MADE OR IMPLIED BY THE FEDERAL RESERVE IN CONNECTION WITH THE MATTER. THE CONSENT ORDER WAS ISSUED ON APRIL 13, 2011, THE HIGHLIGHTS OF WHICH ARE DESCRIBED ABOVE IN ITEM 7. THE SANCTIONS IMPOSED ARE EXPLAINED ABOVE IN ITEM 12.C.

		GENERAL INSTRU	ICTIONS	
This Disclosure Rep	porting Page (DRP ADV) is an 💍 INITIA	AL OR	to report details for affirmative respon	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Form ADV.				
		Regulatory Act	tion	
Check item(s) being	g responded to:			
☐ 11.C(1)	<b>☑</b> 11.C(2)	☐ 11.C(3)	<b>☑</b> 11.C(4)	<b>☑</b> 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.			
Use a separate DRF Execution Page.	P for each event or <i>proceeding</i> . The sar	me event or <i>proceeding</i> may be repor	ted for more than one <i>person</i> or entit	ty using one DRP. File with a completed
	ult in more than one affirmative answer to ore than one regulator, provide details to		1.G. Use only one DRP to report deta	ails related to the same event. If an event gives
PART I				
A. The person(s)  You (the ac	or entity(ies) for whom this DRP is being dvisory firm)	g filed is (are):		
O You and or	ne or more of your advisory affiliates			
	re of your advisory affiliates			
	peing filed for an <i>advisory affiliate</i> , give the affiliate has a CRD number, provide that	<u> </u>	•	•
ADV DRP - AD	OVISORY AFFILIATE			
CRD Number:	-	This advisory affiliate is 🌀 a Firm 🤇	an Individual	
Registered:	O Yes ⊙ No			
Name:	BANK OF AMERICA CORPORATION			
	(For individuals, Last, First, Middle)			
This DRP	should be removed from the ADV record should be removed from the ADV record n with the SEC and the event was resolv	because: (1) the event or proceeding	g occurred more than ten years ago o	or (2) the adviser is registered or applying for
•				ponse to Item 11.D(4), and only if that event in Item 11 that occurred more than ten years
This DRP	should be removed from the ADV record	d because it was filed in error, such a	s due to a clerical or data-entry mista	ike. Explain the circumstances:

B. If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the

	O Yes • No	
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to	o update its IARD or <i>CRD</i> records.
AR	RT II	
۱.	Regulatory Action initiated by:	
	SEC Other Federal OState OSRO OForeign	
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) SECURITIES AND EXCHANGE COMMISSION	
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions: CEASE AND DESIST	
3.	Date Initiated (MM/DD/YYYY):	
	09/29/2014	
1.	Docket/Case Number: 3-16177	
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action	(if applicable):
3.	Principal Product Type:	
	No Product	
	Other Product Types:	
7.	Describe the allegations related to this regulatory action (your response must fit within the THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") ALLEGED THAT BAN CALCULATIONS, FAILED TO DEDUCT CERTAIN REALIZED LOSSES ON CERTAIN STR BY MERRILL LYNCH & CO., INC. ("ML&CO.") THAT BAC ASSUMED OR ACQUIRED AS PAREGULATORY CAPITAL IN ITS FORM 10-Q FILINGS FROM 2009-2014 AND IN ITS FORM THAT BAC VIOLATED SECTION 13(B)(2)(A) AND (B) OF THE EXCHANGE ACT.	IK OF AMERICA CORPORATION ("BAC"), AS PART OF ITS REGULATORY CAPITAL UCTURED NOTES AND OTHER FINANCIAL INSTRUMENTS (THE "NOTES") ISSUED ART OF ITS ACQUISITION OF ML&CO. AND, THEREFORE, BAC OVERSTATED ITS
3.	Current Status? C Pending C On Appeal Final	
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date A	Appeal Filed:
f Fi	Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.	
10.	D. How was matter resolved:	
	Settled	
11.	Resolution Date (MM/DD/YYYY):	
	09/29/2014	
	If not exact, provide explanation:	
12.	2. Resolution Detail:	
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?	
	✓ Monetary/Fine Amount: \$ 7,650,000.00	
	Revocation/Expulsion/Denial	☐ Disgorgement/Restitution
	☐ Censure	✓ Cease and Desist/Injunction
	☐ Bar	Suspension
	B. Other Sanctions Ordered:	
	N/A	
	Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date. Principal, etc.). If requalification by exam/retraining was a condition of the sanction, production has been satisfied. If disposition resulted in a fine, penalty, restitution, disposition or an advisory affiliate date paid and if any portion of penalty was waived:	rovide length of time given to requalify/retrain, type of exam required and whether

BAC, WITHOUT ADMITTING OR DENYING THE COMMISSION'S FINDINGS, EXCEPT AS TO THE COMMISSION'S JURISDICTION OVER IT AND THE SUBJECT MATTER

event? If the answer is "Yes," no other information on this DRP must be provided.

OF THE PROCEEDINGS, AGREED TO (1) CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTIONS 13(B)(2)(A) AND 13(B)(2)(B) OF THE EXCHANGE ACT, AND (2) PAY A CIVIL MONEY PENALTY OF \$7,650,000. THE PENALTY WAS PAID ON OCTOBER 7, 2014. 13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided). THE COMMISSION NOTED THAT BAC SELF IDENTIFIED AND SELF REPORTED THE OVERSTATEMENTS AND THE COMMISSION NOTED THAT BAC HAD PROVIDED SUBSTANTIAL COOPERATION TO THE COMMISSION STAFF. THE COMMISSION ALSO NOTED THAT BAC HAD VOLUNTARILY UNDERTAKEN STEPS TO REMEDIATE AND ADDRESS, AMONG OTHER THINGS, THE INADEQUATE BOOKS AND RECORDS AND INTERNAL ACCOUNTING CONTROL DEFICIENCIES THAT WERE THE SUBJECT OF THE PROCEEDING. GENERAL INSTRUCTIONS This Disclosure Reporting Page (DRP ADV) is an C INITIAL OR OR AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV. Regulatory Action Check item(s) being responded to: 11.C(1) **☑** 11.C(2) 11.C(3) **☑** 11.C(4) **☑** 11.C(5) 11.D(3) 11.D(4) 11.D(1) 11.D(2) 11.D(5) 11.E(1) 11.E(2) 11.E(3) 11.E(4) 11.F. 11.G. Use a separate DRP for each event or proceeding. The same event or proceeding may be reported for more than one person or entity using one DRP. File with a completed Execution Page. One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details to each action on a separate DRP. PART I A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are): You (the advisory firm) C You and one or more of your advisory affiliates One or more of your advisory affiliates If this DRP is being filed for an advisory affiliate, give the full name of the advisory affiliate below (for individuals, Last name, First name, Middle name). If the advisory affiliate has a CRD number, provide that number. If not, indicate "non-registered" by checking the appropriate box. ADV DRP - ADVISORY AFFILIATE CRD This advisory affiliate is 
a Firm an Individual Number: Registered: O Yes O No BANK OF AMERICA Name: **CORPORATION** (For individuals, Last, First, Middle) This DRP should be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or advisory affiliate's favor. If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances: If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided. C Yes © No NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records. PART II Regulatory Action initiated by:

