FORM ADV

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

Prir	mary Business Name: MARBLE BAR ASSET MANAGEME	ENT LLP	CRD Number: 160882
	nual Amendment - All Sections		Rev. 10/2021
3/2	26/2025 11:33:07 AM		
WA	CARNING: Complete this form truthfully. False statement prosecution. You must keep this form updated	· · · · · · · · · · · · · · · · · · ·	
l ter	m 1 Identifying Information		
	sponses to this Item tell us who you are, where you are formation in Item 1 should be provided for the filing advise	_	
Α.	Your full legal name (if you are a sole proprietor, your I MARBLE BAR ASSET MANAGEMENT LLP	last, first, and middle names):	
B.	(1) Name under which you primarily conduct your advis	sory business, if different from Item 1.A.	
	List on Section 1.B. of Schedule D any additional names	under which you conduct your advisory bus	iness.
	(2) If you are using this Form ADV to register more that	an one investment adviser under an <i>umbr</i>	ella registration, check this box \square
	If you check this box, complete a Schedule R for each rel	ying adviser.	
C.	If this filing is reporting a change in your legal name (It name change is of \square your legal name or \square your primary business name:	tem 1.A.) or primary business name (Item	1.B.(1)), enter the new name and specify whether the
D.	() 3	•	2071
	(2) If you report to the SEC as an exempt reporting adv. (3) If you have one or more Central Index Key number	•	all of your CIK numbers:
	CIK Number		
	1535775		
E.	(1) If you have a number ("CRD Number") assigned by	the FINRA's CRD system or by the IARD s	ystem, your <i>CRD</i> number: 160882
	If your firm does not have a CRD number, skip this Item	1.E. Do not provide the CRD number of one	e of your officers, employees, or affiliates.
	(2) If you have additional <i>CRD</i> Numbers, your additional	al <i>CRD</i> numbers:	
		No Information Filed	
F.	Principal Office and Place of Business		
	(1) Address (do not use a P.O. Box):		
	Number and Street 1:	Number and Street 2:	
	7TH FLOOR, SOUTH BLOCK City: State:	55 BAKER STREET Country:	ZIP+4/Postal Code:
	LONDON	United Kingdom	W1U 8EW
	If this address is a private residence, check this bo	ox: 🗖	
	you are applying for registration, or are registered, which you are applying for registration or with whom	with one or more state securities authorities n you are registered. If you are applying for	ess, at which you conduct investment advisory business. If so, you must list all of your offices in the state or states to SEC registration, if you are registered only with the SEC, or es in terms of numbers of employees as of the end of your
	(2) Days of week that you normally conduct business • Monday - Friday • Other:	at your principal office and place of busines	SS:
	Normal business hours at this location: 8 A.M 6 P.M.		

(5) What is the total number of offices, other than your principal office and place of business, at which you conduct investment advisory business as of

(3) Telephone number at this location:

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

44 (0) 20 3023 8100

	the end of your most 0	recently completed fiscal year?				
G.	Mailing address, if differen	nt from your <i>principal office and place</i> o	of business address:			
О.	Number and Street 1:	is in our year principal emice and prace s	Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	City.	State.	Couriti y.	ZIF+4/FUSIAI COUE.		
	If this address is a private	e residence, check this box:				
Н.	If you are a sole proprieto	or, state your full residence address,	if different from your <i>principa</i>	I office and place of business address in Item 1.F.:		
	Number and Street 1:		Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
1.	Do you have one or more LinkedIn)?	websites or accounts on publicly ava	ilable social media platforms	(including, but not limited to, Twitter, Facebook and	Yes N	
	LIIIKedIII) ?					
	If a website address serves addresses for all of the other available social media platfo	s as a portal through which to access o er information. You may need to list m	other information you have pub nore than one portal address. L not provide the indivi	cly available social media platforms on Section 1.1. of S blished on the web, you may list the portal without list Do not provide the addresses of websites or accounts of dual electronic mail (e-mail) addresses of employees of	ting on publicl	
J.	Chief Compliance Officer					
	(1) Provide the name and	contact information of your Chief Cor Compliance Officer, if you have one.	•	n <i>exempt reporting adviser</i> , you must provide the cor rm 1.K. below.	ıtact	
	Name:		Other titles, if any:			
	Telephone number:		Facsimile number, if any:			
	Number and Street 1:		Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	Electronic mail (e-mail) a	ddress, if Chief Compliance Officer ha	is one:			
		npany Act of 1940 that you advise fo imber (if any):		you, a <i>related person</i> or an investment company region officer services to you, provide the <i>person's</i> name ar		
K.		tact Person: If a person other than t may provide that information here.	he Chief Compliance Officer i	is authorized to receive information and respond to	questior	ıs
	Name:		Titles:			
	Telephone number:		Facsimile number, if any:			
	Number and Street 1:		Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	Electronic mail (e-mail) a	ddress, if contact person has one:				
					Yes N	10
L.	•	all of the books and records you are our <i>principal office and place of busines</i>	·	on 204 of the Advisers Act, or similar state law,	0 (0
	If "yes," complete Section	1.L. of Schedule D.			Yes N	Jo
M.	Are you registered with a	foreign financial regulatory authority?				0
	Answer "no" if you are not	registered with a foreign financial regu	llatory authority, even if you h	nave an affiliate that is registered with a foreign financia		
	•	s," complete Section 1.M. of Schedule		2. 2 2 2 Charles registered with a foreign manual		J-
Ν,	Ama way = ! !!) of the Committee E. I.	Act of 10242	Yes N	
N.	Are you a public reporting	company under Sections 12 or 15(d)	of the Securities Exchange A	ACT OF 1934?	0 (⊙
					Yes N	10
Ο.	•	more in assets on the last day of you imate amount of your assets: a \$10 billion	ur most recent fiscal year?		0 (⊙

510 billion to less than \$50 billion

	C \$50 billion or more
	For purposes of Item 1.O. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.
Р.	Provide your <i>Legal Entity Identifier</i> if you have one: 213800RUT3C1PCHUQP60
	A legal entity identifier is a unique number that companies use to identify each other in the financial marketplace. You may not have a legal entity identifier.
SEC	CTION 1.B. Other Business Names
	No Information Filed
SEC	CTION 1.F. Other Offices
	No Information Filed
SEC	CTION 1.I. Website Addresses
lin	st your website addresses, including addresses for accounts on publicly available social media platforms where you control the content (including, but not nited to, Twitter, Facebook and/or LinkedIn). You must complete a separate Schedule D Section 1.1. for each website or account on a publicly available acial media platform.
Ac	ddress of Website/Account on Publicly Available Social Media Platform: HTTP://WWW.MARBLEBAR.COM/
Ac	ddress of Website/Account on Publicly Available Social Media Platform: https://uk.linkedin.com/company/marble-bar-asset-management
SEC	CTION 1.L. Location of Books and Records
	omplete the following information for each location at which you keep your books and records, other than your <i>principal office and place of business</i> . You ust complete a separate Schedule D, Section 1.L. for each location.
	ame of entity where books and records are kept: AYSTONE ADMINISTRATION SOLUTIONS (IE) LIMITED
	umber and Street 1: Number and Street 2: FH FLOOR, 35 SHELBOURNE PLACE BALLSBRIDGE
Cit	
lf	this address is a private residence, check this box:
	elephone Number: Facsimile number, if any: 353 1 8992400
	nis is (check one): one of your branch offices or affiliates.
	a third-party unaffiliated recordkeeper. other.
	riefly describe the books and records kept at this location. JND ADMINISTRATOR. CERTAIN BOOKS AND RECORDS AS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.
Na	ame of entity where books and records are kept:

THETALAKE			
Number and Street 1: 1221 CHAPALA STREET		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
SANTA BARBARA	California	United States	93101
If this address is a private residence, check this bo	ox:		
Telephone Number: +1 650 2423900	Facsimile number, if a	ny:	
This is (check one): one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this ELECTRONIC COMMUNICATIONS RETENTION PROV			
Name of entity where books and records are kept INSTITUTIONAL SHAREHOLDER SERVICES INC	:		
Number and Street 1: 702 KING FARM BOULEVARD, SUITE 300		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
ROCKVILLE	Maryland	United States	20850
If this address is a private residence, check this bo	ox: 🗖		
Telephone Number: +1 646 6806350	Facsimile numbe	er, if any:	
This is (check one): O one of your branch offices or affiliates.			
o a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this PROXY VOTING RECORDS.	s location.		
Name of entity where books and records are kept BROADRIDGE FINANCIAL SOLUTIONS INC.	:		
Number and Street 1: 5 DAKOTA DRIVE, SUITE 300		Number and Street 2:	
City: LAKE SUCCESS	State: New York	Country: United States	ZIP+4/Postal Code: 11042
If this address is a private residence, check this bo	ox: 🗖		
Telephone Number: +1 800 3530103	Facsimile number, if a	ny:	
This is (check one): one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
o other.			

Briefly describe the books and records kept at this location.

SECTI	ON	1.M	. Registration with Foreign Financial Regulatory Authorities
Name	e of	Cou	ntry/Foreign Financial Regulatory Authority:
Otho	٠.		
Othe	is the name and country. In English of seath rouse phenoteal Regulatory Authorities is the name and country. In English of seath rouse phenoteal regulatory authority with which you are registered. You must complete a sept rate Screoule Dischool 1.8. In confirming with remaining your are registered. Same of Country/Covergo Prenotal Regulatory Authority Intel® (largeburn: Thrancia Counties: Authority) Thrancia Counties: Authority appares to this form help os so and you determine whether you are eligible to register with the 5CC Complete this Item 2.A. only if you are applying for congression or soon titing an annual accepting meanment in your Sci. registerion. If you are filling an unweak an agreement and your Sci. registerion in the time 2.A. (1) through 2.A. (12) helps us the applying for an register (or remain registerions) with the 5CC, your must check at least one of the times 2.A. (1) through 2.A. (12) helps us they are summitted an annual activity are analysed and the seather you may affirmatively respond to seath of the 5CC, check Item 2.A. (13). Per ITA her unline 2 provides information to relay you determine whether you may affirmatively respond to seath of these Items (a) has regulatory assets under management of 500 million (in U.S. dollars) or more or (b) has regulatory assets under management of 500 million (in U.S. dollars) or more or (c) has regulatory assets under management of 500 million (in U.S. dollars) or more or (d) has regulatory assets under management of 500 million (in U.S. dollars) or more at the time of filling its most recent annual syndating universities and in registered as an advance of the seath of seather of the seath of the seath of the seather		
Item 2	2 SE	EC Re	egistration/Reporting
SEC re	egis	trati	on or submitting an annual updating amendment to your SEC registration. If you are filing an umbrella registration, the information in Item 2
<i>а</i> р	nnu rov	ial up ides	information to help you determine whether you may affirmatively respond to each of these items.
_	_		
		(1)	
Γ		(2)	
			(b) not subject to examination by the state securities authority of the state where you maintain your principal office and place of business;
		(3)	Reserved
_		(4)	have your principal office and place of business outside the United States;
		(5)	are an investment adviser (or subadviser) to an investment company registered under the Investment Company Act of 1940;
I		(6)	Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under
Γ		(7)	
Γ		(8)	•
			If you check this box, complete Section 2.A.(8) of Schedule D.
ſ		(9)	are an adviser relying on rule 203A-2(c) because you expect to be eligible for SEC registration within 120 days;
			If you check this box, complete Section 2.A.(9) of Schedule D.
ſ		(10)	are a multi-state adviser that is required to register in 15 or more states and is relying on rule 203A-2(d);
			If you check this box, complete Section 2.A. (10) of Schedule D.
ſ		(11)	are an Internet adviser relying on rule 203A-2(e);
	_		If you check this box, complete Section 2.A. (11) of Schedule D.
ſ		(12)	
_	_		
1		(13)	are no longer eligible to remain registered with the SEC.
Ctata	C ~	our!	ties Authority Notice Filings and State Penorting by Evemnt Penorting Advisers

C. Under state laws, SEC-registered advisers may be required to provide to state securities authorities a copy of the Form ADV and any amendments they

PROXY VOTING RECORDS.

		t you would like to receive notice of th	amendment to direct your <i>notice filings</i> or reports to is and all subsequent filings or reports you submit ing to state(s) that currently receive them, uncheck
Jurisdictions			
□ AL	□ IL	□ _{NE}	□ sc
□ AK	IN IN		□ SD
		∥ □ NV	
□ AZ	□ IA	□ NH	□ TN
☐ AR	□ KS	∥ ⊑ NJ	□ тх
CA	□ KY	∥ □ NM	□ ∪т
Со	∥ □ LA	∥ □ NY	□ VT
□ CT	∥ □ ME	∥ □ NC	□ VI
□ DE	□ MD	∥ □ ND	□ VA
□ DC	□ MA	□ он	∥ □ WA
□ FL	∥ □ MI	□ ок	□ wv
□ GA	∥ □ _{MN}	□ OR	□ WI
□ GU	∥ □ MS	□ PA	□ wy
□ HI	□ MO	□ PR	
□ ID	□ MT	□ RI	
ne of Registered Investment Number of Registered Inves Number of Registered Inves	stment Adviser		
	duicar Exporting to be Eligible fo		
nin 120 days, you are require med to have made the require am not registered or require register with the SEC within	2(c), the exemption from the prohited to make certain representations ired representations. You must mared to be registered with the SEC of 120 days after the date my registr	oition on registration available to an accapable about your eligibility for SEC registrations; when the securities authority and I have attached the SEC becomes effective.	lviser that expects to be eligible for SEC registration ion. By checking the appropriate boxes, you will be a reasonable expectation that I will be eligible to
ou are relying on rule 203A-2 nin 120 days, you are require med to have made the require am not registered or require register with the SEC within undertake to withdraw from	2(c), the exemption from the prohited to make certain representations ired representations. You must mared to be registered with the SEC of 120 days after the date my registr	oition on registration available to an accapable about your eligibility for SEC registrations; when the securities authority and I have attached the SEC becomes effective.	lviser that expects to be eligible for SEC registration ion. By checking the appropriate boxes, you will be
ou are relying on rule 203A-2 nin 120 days, you are require med to have made the require am not registered or require register with the SEC within undertake to withdraw from	2(c), the exemption from the prohibed to make certain representations ired representations. You must mared to be registered with the SEC of 120 days after the date my registry SEC registration if, on the 120th from registering with the SEC.	oition on registration available to an accapable about your eligibility for SEC registrations; when the securities authority and I have attached the SEC becomes effective.	lviser that expects to be eligible for SEC registration ion. By checking the appropriate boxes, you will be a reasonable expectation that I will be eligible to
ou are relying on rule 203A-2 nin 120 days, you are require med to have made the require am not registered or require register with the SEC within undertake to withdraw from 203A(a) of the Advisers Act f	2(c), the exemption from the prohibed to make certain representations ired representations. You must mared to be registered with the SEC of 120 days after the date my registry and SEC registration if, on the 120th from registering with the SEC. Adviser 2(d), the multi-state adviser exemp	oition on registration available to an acabout your eligibility for SEC registratives both of these representations: or a state securities authority and I haviation with the SEC becomes effective. day after my registration with the SEC	lviser that expects to be eligible for SEC registration ion. By checking the appropriate boxes, you will be a reasonable expectation that I will be eligible to becomes effective, I would be prohibited by Section on, you are required to make certain representations
ou are relying on rule 203A-20 ain 120 days, you are requiremed to have made the requirement of the register with the SEC within undertake to withdraw from 203A(a) of the Advisers Act of the relying on rule 203A-20 are relying on rule 203A-20 are applying for registrat have reviewed the application.	2(c), the exemption from the prohibed to make certain representations ired representations. You must maked to be registered with the SEC of 120 days after the date my registry and SEC registration if, on the 120th from registering with the SEC. Adviser 2(d), the multi-state adviser exemplication. By checking the appropriation as an investment adviser with the second content of the second con	bition on registration available to an accapabout your eligibility for SEC registratives both of these representations: or a state securities authority and I have ation with the SEC becomes effective. It day after my registration with the SEC between the boxes, you will be deemed to have the SEC, you must make both of these econcluded that I am required by the	lviser that expects to be eligible for SEC registration ion. By checking the appropriate boxes, you will be a reasonable expectation that I will be eligible to becomes effective, I would be prohibited by Section on, you are required to make certain representations at made the required representations.
ou are relying on rule 203A-2 in 120 days, you are requiremed to have made the requirement to have made the requirement am not registered or requiregister with the SEC within undertake to withdraw from 203A(a) of the Advisers Act for are relying on rule 203A-2 at your eligibility for SEC requirement application are reviewed the application of the application of the adviser with the undertake to withdraw from	2(c), the exemption from the prohibed to make certain representations ired representations. You must make to be registered with the SEC of 120 days after the date my registry in SEC registration if, on the 120th from registering with the SEC. Adviser 2(d), the multi-state adviser exemplication. By checking the appropriation as an investment adviser with the state and federal laws and have state securities authorities in those	bition on registration available to an accapulation about your eligibility for SEC registratives both of these representations: or a state securities authority and I have ation with the SEC becomes effective. day after my registration with the SEC day after my registration with the SEC date boxes, you will be deemed to have the SEC, you must make both of these econcluded that I am required by the states.	Iviser that expects to be eligible for SEC registration ion. By checking the appropriate boxes, you will be a reasonable expectation that I will be eligible to becomes effective, I would be prohibited by Section on, you are required to make certain representations a made the required representations.

