FORM ADV

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

Prir	mary Business Name: GRANG	GER MANAGEMENT LLC		CRD Number: 16	8096
Anr	nual Amendment - All Section	าร		Rev. 10/	′2021
2/2	27/2024 2:46:56 PM				
W	•	•	s or omissions may result in denial by filing periodic amendments. Sec	of your application, revocation of your registration, or crime Form ADV General Instruction 4.	inal
Ite	m 1 Identifying Information				
	•	•	<u> </u>	ontact you. If you are filing an <i>umbrella registration</i> , the des information to assist you with filing an <i>umbrella registra</i>	ation.
Α.	Your full legal name (if you a GRANGER MANAGEMENT L		last, first, and middle names):		
B.	(1) Name under which you p	•	sory business, if different from Item	1.A.	
	List on Section 1.B. of Sched	ule D any additional names	under which you conduct your advise	ory business.	
	(2) If you are using this For	m ADV to register more tha	an one investment adviser under ar	n umbrella registration, check this box \square	
	If you check this box, comple	ete a Schedule R for each rel	ying adviser.		
C.	If this filing is reporting a change change is of your legal name or you		tem 1.A.) or primary business name	e (Item 1.B.(1)), enter the new name and specify whether	the
D.	(2) If you report to the SEC	as an exempt reporting adv	nt adviser, your SEC file number: 80 viser, your SEC file number: rs assigned by the SEC ("CIK Numb No Information Filed		
E.	(1) If you have a number ("	<i>CRD</i> Number") assigned by	the FINRA's CRD system or by the	IARD system, your <i>CRD</i> number: 168096	
	If your firm does not have a	CRD number, skip this Item	1.E. Do not provide the CRD number	r of one of your officers, employees, or affiliates.	
	(2) If you have additional Ci	RD Numbers, your addition;	al <i>CRD</i> numbers:		
	•	•	No Information Filed		
F.	Principal Office and Place of E	Business			
	(1) Address (do not use a F	P.O. Box):			
	Number and Street 1:		Number and Street 2:		
	510 MADISON AVENUE		SUITE 2700		
	City:	State:	Country:	ZIP+4/Postal Code:	
	NEW YORK	New York	United States	10022	
	If this address is a priva	ate residence, check this bo	ox: 🗖		
	you are applying for reg which you are applying f	istration, or are registered, v for registration or with whom ne SEC as an exempt reportii	with one or more state securities aut n you are registered. If you are apply	business, at which you conduct investment advisory busines thorities, you must list all of your offices in the state or states ing for SEC registration, if you are registered only with the SE re offices in terms of numbers of employees as of the end of y	to C, or
	(2) Days of week that you on Monday - Friday	•	at your <i>principal office and place of</i>	business:	
	Normal business hours	at this location:			
	9:00AM TO 5:00PM	nis location:			
	(3) Telephone number at the	แร เบเตนเปน.			

(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

(212) 658-0400

(212) 658-0401

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

	3					
G.	Mailing address, if different	t from your <i>principal office and place c</i>	of business address:			
	Number and Street 1:		Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	If this address is a private	e residence, check this box: \Box				
Н.	If you are a sole proprietor	r, state your full residence address, i	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:		
					Yes N	VО
1.	Do you have one or more v LinkedIn)?	websites or accounts on publicly avai	ilable social media platforms	(including, but not limited to, Twitter, Facebook and	•	0
	If a website address serves addresses for all of the othe available social media platfo	as a portal through which to access o er information. You may need to list m	ther information you have pul ore than one portal address. L tent. Do 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 o dual electronic mail (e-mail) addresses of employees or	ing n publicl	
J.	Chief Compliance Officer					
J.	(1) Provide the name and o	contact information of your Chief Cor Compliance Officer, if you have one.		n <i>exempt reporting adviser</i> , you must provide the con em 1.K. below.	tact	
	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) ac	ddress, if Chief Compliance Officer ha	s one:			
		npany Act of 1940 that you advise formber (if any):		you, a <i>related person</i> or an investment company regi officer services to you, provide the <i>person's</i> name an		
K.		tact Person: If a person other than t may provide that information here.	he Chief Compliance Officer	is authorized to receive information and respond to	questior	1S
	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) ac	ddress, if contact person has one:				
					Yes N	10
L.	•	all of the books and records you are ur principal office and place of busines.	·	on 204 of the Advisers Act, or similar state law,	0	0
	If "yes," complete Section 1	1.L. of Schedule D.			Yes N	Nο
M.	Are you registered with a	foreign financial regulatory authority?				•
	•	registered with a foreign financial regu s," complete Section 1.M. of Schedule i		nave an affiliate that is registered with a foreign financia	3 <i>l</i>	
	, ,				Yes N	Ю
N.	Are you a public reporting	company under Sections 12 or 15(d)	of the Securities Exchange A	Act of 1934?	0	•
					Yes N	
Ο.	•	more in assets on the last day of you mate amount of your assets:	ur most recent fiscal year?			©
	I A I NIIIOH IO 1622 HIGH	Y I O DIIIIO I I				