	SEC ○ Other Federal ○ State ○ SRO ○ Foreign	
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) SECURITIES AND EXCHANGE COMMISSION	
2.	Principal Sanction:     Civil and Administrative Penalt(ies) /Fine(s)     Other Sanctions:	
	CEASE AND DESIST	
3.	Date Initiated (MM/DD/YYYY):	
	08/21/2014 © Exact C Explanation  If not exact, provide explanation:	
4.	4. Docket/Case Number: ADMINISTRATIVE PROCEEDING NO. 3-16028	
5.	5. Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if a	oplicable):
6.	6. Principal Product Type: No Product Other Product Types:	
7.	7. Describe the allegations related to this regulatory action (your response must fit within the spanner of the Securities and exchange commission ("Commission") alleged that bank of disclosures in the management's discussion and analysis and results of of uncertainties as to whether certain costs related to loans bac would ull would have a material effect on bac's future income from continuing oper the exchange act and rules 12B-20 and 13A-13 thereunder.	F AMERICA CORPORATION ("BAC") FAILED TO MAKE REQUIRED PERATIONS ("MD&A") SECTIONS OF PERIODIC FILINGS, RELATED TO KNOWN TIMATELY BE REQUIRED TO REPURCHASE FROM CERTAIN INSURERS
8.	8. Current Status? C Pending C On Appeal  Final	
9.	9. If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appea	al Filed:
lf Fi	If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.	
10.	10. How was matter resolved:	
	Settled	
11.	11. Resolution Date (MM/DD/YYYY):	
	08/21/2014 © Exact © Explanation  If not exact, provide explanation:	
12.	12. Resolution Detail:	
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?	
	<ul><li>✓ Monetary/Fine Amount: \$ 20,000,000.00</li><li>✓ Revocation/Expulsion/Denial</li></ul>	Disgorgement/Restitution
	·	Cease and Desist/Injunction
		Suspension
	B. Other Sanctions <i>Ordered:</i> N/A	
	Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date at Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorge you or an <i>advisory affiliate</i> date paid and if any portion of penalty was waived:  BAC AGREED TO (1) CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLEXCHANGE ACT AND RULES 12B-20 AND 13A-13 PROMULGATED THEREUNDER; ANI	le length of time given to requalify/retrain, type of exam required and whether ement or monetary compensation, provide total amount, portion levied against ATIONS AND ANY FUTURE VIOLATIONS OF SECTION 13(A) OF THE
13.	<ol> <li>Provide a brief summary of details related to the action status and (or) disposition and include provided).</li> </ol>	relevant terms, conditions and dates (your response must fit within the space
	BAC ADMITTED TO CERTAIN FACTS SET OUT IN AN ANNEX TO THE ADMINISTRATIVE ORD THE ADMINISTRATIVE ORDER VIOLATED THE FEDERAL SECURITIES LAW AND ADMITTED	

OF THE PROCEEDINGS.

			GENERAL INSTRUCT	TIONS	
This	Disclosure Reporting Page (D	RP ADV) is an 👝 INITI	AL OR	report details for affirmative respo	onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Fo	orm ADV.				
			Regulatory Action	1	
	ck item(s) being responded to:			, mary	_
	11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
	11.D(1)	□ 11.D(2)	□ 11.D(3)	<b>☑</b> 11.D(4)	☐ 11.D(5)
	11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
	11.F.	□ 11.G.			
Exec	cution Page. event may result in more than	one affirmative answer		·	ity using one DRP. File with a completed ails related to the same event. If an event gives
PAR	TI				
_		wukam thia DDD is hair	ar filad is (ara).		
Α.	, , , , , , , ,	ir whom this DRP is beir	ig filed is (are).		
	O You (the advisory firm)				
	C You and one or more of you	our advisory affiliates			
	One or more of your advis	ory affiliates			
		· · · · · ·	the full name of the <i>advisory affiliate</i> belo at number. If not, indicate "non-registered	•	·
	ADV DRP - ADVISORY AFFILIATE				
	CRD		This advisory affiliate is • a Firm • a	an Individual	
	Number:			an marviadai	
	Registered: O Yes O	No			
	Name: BANK OF AM				
	CORPORATI				
		als, Last, First, Middle)			
	This DRP should be remo	oved from the ADV recor	ed because the advisory affiliate(s) is no lead because: (1) the event or proceeding oved in the adviser's or advisory affiliate's	ccurred more than ten years ago	r. or (2) the adviser is registered or applying for
		-			sponse to Item 11.D(4), and only if that event I in Item 11 that occurred more than ten years
	☐ This DRP should be remo	oved from the ADV recor	rd because it was filed in error, such as d	ue to a clerical or data-entry mista	ake. Explain the circumstances:
B.	If the advisory affiliate is regist event? If the answer is "Yes,"		-	∕ affiliate submitted a DRP (with F	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	C Yes ⊙ No				
	NOTE: The completion of this	form does not relieve th	ne advisory affiliate of its obligation to upo	date its IARD or <i>CRD</i> records.	
PAR	ΤII				
1.					
	C SEC	State O SRO O Fo	oreign		
		gn financial regulatory at	uthority, federal, state, or SRO)		
2.	Principal Sanction: Civil and Administrative Pena Other Sanctions:	ult(ies) /Fine(s)			

CEASE AND DESIST OTHER REMEDIAL ACTIONS

٥.	Date Illitiated (MIN/DD/1111).
	05/20/2015 © Exact C Explanation  If not exact, provide explanation:
4.	Docket/Case Number: 15-010-B-HC, 15-010-CMP-HC
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type: Other Other Product Types: FOREIGN EXCHANGE
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided):  ON MAY 20, 2015, THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM ("FRB") ISSUED AN ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY AGAINST BANK OF AMERICA CORPORATION ("BAC") RELATING TO ITS FOREIGN EXCHANGE ("FX") ACTIVITIES ("ORDER") FROM 2008 THROUGH 2013. THE ORDER STATES THAT (A) BAC LACKED ADEQUATE FIRM-WIDE GOVERNANCE, RISK MANAGEMENT, COMPLIANCE AND AUDIT POLICIES AND PROCEDURES TO ENSURE THAT CERTAIN OF THE FIRM'S FX ACTIVITIES COMPLIED WITH SAFE AND SOUND BANKING PRACTICES, APPLICABLE U.S LAWS AND REGULATIONS, INCLUDING POLICIES AND PROCEDURES TO PREVENT POTENTIAL VIOLATIONS OF THE U.S. COMMODITIES, ANTITRUST AND CRIMINAL FRAUD LAWS, AND APPLICABLE INTERNAL POLICIES; (B) BAC'S DEFICIENT POLICIES AND PROCEDURES PREVENTED BAC FROM DETECTING AND ADDRESSING PERIODIC CONDUCT BY BANK OF AMERICA, N.A.'S TRADERS RELATING TO CERTAIN COMMUNICATIONS BY THESE TRADERS; AND (C) AS A RESULT OF DEFICIENT POLICIES AND PROCEDURES DESCRIBED ABOVE, BAC ENGAGED IN UNSAFE AND UNSOUND BANKING PRACTICES.
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:
lf Fi	nal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved: Settled
11.	Resolution Date (MM/DD/YYYY):
	05/20/2015 © Exact C Explanation  If not exact, provide explanation:
12	Resolution Detail:
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?
	✓ Monetary/Fine Amount: \$ 205,000,000.00
	☐ Revocation/Expulsion/Denial ☐ Disgorgement/Restitution
	☐ Censure
	☐ Bar ☐ Suspension
	B. Other Sanctions Ordered: REMEDIAL ACTIONS Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an advisory affiliate date paid and if any portion of penalty was waived:  IN THE ORDER, BAC AGREED TO PAY A CIVIL MONEY PENALTY IN THE TOTAL AMOUNT OF \$205 MILLION AND CONTINUE TO IMPLEMENT ADDITIONAL IMPROVEMENTS IN ITS INTERNAL CONTROLS, COMPLIANCE, RISK MANAGEMENT, AND AUDIT PROGRAMS FOR THE FX ACTIVITIES IN ORDER TO COMPLY WITH BAC POLICIES, SAFE AND SOUND BANKING PRACTICES, AND APPLICABLE U.S. LAWS/REGULATION. SPECIFICALLY, BAC AGREED: (A) BAC SHALL SUBMIT A WRITTEN PLAN TO IMPROVE SENIOR MANAGEMENT'S OVERSIGHT OF BAC'S COMPLIANCE WITH APPLICABLE U.S. LAWS/REGULATIONS AND INTERNAL POLICIES IN CONNECTION WITH CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES; (B) BAC SHALL SUBMIT AN ENHANCED WRITTEN INTERNAL CONTROLS AND COMPLIANCE OMPLY WITH APPLICABLE U.S. LAWS/REGULATIONS WITH RESPECT TO CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES; (C) BAC SHALL SUBMIT A WRITTEN PLAN TO IMPROVE ITS COMPLIANCE RISK MANAGEMENT PROGRAM WITH REGARD TO COMPLIANCE WITH APPLICABLE U.S. LAWS/REGULATIONS WITH RESPECT TO CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES; (D) BAC MANAGEMENT SHALL ANNUALLY CONDUCT A REVIEW OF COMPLIANCE POLICIES AND PROCEDURES APPLICABLE TO CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES AND THEIR IMPLEMENTATION AND AN APPROPRIATE RISK-FOCUSED SAMPLING OF OTHER KEY CONTROLS FOR CERTAIN WHOLESALE TRADING AND SALES ACTIVITIES AND THEIR IMPLEMENTATION AND AN APPROPRIATE RISK-FOCUSED SAMPLING OF OTHER KEY CONTROLS FOR CERTAIN WHOLESALE TRADING AND SALES A