SEC	TION 2.A.(11) Internet Adviser
_	ou are relying on rule 203A-2(e), the Internet adviser exemption from the prohibition on registration, you are required to make a representation about ur eligibility for SEC registration. By checking the appropriate box, you will be deemed to have made the required representation.
_	ou are applying for registration as an investment adviser with the SEC or changing your existing Item 2 response regarding your eligibility for SEC istration, you must make this representation:
	I will provide investment advice on an ongoing basis to more than one client exclusively through an operational interactive website.
_	ou are filing an annual updating amendment to your existing registration and are continuing to rely on the Internet adviser exemption for SEC istration, you must make this representation:
	I have provided and will continue to provide investment advice on an ongoing basis to more than one client exclusively through an <i>operational interactive</i> website.
SEC	TION 2.A.(12) SEC Exemptive <i>Order</i>
	you are relying upon an SEC <i>order</i> exempting you from the prohibition on registration, provide the following information:
App	olication Number:
803	3-
Dat	te of <i>order</i> :
Iter	n 3 Form of Organization
If yo	ou are filing an <i>umbrella registration</i> , the information in Item 3 should be provided for the <i>filing adviser</i> only.
Α.	How are you organized? Corporation
	O Sole Proprietorship
	O Partnership
	C Limited Liability Company (LLC)
	C Limited Partnership (LP)
	Other (specify):
	If you are changing your response to this Item, see Part 1A Instruction 4.
B.	In what month does your fiscal year end each year? DECEMBER
C.	Under the laws of what state or country are you organized?
	State Country
	United Kingdom
	If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.
	If you are changing your response to this Item, see Part 1A Instruction 4.
Iter	n 4 Successions
	Yes No
Α.	Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)?
	If "yes", complete Item 4.B. and Section 4 of Schedule D.
B.	Date of Succession: (MM/DD/YYYY)
	If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.

SECTION 4 Successions

${\bf Item\ 5\ Information\ About\ Your\ Advisory\ Business\ -\ Employees,\ Clients,\ and\ Compensation}$

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

Employees

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

A. Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.

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- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
 - (2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?
 - (3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?
 - (4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?
 - (5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?
 - (6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?

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

Clients

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

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

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

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

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

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

Type of <i>Client</i>	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)			\$
(b) High net worth individuals			\$

	(c) Banking or thrift institutions			\$
	(d) Investment companies			\$
	(e) Business development companies			\$
	(f) Pooled investment vehicles (other than investment companies and business development companies)	13		\$ 1,966,000,000
	(g) Pension and profit sharing plans (but not the plan participants or government pension plans)			\$
	(h) Charitable organizations		V	\$ 74,000,000
	(i) State or municipal <i>government entities</i> (including government pension plans)			\$
	(j) Other investment advisers		V	\$ 14,000,000
	(k) Insurance companies			\$
	(I) Sovereign wealth funds and foreign official institutions			\$
	(m) Corporations or other businesses not listed above			\$ 25,000,000
	(n) Other:			\$
E. `	pensation Arrangements You are compensated for your investment advisory services by (check all th (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):	nat apply):		
	5 Information About Your Advisory Business - Regulatory Assets Under ulatory Assets Under Management	Management		
Regu	natory Assets Orider Management			Yes No
F. ((1) Do you provide continuous and regular supervisory or management ser	rvices to securities	s portfolios?	© 0
	(2) If yes, what is the amount of your regulatory assets under managemen		•	• 0
,	U.S. Dollar Amount	it and total numb		ber of Accounts
				per of Accounts
	Discretionary: (a) \$ 2,079,000,000		(d) 16	
	Non-Discretionary: (b) \$ 0		(e) 0	
	Total: (c) \$ 2,079,000,000		(f) 16	
(Part 1A Instruction 5.b. explains how to calculate your regulatory assets a completing this Item. (3) What is the approximate amount of your total regulatory assets under a re non-United States persons? \$ 1,641,000,000	-		
	\$ 1,041,000,000			
Item	5 Information About Your Advisory Business - Advisory Activities			
Advi	sory Activities			
	What type(s) of advisory services do you provide? Check all that apply.			
	 □ (1) Financial planning services □ (2) Portfolio management for individuals and/or small businesses □ (3) Portfolio management for investment companies (as well as "bus section 54 of the Investment Company Act of 1940) □ (4) Portfolio management for pooled investment vehicles (other than \$\frac{1}{2}\$\$ (5) Portfolio management for businesses (other than small businesses other pooled investment vehicles) □ (6) Pension consulting services □ (7) Selection of other advisers (including private fund managers) □ (8) Publication of periodicals or newsletters □ (9) Security ratings or pricing services □ (10) Market timing services □ (11) Educational seminars/workshops □ (12) Other(specify): 	n investment com	panies)	·
	Do not check Item 5.G.(3) unless you provide advisory services pursuant to al Investment Company Act of 1940, including as a subadviser. If you check Item		3	, 3 3

investment Company Act of 1940, including as a subadviser. If you check item 5.G.(investment companies to which you provide advice in Section 5.G.(3) of Schedule D.

Н.	if you provide financial planning services, to now many <i>clients</i> did you provide these services during your last fiscal year?		
	o o		
	O 1 - 10		
	O 11 - 25		
	O 26 - 50		
	O 51 - 100		
	O 101 - 250		
	O 251 - 500		
	More than 500		
	If more than 500, how many?		
	(round to the nearest 500)		
	In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relat with those investors.	tionship)
	With those investors.		
1	(1) Do you participate in a wren for program?	Yes	
Ι.	(1) Do you participate in a wrap fee program?	0	•
	(2) If you participate in a wrap fee program, what is the amount of your regulatory assets under management attributable to acting as: (a) sponsor to a wrap fee program		
	\$		
	(b) portfolio manager for a <i>wrap fee program</i> ? \$		
	(c) <i>sponsor</i> to and portfolio manager for the same <i>wrap fee program</i> ? \$		
	If you report an amount in Item 5.1.(2)(c), do not report that amount in Item 5.1.(2)(a) or Item 5.1.(2)(b).		
	If you are a portfolio manager for a wrap fee program, list the names of the programs, their sponsors and related information in Section 5.1.(2) of Sc.	hedule	D.
	If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2).	throug	ıh a
i	(1) In response to Item 4.D. of Part 24 of Form ADV, do you indicate that you provide investment advice only with respect to limited types of	Yes	
J.	(1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?	0	•
	(2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management?	0	•
K.	Separately Managed Account Clients		
		Yes	No
	(1) Do you have regulatory assets under management attributable to <i>clients</i> other than those listed in Item 5.D.(3)(d)-(f) (separately managed account <i>clients</i>)?	•	0
	If yes, complete Section 5.K.(1) of Schedule D.		
	(2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise?	0	•
	If yes, complete Section 5.K.(2) of Schedule D.		
	(3) Do you engage in derivative transactions on behalf of any of the separately managed account clients that you advise?	•	0
	If yes, complete Section 5.K.(2) of Schedule D.		
	(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management?	•	0
	If yes, complete Section 5.K.(3) of Schedule D for each custodian.		
L.	Marketing Activities	Yes	No
	(1) Do any of your advertisements include:	162	IVC
	(a) Performance results?	•	0
	(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	0	•

(c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•
(d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•
(e) Third-party ratings?	0	•
(2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of <i>testimonials</i> , <i>endorsements</i> , or <i>third-party ratings</i> ?	0	0
(3) Do any of your advertisements include hypothetical performance?	•	0
(4) Do any of your advertisements include predecessor performance?	0	•

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

No Information Filed

SECTION 5.1.(2) Wrap Fee Programs

No Information Filed

SECTION 5.K.(1) Separately Managed Accounts

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

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

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

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

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

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

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

Generally describe any assets included in "Other"

Ass	et Type	End of year
(i)	Exchange-Traded Equity Securities	61 %
(ii)	Non Exchange-Traded Equity Securities	0 %
(iii)	U.S. Government/Agency Bonds	0 %
(iv)	U.S. State and Local Bonds	0 %
(v)	Sovereign Bonds	0 %
(vi)	Investment Grade Corporate Bonds	0 %
(vii)	Non-Investment Grade Corporate Bonds	0 %
(viii)	Derivatives	1 %
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	0 %
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	0 %
(xi)	Cash and Cash Equivalents	40 %
(xii)	Other	0 %

Generally describe any assets included in "Other"

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

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

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

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

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

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

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

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

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

(i) Mid-Year

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

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

(ii) End of Year

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

		Derivative	Derivative	Derivative	Derivative	Derivative	Derivative
Less than 10%	\$ \$	%	%	%	%	%	%
10-149%	\$ \$	%	%	%	%	%	%
150% or more	\$ \$	%	%	%	%	%	%

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

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

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

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

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

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

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings
Less than 10%	\$ 0	\$ O
10-149%	\$ 0	\$ O
150% or more	\$ 0	\$ O

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

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

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

(a) Legal name of custodian:

THE BANK OF NEW YORK MELLON

(b) Primary business name of custodian:

THE BANK OF NEW YORK MELLON

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

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

NEW YORK New York United States

Yes No

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

 \circ

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

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

HPFHU00Q28E4N0NFVK49

(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?

\$ 68,000,000

any)

(a) Legal name of custodian:

GOLDMAN SACHS & CO. LLC

(b) Primary business name of custodian:

GOLDMAN SACHS & CO. LLC

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

City: State: Country:

		Yes N	lo
(d)	Is the custodian a related person of your firm?	0 0	⊙
(e)	If the custodian is a broker-dealer, provide its SEC registration number (if any) 8 - 129		
(f)	If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity ide any)	<i>ntifier</i> (if	
(g)	What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? \$ 32,000,000		
(a)	Legal name of custodian: CITIGROUP GLOBAL MARKETS LIMITED		
(b)	Primary business name of custodian: CITIGROUP GLOBAL MARKETS LIMITED		
(c)	The location(s) of the custodian's office(s) responsible for custody of the assets:		
	City: State: Country: United Kingdom		
		Yes N	No
(d)	Is the custodian a related person of your firm?	0 (0
(e)	If the custodian is a broker-dealer, provide its SEC registration number (if any)		
(f)	- If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>legal entity ide</i> any) XKZZ2JZF41MRHTR1V493	ntifier (if	
(g)	What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? \$ 14,000,000		
	n 6 Other Business Activities		
In t	nis Item, we request information about your firm's other business activities.		
Α.	You are actively engaged in business as a (check all that apply): (1) broker-dealer (registered or unregistered) (2) registered representative of a broker-dealer (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (4) futures commission merchant		
	 (5) real estate broker, dealer, or agent (6) insurance broker or agent (7) bank (including a separately identifiable department or division of a bank) (8) trust company (9) registered municipal advisor 		
	(10) registered security-based swap dealer (11) major security-based swap participant (12) accountant or accounting firm		
	(13) lawyer or law firm (14) other financial product salesperson (specify):		
	If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule	D. Yes	No
B.	(1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?	0	•
	(2) If yes, is this other business your primary business?	0	0
	If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that	at name. Yes	No
	(3) Do you sell products or provide services other than investment advice to your advisory <i>clients</i> ?	Ö	•
	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	at name.	

New York

United States

NEW YORK

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

SECTION 7.A. Financial Industry Affiliations

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

- 1. Legal Name of *Related Person*: ALPHONSE CAPITAL LLP
- 2. Primary Business Name of *Related Person*: ALPHONSE CAPITAL LLP
- 3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

	or Other		
4.	Related Person's (a) CRD Number (if any):		
	(b) CIK Number(s) (if any):		
	No Information Filed		
5.	 Related Person is: (check all that apply) (a) □ broker-dealer, municipal securities dealer, or government securities broker or dealer (b) ☑ other investment adviser (including financial planners) 		
	(c) ☐ registered municipal advisor (d) ☐ registered security-based swap dealer		
	 (e) major security-based swap participant (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) 		
	(g) futures commission merchant (h) banking or thrift institution		
	(i) □ trust company(j) □ accountant or accounting firm		
	(k) lawyer or law firm		
	(I) 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?		⊙
7.	Are you and the related person under common control?	0	•
8.	(a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> Number and Street 1: Number 2:	'asse	ets:
	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:	Yes	No
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?		•
	(b) If the answer is yes, under what exemption?		
10.	(a) Is the related person registered with a foreign financial regulatory authority?	_	•
	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registed. No Information Filed		٠
11.	Do you and the related person share any supervised persons?	•	0
12.	Do you and the <i>related person</i> share the same physical location?	•	0
1.	Legal Name of <i>Related Person</i> : LEXCOR CAPITAL LLP		
2.	Primary Business Name of <i>Related Person</i> : LEXCOR CAPITAL LLP		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's (a) CRD Number (if any):		

	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n)	other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency		
6	Dow		Yes	
Ο.	ро у	you control or are you controlled by the related person?	0	•
7.	Are	you and the related person under common control?	0	6
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	6
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients's</i> Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:	asse	ets:
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	
7.	(a) (b)	If the answer is yes, under what exemption?	0	(9
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	•	C
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. Name of Country/English Name of <i>Foreign Financial Regulatory Authority</i>	ed.	
		United Kingdom - Financial Conduct Authority		
11.	Do y	you and the related person share any supervised persons?	•	C
12.	Do y	you and the <i>related person</i> share the same physical location?	•	C
1.	_	al Name of <i>Related Person</i> : VAT CAPITAL MANAGEMENT LLC		
2.		nary Business Name of <i>Related Person</i> : 'AT CAPITAL MANAGEMENT LLC		
3.	Rela -	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.	Rela (a)	ated Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		