the end of your most recently completed fiscal year?

510 billion to less than \$50 billion

o \$50 billion or more			
For purposes of Item 1.0. only, "assets" refers the total assets shown on the balance sheet for	-		u manage on behalf of clients. Determine your total assets using
P. Provide your <i>Legal Entity Identifier</i> if you have	one:		
A <i>legal entity identifier</i> is a unique number that <i>identifier</i> .	companies use to ic	dentify each other in the t	financial marketplace. You may not have a legal entity
SECTION 1.B. Other Business Names			
	No	o Information Filed	
SECTION 1.F. Other Offices			
	1.F. for each location	on. If you are applying fo	business, at which you conduct investment advisory business. or SEC registration, if you are registered only with the SEC, or bers of <i>employees</i>).
Number and Street 1: 956 BEACHLAND BLVD.		Number and Street 2: SUITE 11	
City: VERO BEACH	State: Florida	Country: United States	ZIP+4/Postal Code: 32960
If this address is a private residence, check this bo	ox: 🗖		
Telephone Number: 212-658-0420	Facsimile Number	r, if any:	
If this office location is also required to be register adviser on the Uniform Branch Office Registration I			as a branch office location for a broker-dealer or investment nch Number here:
How many <i>employees</i> perform investment advisory	y functions from this	office location?	
Are other business activities conducted at this office \Box (1) Broker-dealer (registered or unregistered)	ce location? (check a	all that apply)	
(2) Bank (including a separately identifiable dep	partment or division	of a bank)	
 □ (3) Insurance broker or agent □ (4) Commodity pool operator or commodity trace □ (5) Registered municipal advisor 	ding advisor (whethe	er registered or exempt fi	rom registration)
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other investment-related business ac	tivities conducted fro	om this office location:	
	1.F. for each location	on. If you are applying fo	business, at which you conduct investment advisory business. or SEC registration, if you are registered only with the SEC, or bers of <i>employees</i>).
Number and Street 1: 14528 S OUTER 40 ROAD		Number and Street 2:	; ;
City: ST. LOUIS	State: Missouri	Country: United States	ZIP+4/Postal Code: 63017
31. LOUI3	IVIISSUULI	omited States	03017
If this address is a private residence, check this bo	ox: 🗖		