[CONTINUED FROM 12.C. ABOVE] (F) BAC SHALL NOT IN THE FUTURE DIRECTLY OR INDIRECTLY RETAIN ANY INDIVIDUAL AS AN OFFICER, EMPLOYEE, AGENT,

provided).

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space

CONSULTANT, OR CONTRACTOR OF BAC OR OF ANY SUBSIDIARY WHO, BASED ON THE INVESTIGATIVE RECORD COMPILED BY U.S. AUTHORITIES, PARTICIPATED IN THE MISCONDUCT UNDERLYING THE ORDER, HAS BEEN SUBJECT TO FORMAL DISCIPLINARY ACTION AS A RESULT OF BAC'S INTERNAL DISCIPLINARY REVIEW OR PERFORMANCE REVIEW IN CONNECTION WITH THE CONDUCT, AND HAS EITHER SEPARATED FROM BAC OR ANY SUBSIDIARY THEREOF OR HAD HIS/HER EMPLOYMENT TERMINATED IN CONNECTION WITH THE CONDUCT. IN SETTLEMENT OF THIS MATTER, BAC CONSENTED AND AGREED TO THE ISSUANCE OF THE ORDER, WHICH THE FRB HAS DETERMINED TO ACCEPT AND HAS ISSUED. THE ALLEGATIONS, DISPOSITIONS, FINDINGS AND SANCTIONS OF THE ORDER ARE DESCRIBED ABOVE IN ITEMS 7 AND 12.

CIVIL	JUDICIAL ACTION DISC	CLOSURE REPORTING PAGE (ADV)	)		
			GENERAL INST		
This	Disclosure Reporting P	age (DRP ADV) is an 💍 INITIAL 🕻	OR · AMENDED response us	ed to report details for affirmative re	esponses to Item 11.H. of Part 1A or Item 2.F. of Part
1B o	of Form ADV.				
			Civil Jud	icial	
Che	ck Part 1A item(s) being	responded to:			
	11.H(1)(a)	<b>☑</b> 11.H(1)(b)		☐ 11.H(1)(c)	□ 11.H(2)
Che	ck Part 1B item(s) being	g responded to:			
	2.F(1)	2.F(2)	2.F(3)	□ 2.F(4)	□ 2.F(5)
	a separate DRP for eac	ch event or <i>proceeding</i> . The same	event or <i>proceeding</i> may be re	ported for more than one <i>person</i> or	rentity using one DRP. File with a completed
		re than one affirmative answer to Ite orted on separate DRPs.	em 11.H. of Part 1A or Item 2.F.	of Part 1B. Use only one DRP to re	eport details related to the same event. Unrelated civil
PAR	ті				
A.	The person(s) or entity	(ies) for whom this DRP is being fil	led is (are):		
	C You (the advisory fi	irm)			
	C You and one or mo	re of your advisory affiliates			
	One or more of you				
		advisory affiliates			
	If this DRP is being file	ed for an <i>advisory affiliat</i> e, give the	full name of the advisory affiliat	e below (for individuals, Last name	, First name, Middle name).
	If the advisory affiliate I	has a <i>CRD</i> number, provide that nu	umber. If not, indicate "non-regi	stered" by checking the appropriate	e box.
	ADV DRP - ADVISORY	/ AFFILIATE			
	CRD	This	s advisory affiliate is 🗿 a Firm	C an Individual	
	Number:				
	Registered: C Ye	es 💿 No			
		OF AMERICA			
		PORATION ndividuals, Last, First, Middle)			
	(FOI II	idividuals, Last, First, Middle)			
	This DRP should b	e removed from the ADV record be re removed from the ADV record be e SEC and the event was resolved	ecause: (1) the event or procee	ding occurred more than ten years	viser. ago or (2) the adviser is registered or applying for
		-			n response to Item 11.H.(1)(a), and only if that event isted in Item 11 that occurred more than ten years
	☐ This DRP should b	e removed from the ADV record be	ecause it was filed in error, suc	h as due to a clerical or data-entry	mistake. Explain the circumstances:
B.	<del>-</del>	is registered through the IARD syst "Yes," no other information on this	<u>-</u>	dvisory affiliate submitted a DRP (w	ith Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	C Yes O No		·		
	NOTE: The completion	of this form does not relieve the a	dvisory affiliate of its obligation	to update its IARD or <i>CRD</i> records	

#### PART II

1. Court Action initiated by: (Name of regulator, *foreign financial regulatory authority, SRO*, commodities exchange, agency, firm, private plaintiff, etc.) SECURITITES AND EXCHANGE COMMISSION