5. Related Person is: (check all that apply)

	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	` '	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	.0,	futures commission merchant		
		banking or thrift institution		
		trust company		
	0,	accountant or accounting firm		
		lawyer or law firm		
		insurance company or agency		
	(m)			
	(n)			
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	V	N.I
_	Dow	you central or are you centralled by the related percent	Yes	
О.	ро у	you control or are you controlled by the related person?	0	⊙
_	•			
1.	Are y	you and the <i>related person</i> under common <i>contro</i> ?	0	⊙
_				
8.		Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	⊙
		If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	\circ
		presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not		
		required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your c	lients' asse	ets:
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
		If this address is a private residence, check this box.	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	
		If the answer is yes, under what exemption?		٠
	(6)	If the answer is yes, under what exemption:		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is re-		٠
	(0)	No Information Filed	igistor ou.	
11.	Do y	you and the related person share any supervised persons?	•	0
			_	
12.	Do y	ou and the related person share the same physical location?	•	0
1	Lega	al Name of <i>Related Person</i> :		
	_	DX CAPITAL PARTNERS LLP		
2.	Prim	ary Business Name of Related Person:		
	VELC	DX CAPITAL PARTNERS LLP		
_				
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe			
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
E	D = '	ted Person is. (about all that apply)		
5.		ted Person is: (check all that apply)		
	` ,	broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)		
		registered municipal advisor registered security-based swap dealer		
	(u) (e)	major security-based swap dealer major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	. ,			

	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(l)	insurance company or agency		
	` ,	pension consultant		
	(n)	real estate broker or dealer		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	s No
	Do y	you control or are you controlled by the related person?	0	⊙
	Are y	you and the <i>related person</i> under common <i>control</i> ?	0	\odot
	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	⊙
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	0
		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 clients' funds or securities that are maintained at the related person?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your client	ts' ass	ets:
		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	v	
	(-)			s No
	(a)	If the related person is an investment adviser, is it exempt from registration?	0	⊙
	(b)	If the answer is yes, under what exemption?		
).	(a)	Is the related person registered with a foreign financial regulatory authority?	\odot	\circ
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is register.	tered.	
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		United Kingdom - Financial Conduct Authority		
	Do y	United Kingdom - Financial Conduct Authority you and the related person share any supervised persons?	•	0
	Do y		•	0
1.				
1.		you and the related person share any supervised persons?	© ©	
1.		you and the related person share any supervised persons?		
2.	Do y	you and the <i>related person</i> share any <i>supervised persons</i> ? you and the <i>related person</i> share the same physical location?		
2.	Do y	you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person:		
l. Σ.	Do y	you and the <i>related person</i> share any <i>supervised persons</i> ? you and the <i>related person</i> share the same physical location?		
2.	Do y Lega ELEP	you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP		
1.	Do y Lega ELEP	you and the related person share any supervised persons? you and the related person share the same physical location? All Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP pary Business Name of Related Person:		
2.	Do y Lega ELEP	you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP		
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1.	Do y Lega ELEP Prim ELEP Rela	you and the related person share any supervised persons? you and the related person share the same physical location? All Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP hary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
1.	Do y Lega ELEP Prim ELEP Rela - or Othe	you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP hary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		_
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1.	Do y Lega ELEP Prim ELEP Rela or Othe	you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP hary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
1.	Do y Lega ELEP Prim ELEP Rela or Other Rela (a)	you and the related person share any supervised persons? you and the related person share the same physical location? All Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP harry Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ted Person's CRD Number (if any):		
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1.	Do y Lega ELEP Prim ELEP Rela or Other Rela (a)	you and the related person share any supervised persons? you and the related person share the same physical location? All Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP harry Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ted Person's CRD Number (if any):		
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1.	Do y Lega ELEP Prim ELEP Rela - or Other (a) (b)	rou and the related person share any supervised persons? rou and the related person share the same physical location? al Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP pary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er ted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed		
2.	Do y Lega ELEP Prim ELEP Rela or Othe Rela (a) (b)	rou and the related person share any supervised persons? you and the related person share the same physical location? All Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Hary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) ar ted Person's CRD Number (if any): No Information Filed		
11.	Lega ELEP Prim ELEP Rela or Other (a) (b)	rou and the related person share any supervised persons? rou and the related person share the same physical location? All Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP sary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) ar ted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer		_
2.	Lega ELEP Prim ELEP or Othe (a) (b)	rou and the related person share any supervised persons? rou and the related person share the same physical location? All Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP stary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or ted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)		
2.	Lega ELEP Prim ELEP Or Othe (a) (b)	rou and the related person share any supervised persons? rou and the related person share the same physical location? All Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP tary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (If any) (e.g., 801-, 8-, 866-, 802-) er ted Person's CRD Number (If any): No Information Filed ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor		
2.	Legal ELEP Prim ELEP or Other (a) (b) Rela (a) (b) (c) (d)	rou and the related person share any supervised persons? rou and the related person share the same physical location? al Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP rary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) ar ted Person's CRD Number (if any): No Information Filed ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer or registered municipal advisor registered security-based swap dealer		_
2.	Legal ELEP Prim ELEP Or Other (a) (b) Rela (a) (b) (c) (d) (e) (e)	rou and the related person share any supervised persons? rou and the related person share the same physical location? All Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Bary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) Betted Person's CRD Number (if any): No Information Filed ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer or other investment adviser (including financial planners) registered security-based swap dealer major security-based swap participant		
2.	Legal ELEP Prim ELEP or Other (a) (b) (c) (d) (e) (f)	Tou and the related person share any supervised persons? Tou and the related person share the same physical location? Is Name of Related Person: HANT ASSET MANAGEMENT (LONDON) LLP Tary Business Name of Related Person: HANT ASSET MANAGEMENT (LONDON) LLP Tary Business Name of Related Person: HANT ASSET MANAGEMENT (LONDON) LLP Teted Person's SEC File Number (If any) (e.g., 801-, 8-, 866-, 802-) Teted Person's CRD Number (If any): No Information Filed Teted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap dealer major security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	Do y Lega ELEP Prim ELEP Rela or Other (a) (b) (c) (d) (e) (f) (g)	rou and the related person share any supervised persons? rou and the related person share the same physical location? In Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP rary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP rary Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) Sec. CRD Number (if any): CIK Number(s) (if any): No Information Filed Ited Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer or their investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant		
1.	Do y Lega ELEP Prim ELEP Rela (a) (b) (b) Rela (a) (c) (d) (e) (f) (g) (h)	rou and the related person share any supervised persons? rou and the related person share the same physical location? In Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Barry Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Red Person's SEC File Number (If any) (e.g., 801-, 8-, 866-, 802-) Ber Red Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed Red Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer registered municipal advisor registered municipal advisor registered security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) tutures commission merchant banking or thrift institution		
1.	Do y Lega ELEP Prim ELEP Rela or Other (a) (b) (c) (d) (e) (f) (g) (h) (i)	rou and the related person share any supervised persons? rou and the related person share the same physical location? In Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Barry Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Barry Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Barry Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Barry Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Barry Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Barry Business Name of Related Person: Barry Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Barry Business Name of Related Person: Ba		
1. 2	Do y Lega ELEP Prim ELEP Rela (a) (b) (b) Rela (a) (c) (d) (e) (f) (g) (h)	rou and the related person share any supervised persons? rou and the related person share the same physical location? In Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Barry Business Name of Related Person: PHANT ASSET MANAGEMENT (LONDON) LLP Red Person's SEC File Number (If any) (e.g., 801-, 8-, 866-, 802-) Ber Red Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed Red Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer registered municipal advisor registered municipal advisor registered security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) tutures commission merchant banking or thrift institution		

	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o) (p)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(ρ)	Sportsor, general partner, managing member (or equivalent) or pooled investment vehicles	Yes	No
6.	Do y	you control or are you controlled by the related person?	0	•
7.	Are	you and the related person under common control?	0	•
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> Number and Street 1: Number and Street 2:	'asse	ets:
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
			Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	\circ	•
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	~	_
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.	⊙ ered.	O
	(-)	Name of Country/English Name of Foreign Financial Regulatory Authority		
		United Kingdom - Financial Conduct Authority		
11.	Do y	you and the <i>related person</i> share any <i>supervised persons</i> ?	\odot	0
12.	Doy	you and the <i>related person</i> share the same physical location?	•	0
Iter	n 7 <i>F</i>	Private Fund Reporting		
			Yes	No
В. и	Are y	ou an adviser to any <i>private fund</i> ?	•	0
	sente repor 7.B.(1	es," 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 ence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in \$1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You ad, complete Section 7.B.(2) of Schedule D.	t Sectio	n
	code,	her 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 alphabe or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code nation in place of the fund's name.		
SEC	TLOI	N 7.B.(1) <i>Private Fund</i> Reporting		
JEC	1101			
		Funds per Page: 15 Total Funds: 4		
	DDU	VATE FUND		
A	PRIN	/ATE FUND		
<u> </u>	<u>nform</u>	nation About the <i>Private Fund</i>		
1	. (8	a) Name of the <i>private fund</i> : CHELODINA MASTER FUND		
	(k	o) Private fund identification number: (include the "805-" prefix also) 805-1338780197		
	. U	nder the laws of what state or country is the <i>private fund</i> organized:		
	_	State: Country:		

Name of G	eneral Partner, Manager, Trustee, or Director		
MARTIN LAI	NG		
MICHAEL PA	ARTON		
o) If filing	an umbrella registration, identify the filing adviser	rand/or relying adviser(s) that sponsor(s) or manage(s) this private fund.	
		No Information Filed	
_	fund (check all that apply; you must check at lea		40
		stment company under section 3(c)(1) of the Investment Company Act of 19- stment company under section 3(c)(7) of the Investment Company Act of 19-	
a (2) quai	illies for the exclusion from the definition of life.	stiffert company under section 3(c)(7) of the investment company Act of 199	40
ist the nam	me and country, in English, of each <i>foreign financ</i>	ial regulatory authority with which the private fund is registered.	
Name of Co	ountry/English Name of Foreign Financial Reg	gulatory Authority	
Cayman Isl	lands - Cayman Islands Monetary Authority		
			Yes
a) Is this a	a "master fund" in a master-feeder arrangement	t?	•
b) If yes, \	what is the name and private fund identification i	number (if any) of the feeder funds investing in this private fund?	
Name of pi	rivate fund	Private fund identification number	
CHELODINA	A FEEDER FUND	805-4187881044	
			Yes
c) Is this a	a "feeder fund" in a master-feeder arrangement	?	0
d) If ves v	what is the name and <i>private fund</i> identification r	number (if any) of the master fund in which this private fund invests?	
	,		
Name o			
	of private fund:		
	or private rund:		
Private:			
	fund identification number:		
	fund identification number:		
(include	fund identification number: e the "805-" prefix also)	er arrangement regardless of whether you are filing a single Schedule D, Sec	tion 7.B.(1
(include	fund identification number: e the "805-" prefix also)		tion 7.B.(1
(include IOTE: You or the mas	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feedester-feeder arrangement or reporting on the fund	ds separately.	
(include	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feede eter-feeder arrangement or reporting on the func-		
(include IOTE: You or the mas f you are fi ne feeder f	fund identification number: te the "805-" prefix also) must complete question 6 for each master-feeder arrangement or reporting on the functions a single Schedule D, Section 7.B.(1) for a method funds answer the following questions:	ds separately.	
(include IOTE: You or the mas f you are fi ne feeder f	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feede eter-feeder arrangement or reporting on the func-	ds separately.	
(include IOTE: You or the mas If you are fi the feeder f	fund identification number: the the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the function a single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed.	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B.(1)), for each
(include IOTE: You or the mas If you are fine feeder for Additional	fund identification number: the the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the function a single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed.	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B.(1) For a master-feeder arrangement according to the instructions to this Section 7.), for each
(include IOTE: You or the mas If you are fine feeder for Additional	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the function as single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. are filing a single Schedule D, Section 7.B.(1) for	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B.(1) For a master-feeder arrangement according to the instructions to this Section 7.), for each
(included) IOTE: You sor the mass If you are fine feeder for the	fund identification number: the the "805-" prefix also) must complete question 6 for each master-feedenter-feeder arrangement or reporting on the function as single Schedule D, Section 7.B.(1) for a magnitude answer the following questions: Feeder Fund Information: 1 Record(s) Filed. are filling a single Schedule D, Section 7.B.(1) for the feeder funds answer the following questions:	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B.(1) For a master-feeder arrangement according to the instructions to this Section 7.), for each
(included) IOTE: You are fine feeder for the mase for the mase for the mase for the mase for the feeder for th	fund identification number: the the "805-" prefix also) must complete question 6 for each master-feeder arrangement or reporting on the function as single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. are filling a single Schedule D, Section 7.B.(1) for the feeder funds answer the following question of the private fund: CHELODINA FEEDER FUND	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B.(1) For a master-feeder arrangement according to the instructions to this Section 7.), for each
(included) IOTE: You sor the mass If you are fine feeder for the	fund identification number: the the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the function of the ster-feeder arrangement or reporting on the function as single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. The feeder funds answer the following question of the feeder funds answer the following question of the private fund: CHELODINA FEEDER FUND Private fund identification number:	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B.(1) For a master-feeder arrangement according to the instructions to this Section 7.), for each
(included) IOTE: You are fine feeder for the mase for the mase for the mase for the mase for the feeder for th	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the fund funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. are filing a single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: CHELODINA FEEDER FUND Private fund identification number: (include the "805-" prefix also)	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B.(1) For a master-feeder arrangement according to the instructions to this Section 7.), for each
(included) IOTE: You are fine feeder for the mase for the mase for the mase for the mase for the feeder for th	fund identification number: the the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the function of the ster-feeder arrangement or reporting on the function as single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. The feeder funds answer the following question of the feeder funds answer the following question of the private fund: CHELODINA FEEDER FUND Private fund identification number:	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B.(1) For a master-feeder arrangement according to the instructions to this Section 7.), for each
(included) IOTE: You are fine feeder for the mase for the mase for the mase for the mase for the feeder for th	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the fund funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. are filing a single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: CHELODINA FEEDER FUND Private fund identification number: (include the "805-" prefix also)	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B.(1) For a master-feeder arrangement according to the instructions to this Section 7.), for each
(included) IOTE: You are fine feeder for the mase for the mase for the mase for the mase for the feeder for th	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the fund funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. are filing a single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: CHELODINA FEEDER FUND Private fund identification number: (include the "805-" prefix also)	aster-feeder arrangement according to the instructions to this Section 7.B.(1) as a master-feeder arrangement according to the instructions to this Section 7 ans:), for each
(included) IOTE: You have the mass f you are fine feeder for feeder for feeder for feeder for feeder feed	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the fundation as single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. are filing a single Schedule D, Section 7.B.(1) for the feeder funds answer the following question. Name of the private fund: CHELODINA FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-4187881044	aster-feeder arrangement according to the instructions to this Section 7.B.(1) as a master-feeder arrangement according to the instructions to this Section 7 ons:), for each
(included) IOTE: You have the mass f you are fine feeder for feeder for feeder for feeder for feeder feed	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feeder arrangement or reporting on the fundation as single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. are filing a single Schedule D, Section 7.B.(1) for the feeder funds answer the following question. Name of the private fund: CHELODINA FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-4187881044 Under the laws of what state or country is the State: Country is the State:	aster-feeder arrangement according to the instructions to this Section 7.B.(1) as a master-feeder arrangement according to the instructions to this Section 7 ons:), for each
(included) IOTE: You soon the mass If you are fine feeder for feeder for (a) (b)	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feeder arrangement or reporting on the function of the feeder arrangement or reporting on the function of the feeder fund Information: Feeder Fund Information: 1 Record(s) Filed. are filing a single Schedule D, Section 7.B.(1) for a material fund of the feeder funds answer the following question of the feeder funds answer the following question Name of the private fund: CHELODINA FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-4187881044 Under the laws of what state or country is the State: Counce Cayn	private fund organized: nan Islands), for each
(included) IOTE: You soon the mass If you are fine feeder for feeder for (a) (b)	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the fundations as single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. The feeder funds answer the following question in the private fund: CHELODINA FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-4187881044 Under the laws of what state or country is the State: Country is the State: Country in Name(s) of General Partner, Manager, Trustee	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B. (1) Part a master-feeder arrangement according to the instructions to this Section 7 ons: Private fund organized: Private fun), for each
(included) IOTE: You soon the mass If you are fine feeder for feeder for (a) (b)	must complete question 6 for each master-feedester-feeder arrangement or reporting on the functions a single Schedule D, Section 7.B.(1) for a mfunds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. are filing a single Schedule D, Section 7.B.(1) for a mfunds answer the following questions: CHELODINA FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-4187881044 Under the laws of what state or country is the State: Country Name(s) of General Partner, Manager, Trustee Name of General Partner, Manager, Trustee	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B. (1) Part a master-feeder arrangement according to the instructions to this Section 7 ons: Private fund organized: Private fun), for each
(included) IOTE: You soon the mass If you are fine feeder for feeder for (a) (b)	fund identification number: e the "805-" prefix also) must complete question 6 for each master-feeder ster-feeder arrangement or reporting on the fundations as single Schedule D, Section 7.B.(1) for a magnetic funds answer the following questions: Feeder Fund Information: 1 Record(s) Filed. The feeder funds answer the following question in the private fund: CHELODINA FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-4187881044 Under the laws of what state or country is the State: Country is the State: Country in Name(s) of General Partner, Manager, Trustee	ds separately. Paster-feeder arrangement according to the instructions to this Section 7.B. (1) Part a master-feeder arrangement according to the instructions to this Section 7 ons: Private fund organized: Private fun), for each