Telephone Number: 201-739-3958	Facsimile Number, it	f any:		
•	ed to be registered with FINRA or a sice Registration Form (Form BR), plea	· ·	branch office location for a broker-dealer or lumber here:	· investment
How many <i>employees</i> perform inve	estment advisory functions from this c	office location?		
Are other business activities condu	ucted at this office location? (check al	II that apply)		
\square (1) Broker-dealer (registered or	· unregistered)			
\square (2) Bank (including a separately	, identifiable department or division o	of a bank)		
\square (3) Insurance broker or agent				
\square (4) Commodity pool operator or	commodity trading advisor (whether	registered or exempt from i	registration)	
\square (5) Registered municipal adviso	r			
\square (6) Accountant or accounting fire	m			
(7) Lawyer or law firm				
Describe any other investment-rela	ated business activities conducted from	m this office location:		
You must complete a separate Sch		n. If you are applying for SEC	ess, at which you conduct investment advisor registration, if you are registered only with of employees).	•
Number and Street 1: 50 MILLSTONE ROAD		Number and Street 2: BUILDING 200, SUITE	190	
City:	State:	Country:	ZIP+4/Postal Code:	
EAST WINDSOR	New Jersey	United States	08520	
If this address is a private residen	ce, check this box:			
Telephone Number: 609-613-8204	Facsimile Number, if a	ny:		
•	ed to be registered with FINRA or a sice Registration Form (Form BR), plea	· ·	branch office location for a broker-dealer or lumber here:	· investment
How many <i>employees</i> perform inve	estment advisory functions from this o	office location?		
Are other business activities condu	ucted at this office location? (check al unregistered)	ll that apply)		
\square (2) Bank (including a separately	, identifiable department or division o	of a bank)		
(3) Insurance broker or agent				
(4) Commodity pool operator or	commodity trading advisor (whether	registered or exempt from i	registration)	
(5) Registered municipal adviso				
(6) Accountant or accounting firm	m			
(7) Lawyer or law firm				
Describe any other investment-rela	ated business activities conducted from	m this office location:		
SECTION 1 I Website Addresses				

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

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

SECT	SECTION 1.L. Location of Books and Records						
Complete the following information for each location at which you keep your books and records, other than your <i>principal office and place of business</i> . You must complete a separate Schedule D, Section 1.L. for each location.							
			ty where books and records are kep OLOGIES, INC.	t:			
			Street 1: ARE, 6TH FLOOR		Number and Street 2:		
City NEV	v: V YC)RK		State: New York	Country: United States	ZIP+4/Postal Code: 10036	
lf th	nis a	ddres	ss is a private residence, check this b	oox:			
		ne Ni 9244	umber:	Facsimile number, if	any:		
			cone): ur branch offices or affiliates.				
0	a thi	rd-pa	arty unaffiliated recordkeeper.				
•	othe	r.					
	-		be the books and records kept at thi RECORDS FOR POOLED FUNDS	s location.			
0=0=							
SECI	ION	1 1.IVI	. Registration with Foreign Financia	al Regulatory Authori	ties		
				No	Information Filed		
Item	2 S	EC R	egistration/Reporting				
SEC	regi	strati		•	•	SEC. Complete this Item 2.A. only if you are applying for filing an <i>umbrella registration</i> , the information in Item 2	
	ann prov	<i>ual u_l</i> /ides		stration and you are no	o longer eligible to registe	A.(1) through 2.A.(12), below. If you are submitting an er with the SEC, check Item 2.A.(13). Part 1A Instruction 2 of these items.	
	V	(1)	are a large advisory firm that either	er:			
			(a) has regulatory assets under mar	nagement of \$100 mill	lion (in U.S. dollars) or mo	pre; or	
			(b) has regulatory assets under mar amendment and is registered wi	-	on (in U.S. dollars) or mor	e at the time of filing its most recent annual updating	
		(2)	are a mid-sized advisory firm that million (in U.S. dollars) and you are		s under management of \$.	25 million (in U.S. dollars) or more but less than \$100	
			(a) not required to be registered as of business; or	an adviser with the s	state securities authority of	f the state where you maintain your principal office and place	
			(b) not subject to examination by the	ne <i>state securities autl</i>	hority of the state where y	ou maintain your principal office and place of business;	
			Click HERE for a list of states in v authority.	vhich an investment ad	lviser, if registered, would i	not be subject to examination by the state securities	
		(3)	Reserved				
		(4)	have your principal office and place of	f business outside the	United States;		
		(5)	are an investment adviser (or sub-	adviser) to an investi	ment company registered	d under the Investment Company Act of 1940;	
		(6)				relopment company pursuant to section 54 of the relation of regulatory assets under	
		(7)	are a pension consultant with resp	ect to assets of plans	having an aggregate valu	ue of at least \$200,000,000 that qualifies for the exemption	
			in rule 203A-2(a);				