۷.	Civil Penalty(ies)/Fine(s) Other Relief Sought: INJUNCTION						
3.	Filing Date of Court Action (MM/DD/YYYY):						
	01/12/2010  Exact  Suplanation  If not exact, provide explanation:						
4.	Principal Product Type: No Product Other Product Types:						
5.	Formal Action was brought in (include name of Federal, State or Foreign U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK	Court, Location of Court - City or County <u>and</u> State or Country, Docket/Case Number): K; 10-CV-0215(JSR)					
6.	Advisory Affiliate Employing Firm when activity occurred which led to the	civil judicial action (if applicable):					
7.	THE SECURITIES AND EXCHANGE COMMISSION ("SEC") ALLEGED TH	AT BANK OF AMERICA CORPORATION (THE "CORPORATION") VIOLATED THE FEDERAL PROXY RILL LYNCH & CO., INC.'S KNOWN AND ESTIMATED LOSSES IN THE FOURTH QUARTER OF 2008					
8.	Current Status? C Pending C On Appeal  Final						
9.	If on appeal, action appealed to (provide name of court) and Date Appeal Filed (MM/DD/YYYY):						
10.	). If pending, date notice/process was served (MM/DD/YYYY):						
lf Fi	Final or On Appeal, complete all items below. For Pending Actions, complet	e Item 14 only.					
11.	. How was matter resolved:  Consent						
12.	2. Resolution Date (MM/DD/YYYY):						
	02/24/2010  Exact Explanation If not exact, provide explanation:						
13.	3. Resolution Detail:						
	A. Were any of the following Sanctions Ordered or Relief Granted(che	ck appropriate items)?					
	Monetary/Fine Amount: \$ 150,000,000.00						
	Revocation/Expulsion/Denial	✓ Disgorgement/Restitution					
	☐ Censure	☐ Cease and Desist/Injunction					
	☐ Bar	☐ Suspension					
	B. Other Sanctions:						
	THE CORPORATION AGREED, FOR A PERIOD OF THREE YEARS, CORPORATE GOVERNANCE AND DISCLOSURE PRACTICES.	, TO COMPLY WITH AND MAINTAIN CERTAIN REQUIREMENTS RELATED TO THE CORPORATION'S					
	Principal, etc.). If requalification by exam/retraining was a condition of	including start date and capacities affected (General Securities Principal, Financial Operations of the sanction, provide length of time given to requalify/retrain, type of exam required and whether y, restitution, disgorgement or monetary compensation, provide total amount, portion levied against us waived:					
14.	provided)	ation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space					
	•	MILLION CIVIL PENALTY TO BE DISTRIBUTED TO SHAREHOLDERS AS PART OF THE SEC'S FAIR					

FUNDS PROGRAM AT A LATER DATE IN ACCORDANCE WITH FURTHER ORDER OF THE COURT. IN ADDITION, AS PART OF THE FINAL JUDGMENT, THE CORPORATION

AGREED, FOR A PERIOD OF THREE YEARS, TO COMPLY WITH AND MAINTAIN CERTAIN REQUIREMENTS RELATED TO THE CORPORATION'S CORPORATE

GOVERNANCE AND DISCLOSURE PRACTICES.

This	Disclosure Rep	oorting Page (DRP ADV) i	s an C INITIAL on C	GENERAL INS		e responses to Item 11.H. of Part 1A or Item 2.F. of Part
	f Form ADV.		OR W	•		
				Civil Ju	dicial	
Che	ck Part 1A item	(s) being responded to:		OIVII Gu	arorar	
	11.H(1)(a)	(3) being responded to.	☐ 11.H(1)(b)		<b>☑</b> 11.H(1)(c)	□ 11.H(2)
Che	ck Part 1B item	(s) being responded to:				
	2.F(1)	2.F(2)	)	2.F(3)	□ 2.F(4)	□ 2.F(5)
Exec	cution Page. event may resu		ative answer to Item 11.			or entity using one DRP. File with a completed preport details related to the same event. Unrelated civil
PAR	ΤI					
A.	The person(s)	or entity(ies) for whom thi	s DRP is being filed is	(are):		
	O You (the ac	dvisory firm)				
	O You and or	ne or more of your advisor	v affiliates			
		re of your advisory affiliate				
		advisory arimate	,,			
					te below (for individuals, Last nar gistered" by checking the appropri	•
	ADV DRP - AD	OVISORY AFFILIATE				
	CRD Number:		This advi	sory affiliate is 🌀 a Firn	n C an Individual	
	Registered:	C Yes © No				
	Name:	BANK OF AMERICA CORPORATION				
		(For individuals, Last, F	irst, Middle)			
	This DRP		he ADV record because	e: (1) the event or procee		adviser. rs ago or (2) the adviser is registered or applying for
	-			• •	-	y in response to Item 11.H.(1)(a), and only if that event at listed in Item 11 that occurred more than ten years
	☐ This DRP	should be removed from t	he ADV record because	e it was filed in error, suc	ch as due to a clerical or data-ent	ry mistake. Explain the circumstances:
B.		affiliate is registered throunswer is "Yes," no other in			dvisory affiliate submitted a DRP	(with Form ADV, BD or U-4) to the IARD or CRD for the
	C Yes € N	0				
	NOTE: The co	mpletion of this form does	not relieve the advisor	ry affiliate of its obligation	to update its IARD or <i>CRD</i> recor	ds.
PAR	TII					
1.		itiated by: (Name of regulations of the STATE (	•	egulatory authority, SRO,	, commodities exchange, agency,	firm, private plaintiff, etc.)
2.	Principal Relie	es)/Fine(s)				
	Other Relief Son DISGORGEME	ought: ENT; INJUNCTION; RESTI	TUTION; ATTORNEYS	FEES AND OTHER EQU	JITABLE RELIEF	
3.	Filing Date of C	Court Action (MM/DD/YYYY	<b>'</b> ):			

02/04/2010 © Exact © Explanation

4.	Principal Product Type:				
	No Product				
	Other Product Types:				
5.	Formal Action was brought in (include name of Federal, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case Number): SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF NEW YORK				
6.	Advisory Affiliate Employing Firm when activity occurred which led to the civil judicial action (if applicable):				
7.	Describe the allegations related to this civil action (your response must fit within the space provided): THE ATTORNEY GENERAL OF THE STATE OF NEW YORK ALLEGES THAT BANK OF AMERICA CORPORATION ("BAC"), ITS FORMER CEO KENNETH D. LEWIS AND ITS FORMER CFO JOSEPH L. PRICE ENGAGED IN ACTS AND PRACTICES IN CONNECTION WITH THE MERGER (THE "MERGER") BETWEEN BAC AND MERRILL LYNCH & CO. INC. ("MERRILL LYNCH") THAT VIOLATED CERTAIN PROVISIONS OF THE NEW YORK GENERAL BUSINESS LAW (THE "MARTIN ACT") AND THE NEW YORK EXECUTIVE LAW.				
8.	Current Status? C Pending C On Appeal  Final				
9.	If on appeal, action appealed to (provide name of court) and Date Appeal Filed (MM/DD/YYYY):				
10	If pending, date notice/process was served (MM/DD/YYYY):				
10.					
	02/04/2010 Exact Explanation  If not exact, provide explanation:				
	ii not exact, provide explanation.				
If F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.				
11.	How was matter resolved: Settled				
12.	Resolution Date (MM/DD/YYYY):				
	03/25/2014 © Exact © Explanation				
	If not exact, provide explanation:				
	in not oxact, provide explanation.				
13.	Resolution Detail:				
10.	A. Were any of the following Sanctions Ordered or Relief Granted(check appropriate items)?				
	Monetary/Fine Amount: \$				
	Revocation/Expulsion/Denial  Disgorgement/Restitution				
	☐ Censure ☐ Cease and Desist/Injunction				
	☐ Bar ☐ Suspension				
	·				
	B. Other Sanctions:  BAC AGREED TO PAY THE NEW YORK ATTORNEY GENERAL \$15,000,000 (AS COSTS OF INVESTIGATION AND SUBSEQUENT LITIGATION) AS WELL AS MAKING SEVERAL CORPORATE GOVERNANCE CHANGES.				
	C. Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> date paid and if any portion of penalty was waived:  BAC AGREED TO PAY THE NEW YORK ATTORNEY GENERAL \$15,000,000 (AS COSTS OF INVESTIGATION AND SUBSEQUENT LITIGATION) AS WELL AS MAKING SEVERAL CORPORATE GOVERNANCE CHANGES.				
14.	Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided)				
	ON FEBRUARY 4, 2010, THE NEW YORK ATTORNEY GENERAL FILED A CIVIL COMPLAINT IN THE SUPREME COURT OF NEW YORK STATE, ENTITLED PEOPLE OF THE STATE OF NEW YORK V. BANK OF AMERICA, ET AL. THE COMPLAINT NAMES AS DEFENDANTS BAC AND BAC'S FORMER CHIEF EXECUTIVE AND CHIEF FINANCIAL OFFICERS, KENNETH D. LEWIS, AND JOSEPH L. PRICE, AND ALLEGES VIOLATIONS OF SECTIONS 352, 352-C(1)(A), 352-C(1)(C), AND 353 OF THE NEW YORK MARTIN ACT, AND SECTION 63(12) OF THE NEW YORK EXECUTIVE LAW. THE COMPLAINT ATTACKS THE SUFFICIENCY AND ACCURACY OF BAC'S DISCLOSURES AND ITS PRACTICES RELATED TO BAC'S MERGER WITH MERRILL LYNCH, INCLUDING: (I) THE DISCLOSURE OF MERRILL LYNCH'S FINANCIAL CONDITION AND ITS INTERIM AND PROJECTED LOSSES DURING THE FOURTH QUARTER OF 2008, (II) BAC'S CONTACTS WITH FEDERAL GOVERNMENT OFFICIALS REGARDING BAC'S CONSIDERATION OF INVOKING THE MATERIAL ADVERSE EFFECT CLAUSE IN THE MERGER AGREEMENT WITH MERRILL LYNCH AND THE POSSIBILITY OF OBTAININ ADDITIONAL GOVERNMENT ASSISTANCE, (III) THE DISCLOSURE OF THE PAYMENT AND TIMING OF YEAR-END INCENTIVE COMPENSATION TO MERRILL LYNCH EMPLOYEES, AND (IV) PUBLIC STATEMENTS REGARDING THE DUE DILIGENCE CONDUCTED IN CONNECTION WITH THE MERGER AND POSITIVE STATEMENTS REGARDING THE MERGER. THE COMPLAINT SEEKS AN UNSPECIFIED AMOUNT IN DISGORGEMENT, PENALTIES, RESTITUTION, AND DAMAGES, COSTS AND OTHER EQUITABLE RELIEF, ALTHOUGH THE NYAG WITHDREW ITS DEMAND FOR DAMAGES. ON MARCH 25, 2014, BAC ENTERED INTO A SETTLEMENT AGREEMENT TERMINATING THE NEW YORK ATTORNEY GENERAL'S LAWSUIT AGAINST BAC.				