(d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

	(0)	The private fund (sheet, all that apply, you rejet sheet, at least one).		
	(e)	The <i>private fund</i> (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company	av Act of	
		1940	IY ACT OF	
		(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Compart 1940	ny Act of	
	(f)	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
		Name of Country/English Name of Foreign Financial Regulatory Authority		1
		Cayman Islands - Cayman Islands Monetary Authority		111
	assets in a	purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question in a single master fund invests of this question in a single master fund invests substantially all of its assets in a single master fund	f it issue	d
0	() I II I		Yes	No
8.		private fund a "fund of funds"?	_	⊙
		purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investmegardless of whether they are also <i>private funds</i> or registered investment companies.	ent	
	(b) If yes,	does the private fund invest in funds managed by you or by a related person?	0	0
			Yes	No
9.		r last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type	of fund is the <i>private fund</i> ?		
	• hedge f	und $^{f O}$ liquidity fund $^{f O}$ private equity fund $^{f O}$ real estate fund $^{f O}$ securitized asset fund $^{f O}$ venture capital fund $^{f O}$ Other p	ivate fun	ıd:
	NOTE: For	definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gro \$ 10,000,0	oss asset value of the <i>private fund</i> :		
<u>Ow</u>	nershi <u>p</u>			
12.	Minimum ir \$ 250,000	evestment commitment required of an investor in the <i>private fund</i> :		
	•	ort the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in nal documents of the fund).	the	
13.	Approximat	te number of the <i>private fund's</i> beneficial owners:		
14.	What is the	e approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15.	(a) What is	s the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	(b) If the p	private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment	Yes	
	•	ny Act of 1940, are sales of the fund limited to qualified clients?		V
16.	What is the	e approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
Υοι	ur Advisory	<u>Services</u>		
			Yes	No
17.	(a) Are you	u a subadviser to this <i>private fund</i> ?	0	\odot

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer to

question 17.(a) is "no," leave this question blank.

No Information Filed

		No illiornation riled		
			Ye	s No
		Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	_
		If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If to question 18.(a) is "no," leave this question blank.	the ans	wer
		No Information Filed		
			Ye	s No
	Are	your clients solicited to invest in the private fund?	0	⊙
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
	App 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
iva	ate	Offering		
		the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Ye:	s No
		es, provide the <i>private fund's</i> Form D file number (if any):		
ŀ		m D file number I-416664		
ļ	021	-410004		
	RVI(CE PROVIDERS	Ve	s No
	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	•	_
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one audi	_	
		you must complete questions (b) through (f) separately for each auditing firm.		
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm: KPMG		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: State: Country:		
		GRAND CAYMAN Cayman Islands		
			Yes	No
		(d) Is the auditing firm an independent public accountant?	⊙	0
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
		If yes, Public Company Accounting Oversight Board-Assigned Number:		
		1323		
		(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 No
		Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	•	0
				0
	(h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified • Yes • No • Report Not Yet Received	opinio	is?
		™ 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.

LONDON

Yes No

 \circ

 \circ

24.	(a)	Does the <i>private fund</i> use one or more prime brokers?		\odot
			C 11	1.

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

Additional	Prime Broker	Information	: 3	Record(s)	Filed.
, taartioi lai	I I II II C DI ORCI	monnation		1100014		i iica.

Addi	tional Prime Broker Information : 3 F	Record(s) Filed.			
			through (e) below for each prime broker the <i>private fund</i> uses. questions (b) through (e) separately for each prime broker.	If the	
(b)	Name of the prime broker: GOLDMAN SACHS INTERNATIONAL				
(c)	If the prime broker is registered with	the SEC, its registration n	number:		
	- CRD Number (if any):				
(d)	Location of prime broker's office used				
	3	itate:	Country:		
	LONDON		United Kingdom		
				Yes	No
(e)	Does this prime broker act as custodia	an for some or all of the p	private fund's assets?	•	\circ
priv	nate fund uses more than one prime brown Name of the prime broker:	•	through (e) below for each prime broker the <i>private fund</i> uses. questions (b) through (e) separately for each prime broker.	If the	
	J P MORGAN SECURITIES PLC				
(c)	If the prime broker is registered with	the SEC, its registration n	number:		
	CRD Number (if any):				
(d)	Location of prime broker's office used	principally by the <i>private</i>	fund (city, state and country):		
	City: S	itate:	Country:		
	LONDON		United Kingdom		
				Yes	No
(e)	Does this prime broker act as custodia	an for some or all of the p	private fund's assets?	•	\circ
	•	•	through (e) below for each prime broker the <i>private fund</i> uses. questions (b) through (e) separately for each prime broker.	If the	
(b)	Name of the prime broker: MORGAN STANLEY & CO INTERNATION	IAL PLC			
(c)	If the prime broker is registered with	the SEC, its registration n	number:		
	CRD Number (if any):				
(d)	Location of prime broker's office used	principally by the <i>private</i>	fund (city, state and country):		
	City: S	itate:	Country:		

United Kingdom

(e) Does this prime broker act as custodian for some or all of the *private fund's* assets?

Yes No 25. (a) Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets? ⊕ \circ If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 3 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: GOLDMAN SACHS INTERNATIONAL (c) Primary business name of custodian: GOLDMAN SACHS INTERNATIONAL (d) The location of the custodian's office responsible for custody of the private fund's assets (city, state and country): State: Country: LONDON United Kingdom Yes No (e) Is the custodian a related person of your firm? 0 **③** (f) If the custodian is a broker-dealer, provide its SEC registration number (if any): CRD Number (if any): (g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity identifier (if any) W22LROWP2IHZNBB6K528 If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: J P MORGAN SECURITIES PLC (c) Primary business name of custodian: J P MORGAN SECURITIES PLC (d) The location of the custodian's office responsible for custody of the private fund's assets (city, state and country): State: Country: City: LONDON United Kingdom Yes No (e) Is the custodian a related person of your firm? \odot \circ (f) If the custodian is a broker-dealer, provide its SEC registration number (if any): CRD Number (if any): (g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity identifier (if any) K6Q0W1PS1L1O4IQL9C32

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

	MORGAN STANLEY & CO INT	ERNATIONAL PLC		
(c)	Primary business name of common MORGAN STANLEY	ustodian:		
(d)	The location of the custodia	n's office responsible for a	custody of the private fund's assets (city, state and coun	try):
	City:	State:	Country:	
	LONDON		United Kingdom	Va
(e)	Is the custodian a related pe	erson of your firm?		Ye
(f)	If the custodian is a broker-	dealer, provide its SEC req	gistration number (if any):	
	- CRD Number (if any):			
(g)	If the custodian is not a bro identifier (if any) 4PQUHN3JPFGFNF3BB653	ker-dealer, or is a broker-	dealer but does not have an SEC registration number,	provide its <i>legal entity</i>
	e answer to question 26.(a) is complete questions (b) throu		ons (b) through (f) below. If the <i>private fund</i> uses more administrator.	than one administrat
must	•	ugh (f) separately for each	administrator.	than one administrat
Addi	tional Administrator Information and the answer to question 26.(a)	nation: 1 Record(s) Filed is "yes," respond to ques	administrator.	
Addi If ti adn	tional Administrator Information and the answer to question 26.(a)	nation: 1 Record(s) Filed is "yes," respond to ques	administrator. .tions (b) through (f) below. If the <i>private fund</i> uses mo	
Addi If ti adn	tional Administrator Informational Administrator Information answer to question 26.(a) ministrator, you must comple	nation: 1 Record(s) Filed is "yes," respond to ques te questions (b) through (administrator. 	
Addi If ti adn	tional Administrator Inform the answer to question 26.(a) ministrator, you must comple Name of administrator:	nation: 1 Record(s) Filed is "yes," respond to ques te questions (b) through (administrator. 	
Addi If tl adn (b)	tional Administrator Inform the answer to question 26.(a) ministrator, you must comple Name of administrator:	nation: 1 Record(s) Filed is "yes," respond to ques te questions (b) through (administrator. 	
Addi If tl adn (b)	tional Administrator Inform the answer to question 26.(a) ministrator, you must comple Name of administrator: WAYSTONE ADMINISTRATIO Location of administrator (ci	nation: 1 Record(s) Filed is "yes," respond to ques te questions (b) through (administrator. Itions (b) through (f) below. If the <i>private fund</i> uses mo f) separately for each administrator. Country:	
Addi If tl adn (b)	complete questions (b) throughtional Administrator Informational Administrator Informational Administrator (citional Administrator, you must complement to administrator: WAYSTONE ADMINISTRATION Location of administrator (citional Administrator)	nation: 1 Record(s) Filed is "yes," respond to ques te questions (b) through (administrator. Itions (b) through (f) below. If the <i>private fund</i> uses mo f) separately for each administrator.	re than one
Addi If tl adn (b)	tional Administrator Inform the answer to question 26.(a) ministrator, you must comple Name of administrator: WAYSTONE ADMINISTRATIO Location of administrator (ci	nation: 1 Record(s) Filed is "yes," respond to quested the questions (b) through (N SOLUTIONS (IE) LIMITED ity, state and country): State:	administrator. Itions (b) through (f) below. If the <i>private fund</i> uses mo f) separately for each administrator. Country:	re than one
Addi If the adm (b) (c)	complete questions (b) throughtional Administrator Informational Administrator Informational Administrator Informational Administrator (a) the answer to question 26. (a) ministrator, you must complete Name of administrator: WAYSTONE ADMINISTRATION Location of administrator (cinciple City: DUBLIN Is the administrator a relater	nation: 1 Record(s) Filed is "yes," respond to queste questions (b) through (N SOLUTIONS (IE) LIMITED ity, state and country): State:	administrator. Autions (b) through (f) below. If the <i>private fund</i> uses mo f) separately for each administrator. Country: Ireland	re than one Yes
Addi If the adm (b) (c)	tional Administrator Informational Administrator Informational Administrator Informational Administrator Informational Administrator 26. (a) ministrator, you must comple Name of administrator: WAYSTONE ADMINISTRATION Location of administrator (ci City: DUBLIN Is the administrator a relater Does the administrator pregnance of the present the complex of the compl	nation: 1 Record(s) Filed is "yes," respond to quested questions (b) through (N SOLUTIONS (IE) LIMITED ity, state and country): State: ed person of your firm?	administrator. Itions (b) through (f) below. If the <i>private fund</i> uses mo f) separately for each administrator. Country:	re than one Yes
Addi If the adm (b) (c) (d) (e)	tional Administrator Informational Administrator Informational Administrator Informational Administrator Informational Administrator 26. (a) ministrator, you must comple Name of administrator: WAYSTONE ADMINISTRATION Location of administrator (ci City: DUBLIN Is the administrator a relater Does the administrator prepared of the answer to question 20	nation: 1 Record(s) Filed is "yes," respond to quested questions (b) through (N SOLUTIONS (IE) LIMITED ity, state and country): State: ed person of your firm? pare and send investor acceptors) Some (provided to the country) of "some," we have a store to the country of	administrator. Stions (b) through (f) below. If the <i>private fund</i> uses mo f) separately for each administrator. Country: Ireland	re than one Yes C estors) of the) private fund's
Addi If the adm (b) (c) (d) (e)	tional Administrator Informational Administrator Informational Administrator Informational Administrator Informational Administrator 26. (a) ministrator, you must comple Name of administrator: WAYSTONE ADMINISTRATION Location of administrator (ci City: DUBLIN Is the administrator a relater Does the administrator prepared of the answer to question 20	nation: 1 Record(s) Filed is "yes," respond to quested questions (b) through (N SOLUTIONS (IE) LIMITED ity, state and country): State: ed person of your firm? pare and send investor acceptors) Some (provided to the country) of "some," we have a store to the country of	country: Ireland Country: Ireland	re than one Yes C estors) of the) private fund's
Addi If the adm (b) (c) (d) (e)	itional Administrator Inform the answer to question 26.(a) ministrator, you must comple Name of administrator: WAYSTONE ADMINISTRATIO Location of administrator (ci City: DUBLIN Is the administrator a relate Does the administrator prepare Yes (provided to all invess If the answer to question 26 investors? If investor accou	nation: 1 Record(s) Filed is "yes," respond to queste questions (b) through (N SOLUTIONS (IE) LIMITED ity, state and country): State: ed person of your firm? pare and send investor acceptors) Some (provided to the country) or "some," want statements are not send	country: Ireland Country: Ireland	re than one Yes Constors) of the) private fund's not applicable."

<u>Marketers</u>

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

Yes No

	uses. If the <i>private fund</i> uses more than one marketer you must complete questions (I	b) through (g) separately for each marketer.
	No Information Filed	
A. F	PRIVATE FUND	
Info	formation About the <i>Private Fund</i>	
1.	 (a) Name of the <i>private fund</i>: EAM LONG-ONLY EMERGING MARKETS MASTER FUND LIMITED (b) <i>Private fund</i> identification number: (include the "805-" prefix also) 805-7389231579 	
2.	Under the laws of what state or country is the <i>private fund</i> organized:	
۷.	State: Country:	
	Cayman Islands	
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a single	milar capacity):
	Name of General Partner, Manager, Trustee, or Director	
	ANGILYNN BARAUD CHRISTIAN LEITZINGER	
	CHRISTINA MCGUIRE	
	PETER LITVIN	
	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that s No Information Filed	sponsor(s) or manage(s) this <i>private fund</i> .
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 ☐ (2) qualifies for the exclusion from the definition of investment company under section	
5.	List the name and country, in English, of each foreign financial regulatory authority with whi	ch the <i>private fund</i> is registered.
	Name of Country/English Name of Foreign Financial Regulatory Authority	
	Cayman Islands - Cayman Islands Monetary Authority	
		Yes No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	⊙ C
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder fundamental fundament	
	Name of private fund	Private fund identification number
	EAM LONG-ONLY EMERGING MARKETS FEEDER FUND LIMITED EAM LONG-ONLY EMERGING MARKETS FUND DELAWARE LP	805-8902615183 805-8828148660
	LAW LONG-ONET EMENGING MARKETS FOND DELAWARE EI	003-0020140000
		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 f Name of private fund:	und in which this <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 waster-feeder arrangement or reporting on the funds separately.	whether you are filing a single Schedule D, Section 7.B.(1)
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement accordine feeder funds answer the following questions:	ording to the instructions to this Section 7.B.(1), for each of

Additional Feeder Fund Information: 2 Record(s) Filed.