	registered with the SLC, and	id your principal office and place of bus	silless is the same as the registered adv	1361,
	If you check this box, comp	lete Section 2.A.(8) of Schedule D.		
	(9) are an adviser relying on r	rule 203A-2(c) because you expect to	be eligible for SEC registration within	ո 120 days;
	If you check this box, comp	lete Section 2.A.(9) of Schedule D.		
	(10) are a multi-state adviser	that is required to register in 15 or m	ore states and is relying on rule 203A-2((d);
		lete Section 2.A.(10) of Schedule D.		
	(11) are an Internet adviser re			
			on a single series and the series of the ser	
		er exempting you from the prohibition	n against registration with the SEC;	
		lete Section 2.A. (12) of Schedule D.		
	(13) are no longer eligible to re	emain registered with the SEC.		
Sta	ate Securities Authority Notice Filing	, , ,	eporting Advisers state securities authorities a copy of the	5 400
0.	file with the SEC. These are called not of reports and any amendments they like to receive notice of this and all standarditional state(s), check the box(estate)	otice filings. In addition, exempt reports y file with the SEC. If this is an initial a subsequent filings or reports you subm s) next to the state(s) that you would	ing advisers may be required to provide application or report, check the box(es) nit to the SEC. If this is an amendment the like to receive notice of this and all subsections or reports from going to state(s	state securities authorities with a copy next to the state(s) that you would to direct your notice filings or reports to esequent filings or reports you submit
	Jurisdictions			
	AL	□ IL	□ NE	□ sc
	□ AK	IN IN	□ NV	□ SC □ SD
	□ AZ	□ IA	□ NH	□ TN
	□ AR	□ KS	☑ NJ	□ TX
	□ ca	□ KY	□ _{NM}	□ UT
	□ со	□ LA	₽ NY	□ VT
	□ ст	□ ME	□ NC	□ VI
	□ DE	□ MD	□ ND	□ VA
	□ DC	□ MA	□ он	□ WA
	⊡ FL	∥ □ мі	□ ок	□ wv
	□ GA	□ MN	OR	□ wi
	GU	☐ MS	□ PA	□ WY
	□ HI □ ID	MO □ MT	□ PR □ RI	
		MI	I RI	
	state's notice filing or report filing fee		om going to a state that currently receives must be filed before the end of the year (E	
	CTION 2.A.(8) Related Adviser	L 0004 0(1) 5 H H H H		
wit		•	registration because you <i>control</i> , are <i>con</i> office and place of business is the same as	•
Naı	nme of Registered Investment Adviser			
CRI	RD Number of Registered Investment A	dviser		
SE(C Number of Registered Investment Ad	dviser		
SEC	CTION 2.A.(9) Investment Adviser Ex	specting to be Eligible for Commissis	on Registration within 120 Days	
wit		ce certain representations about your	istration available to an adviser that expeligibility for SEC registration. By check	

I am not registered or required to be registered with the SEC or a state securities authority and I have a reasonable expectation that I will be eligible to

□ I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section

register with the SEC within 120 days after the date my registration with the SEC becomes effective.

203A(a) of the Advisers Act from registering with the SEC.
SECTION 2.A.(10) Multi-State Adviser
If you are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.
If you are applying for registration as an investment adviser with the SEC, you must make both of these representations: I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the state securities authorities in those states.
I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the <i>state securities authorities</i> of those states.
If you are submitting your annual updating amendment, you must make this representation:
Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the state securities authorities in those states.
SECTION 2.A.(12) SEC Exemptive Order
If you are relying upon an SEC <i>order</i> exempting you from the prohibition on registration, provide the following information:
Application Number:
803-
Date of order:
Item 3 Form of Organization
If you are filing an umbrella registration, the information in Item 3 should be provided for the filing adviser only.
A. How are you organized?
Corporation
C Sole Proprietorship
C Limited Liability Partnership (LLP)
C Partnership
Limited Liability Company (LLC)
C Limited Partnership (LP)
Other (specify):
If you are changing your response to this Item, see Part 1A Instruction 4.
B. In what month does your fiscal year end each year? DECEMBER
C. Under the laws of what state or country are you organized?
State Country
Delaware United States
If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.
If you are changing your response to this Item, see Part 1A Instruction 4.
Item 4 Successions
Yes No
A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)?
structure or regar status (e.g., roth) or organization or state or 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

No Information Filed

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

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

Employees

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

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

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- 3. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
 - (2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?
 - (3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?