If not exact, provide explanation:

This	s Disclosure Rer	porting Page (DRP ADV) is	an a INITIAL a	GENERAL INS		e responses to Item 11.H. of Part 1A or Item 2.F. of Part
	of Form ADV.		or o	,		
Ob -	ala Dant 4 A itana	(-) b -:		Civil Ju	udicial	
	еск Рап 1A item 11.Н(1)(а)	(s) being responded to:	<b>☑</b> 11.H(1)(b)		☐ 11.H(1)(c)	□ 11.H(2)
_	11.1(1)(α)		(1)(5)		<u> </u>	(2)
		(s) being responded to:		<b>-</b> 2 <b>-</b> (2)	☐ 2.F(4)	<b>F</b> 2 <b>F</b> ( <b>F</b> )
	2.F(1)	□ 2.F(2)		2.F(3)	L 2.F(4)	□ 2.F(5)
	a separate DRI cution Page.	of for each event or <i>proceed</i>	ding . The same event	or <i>proceeding</i> may be	reported for more than one <i>perso</i>	n or entity using one DRP. File with a completed
		alt in more than one affirmate the reported on separate		.H. of Part 1A or Item 2.	F. of Part 1B. Use only one DRP t	o report details related to the same event. Unrelated civil
PAR	RTI					
A.	The person(s)	or entity(ies) for whom this	DRP is being filed is	(are):		
	C You (the ac	dvisory firm)				
	C You and or	ne or more of your <i>advisory</i>	, affiliatos			
		re of your advisory affiliates				
	•	advisory affiliates	S			
		-			ate below (for individuals, Last na gistered" by checking the appropr	·
	ADV DRP - AD	OVISORY AFFILIATE				
	CRD		This advi	sory affiliate is 🌀 a Fir	m C an Individual	
	Number:			•		
	Registered:	C Yes O No				
	Name:	BANK OF AMERICA CORPORATION				
		(For individuals, Last, Fi	rst, Middle)			
	This DRP		e ADV record because	e: (1) the event or proce		adviser. ars ago or (2) the adviser is registered or applying for
	-			• •	-	ly in response to Item 11.H.(1)(a), and only if that event int listed in Item 11 that occurred more than ten years
	□ #: DDD		AB)/			
	L INIS DRP	snoula be removed from th	e adv record because	e it was filed in error, st	ich as que to a cierical or data-en	try mistake. Explain the circumstances:
B.		affiliate is registered througnswer is "Yes," no other inf	·		advisory affiliate submitted a DRP	(with Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	C Yes ⊙ N	0				
	NOTE: The co	mpletion of this form does	not relieve the <i>advisor</i>	ry affiliate of its obligatio	n to update its IARD or <i>CRD</i> reco	rds.
PAR						
1.		nitiated by: (Name of regula NND EXCHANGE COMMIS:	-	egulatory authority, SRC	O, commodities exchange, agency	, firm, private plaintiff, etc.)
2.	Principal Relie Civil Penalty(ie Other Relief S INJUNCTION	es)/Fine(s)				
3.	Filing Date of C	Court Action (MM/DD/YYYY)	:			

08/03/2009 • Exact • Explanation

	If not exact, provide explanation:
4.	Principal Product Type: No Product Other Product Types:
5.	Formal Action was brought in (include name of Federal, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case Number): U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK; 09-CV-6829
6.	Advisory Affiliate Employing Firm when activity occurred which led to the civil judicial action (if applicable):
7.	Describe the allegations related to this civil action (your response must fit within the space provided): THE SECURITIES AND EXCHANGE COMMISSION ("SEC") ALLEGED THAT BANK OF AMERICA CORPORATION (THE "CORPORATION") VIOLATED SECTION 14(A) OF THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT") AND RULE 14A-9 THEREUNDER BY FAILING TO DISCLOSE IN THE CORPORATION'S JOINT PROXY STATEMENT FILED ON NOVEMBER 3, 2008 THE INCENTIVE COMPENSATION THAT MERRILL LYNCH & CO., INC. COULD, IN ITS DISCRETION, AWARD TO ITS EMPLOYEES PRIOR TO COMPLETION OF ITS MERGER WITH THE CORPORATION.
8.	Current Status? C Pending C On Appeal  Final
9.	If on appeal, action appealed to (provide name of court) and Date Appeal Filed (MM/DD/YYYY):
10.	If pending, date notice/process was served (MM/DD/YYYY):  © Exact © Explanation  If not exact, provide explanation:
If F	nal or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.
11.	How was matter resolved: Consent
12.	Resolution Date (MM/DD/YYYY):  02/24/2010 Exact Explanation  If not exact, provide explanation:
13.	Resolution Detail:
	A. Were any of the following Sanctions Ordered or Relief Granted(check appropriate items)?
	✓ Monetary/Fine Amount: \$ 150,000,000.00
	☐ Revocation/Expulsion/Denial ☐ Disgorgement/Restitution ☐ Censure ☐ Cease and Desist/Injunction
	□ Bar □ Suspension
	B. Other Sanctions: THE CORPORATION AGREED, FOR A PERIOD OF THREE YEARS, TO COMPLY WITH AND MAINTAIN CERTAIN REQUIREMENTS RELATED TO THE CORPORATION'S
	CORPORATE GOVERNANCE AND DISCLOSURE PRACTICES.  C. Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> date paid and if any portion of penalty was waived:  N/A
14.	Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided)  ON FEBRUARY 24, 2010, A FINAL CONSENT JUDGMENT (THE "FINAL JUDGMENT") WAS ENTERED BY THE COURT. UNDER THE TERMS OF THE FINAL JUDGMENT, THE CORPORATION AGREED TO PAY \$1 IN DISGORGEMENT AND A \$150 MILLION CIVIL PENALTY TO BE DISTRIBUTED TO SHAREHOLDERS AS PART OF THE SEC'S FAIR FUNDS PROGRAM AT A LATER DATE IN ACCORDANCE WITH FURTHER ORDER OF THE COURT. IN ADDITION, AS PART OF THE FINAL JUDGMENT, THE CORPORATION AGREED, FOR A PERIOD OF THREE YEARS, TO COMPLY WITH AND MAINTAIN CERTAIN REQUIREMENTS RELATED TO THE CORPORATION'S CORPORATE GOVERNANCE AND DISCLOSURE PRACTICES.
This	GENERAL INSTRUCTIONS  Disclosure Reporting Page (DRP ADV) is an C INITIAL OR S AMENDED response used to report details for affirmative responses to Item 11.H. of Part 1A or Item 2.F. of Part