(a)	Name of the <i>private fund</i> :
	EAM LONG-ONLY EMERGING MARKETS FEEDER FUND LIMITED
(b)	Private fund identification number:
	(include the "805-" prefix also)
	805-8902615183
(c)	Under the laws of what state or country is the <i>private fund</i> organized:
/	State: Country:
	Cayman Islands
(d) (1)	Name(s) of General Partner, Manager, Trustee or Directors (or <i>persons</i> serving in a similar capacity):
	Name of General Partner, Manager, Trustee or Director
	ANGILYNN BARAUD
	CHRISTIAN LEITZINGER
	CHRISTINA MCGUIRE
	PETER LITVIN
(d) (2)	If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> No Information Filed
(e)	The <i>private fund</i> (check all that apply; you must check at least one):
(0)	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company
	1940
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company
	1940
(f)	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.
	Name of Country/English Name of Foreign Financial Regulatory Authority
	Cayman Islands - Cayman Islands Monetary Authority
-	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 the feeder funds answer the following questions:
	Name of the private fund:
(a)	·
	EAM LONG-ONLY EMERGING MARKETS FUND DELAWARE LP
(b)	Private fund identification number:
	(include the "805-" prefix also)
	805-8828148660
(a)	Under the laws of what state or country is the <i>private fund</i> organized:
()	onder the laws or what state or country is the private rand organized.
(C)	Stato: Country:
(C)	State: Country: Delaware United States
	Delaware United States
	Delaware United States Name(s) of General Partner, Manager, Trustee or Directors (or <i>persons</i> serving in a similar capacity):
	Delaware United States Name(s) of General Partner, Manager, Trustee or Directors (or <i>persons</i> serving in a similar capacity): Name of General Partner, Manager, Trustee or Director
(c)	Delaware United States Name(s) of General Partner, Manager, Trustee or Directors (or <i>persons</i> serving in a similar capacity):

	1940		
	(f) List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	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 or assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
0		'es	
8.	(a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	0	•
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	0
	Υ	'es	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type of fund is the private fund?		
	• hedge fund • liquidity fund • private equity fund • real estate fund • securitized asset fund • venture capital fund • Other private	fun	d:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 217,000,000		
Ow	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 5,000,000 NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 52		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
		es O	
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 2%		
You	r Advisory Services		
17		es	
17.	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer to question 17.(a) is "no," leave this question blank.		⊙
	No Information Filed		
	Υ	'es	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ? (b) If the answer to question 18 (a) is "yes," provide the name and SEC file number, if any, of the other advisers to the private fund. If the answer to question 18 (b) is "yes," provide the name and SEC file number, if any, of the other advisers to the private fund.	0	•

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

1940

		to question to (a) is the reave this question brank.		
		No Information Filed		
			Ye	s No
19.	Are :	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	•
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
20.		oximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
	0%			
Priv	vate (Offering Control of the Control of t		
			Ye	s No
21.	Has	the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	0
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		m D file number		
		-288137		
	021	-397498		
B. S	ERVIC	CE PROVIDERS		
Aud	ditors			
23	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?		s No
20.		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one audit	_	_
		you must complete questions (b) through (f) separately for each auditing firm.		
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm: KPMG		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
		City: State: Country:		
		GRAND CAYMAN Cayman Islands		
			Yes	No
		(d) Is the auditing firm an independent public accountant?	⊙	0
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
		If yes, Public Company Accounting Oversight Board-Assigned Number: 1323		
		(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 No
		Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	o	0
	(h)	Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified	opinio	ns?
		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 avai	lable.
<u>Prii</u>	me Bı	<u>roker</u>		
			Ye	s No
24.	(a)	Does the <i>private fund</i> use one or more prime brokers?	G	0

Addi	itional Prime Broker Infor	rmation : 1 Record(s) Filed	l.	
	•		stions (b) through (e) below for each prime broker the complete questions (b) through (e) separately for each	•
(b)	Name of the prime broker HSBC BANK PLC	7:		
(c)	If the prime broker is reg	istered with the SEC, its reg	sistration number:	
	CRD Number (if any):			
(d)	Location of prime broker's		ne <i>private fund</i> (city, state and country):	
	City: LONDON	State:	Country:	
	LONDON		United Kingdom	Ye
(e)	Does this prime broker ac	et as custodian for some or	all of the <i>private fund's</i> assets?	•
<u>an</u>				,
			the contract of the contract o	
If the	e answer to question 25.(a) is "yes," respond to quest dian, you must complete qu	me brokers listed above) to hold some or all of its asserions (b) through (g) below for each custodian the <i>priva</i> estions (b) through (g) separately for each custodian.	
If the fund to	e answer to question 25.(a) uses more than one custod itional Custodian Informathe answer to question 25.) is "yes," respond to quest dian, you must complete quest dian: 1 Record(s) Filed. (a) is "yes," respond to que	ions (b) through (g) below for each custodian the <i>priva</i>	ate fund uses. If the priv
Addi	e answer to question 25.(a) uses more than one custod itional Custodian Informathe answer to question 25.) is "yes," respond to quest dian, you must complete quest dian: 1 Record(s) Filed. (a) is "yes," respond to que	ions (b) through (g) below for each custodian the <i>priva</i> estions (b) through (g) separately for each custodian. stions (b) through g) below for each custodian the <i>priv</i>	ate fund uses. If the priv
Addi: If the fund to the fund	e answer to question 25. (a uses more than one custod itional Custodian Information answer to question 25. and uses more than one custodian:	is "yes," respond to quest dian, you must complete quest dian; You must complete quest dian; Yes," respond to quest todian, you must complete of	ions (b) through (g) below for each custodian the <i>priva</i> estions (b) through (g) separately for each custodian. stions (b) through g) below for each custodian the <i>priv</i>	ate fund uses. If the priv
Addi If the fund (b)	e answer to question 25. (a uses more than one custod itional Custodian Informational Custodian Information Inform	is "yes," respond to quest dian, you must complete quest dian. Ition: 1 Record(s) Filed. (a) is "yes," respond to quest dian, you must complete of the compl	ions (b) through (g) below for each custodian the <i>priva</i> estions (b) through (g) separately for each custodian. stions (b) through g) below for each custodian the <i>priv</i> questions (b) through (g) separately for each custodian custodian (g) separately for each custodian (g) se	vate fund uses. If the priv
Addi If the fund (b)	e answer to question 25. (a uses more than one custod itional Custodian Informational Custodian Information Inform	is "yes," respond to quest dian, you must complete quest dian. You must complete quest dian. It is "yes," respond to quest dian, you must complete of the comp	ions (b) through (g) below for each custodian the <i>priva</i> estions (b) through (g) separately for each custodian. stions (b) through g) below for each custodian the <i>priv</i> questions (b) through (g) separately for each custodian	vate fund uses. If the priv
Addidate (b)	e answer to question 25. (a uses more than one custod itional Custodian Informational Custodian Information Informational Custodian Information Inform	is "yes," respond to quest dian, you must complete quest dian. You must complete quest dian. It is "yes," respond to quest dian, you must complete of the comp	custody of the private fund's assets (city, state and cour	vate fund uses. If the private fund uses. If the private fund uses. If the private fund uses.
Addidate the fund (b) (c)	e answer to question 25. (a uses more than one custod itional Custodian Informational Custodian Information Informational Custodian Information Inform	is "yes," respond to quest dian, you must complete quest dian. You must complete quest dian. It is "yes," respond to quest dian, you must complete of the comp	custody of the private fund's assets (city, state and cour	vate fund uses. If the priv
Addidate If the fund (b) (c) (d)	e answer to question 25. (a uses more than one custod uses more than one custod itional Custodian Information and uses more than one custodian: Legal name of custodian: HSBC BANK PLC Primary business name of HSBC The location of the custod City: LONDON Is the custodian a related	is "yes," respond to quest dian, you must complete quest dian. You must complete quest dian. It is "yes," respond to quest dian, you must complete of the comp	custody of the private fund's assets (city, state and cour Country: United Kingdom	vate fund uses. If the private fund uses.
Addidate If the fund (b) (c) (d)	e answer to question 25. (a uses more than one custod uses more than one custod itional Custodian Information and uses more than one custodian: Legal name of custodian: HSBC BANK PLC Primary business name of HSBC The location of the custod City: LONDON Is the custodian a related	is "yes," respond to quest dian, you must complete quest dian, you must complete quest dian: (a) is "yes," respond to quest dian, you must complete of the co	custody of the private fund's assets (city, state and cour Country: United Kingdom	vate fund uses. If the private fund uses.
Addition (b) (c) (d)	e answer to question 25. (a uses more than one custod uses more than one custod itional Custodian Information of the answer to question 25. and uses more than one custodian: Legal name of custodian: HSBC BANK PLC Primary business name of HSBC The location of the custod City: LONDON Is the custodian a related If the custodian is a broken- CRD Number (if any):	is "yes," respond to quest dian, you must complete question: 1 Record(s) Filed. (a) is "yes," respond to questodian, you must complete of todian, you must complete of state: dian's office responsible for State:	custody of the private fund's assets (city, state and cour Country: United Kingdom	vate fund uses. If the private fund uses.

Admin

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

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

Ad				
	•		ons (b) through (f) below. If the <i>private fund</i> uses more than or separately for each administrator.	ne
	o) Name of administrator:			
	WAYSTONE ADMINISTRATION	N SOLUTIONS (IE) LIMITED		
	c) Location of administrator (ci	ty, state and country):		
	City:	State:	Country:	
	DUBLIN		Ireland	Yes No
(d) Is the administrator a <i>relate</i>	d person of your firm?		0 0
(ount statements to the <i>private fund's</i> investors? some but not all investors) No (provided to no investors)	
(1	•	• •	o sends the investor account statements to the (rest of the) protection to the (rest of the) private fund's investors, respond "not applicate to the control of the control	
ur <i>re</i> 0% :lude evan	only those assets where (i) su	ch <i>person</i> carried out the va used for purposes of invest	assets (by value) was valued by a <i>person</i> , such as an administ aluation procedure established for that asset, if any, including of the tor subscriptions, redemptions or distributions, and fee calculat	obtaining any
<u>ers</u>				Yes
	es the <i>private fund</i> use the serv	ices of someone other than	you or your <i>employees</i> for marketing purposes?	Yes ⊙
Doe You sim	ı must answer "yes" whether t ilar <i>person.</i> If the answer to qu	he <i>person</i> acts as a placeme estion 28.(a) is "yes," respo	you or your <i>employees</i> for marketing purposes? ent agent, consultant, finder, introducer, municipal advisor or of and to questions (b) through (g) below for each such marketer sust complete questions (b) through (g) separately for each mar	ther solicitor, or the <i>private fund</i>
Doe You sim use	ı must answer "yes" whether t ilar <i>person.</i> If the answer to qu	he <i>person</i> acts as a placeme estion 28.(a) is "yes," respo e than one marketer you mu	ent agent, consultant, finder, introducer, municipal advisor or of and to questions (b) through (g) below for each such marketer	ther solicitor, or the <i>private fund</i>
You sim use	u must answer "yes" whether to illar person. If the answer to quees. If the private fund uses more ditional Marketer Information ou must answer "yes" whether r similar person. If the answer to	he <i>person</i> acts as a placeme estion 28.(a) is "yes," respo e than one marketer you mu h: 2 Record(s) Filed. The <i>person</i> acts as a placer to question 28.(a) is "yes," r	ent agent, consultant, finder, introducer, municipal advisor or of and to questions (b) through (g) below for each such marketer	ther solicitor, or the <i>private fund</i> keter. other solicitor, keter the <i>private</i>
You sim use	u must answer "yes" whether to illar person. If the answer to quees. If the private fund uses more ditional Marketer Information ou must answer "yes" whether r similar person. If the answer to	he <i>person</i> acts as a placeme estion 28.(a) is "yes," respo e than one marketer you mu h: 2 Record(s) Filed. The <i>person</i> acts as a placer to question 28.(a) is "yes," r	ent agent, consultant, finder, introducer, municipal advisor or of and to questions (b) through (g) below for each such marketer ust complete questions (b) through (g) separately for each man ment agent, consultant, finder, introducer, municipal advisor or respond to questions (b) through (g) below for each such mark	ther solicitor, or the <i>private fund</i> keter. other solicitor, keter the <i>private</i>
Acc	u must answer "yes" whether to illar person. If the answer to quees. If the private fund uses more ditional Marketer Information ou must answer "yes" whether r similar person. If the answer to	he person acts as a placement estion 28.(a) is "yes," response than one marketer you much: 2 Record(s) Filed. The person acts as a placement of question 28.(a) is "yes," responses more than one marketer,	ent agent, consultant, finder, introducer, municipal advisor or of and to questions (b) through (g) below for each such marketer ust complete questions (b) through (g) separately for each man ment agent, consultant, finder, introducer, municipal advisor or respond to questions (b) through (g) below for each such mark	ther solicitor, or the <i>private fund</i> keter. other solicitor, keter the <i>private</i> ach marketer.
Ook You Add You for	i must answer "yes" whether to illar person. If the answer to quees. If the private fund uses more ditional Marketer Information ou must answer "yes" whether r similar person. If the answer to quee und uses. If the private fund uses	he person acts as a placement estion 28. (a) is "yes," response than one marketer you muth: 2 Record(s) Filed. The person acts as a placement of question 28. (a) is "yes," responses more than one marketer, arson of your firm?	ent agent, consultant, finder, introducer, municipal advisor or of and to questions (b) through (g) below for each such marketer ust complete questions (b) through (g) separately for each man ment agent, consultant, finder, introducer, municipal advisor or respond to questions (b) through (g) below for each such mark	ther solicitor, or the <i>private fund</i> keter. other solicitor, keter the <i>private</i> ach marketer. Yes No
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Yoursimuse Add Y G fi (((((((((((((((((((((((((((((((in must answer "yes" whether to gue is. If the private fund uses more distinal Marketer Information ou must answer "yes" whether r similar person. If the answer to und uses. If the private fund uses is the private fund uses. If the marketer a related person is the marketer: ELEPHANT ASSET MANAGEM d) If the marketer is registered and CRD Number (if any): e) Location of the marketer's or City: LONDON	he person acts as a placement estion 28. (a) is "yes," response than one marketer you much: 2 Record(s) Filed. The person acts as a placement of question 28. (a) is "yes," reson of your firm? ENT (LONDON) LLP I with the SEC, its file number of the state:	ent agent, consultant, finder, introducer, municipal advisor or or ond to questions (b) through (g) below for each such marketer ust complete questions (b) through (g) separately for each marketer agent, consultant, finder, introducer, municipal advisor or respond to questions (b) through (g) below for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (b) through (g) separately for each such mark you must complete questions (g) through (g) separately for each such mark you must complete questio	ther solicitor, or the private fund keter. other solicitor, keter the private ach marketer. Yes No O
You sim use	in must answer "yes" whether to gue is. If the private fund uses more distinal Marketer Information ou must answer "yes" whether r similar person. If the answer to und uses. If the private fund uses is the private fund uses. If the marketer a related person is the marketer: ELEPHANT ASSET MANAGEM d) If the marketer is registered and CRD Number (if any): e) Location of the marketer's or City: LONDON	he person acts as a placement estion 28. (a) is "yes," response than one marketer you much: 2 Record(s) Filed. The person acts as a placement of question 28. (a) is "yes," reson of your firm? ENT (LONDON) LLP I with the SEC, its file number of the state: the private fund through one	ent agent, consultant, finder, introducer, municipal advisor or or on the description of	ther solicitor, or the private fund keter. other solicitor, seter the private ach marketer. Yes No Yes No