(4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?

- (5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?
- (6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?
 0

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

Clients

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

- C. (1) To approximately how many *clients* for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?
 - (2) Approximately what percentage of your *clients* are non-*United States persons*? 1%
- 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 Client	(1) Number of Client(s)	5 Clients	(3) Amount of Regulatory Assets under Management
	(a) Individuals (other than high net worth individuals)			\$
	(b) High net worth individuals	17		\$ 939,081,083
	(c) Banking or thrift institutions			\$
	(d) Investment companies			\$
	(e) Business development companies			\$
	(f) Pooled investment vehicles (other than investment companies and business development companies)	9		\$ 729,377,728
	(g) Pension and profit sharing plans (but not the plan participants or government pension plans)			\$
	(h) Charitable organizations			\$
	(i) State or municipal government entities (including government pension plans)			\$
	(j) Other investment advisers			\$
	(k) Insurance companies			\$
	(I) Sovereign wealth funds and foreign official institutions			\$
	(m) Corporations or other businesses not listed above		Ø	\$ 3,240,806,304
	(n) Other:			\$
Con	npensation Arrangements			
E.	You are compensated for your investment advisory services by (check all the	hat apply):		
	(1) A percentage of assets under your management			
	(2) Hourly charges			
	(3) Subscription fees (for a newsletter or periodical)			
	(4) Fixed fees (other than subscription fees) (5) Commissions			
	(6) Performance-based fees			
	(c) Performance based rees (7) Other (specify):			
Item	5 Information About Your Advisory Business - Regulatory Assets Under	Management		
Reg	ulatory Assets Under Management			
				Yes No
F.	(1) Do you provide continuous and regular supervisory or management se	rvices to securities	portfolios?	⊙ ○
	(2) If yes, what is the amount of your regulatory assets under manageme U.S. Dollar Amount	ent and total numbe		ber of Accounts
	Discretionary: (a) \$ 4,909,265,115		(d) 145	ber of Accounts
	Non-Discretionary: (a) \$ 4,767,263,113		(e) 0	
	Total: (c) \$ 4,909,265,115		(f) 145	
	10tal. (c) \$ 4,909,205,115		(1) 145	
	Part 1A Instruction 5.b. explains how to calculate your regulatory assets completing this Item.	under managemen	t. You must follow th	ese instructions carefully when
	(3) What is the approximate amount of your total regulatory assets under	management (res	orted in Itam F.E. (2)	(c) ahova) attributable to cliente who
	are non-United States persons?	тапауеттеті (герс	,, tou iii itelii 3.F.(2,	(to therits will
	\$ 13,006,668			
Item	5 Information About Your Advisory Business - Advisory Activities			
Adv	isory Activities			
G.	What type(s) of advisory services do you provide? Check all that apply.			
	(1) Financial planning services			
	(2) Portfolio management for individuals and/or small businesses			
	(3) Portfolio management for investment companies (as well as "bu	ısiness developmer	it companies" that h	nave made an election pursuant to
	section 54 of the Investment Company Act of 1940) (4) Portfolio management for pooled investment vehicles (other tha	n investment comp	anios)	
	 (4) Portfolio management for pooled investment vehicles (other that (5) Portfolio management for businesses (other than small businesses) 		•	registered investment companies and
	other pooled investment vehicles)	2007 or motitutional	onema (other thall	. eg.stered investment companies and
	(6) Pension consulting services			
	(7) Selection of other advisers (including <i>private fund</i> managers)			
	[(8) Publication of periodicals or newsletters			
	(9) Security ratings or pricing services			
	(10) Market timing services			
	(11) Educational seminars/workshops			
	(12) Other(specify):			