1B of Form ADV.

ck Part 1A item	n(s) being responded to:	11.H(1)(b)	☐ 11.H(1)(c)	□ 11.H(2)
	n(s) being responded to:			
2.F(1)	□ 2.F(2)	□ 2.F(3)	□ 2.F(4)	□ 2.F(5)
a separate DR cution Page.	P for each event or <i>proceeding</i> .	The same event or <i>proceeding</i> may b	e reported for more than one <i>person</i> o	or entity using one DRP. File with a completed
	ult in more than one affirmative ar st be reported on separate DRPs		2.F. of Part 1B. Use only one DRP to	report details related to the same event. Unrelated civi
ΤΙ				
The person(s)  You (the a	or entity(ies) for whom this DRP dvisory firm)	is being filed is (are):		
~	ne or more of your advisory affilia	ato a		
	ore of your advisory affiliates	nes		
		e, give the full name of the advisory af	filiate below (for individuals, Last nam	e. First name. Middle name).
		-	registered" by checking the appropriat	•
ADV DRP - A	DVISORY AFFILIATE			
CRD		This advisory affiliate is 🌀 a F	Firm C an Individual	
Number: Registered:				
	V Yes V No			
Name:	BANK OF AMERICA CORPORATION			
	(For individuals, Last, First, Mi	ddle)		
CRD Numbe	er:	This advisory affiliate is <b>ⓒ</b> a F	Firm C an Individual	
Registered:	C Yes ⊙ No	,		
Name:	BANK OF AMERICA, N.A. (For individuals, Last, First, M	iddle)		
CRD		This advisory affiliate is 🌀 a F	Firm C an Individual	
Number:				
Registered.	O Yes O No			
Name:	BAC HOME LOANS SERVICING. F/K/A COUNTRYWIDE HOME LO SERVICING, LP (For individuals, Last, First, Midd	DANS		
	(1 of marriadaid, Eddt, 1 not, made			
CRD Number:		This advisory affiliate is 🌀 a F	Firm C an Individual	
Registered:	00			
	v res v No	_		
Name:	COUNTRYWIDE HOME LOAN: INC.	5,		
	(For individuals, Last, First, Mic	ddle)		
CRD		This advisory affiliate is . a I	Firm O an Individual	
Number:		This auvisory allillate is 🐸 a f	iiii — aii iiiuiviuudi	
Registered:	○ Yes ⓒ No			
Name:	COUNTRYWIDE FINANCIAL			
	CORPORATION (For individuals, Last, First, Midd	fle)		
CRD		_		
Number:		This advisory affiliate is 🌀 a F	Firm C an Individual	
Registered:	O Yes O No			
Name:	COUNTRYWIDE MORTGAGE			
	VENTURES, LLC			

(For individuals, Last, First, Middle)

	CRD Number:	:	This advisory affiliate is ⊙ a Firm ∵ an Individual		
	Registered:	O Yes ⊙ No			
	Name:	COUNTRYWIDE BANK, (For individuals, Last, F			
	This DRP sh	hould be removed from th	ne ADV record because the advisory affiliate(s) is no longer associated with the adviser.  ne ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for ent was resolved in the adviser's or advisory affiliate's favor.		
	-	-	a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.H.(1)(a), and only if that event are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years		
	☐ This DRP sh	hould be removed from th	ne ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:		
B.	<del>-</del>	~	gh the IARD system or <i>CRD</i> system, has the <i>advisory affiliate</i> submitted a DRP (with Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the formation on this DRP must be provided.		
	C Yes € No				
	NOTE: The com	npletion of this form does	not relieve the advisory affiliate of its obligation to update its IARD or CRD records.		
PAR	ΤII				
1.		• •	ator, foreign financial regulatory authority, SRO, commodities exchange, agency, firm, private plaintiff, etc.) HE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA		
2.	Principal Relief Civil Penalty(ies Other Relief Sou	s)/Fine(s)			
		-	& ORIGINATION STANDARDS		
3.	Filing Date of Co	ourt Action (MM/DD/YYYY	<b>)</b> :		
		Exact C Explanation vide explanation:			
4.	Principal Product Other Other Product To	ypes:	ICING AND ORIGINATION		
5.	5. Formal Action was brought in (include name of Federal, State or Foreign Court, Location of Court - City or County <u>and</u> State or Country, Docket/Case Number): U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, DOCKET NUMBER 1:12-CV-00361-RMC				
6.	Advisory Affiliate	e Employing Firm when a	activity occurred which led to the civil judicial action (if applicable):		
7.	Describe the allegations related to this civil action (your response must fit within the space provided):  ON MARCH 12, 2012, THE DEPARTMENT OF JUSTICE AND THE ATTORNEYS GENERAL OF 49 STATES AND THE DISTRICT OF COLUMBIA FILED A COMPLAINT ("COMPLAINT") AND CONSENT JUDGMENT AGAINST BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., BAC HOME LOANS SERVICING, LP F/K/A COUNTRYWIDE HOME LOANS SERVICING, LP, COUNTRYWIDE HOME LOANS, INC., COUNTRYWIDE FINANCIAL CORPORATION, COUNTRYWIDE MORTGAGE VENTURES, LLC, AND/OR COUNTRYWIDE BANK, FSB (TOGETHER, "BANK OF AMERICA") AND OTHER MAJOR MORTGAGE SERVICERS TO SETTLE A NUMBER OF RELATED INVESTIGATIONS INTO RESIDENTIAL LOAN SERVICING AND ORIGINATION PRACTICES (THE "SETTLEMENT"). THE COMPLAINT ALLEGED THE DEFENDANT MISCONDUCT RELATED TO ITS ORIGINATION AND SERVICING OF SINGLE FAMILY RESIDENTIAL MORTGAGES CAUSED THE DEFENDANTS TO HAVE VIOLATED, AMO OTHER LAWS, THE UNFAIR AND DECEPTIVE ACTS AND PRACTICES LAWS OF THE PLAINTIFF STATES, THE FALSE CLAIMS ACT, THE FINANCIAL INSTITUTIONS REFORM, RECOVERY, AND ENFORCEMENT ACT OF 1989, THE SERVICEMEMBERS CIVIL RELIEF ACT, AND THE BANKRUPTCY CODE AND FEDERAL RULES OF BANKRUPTCY PROCEDURE.				
8.	Current Status?	Pending C On A	opeal		
9.	If on appeal, act	tion appealed to (provide	name of court) and Date Appeal Filed (MM/DD/YYYY):		
10.		notice/process was serve	d (MM/DD/YYYY):		
	C Exact C	Explanation vide explanation:			

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.