	or similar person. If th	e answer to question 28.(a) is	placement agent, consultant, finder, introducer, munic 'yes," respond to questions (b) through (g) below for each	each such marketer the <i>private</i>
				Yes No
	(b) Is the marketer a	related person of your firm?		○ ⊙
	(c) Name of the mark W CAMPION CAPI			
	(d) If the marketer is 8 - 69453 and CRD Number		number (e.g., 801-, 8-, or 866-):	
	171277	(II arry).		
	(e) Location of the ma	arketer's office used principally	by the <i>private fund</i> (city, state and country):	
	City:	State:	Country:	
	MIAMI	Florida	United States	
				Yes No
	(f) Does the markete	er market the <i>private fund</i> throu	gh one or more websites?	○ ●
	(g) If the answer to d	question 28.(f) is "yes," list the	website address(es):	
			No Information Filed	
	L			
1.	(a) Name of the <i>private fund</i> LEXCOR MASTER FUND(b) <i>Private fund</i> identificatio (include the "805-" pref 805-8547054532	n number:		
2.	Under the laws of what stat	e or country is the <i>private fund</i>	organized:	
	State:	Country: Cayman Isla	nds	
3.	(a) Name(s) of General Part	•	tors (or <i>persons</i> serving in a similar capacity):	
	Name of General Partner,	Manager, Trustee, or Director		
	MARTIN LANG			
	MICHAEL KOPP			
	MICHAEL PARTON			
	RICHARD HAAS			
	(b) If filing an <i>umbrella regis</i>	stration, identify the filing advise	r and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s)	this <i>private fund</i>
		usoning the ming duvise	No Information Filed	, pato rana.
4.		nat apply; you must check at lea		
	•		stment company under section 3(c)(1) of the Investme stment company under section 3(c)(7) of the Investme	, ,
5.	List the name and country, i	in English, of each <i>foreign financ</i>	ial regulatory authority with which the private fund is req	gistered.
	Name of Country/English	Name of Foreign Financial Re	gulatory Authority	
	Cayman Islands - Cayman	Islands Monetary Authority		

6. (a) Is this a "master fund" in a master-feeder arrangement?

Yes No

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

Name of private fund	Private fund identification number		
LEXCOR CAYMAN FEEDER FUND LP	805-5047154480		
LEXCOR FEEDER FUND	805-2315817622		

Yes	No
-----	----

(c) Is this a "feeder fund" in a master-feeder arrangement?

 \circ

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests? Name of *private fund*:

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

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

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

Additional Feeder Fund Information: 2 Record(s) Filed.

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

LEXCOR CAYMAN FEEDER FUND LP

(b) Private fund identification number: (include the "805-" prefix also) 805-5047154480

(c) Under the laws of what state or country is the *private fund* organized:

State:

Country:

Cayman Islands

(d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

LEXCOR GENERAL PARTNER

- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

 No Information Filed
- (e) 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
- (f) List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority

Cayman Islands - Cayman Islands Monetary Authority

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

LEXCOR FEEDER FUND

(b) Private fund identification number:

		(include the "805-" prefix also)				
		805-2315817622				
	(c)	Under the laws of what state or country is the <i>private fund</i> organized:				
		State: Country:				
		Cayman Islands				
	(d) (1)	Name(s) of General Partner, Manager, Trustee or Directors (or <i>persons</i> serving in a similar capacity):				
		Name of General Partner, Manager, Trustee or Director				
		MARTIN LANG				
		MICHAEL KOPP				
		MICHAEL PARTON				
		RICHARD HAAS				
	(d) (2)	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fundamental No Information Filed	nd:			
	(e)	The <i>private fund</i> (check all that apply; you must check at least one):				
		(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company	Act of			
		(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company 1940	Act of			
	(f)	List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.				
		Name of Country/English Name of Foreign Financial Regulatory Authority				
		Cayman Islands - Cayman Islands Monetary Authority				
				_		
	assets in a s	urposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if isses (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.				
8.	(a) Is this p	rivate fund a "fund of funds"?	0	G		
	•	urposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment gardless of whether they are also private funds or registered investment companies.				
		loes the private fund invest in funds managed by you or by a related person?	0	C		
9.		last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	Yes I			
10.	What type o	f fund is the <i>private fund</i> ?				
	ⓒ hedge fu	nd $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital fund $^{f C}$ Other <i>priv</i>	ate fund	l:		
	NOTE: For d	efinitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.				
11.	Current gros \$ 993,000,0	ss asset value of the <i>private fund</i> : 00				
<u>Ow</u>	nership					
12.		vestment commitment required of an investor in the <i>private fund</i> :				
	\$ 1,000,000					

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

	6%			
15.	(a)	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	0%			
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?		No.
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
Υοι	ır Ad	dvisory Services		
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	es.	No ②
		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 question 17.(a) is "no," leave this question blank.	0	
		No Information Filed		
			/es	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	•
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the a to question 18.(a) is "no," leave this question blank.	nsw	er
		No Information Filed		
			es/	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	•
	NOT	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Pri</u>	<u>/ate</u>	<u>Offering</u>	/05	No
21.	Has	the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	⊙	0
22.	If y	es, provide the <i>private fund's</i> Form D file number (if any):		
		rm D file number		
	021	1-307549		
	021	1-496165		
B. S	ERVI	CE PROVIDERS		
Aud	ditors			
23	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	res	No
25.	(a)	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	0
			() e:	⊙
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm.	TITM	1,
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
		(b) Name of the auditing firm: KPMG		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
		City: State: Country: GRAND CAYMAN Cayman Islands		
			s N	No

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

	•	0
(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
If yes, Public Company Accounting Oversight Board-Assigned Number: 1323		
(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board accordance with its rules?	din 👩	0
	v	'es
g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?		⊙
n) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqua	alified opini	ons:
⊙ 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 r	report is ava	ailab
<u>Broker</u>		
	Υ	'es
Does the <i>private fund</i> use one or more prime brokers? If the answer to question 24 (a) is "yes " respond to questions (b) through (c) below for each prime broker the private fund use		⊙ rivat
If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	∍s. If the <i>pi</i>	rıvat
Additional Prime Broker Information : 2 Record(s) Filed.		
private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker (b) Name of the prime broker: GOLDMAN SACHS INTERNATIONAL	:	
(c) If the prime broker is registered with the SEC, its registration number:		
CRD Number (if any):		
CRD Number (if any): (d) Location of prime broker's office used principally by the <i>private fund</i> (city, state and country):		
(d) Location of prime broker's office used principally by the <i>private fund</i> (city, state and country): City: Country:		
(d) Location of prime broker's office used principally by the <i>private fund</i> (city, state and country):	Yes	s No
(d) Location of prime broker's office used principally by the <i>private fund</i> (city, state and country): City: State: Country:	Yes ⊙	
(d) Location of prime broker's office used principally by the <i>private fund</i> (city, state and country): City: COUNTRY: LONDON United Kingdom	uses. If the	0
(d) Location of prime broker's office used principally by the <i>private fund</i> (city, state and country): City: State: Country: LONDON United Kingdom (e) Does this prime broker act as custodian for some or all of the <i>private fund</i> 's assets? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uprivate fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker (b) Name of the prime broker: MERRILL LYNCH INTERNATIONAL	uses. If the	0
(d) Location of prime broker's office used principally by the <i>private fund</i> (city, state and country): City: State: Country: LONDON United Kingdom (e) Does this prime broker act as custodian for some or all of the <i>private fund's</i> assets? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund uprivate fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker (b) Name of the prime broker: MERRILL LYNCH INTERNATIONAL (c) If the prime broker is registered with the SEC, its registration number:	uses. If the	0
(d) Location of prime broker's office used principally by the <i>private fund</i> (city, state and country): City: State: Country: LONDON United Kingdom (e) Does this prime broker act as custodian for some or all of the <i>private fund</i> 's assets? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> u <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker (b) Name of the prime broker: MERRILL LYNCH INTERNATIONAL (c) If the prime broker is registered with the SEC, its registration number: CRD Number (if any): (d) Location of prime broker's office used principally by the <i>private fund</i> (city, state and country): City: State: Country:	uses. If the	s Nd

Yes	N
yes	

0

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

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

Addi	ional Custodian Information : 2 Record(s) Filed.			
	ne answer to question 25.(a) is "yes," respond to questions (b) duses more than one custodian, you must complete questions	through g) below for each custodian the <i>private fund</i> uses. If the (b) through (g) separately for each custodian.	priva	te
(b)	Legal name of custodian: GOLDMAN SACHS INTERNATIONAL			
(c)	Primary business name of custodian: GOLDMAN SACHS INTERNATIONAL			
(d)	The location of the custodian's office responsible for <i>custody</i> o	f the <i>private fund's</i> assets (city, state and country):		
	City: State:	Country: United Kingdom		
		-	Yes	No
(e)	Is the custodian a related person of your firm?		0	•
(f)	If the custodian is a broker-dealer, provide its SEC registration	number (if any):		
	- CRD Number (if any):			
(g)	If the custodian is not a broker-dealer, or is a broker-dealer b <i>identifier</i> (if any)	ut does not have an SEC registration number, provide its <i>legal enti</i>	ity	
	W22LROWP2IHZNBB6K528			
	ne answer to question 25.(a) is "yes," respond to questions (b) if uses more than one custodian, you must complete questions	through g) below for each custodian the <i>private fund</i> uses. If the (b) through (g) separately for each custodian.	priva	te
(b)	Legal name of custodian: MERRILL LYNCH INTERNATIONAL			
(c)	Primary business name of custodian: MERRILL LYNCH INTERNATIONAL			
(d)	The location of the custodian's office responsible for custody or			
	City: State: LONDON	Country: United Kingdom		
(e)	Is the custodian a <i>related person</i> of your firm?		Yes	No ⊙
(f)	If the custodian is a broker-dealer, provide its SEC registration	number (if any):		
	-			
	CRD Number (if any):			
(g)	If the custodian is not a broker-dealer, or is a broker-dealer b identifier (if any) GGDZP1UYGU9STUHRDP48	ut does not have an SEC registration number, provide its <i>legal enti</i>	ity	

ddi	tional Administrator Information : 1 Record(s) Filed.			
	he answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one ninistrator, you must complete questions (b) through (f) separately for each administrator.			
(b)	Name of administrator:			
` ,	WAYSTONE ADMINISTRATION SOLUTIONS (IE) LIMITED			
(c)	Location of administrator (city, state and country):			
	City: State: Country:			
	DUBLIN	.,		
(d)	Is the administrator a <i>related person</i> of your firm?	Ye		•
(e)	Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?			
	• Yes (provided to all investors) • Some (provided to some but not all investors) • No (provided to no investors)			
(f)	If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) <i>private</i> investors? If investor account statements are not sent to the (rest of the) <i>private fund's</i> investors, respond "not applicable.		;	
tion	s) was the valuation determined by such <i>person</i> .			
oes ou n	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? nust answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other s		or,	
oes ou n mila	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	rivate	or,	
oes ou n mila ses.	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? nust answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other s r <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the p	rivate	or,	
ooes ou n mila sees. Addi You or s	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? nust answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other someone. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the particle of the private fund uses more than one marketer you must complete questions (b) through (g) separately for each marketer	solic	or, e fu	
ooes ou n mila ses. Addi You or s	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? nust answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other services. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the parameter fund uses more than one marketer you must complete questions (b) through (g) separately for each marketer tional Marketer Information: 1 Record(s) Filed. In must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer	solic	or, e fu iito riva er.	
oes ou n mila ses. You or s fund (b)	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? nust answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other someone. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the particle fund uses more than one marketer you must complete questions (b) through (g) separately for each marketer tional Marketer Information: 1 Record(s) Filed. It must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer divides. If the <i>private fund</i> uses more than one marketer, you must complete questions (b) through (g) separately for each marketer.	solic the pa	or, e fu iito riva er.	/
oes oes mila ses. Addi You or s fund (b)	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other someone. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the partial finder fund uses more than one marketer you must complete questions (b) through (g) separately for each marketer tional Marketer Information: 1 Record(s) Filed. In must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other initial person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer a related person of your firm? Is the marketer a related person of your firm? Name of the marketer:	solic the pa	or, e fu iito riva er.	1
oes oes mila ses. Addi You or s fund (b)	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other services or person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the particle fund uses more than one marketer you must complete questions (b) through (g) separately for each marketer tional Marketer Information: 1 Record(s) Filed. If must answer "yes" whether the person acts as a placement agent, consultant, finder, introducer, municipal advisor or other similar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer duses. If the private fund uses more than one marketer, you must complete questions (b) through (g) separately for each marketer a related person of your firm? Name of the marketer: LEXCOR CAPITAL LLP	solic the pa	or, e fu iito riva er.	/
ooes ou n mila ses. addi You or s fund (b) (c)	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? nust answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other services. If the answer to question 28. (a) is "yes," respond to questions (b) through (g) below for each such marketer the part of the private fund uses more than one marketer you must complete questions (b) through (g) separately for each marketer tional Marketer Information: 1 Record(s) Filed. It must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other imiliar <i>person</i> . If the answer to question 28. (a) is "yes," respond to questions (b) through (g) below for each such marketer draws. If the <i>private fund</i> uses more than one marketer, you must complete questions (b) through (g) separately for each marketer are lated person of your firm? Name of the marketer: LEXCOR CAPITAL LLP If the marketer is registered with the SEC, its file number (e.g., 801-, 8-, or 866-): and CRD Number (if any): Location of the marketer's office used principally by the <i>private fund</i> (city, state and country):	solic the pa	or, e fu iito riva er.	/
ooes ou n mila ses. addi You or s fund (b) (c)	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? nust answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other sreprosor. If the answer to question 28 (a) is "yes," respond to questions (b) through (g) below for each such marketer the purpose. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer tional Marketer Information: 1 Record(s) Filed. In must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other imiliar <i>person</i> . If the answer to question 28 (a) is "yes," respond to questions (b) through (g) below for each such marketer draws. If the <i>private fund</i> uses more than one marketer, you must complete questions (b) through (g) separately for each must be marketer a <i>related person</i> of your firm? Name of the marketer: LEXCOR CAPITAL LLP If the marketer is registered with the SEC, its file number (e.g., 801-, 8-, or 866-): and CRD Number (if any):	solic the pa	or, e fu iito riva er.	1
ooes ou n mila ses. addi You or s fund (b) (c)	the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? In the private fund use the person acts as a placement agent, consultant, finder, introducer, municipal advisor or other is reperson. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the private fund uses more than one marketer you must complete questions (b) through (g) separately for each marketer titional Marketer Information: 1 Record(s) Filed. It must answer "yes" whether the person acts as a placement agent, consultant, finder, introducer, municipal advisor or other is imiliar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer of uses. If the private fund uses more than one marketer, you must complete questions (b) through (g) separately for each must be the marketer a related person of your firm? Name of the marketer: LEXCOR CAPITAL LLP If the marketer is registered with the SEC, its file number (e.g., 801-, 8-, or 866-): - and CRD Number (if any): Location of the marketer's office used principally by the private fund (city, state and country): City: State: Country:	solic the pa	or, e fu	

 \odot \circ

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

A. P	PRIVATE FUND		
Info	ormation About the <i>Private Fund</i>		
1.	(a) Name of the <i>private fund</i> :		
	NAVAT MASTER FUND		
	(b) Private fund identification number:		
	(include the "805-" prefix also)		
	805-5647299307		
2	Under the laws of what state or country is the <i>private fund</i> of	pranizad.	
2.	State: Country:	n gamzeu.	
	Cayman Islar	nds	
3.	(a) Name(s) of General Partner, Manager, Trustee, or Direct	tors (or <i>persons</i> serving in a similar capacity):	
	Name of General Partner, Manager, Trustee, or Director		
	LAURA MÄNNISTÖ		
	MARTIN LANG		
	MICHAEL PARTON		
	(b) If filing an umbrella registration, identify the filing adviser	and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.	
		No Information Filed	
5.	List the name and country, in English, of each foreign financial Name of Country/English Name of Foreign Financial Reg	ial regulatory authority with which the private fund is registered.	
	Cayman Islands - Cayman Islands Monetary Authority		
,			Yes No
6.	(a) Is this a "master fund" in a master-feeder arrangement		⊙ ○
		number (if any) of the feeder funds investing in this private fund?	
	Name of <i>private fund</i> NAVAT DELAWARE FEEDER FUND LP	Private fund identification number 805-8846375638	
	NAVAT FEEDER FUND	805-7611005246	
	THE TELEVISION OF THE TELEVISI	000 7011000210	
			Yes No
	(c) Is this a "feeder fund" in a master-feeder arrangement?		Yes No
		? number (if any) of the master fund in which this <i>private fund</i> invests?	
	(d) If yes, what is the name and <i>private fund</i> identification n		
	(d) If yes, what is the name and <i>private fund</i> identification in Name of <i>private fund</i> :		
	(d) If yes, what is the name and <i>private fund</i> identification in Name of <i>private fund</i> : **Private fund identification number: (include the "805-" prefix also)	number (if any) of the master fund in which this <i>private fund</i> invests? er arrangement regardless of whether you are filing a single Schedule D, Sec	0 0
7.	(d) If yes, what is the name and private fund identification in Name of private fund: Private fund identification number: (include the "805-" prefix also) NOTE: You must complete question 6 for each master-feeder for the master-feeder arrangement or reporting on the fund	number (if any) of the master fund in which this <i>private fund</i> invests? er arrangement regardless of whether you are filing a single Schedule D, Sec	○ ○ tion 7.B.(1)

No Information Filed

(g) If the answer to question 28.(f) is "yes," list the website address(es):

	f the feeder funds answer the following questions:
(a)	Name of the <i>private fund</i> :
	NAVAT DELAWARE FEEDER FUND LP
(b)	Private fund identification number:
	(include the "805-" prefix also)
	805-8846375638
(c)	Under the laws of what state or country is the <i>private fund</i> organized:
	State: Country:
	Delaware United States
(d) (1)	Name(s) of General Partner, Manager, Trustee or Directors (or <i>persons</i> serving in a similar capacity):
	Name of General Partner, Manager, Trustee or Director
	NAVAT GENERAL PARTNER
(d) (2)	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. No Information Filed
(e)	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
	1940
	2 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company
	1940
(f)	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.
	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. No Information Filed are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(
If you a	No Information Filed
If you a each of (a)	No Information Filed are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND
If you a	No Information Filed are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number:
If you a each of (a)	No Information Filed are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also)
If you a each of (a)	No Information Filed are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number:
If you a each of (a)	No Information Filed are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246
If you a each of (a)	No Information Filed are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized:
If you a each of (a)	No Information Filed are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized: State: Country:
If you a each of (a)	No Information Filed are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized:
If you a each of (a) (b)	No Information Filed are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized: State: Country:
If you a each of (a) (b)	Are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized: State: Country: Cayman Islands
If you a each of (a) (b)	are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized: State: Country: Cayman Islands Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity):
If you a each of (a) (b)	are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized: State: Country: Cayman Islands Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity): Name of General Partner, Manager, Trustee or Director
If you a each of (a) (b)	No Information Filed are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized: State: Country: Cayman Islands Name(s) of General Partner, Manager, Trustee or Director LAURA MÄNNISTÖ
If you a each of (a) (b)	No Information Filed are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized: State: Country: Cayman Islands Name(s) of General Partner, Manager, Trustee or Director LAURA MÄNNISTÖ MARTIN LANG
If you a each of (a) (b) (c) (d) (1)	No Information Filed are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.() f the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized: State: Country: Cayman Islands Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity): Name of General Partner, Manager, Trustee or Director LAURA MÄNNISTÖ MARTIN LANG MICHAEL PARTON If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. No Information Filed
If you a each of (a) (b)	Are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f) the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized: State: Country: Cayman Islands Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity): Name of General Partner, Manager, Trustee or Director LAURA MÄNNISTÖ MARTIN LANG MICHAEL PARTON If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund No Information Filed The private fund (check all that apply: you must check at least one):
If you a each of (a) (b) (c) (d) (1)	Are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(f) the feeder funds answer the following questions: Name of the private fund: NAVAT FEEDER FUND Private fund identification number: (Include the "805-" prefix also) 805-7611005246 Under the laws of what state or country is the private fund organized: State: Country: Cayman Islands Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity): Name of General Partner, Manager, Trustee or Director LAURA MÄNNISTO MARTIN LANG MICHAEL PARTON If filing an umbrolla registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund No Information Filed The private fund (check all that apply: you must check at least one):

	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Cayman Islands - Cayman Islands Monetary Authority		$\rfloor \parallel$
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially a assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if i multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
	maniple diasses (or series) or shares or interests, and each diass (or series) invests substantially all or its assets in a single master rana.	Yes	No
8.	(a) Is this private fund a "fund of funds"?	0	•
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investme vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	nt	
	(b) If yes, does the private fund invest in funds managed by you or by a related person?	0	0
		Yes	No.
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	. What type of fund is the <i>private fund</i> ?		
	• hedge fund • liquidity fund • private equity fund • real estate fund • securitized asset fund • venture capital fund • Other private of the	vate fu	nd:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	. Current gross asset value of the <i>private fund</i> : \$ 126,000,000		
<u>Ow</u>	<u>vnership</u>		
12.	. Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000		
	NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund).	ne	
13.	. Approximate number of the <i>private fund's</i> beneficial owners: 62		
14.	. What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 9%		
15.	. (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	0%	Yes	. No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	. What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 47%		
You	ur Advisory Services		
17.	(a) Are you a subadviser to this <i>private fund</i> ?	_	No
17.	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	er to	•
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i>?(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 to question 18.(a) is "no," leave this question blank.	O e ansv	⊙ ver
	No Information Filed		

Yes No

List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.

(f)

19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	С	•
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
Priv	vate Offering		
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Ye ©	s No
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-324616		
	021-475158		
B. SI	ERVICE PROVIDERS		
Auc	<u>itors</u>	Ve	s No
23.	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	6	_
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	6	
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one audityou must complete questions (b) through (f) separately for each auditing firm.		
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm: KPMG		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country:		
	GRAND CAYMAN Cayman Islands		
	(d) Is the auditing firm an independent public accountant?	Yes	
	(a) is the additing firm air independent public accountant:	⊙	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number:		
	1323		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
	(g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's	Ye •	s No
	investors?		
	(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified	opinio	ns?
	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 ava	ilable.
Prir	ne Broker	Υє	s No
24.	(a) Does the <i>private fund</i> use one or more prime brokers?	e	_
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If		
	funduses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker		

Additional Prime Broker Information : 2 Record(s) Filed.

(b)				
	Name of the prime broker: GOLDMAN SACHS INTERNATIONAL			
(c)	If the prime broker is registered wi	th the SEC, its registr	ration number:	
	CRD Number (if any):			
(d)	Location of prime broker's office use	ed principally by the $ ho$	private fund (city, state and country):	
	City: LONDON	State:	Country: United Kingdom	
(e)	Does this prime broker act as custo	dian for some or all c	of the <i>private fund's</i> assets?	
		·	ons (b) through (e) below for each prime broker the pupilete questions (b) through (e) separately for each	•
	Name of the prime broker: MORGAN STANLEY & CO. INTERNAT	ONAL PLC.		
(c)	If the prime broker is registered wi	th the SEC, its registr	ration number:	
	- CRD Number (if any):			
	City:	ed principally by the μ State:	orivate fund (city, state and country): Country:	
	LONDON		United Kingdom	
	Does this prime broker act as custo	dian for some or all c		
(e) Does t	Does this prime broker act as custo the <i>private fund</i> use any custodians answer to question 25.(a) is "yes,"	(including the prime l		s?
n Does t	Does this prime broker act as custo the <i>private fund</i> use any custodians answer to question 25.(a) is "yes,"	(including the prime l respond to questions must complete questi	of the <i>private fund's</i> assets? brokers listed above) to hold some or all of its assets	s?
n Does to the fund u Addit	The private fund use any custodians answer to question 25.(a) is "yes," uses more than one custodian, you use the custodian one custodian and custodian information: 2 Reference answer to question 25.(a) is "yes"	(including the prime large) respond to questions must complete questions ecord(s) Filed.	of the <i>private fund's</i> assets? brokers listed above) to hold some or all of its assets	es? te fund uses. If the p ate fund uses. If the
n Does to find u Addit If the fund (b)	The private fund use any custodians answer to question 25.(a) is "yes," uses more than one custodian, you use the custodian one custodian and custodian information: 2 Reference answer to question 25.(a) is "yes"	(including the prime large) respond to questions must complete questions ecord(s) Filed.	brokers listed above) to hold some or all of its asset (b) through (g) below for each custodian the privations (b) through (g) separately for each custodian.	es? te fund uses. If the p ate fund uses. If the
n Does to the fund u Addit If the fund (b)	the <i>private fund</i> use any custodians answer to question 25.(a) is "yes," sees more than one custodian, you recommend to the answer to question 25.(a) is "yes," are answer to question 25.(a) is "yes," the answer to question 25.(a) is "yes," the answer to question 25.(b) is "yes," the answer to question 25.(b) is "yes," the answer to question 25.(c) is "yes," the answer to question 25.(d) is "yes," the answer the	(including the prime larespond to questions must complete questions ecord(s) Filed. If the respond to question is must complete questions are must complete questions.	brokers listed above) to hold some or all of its asset (b) through (g) below for each custodian the privations (b) through (g) separately for each custodian.	es? te fund uses. If the p ate fund uses. If the
(e) Does to the fund under the fund (b) (c)	the <i>private fund</i> use any custodians answer to question 25.(a) is "yes," uses more than one custodian, you reside answer to question 1 nformation: 2 Reference answer to question 25.(a) is "yes," uses more than one custodian, you uses more than one custodian, you uses more than one custodian, you begal name of custodian: GOLDMAN SACHS INTERNATIONAL Primary business name of custodian GOLDMAN SACHS INTERNATIONAL	(including the prime larespond to questions must complete questions ecord(s) Filed. The property of the prime larespond to question must complete questions.	brokers listed above) to hold some or all of its asset (b) through (g) below for each custodian the privations (b) through (g) separately for each custodian.	ate fund uses. If the p
(e) Does to the fund und (b) (c)	the <i>private fund</i> use any custodians answer to question 25.(a) is "yes," uses more than one custodian, you reside answer to question 1 information: 2 Reference answer to question 25.(a) is "yes," uses more than one custodian, you uses more than one custodian, you uses more than one custodian, you begal name of custodian: GOLDMAN SACHS INTERNATIONAL Primary business name of custodian GOLDMAN SACHS INTERNATIONAL The location of the custodian's official City:	(including the prime larespond to questions must complete questions) (including the prime larespond to question) (including the prime larespond to questio	brokers listed above) to hold some or all of its asset (b) through (g) below for each custodian the private ons (b) through (g) separately for each custodian. Ons (b) through g) below for each custodian the private ons (b) through (g) separately for each custodian the private ons (b) through (g) separately for each custodian.	s? te fund uses. If the p ate fund uses. If the