11.	Hov Sett	w was matter resolved: tled					
12.	Res	solution Date (MM/DD/YY	YY):				
	04/0	05/2012  Exact Oot exact, provide explana	Explanation				
13.	Res	solution Detail:					
	A.	Were any of the follow	ring Sanctions Ordered or Relief	Granted(check appropria	te items)?		
		Monetary/Fine Amo			_		
		Revocation/Expuls	sion/Denial		☑ Disgorgement/Restitution		
		☐ Censure ☐ Bar			Cease and Desist/Injuncti	on	
	В.				☐ Suspension		
	_	THE TOTAL AMOUNT MILLION OF THIS AMO DISCLOSED IN THIS S	DUNT MAY BE TREATED AS A C	IVIL PENALTY AT THE DI HE BOX ABOVE AS THE I	SCRETION OF THE STATES AND D	ENTS AS FURTHER DESCRIBED IN 13.C. UP TO DISTRICT OF COLUMBIA. THE AMOUNT IS BEING AS A CIVIL PENALTY IS NOT KNOWN. OTHER	
	C.	Principal, etc.). If requa	alification by exam/retraining was	s a condition of the sanction a fine, penalty, restitution	n, provide length of time given to re	neral Securities Principal, Financial Operations equalify/retrain, type of exam required and whethe ensation, provide total amount, portion levied again	
14.	prov BAN FAC BAN	ESTABLISHED FOR T CLAIMS IN THIS MATT AS A CIVIL PENALTY. I RELATING TO SERVIC PROGRAMS TO PROV SOLUTIONS, INCLUDI UNEMPLOYED, MILITA AND THE OFFER OF C OWNERSHIP. ALSO, I ELIGIBILITY CRITERIA AMERICA OWNED MC THAN THE CURRENT ENHANCEMENTS AND OVIDE A BRIEF SUMMARY OF VIDEO OVIDEO	HIS PURPOSE THE SUM OF \$2 TER AND ACCORDING TO CERT IN ADDITION, BANK OF AMERIC CING OF LOANS. THE ADDITION //IDE BORROWER ASSISTANCE ING THE BROADER USE OF PR ARY SERVICE MEMBERS AND O DTHER ASSISTANCE PROGRAI BANK OF AMERICA SHALL PRO A. THE REFINANCING PROGRAI DRTGAGES TO PROVIDE REDUI VALUE OF THEIR HOMES. FOL D PROVIDE ADDITIONAL DETAI circumstances related to the ac	CASEATIONS ARE DESCR	M SHALL BE ADDED TO FUNDS BEHED IN THE SETTLEMENT. UP TO 26,200,000 OF RELIEF TO CONSUITE GINATION STANDARDS INCLUDES PROPRIETARY PROGRAMS TO FE PERMITTED BY THE MORTGAGE HIDENTIFIED SPECIAL SITUATION OF FORECLOSURE AND FUNIONEW REFINANCING PROGRAM FOR IND REFINANCING OPPORTUNITI NY HOMEOWNERS WHO ARE CURE THE SETTLEMENT TERMS, BAIT INCLUDING STAND THE SETTLEMENT TERMS, BAIT INCLUDING OPPORTUNITION OF THE SETTLEMENT TERMS, BAIT INCLUDING OF THE SETTLEMENT TERMS, BAIT INCLUDING OF THE SETTLEMENT OF THE SETTLEMEN	EING PAID BY OTHER INSTITUTIONS RESOLVING STATES OF AN INTEREST BEARING ESCROW ACCOUNT TO BING PAID BY OTHER INSTITUTIONS RESOLVING STATES WHO MEET CERTAIN ELIGIBILITY CRITER OF THE DEVELOPMENT OF NEW OR ENHANCED PROVIDE EXPANDED MORTGAGE MODIFICATION OF INVESTOR, ENHANCED PROGRAMS FOR DISS, ENHANCED FACILITATION OF SHORT SALE DISS FOR FAMILIES TRANSITIONING OUT OF HON OR CURRENT CONSUMERS WHO MEET OTHER ES OR LOWER INTEREST RATES ON BANK OF RRENT ON THEIR PAYMENTS BUT OWE MORE NIK OF AMERICA WILL FINALIZE ITS PROGRAM OF AMERICA WILL FINALIZE WILL FINA	NG TED RIA N ES, ME R
Thic	Dies	Nocure Poporting Poss (	IDDD ADVA is an - INITIAL		STRUCTIONS	a responses to Item 11 U. of Part 14 or Item 2.5	of Dort
		m ADV.	DRP ADV) IS AN O INITIAL OR	,   AMENDED response	used to report details for anifmative	e responses to Item 11.H. of Part 1A or Item 2.F. o	or Part
				Civil	udicial		
		art 1A item(s) being resp					
	1.H(	(1)(a)	□ 11.H(1)(b)		☐ 11.H(1)(c)	<b>☑</b> 11.H(2)	
	ck Pa	art 1B item(s) being resp	onded to: ☐ 2.F(2)	□ 2.F(3)	☐ 2.F(4)	□ 2.F(5)	
	-	parate DRP for each even Page.	ent or <i>proceeding</i> . The same ev	ent or <i>proceeding</i> may be	reported for more than one person	or entity using one DRP. File with a completed	
		nt may result in more tha ctions must be reported		11.H. of Part 1A or Item 2	.F. of Part 1B. Use only one DRP to	o report details related to the same event. Unrelate	ed civil
PAR			frankrij DDD i i i m	Lie (ene)			
Α	Ihe	nerson(s) or entity(ies) t	for whom this DRP is being filed	is taral.			

You (the advisory firm)

f this DRP is	-	e the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name).  nat number. If not, indicate "non-registered" by checking the appropriate box.
ADV DRP - A	DVISORY AFFILIATE	
CRD Numb	er:	This advisory affiliate is $\odot$ a Firm $\circ$ an Individual
Registered:	C Yes ⊙ No	
Name:	BANK OF AMERICA, N.A. (For individuals, Last, First, Middle)	
CRD		This advisory affiliate is  a Firm  an Individual
Number: Registered:	O Yes ⊙ No	and an early annated to the artiful and the ar
Name:	BANC OF AMERICA MORTGAGE SECURITIES, INC. (For individuals, Last, First, Middle)	
CRD		This advisance of lists is (i) a Firm (i) as hadicides.
Number:		This advisory affiliate is . a Firm . an Individual
Registered:	<ul> <li>C Yes</li></ul>	
	(1 of maividuals, East, 1 list, Middle)	
CRD Number:	<u>7691</u>	This advisory affiliate is
	⊙ Yes C No	
Name:	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED (For individuals, Last, First, Middle)	
This DRP registration of you are registration occurred more ago.  This DRP the advisory event? If the a	should be removed from the ADV recommendation with the SEC and the event was resolved in with the SEC and the event was resolved in the second state of the second in the	ord because the advisory affiliate(s) is no longer associated with the adviser.  For decause: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for olved in the adviser's or advisory affiliate's favor.  For initial authority, you may remove a DRP for an event you reported only in response to Item 11.H.(1)(a), and only if that event exed or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years and because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:  O system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the in this DRP must be provided.
	initiated by: (Name of regulator, foreign	financial regulatory authority, SRO, commodities exchange, agency, firm, private plaintiff, etc.)
UNITED STA	TES OF AMERICA	
Principal Reli Civil Penalty( Other Relief S PREJUDGME	ies)/Fine(s)	EYS' FEES.
Filing Date of	Court Action (MM/DD/W/W)	
imig Date of	Court Action (MM/DD/YYYY):	
08/06/2013	<ul> <li>Exact</li></ul>	
08/06/2013	Exact C Explanation rovide explanation:	