identifier (if any) W22LROWP2IHZNBB6K		ler but does not have an SEC registration number	er, provide its <i>legal ent</i> i
·		ns (b) through g) below for each custodian the $ ho$ cions (b) through (g) separately for each custodi	
(b) Legal name of custodia MORGAN STANLEY & CO			
(c) Primary business name MORGAN STANLEY & CC			
(d) The location of the cus	todian's office responsible for custo	ody of the <i>private fund's</i> assets (city, state and co	ountry):
City:	State:	Country:	
LONDON		United Kingdom	
(e) Is the custodian a relati	ted person of your firm?		
	,		
(f) If the custodian is a bro	oker-dealer, provide its SEC registr	ation number (if any):	
-			
CRD Number (if any):			
(g) If the custodian is not a identifier (if any) 4PQUHN3JPFGFNF3BB6		ler but does not have an SEC registration number	er, provide its <i>legal ent</i>
identifier (if any) 4PQUHN3JPFGFNF3BB6		ler but does not have an SEC registration number	er, provide its <i>legal ent</i>
identifier (if any) 4PQUHN3JPFGFNF3BB6		ler but does not have an SEC registration number	er, provide its <i>legal ent</i>
identifier (if any) 4PQUHN3JPFGFNF3BB6 crator Does the private fund use an	administrator other than your firm	?	
identifier (if any) 4PQUHN3JPFGFNF3BB6 crator Does the private fund use an lf the answer to question 26.	administrator other than your firm	? (b) through (f) below. If the <i>private fund</i> uses m	
identifier (if any) 4PQUHN3JPFGFNF3BB6 Trator Does the private fund use an lf the answer to question 26. must complete questions (b)	administrator other than your firm (a) is "yes," respond to questions	? (b) through (f) below. If the <i>private fund</i> uses m	
identifier (if any) 4PQUHN3JPFGFNF3BB6 rator Does the private fund use an if the answer to question 26. must complete questions (b) Additional Administrator In If the answer to question 2	administrator other than your firm (a) is "yes," respond to questions through (f) separately for each administration: 1 Record(s) Filed. 6.(a) is "yes," respond to question mplete questions (b) through (f) separately for each administration in the sequence of the sequ	? (b) through (f) below. If the <i>private fund</i> uses ministrator. s (b) through (f) below. If the <i>private fund</i> uses	ore than one administr
identifier (if any) 4PQUHN3JPFGFNF3BB6 rator Does the private fund use an if the answer to question 26. must complete questions (b) Additional Administrator In If the answer to question 2 administrator, you must co (b) Name of administrator:	administrator other than your firm (a) is "yes," respond to questions through (f) separately for each administration: 1 Record(s) Filed. 6.(a) is "yes," respond to question mplete questions (b) through (f) separately for each administration in the sequence of the sequ	? (b) through (f) below. If the <i>private fund</i> uses ministrator. s (b) through (f) below. If the <i>private fund</i> uses	ore than one administr
identifier (if any) 4PQUHN3JPFGFNF3BB6 Trator Does the private fund use an all the answer to question 26. must complete questions (b) Additional Administrator In administrator, you must co deministrator, you must co waystone Administrator: Waystone Administrator:	administrator other than your firm (a) is "yes," respond to questions through (f) separately for each ad formation: 1 Record(s) Filed. 6.(a) is "yes," respond to question mplete questions (b) through (f) separately for each ad ATION SOLUTIONS (IE) LIMITED	? (b) through (f) below. If the <i>private fund</i> uses ministrator. s (b) through (f) below. If the <i>private fund</i> uses	ore than one administr
identifier (if any) 4PQUHN3JPFGFNF3BB6 Trator Does the private fund use an all the answer to question 26. must complete questions (b) Additional Administrator In administrator, you must co deministrator, you must co waystone Administrator: Waystone Administrator:	administrator other than your firm (a) is "yes," respond to questions through (f) separately for each ad aformation: 1 Record(s) Filed. 6.(a) is "yes," respond to question mplete questions (b) through (f) separately for each ad a formation in the first production of t	? (b) through (f) below. If the <i>private fund</i> uses ministrator. s (b) through (f) below. If the <i>private fund</i> uses	ore than one administr
identifier (if any) 4PQUHN3JPFGFNF3BB6 Trator Does the private fund use an all the answer to question 26. must complete questions (b) Additional Administrator In administrator, you must co (b) Name of administrator: WAYSTONE ADMINISTR (c) Location of administrator.	administrator other than your firm (a) is "yes," respond to questions through (f) separately for each administration: 1 Record(s) Filed. 6.(a) is "yes," respond to question mplete questions (b) through (f) separately for each administration in the sequence of the sequ	? (b) through (f) below. If the <i>private fund</i> uses meministrator. s (b) through (f) below. If the <i>private fund</i> uses eparately for each administrator.	ore than one administr
identifier (if any) 4PQUHN3JPFGFNF3BB6 grator Does the private fund use an all the answer to question 26. must complete questions (b) Additional Administrator In administrator In administrator, you must co (b) Name of administrator: WAYSTONE ADMINISTR (c) Location of administration City:	administrator other than your firm (a) is "yes," respond to questions through (f) separately for each admorphism and the separately fo	(b) through (f) below. If the <i>private fund</i> uses mainistrator. s (b) through (f) below. If the <i>private fund</i> uses eparately for each administrator. Country:	ore than one administr
identifier (if any) 4PQUHN3JPFGFNF3BB6 Trator Does the private fund use an all the answer to question 26. must complete questions (b) Additional Administrator In If the answer to question 2 administrator, you must co (b) Name of administrator: WAYSTONE ADMINISTR (c) Location of administrator: City: DUBLIN (d) Is the administrator a final deciration of the properties of the private funds of the priv	administrator other than your firm (a) is "yes," respond to questions through (f) separately for each ad aformation: 1 Record(s) Filed. 6.(a) is "yes," respond to question mplete questions (b) through (f) so ATION SOLUTIONS (IE) LIMITED or (city, state and country): State:	(b) through (f) below. If the <i>private fund</i> uses mainistrator. s (b) through (f) below. If the <i>private fund</i> uses eparately for each administrator. Country:	ore than one administr more than one

you	ring 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, thur <i>related person</i> ?	hat is	not
rele	Jife colly those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including obtaining evant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (in ocations) was the valuation determined by such <i>person</i> .		
Markete	<u>ers</u>		
29 (2)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	,	Yes No
20. (d)	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other soli similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.		
	Additional Marketer Information : 1 Record(s) Filed.		
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other s or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>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.	e <i>pri</i> v	ate
		Yes	No
	(b) Is the marketer a related person of your firm?	•	0
	(c) Name of the marketer: NAVAT CAPITAL MANAGEMENT LLC		
	(d) If the marketer is registered with the SEC, its file number (e.g., 801-, 8-, or 866-):		
	and CRD Number (if any):		
	(e) Location of the marketer's office used principally by the <i>private fund</i> (city, state and country): City: BEIT SHEMESH Israel		
	(f) Does the marketer market the <i>private fund</i> through one or more websites?	Yes	No ©
	(g) If the answer to question 28.(f) is "yes," list the website address(es): No Information Filed		
	Funds per Page: 15 Total Funds: 4		
CTION	7.B.(2) <i>Private Fund</i> Reporting		
	e of the <i>private fund</i> : BIN HEDGED EQUITY FUND LP		
(inclu	ate fund identification number: ude the "805-" prefix also) 4142684909		
Name CORE SEC	e and SEC File number of adviser that provides information about this <i>private fund</i> in Section 7.B.(1) of Schedule D of its Form ADV filir e: BIN CAPITAL PARTNERS, L.P. File Number: - 63358	ng	

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

Yes No

0 0

	or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series invests substantially all of its assets in a single master fund.		
1.	Name of the <i>private fund</i> : WALLEYE MANAGER OPPORTUNITIES LLC		
2.	Private fund identification number: (include the "805-" prefix also) 805-7359352320		
3.	Name and SEC File number of adviser that provides information about this <i>private fund</i> in Section 7.B.(1) of Schedule D of its Form ADV filing Name:		
	WALLEYE CAPITAL LLC		
	SEC File Number:		
	801 - 113731	Yes	No
4.	Are your <i>clients</i> solicited to invest in this <i>private fund</i> ?	0	©.
	In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangem or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fundsting in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) substantially all of its assets in a single master fund.	ent, or und"	
and	onflicts of interest may occur between you and your <i>clients</i> . Newly-formed advisers should base responses to these questions on the types of particles that you expect to engage in during the next year. The Item 7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.	- Troipat	
Pro	oprietary Interest in <i>Client</i> Transactions		
A.	Do you or any related person:	Yes	No
	(1) buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?	0	⊙
	(2) buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	0	⊙
	(3) recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	0	•
Sa	lles Interest in <i>Client</i> Transactions		
B.	Do you or any related person:	Yes	No
	(1) as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory client securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	•
	(2) recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	0	•
	(3) recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	0	•
In	vestment or Brokerage Discretion		
C.	Do you or any related person have discretionary authority to determine the:	Yes	No
	(1) securities to be bought or sold for a <i>client's</i> account?	⊙	0
	(2) amount of securities to be bought or sold for a <i>client's</i> account?	⊙	\circ
	(3) broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?	\odot	\circ
	(4) commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	•	0
D.	If you answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	•
E.	Do you or any related person recommend brokers or dealers to clients?	•	0

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

G.	(1)		ive research or other products or services other than execution from a broker-dealer or a third party ion with <i>client</i> securities transactions?	0	•
	(2)	·	e "soft dollar benefits" you or any related persons receive eligible "research or brokerage services" under	0	•
		section 28(e) of the Securities Ex	change Act of 1934?		
Н.	(1)	Do you or any related person, dire	ctly or indirectly, compensate any <i>person</i> that is not an <i>employee</i> for <i>client</i> referrals?	\odot	0
	(2)		ctly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for ensation in addition to the <i>employee's</i> regular salary)?	0	•
1.	-	you or any <i>related person</i> , including son) for <i>client</i> referrals?	any employee, directly or indirectly, receive compensation from any person (other than you or any related	0	•
	In y	our response to Item 8.I., do not inc	clude the regular salary you pay to an employee.		
	fron		onsider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or re on in exchange for client referrals, including any bonus that is based, at least in part, on the number or amoun		
l tei	n 9 C	ustody			
In ·	this It	em, we ask you whether you or a	related person has custody of client (other than clients that are investment companies registered under the about your custodial practices.	ne	
A.	(1)	Do you have <i>custody</i> of any advis	ory <i>clients'</i> :	Yes	No.
		(a) cash or bank accounts?		\odot	0
		(b) securities?		•	0
	direc have	ctly from your clients' accounts, or (i e overcome the presumption that yo	the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisorily a related person has custody of client assets in connection with advisory services you provide to clients, but are not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.	ıt you	
	(2)	you have <i>custody</i> :	(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	11
		U.S. Dollar Amount	Total Number of <i>Clients</i>		
		(a) \$ 35,000,000	(b) 1		
	inclu coni	ude the amount of those assets and	the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accour the number of those clients in your response to Item 9.A.(2). If your related person has custody of client ass rovide to clients, do not include the amount of those assets and number of those clients in your response to r response to Item 9.B.(2).	sets in	7
B.	(1)	•	ces you provide to clients, do any of your related persons have custody of any of your advisory clients':	Yes	s No
		(a) cash or bank accounts?		\odot	0
		(b) securities?		•	0
	You	are required to answer this item reg	gardless of how you answered Item 9.A.(1)(a) or (b).		
	(2)	If you checked "yes" to Item 9.B.(your related persons have custody	(1)(a) or (b), what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for 7:	r whic	h
		U.S. Dollar Amount	Total Number of Clients		
		(a) \$ 79,000,000	(b) 2		
C.	-	ou or your <i>related persons</i> have <i>cus</i> apply:	stody of client funds or securities in connection with advisory services you provide to clients, check all the	follow	ing
	(1)	A qualified custodian(s) sends acc	count statements at least quarterly to the investors in the pooled investment vehicle(s) you manage.		
	(2)	An independent public accountant a are distributed to the investors in	audits annually the pooled investment vehicle(s) that you manage and the audited financial statements in the pools.	▽	
	(3)	An independent public accountant of	conducts an annual surprise examination of client funds and securities.		
	(4)	An independent public accountant pare qualified custodians for client	orepares an internal control report with respect to custodial services when you or your related persons funds and securities.		
	an ii	nternal control report. (If you checke	(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or ed Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provide funds you advise in Section 7.B.(1) of Schedule D).		

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

D.	Do 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	\circ	\odot					
	(2) your related person(s) act as qualified custodian(s)	\circ	•					
	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 indefunder rule 206(4)-2 of the Advisers Act.	epenc	dent					
E.	If you are filing your annual updating amendment and you were subject to a surprise examination by an independent public accountant during your last fiscal year, provide the date (MM/YYYY) the examination commenced:							
F.	If you or your related persons have custody of client funds or securities, how many persons, including, but not limited to, you and your related persons as qualified custodians for your clients in connection with advisory services you provide to clients?	ions,	act					
SEC	CTION 9.C. Independent Public Accountant							
	No Information Filed							
ter	m 10 Control Persons							
	this Item, we ask you to identify every <i>person</i> that, directly or indirectly, controls you. If you are filing an umbrella registration, the information in Item ould be provided for the filing adviser only.	m 10)					
anc	you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners. If this is an amendment and you are updating information you repetither Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.							
A.	Does any <i>person</i> not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, <i>control</i> your management or policies?	Yes	No ⊙					
	If yes, complete Section 10.A. of Schedule D.							
В.	If any <i>person</i> named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Sec Exchange Act of 1934, please complete Section 10.B. of Schedule D.	uritie	∋ S					
SEC	CTION 10.A. Control Persons							
	No Information Filed							
SEC	CTION 10.B. <i>Control Person</i> Public Reporting Companies							
	No Information Filed							
ter	m 11 Disclosure Information							
dete	this Item, we ask for information about your disciplinary history and the disciplinary history of all your advisory affiliates. We use this information to termine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as estment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to me	s an	than					

one of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the filing adviser and all relying advisers under an umbrella registration.

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

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

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

For	"yes" answers to the following questions, complete a Criminal Action DRP:							
A.	In the past ten years, have you or any advisory affiliate:	Yes	No					
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?							
	(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) charges that are currently pending.	to						
В.	In the past ten years, have you or any advisory affiliate:							
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	0	•					
	(2) been 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) charges that are currently pending.	to						
For	"yes" answers to the following questions, complete a Regulatory Action DRP:							
C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	No					
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	\odot					
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	0	\odot					
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•					
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	0	\odot					
	(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	0					
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	0	•					
	(3) ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	0	⊙					
	(4) in the past ten years, entered an order against you or any advisory affiliate in connection with an investment-related 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?	0	•					
E.	Has any self-regulatory organization or commodities exchange ever:							
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	•					
	(2) found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	0	•					
	(3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•					
	(4) disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities?	0	•					
F.	Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or suspended?	0	•					
G.	Are you or any <i>advisory affiliate</i> now the subject of any regulatory <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?	0	•					
For	"yes" answers to the following questions, complete a Civil Judicial Action DRP:							
H.	(1) Has any domestic or foreign court:	Yes	No					
	(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	\circ	\odot					
	(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?	\circ	\odot					
	(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against you or any advisory affiliate by a state or foreign financial regulatory authority?	0	•					
	(2) Are you or any advisory affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of Item 11.H.(1)?	0	•					

0 0

Do any of the events below involve you or any of your *supervised persons*?

Item 12 Small Businesses

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

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

For purposes of this Item 12 only:

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

Yes No

Α.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	\circ	\circ
If "	yes," you do not need to answer Items 12.B. and 12.C.		
B.	Do you:		
	(1) control another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0
C.	Are you:		
	(1) controlled by or under common control with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the	0	0

Schedule A

Direct Owners and Executive Officers

- 1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
- 2. Direct Owners and Executive Officers. List below the names of:

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 (Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
- (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);

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

FULL LEGAL NAME	DE/FE/I	Title or Status	Date Title or	Ownership	Control	PR	CRD No. If None: S.S. No.
(Individuals: Last Name, First			Status Acquired	Code	Person		and Date of Birth, IRS Tax
Name, Middle Name)			MM/YYYY				No. or Employer ID No.
NATHANSON, HILTON, DARREN	I	FOUNDER PARTNER	07/2010	Е	Υ	N	5054782
			 				

Benjamin, Jeremy, Frederick	I	PARTNER	11/2018	В	Υ	Ν	7069700
BENJAMIN, SAUL, JUSTIN	1	CHIEF OPERATING OFFICER, CHIEF	11/2024	NA	Υ	Ν	7973123
		COMPLIANCE OFFICER & MONEY					
		LAUNDERING REPORTING OFFICER					
Bendersky, Martin	I	HEAD OF STRATEGIC INITIATIVES	08/2024	NA	Υ	N	7195006

Schedule B

Indirect Owners

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

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

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

No Information Filed

Schedule D - Miscellaneous

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

CERTAIN RESPONSES TO SCHEDULE D, SECTION 7.B.(2) HAVE BEEN OMITTED AND ARE THE SUBJECT OF A REQUEST FOR CONFIDENTIAL TREATMENT PENDING WITH THE U.S. SECURITIES AND EXCHANGE COMMISSION.

Schedule R

No Information Filed

DRP Pages

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

Part 2

Exemption from brochure delivery requirements for SEC-registered advisers

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

Yes No

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

 \circ **(**

If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
399139	MARBLE BAR ASSET MANAGEMENT LLP,	High net worth individuals, Pension plans/profit
	FORM ADV PART 2A BROCHURE AND 2B	sharing plans, Foundations/charities,
	SUPPLEMENT, MAR 26TH, 2025	Government/municipal, Other institutional, Private
		funds or pools

Part 3

CRS	Type(s)	Affiliate Info	Retire

There are no CRS filings to display.

Execution Pages

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

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

Appointment of Agent for Service of Process

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

Signature

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

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

Signature:

Date: MM/DD/YYYY

Printed Name:

Title:

Adviser CRD Number:

160882

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

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

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a notice filing, as your agents to receive service, and agree that such

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

2. Appointment and Consent: Effect on Partnerships

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

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

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

Signature

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

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

Signature:

JONATHAN CAPLAN

Printed Name:

JONATHAN CAPLAN

Adviser CRD Number:

160882

Date: MM/DD/YYYY 03/26/2025

Title:

HEAD OF COMPLIANCE