	RESIDENTIAL MORTGAGE-BACKED SECURITIES
5.	Formal Action was brought in (include name of Federal, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case Number): UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA, CIVIL ACTION NO. 3:13-CV-446
6.	Advisory Affiliate Employing Firm when activity occurred which led to the civil judicial action (if applicable):
7.	Describe the allegations related to this civil action (your response must fit within the space provided):  ON AUGUST 6, 2013, THE DEPARTMENT OF JUSTICE FILED A CIVIL ACTION AGAINST MERRILL LYNCH, PIERCE, FENNER & SMITH, INC. F/K/A BANC OF AMERICA SECURITIES LLC (THE "FIRM") AND OTHER ENTITIES (COLLECTIVELY THE "ENTITIES"). THE DEPARTMENT OF JUSTICE ALLEGES THAT THE ENTITIES VIOLATED THE FINANCIAL INSTITUTIONS REFORM, RECOVERY AND ENFORCEMENT ACT OF 1989, 12 U.S.C. § 1833A, THROUGH CIVIL VIOLATIONS OF 18 U.S.C. §§ 1001 AND 1014. THE COMPLAINT CLAIMS THAT THE ENTITIES MADE FALSE STATEMENTS TO AND OMITTED MATERIAL INFORMATION FROM THE GOVERNMENT AND FEDERALLY INSURED FINANCIAL INSTITUTIONS. SPECIFICALLY, THE COMPLAINT ALLEGES THAT THE ENTITIES FAILED TO DISCLOSE THE DISPROPORTIONATE CONCENTRATION OF WHOLESALE CHANNEL LOANS ORIGINATED BY THIRD PARTIES UNDERLYING THE RESIDENTIAL MORTGAGE BACKED SECURITIES. THE COMPLAINT ALLEGES THAT THE ENTITIES KNEW THE WHOLESALE CHANNEL LOANS WERE RISKIER AS COMPARED TO SIMILAR MORTGAGES ORIGINATED BY THE ENTITIES DIRECTLY. THE COMPLAINT ALSO ALLEGES THAT THE ENTITIES FAILED TO DISCLOSE THE PERCENTAGE OF PAPERSAVER LOANS MADE TO SELF-EMPLOYED BORROWERS. THE COMPLAINT ALLEGES THAT THE ENTITIES KNEW PAPERSAVER LOANS WERE RISKIER THAN MORTGAGES GIVEN TO SALARIED BORROWERS. THE COMPLAINT FURTHER ALLEGES THAT, EVEN THOUGH THE ENTITIES WERE AWARE OF THE RISKS ASSOCIATED WITH THE CHARACTERISTICS OF THE POOL, THE ENTITIES FAILED TO CONDUCT THIRD-PARTY DUE DILIGENCE ON THE MORTGAGES IN THE POOL AND VIOLATED THE FIRM'S DUE DILIGENCE POLICIES. THE COMPLAINT SEEKS A CIVIL MONETARY JUDGMENT IN AN UNSTATED AMOUNT PURSUANT TO 12 U.S.C. § 1833A(B), PREJUDGMENT INTEREST, AND ATTORNEYS' FEES.
8.	Current Status? C Pending C On Appeal C Final
9.	If on appeal, action appealed to (provide name of court) and Date Appeal Filed (MM/DD/YYYY):
10.	If pending, date notice/process was served (MM/DD/YYYY):
	08/06/2013  Exact  Explanation  If not exact, provide explanation:
lf Fi	inal or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.
11.	How was matter resolved: Dismissed
12.	Resolution Date (MM/DD/YYYY):  08/29/2014  Exact  Explanation  If not exact, provide explanation:
13.	Resolution Detail:
	A. Were any of the following Sanctions Ordered or Relief Granted(check appropriate items)?  Monetary/Fine Amount: \$  Revocation/Expulsion/Denial  Disgorgement/Restitution
	☐ Censure ☐ Cease and Desist/Injunction
	☐ Bar ☐ Suspension
	B. Other Sanctions:
	<ul> <li>NONE</li> <li>C. Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> date paid and if any portion of penalty was waived:</li> <li>NONE</li> </ul>
14.	Provide a brief summary of circumstances related to the action(s), allegation(s), disposition(s) and/or finding(s) disclosed above (your response must fit within the space provided)  ON AUGUST 21, 2014, THE U.S. DEPARTMENT OF JUSTICE ("DOJ") ANNOUNCED A GLOBAL SETTLEMENT AGREEMENT BETWEEN BANK OF AMERICA CORPORATION AND SEVERAL OF ITS AFFILIATES (TOGETHER "BANK OF AMERICA") AND THE DOJ, AMONG OTHERS, IN CONNECTION WITH THE PACKAGING, ORIGINATION, MARKETING, SALE STRUCTURING, ARRANGEMENT, AND ISSUANCE OF RESIDENTIAL MORTGAGE-BACKED SECURITIES ("RMBS") AND COLLATERALIZED DEBT OBLIGATIONS ("CDOS"). AS PART OF THE GLOBAL SETTLEMENT AGREEMENT, THE DOJ RELEASED BANK OF AMERICA FROM THE CONDUCT ALLEGED IN THE COMPLAINT FILED ON AUGUST 6, 2013. ON AUGUST 29, 2014, THE DISTRICT COURT DISMISSED THE DOJ COMPLAINT (THE SUBJECT OF THIS DRP) WITH PREJUDICE. THE DOJ DID NOT ENJOIN BANK OF AMERICA AND, THEREFORE, 11H(1)(A) IS NOT APPLICABLE. THERE WAS NO FINDING OF VIOLATIONS OF INVESTMENT-RELATED STATUTES OR REGULATIONS BY THE DOJ AND, THEREFORE, 11H(1)(B) IS NOT APPLICABLE. AND THE DOJ IS NOT A STATE OR FOREIGN FINANCIAL REGULATIONS AND THEREFORE 11H(1)(C) IS NOT APPLICABLE.

DOJ DRP BE REMOVED AS THE MATTER WAS DISMISSED AND THERE WAS NO FINDING/ACTION AGAINST BANK OF AMERICA BY THE DOJ.\*\*\*\*\*

Other

Other Product Types:

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 you 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?	0	$\odot$
If no, complete the ADV Part 2 filing below.		
Amend, retire or file new brochures:		

### **Execution Pages**

#### DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

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

#### Appointment of Agent for Service of Process

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

## Signature

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

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

Signature:

JENNIFER GOMER

Printed Name:

JENNIFER GOMER

Adviser CRD Number:

157801

Date: MM/DD/YYYY 08/21/2015

Title:

**AUTHORIZED SIGNATORY** 

### **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.

Title:

Signature: Date: MM/DD/YYYY

Printed Name:

Adviser CRD Number:

157801