investment companies to which you provide advice in Section 5.G. (3) of Schedule D.	r	
If you provide financial planning services, to how many <i>clients</i> did you provide these services during your last fiscal year? O 0 O 1 - 10		
O 11 - 25		
O 26 - 50		
O 51 - 100		
0 101 - 250		
251 - 500		
M 11 500		
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 relation with those investors.	onship	
(1) Do you participate in a <i>wrap fee program</i> ?	Yes	
(2) If you participate in a wrap fee program, what is the amount of your regulatory assets under management attributable to acting as:	~	~
(a) sponsor to a wrap fee program \$		
(b) portfolio manager for a <i>wrap fee program</i> ?		
(c) sponsor to and portfolio manager for the same wrap fee program? \$		
If you report an amount in Item 5.1.(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 Sch	edule :	_
		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 to wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2).	througi	h a
		h a
wrap fee program, do not check Item 5.1.(1) or enter any amounts in response to Item 5.1.(2). (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	througi Y es	h a No
wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your	Yes O	h a No ⊙
wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management?	Yes O O Yes	h a No ⊙
wrap fee program, do not check Item 5.1.(1) or enter any amounts in response to Item 5.1.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately	Yes O O Yes	h a No ⊙ No
wrap fee program, do not check Item 5.1.(1) or enter any amounts in response to Item 5.1.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately managed account clients)? If yes, complete Section 5.K.(1) of Schedule D.	Yes O O Yes	No C
wrap fee program, do not check Item 5.1.(1) or enter any amounts in response to Item 5.1.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately managed account clients)? If yes, complete Section 5.K.(1) of Schedule D. (2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise?	Yes O O Yes	h a No ⊙ No
wrap fee program, do not check Item 5.1.(1) or enter any amounts in response to Item 5.1.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately managed account clients)? If yes, complete Section 5.K.(1) of Schedule D.	Yes O O Yes	No C
wap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately managed account clients)? If yes, complete Section 5.K.(1) of Schedule D. (2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise? If yes, complete Section 5.K.(2) of Schedule D.	Yes O O Yes	No C
wrap fee program, do not check Item 5.1.(1) or enter any amounts in response to Item 5.1.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately managed account clients)? If yes, complete Section 5.K.(1) of Schedule D. (2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise?	Yes O O Yes	No C
wap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately managed account clients)? If yes, complete Section 5.K.(1) of Schedule D. (2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise? If yes, complete Section 5.K.(2) of Schedule D.	Yes O O Yes	No C
wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately managed account clients)? If yes, complete Section 5.K.(1) of Schedule D. (2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise? 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? 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	Yes O O Yes	No C
wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately managed account clients)? If yes, complete Section 5.K.(1) of Schedule D. (2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise? 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? If yes, complete Section 5.K.(2) of Schedule D.	Yes O Yes O O	No C
wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2). (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately managed account clients)? If yes, complete Section 5.K.(1) of Schedule D. (2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise? 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? 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?	Yes O Yes O O	No C
wrap fee program, do not check Item 5.1.(1) or enter any amounts in response to Item 5.1.(2). (1) In response to Item 4.8. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (2) Do you report client assets in Item 4.8. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? Separately Managed Account Clients (1) Do you have regulatory assets under management attributable to clients other than those listed in Item 5.D.(3)(d)-(f) (separately managed account clients)? If yes, complete Section 5.K.(1) of Schedule D. (2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise? 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? 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? If yes, complete Section 5.K.(3) of Schedule D for each custodian.	Yes O Yes O O	No G

Н.

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J.

K.

L.

(a) Performance results?

(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	0	•
(c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•
(d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•
(e) Third-party ratings?	0	•
(2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of <i>testimonials</i> , <i>endorsements</i> , or <i>third-party ratings</i> ?	0	•
(3) Do any of your advertisements include hypothetical performance?	0	•
(4) Do any of your advertisements include predecessor performance?	0	•

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.

Ass	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"

(b) As	set Type	End of year
(i)	Exchange-Traded Equity Securities	1 %
(ii)	Non Exchange-Traded Equity Securities	0 %
(iii	U.S. Government/Agency Bonds	0 %
(i∨	U.S. State and Local Bonds	0 %
(v)	Sovereign Bonds	0 %
(∨) Investment Grade Corporate Bonds	0 %
(∨	i) Non-Investment Grade Corporate Bonds	0 %
(∨	ii) Derivatives	0 %
(i×	Securities Issued by Registered Investment Companies or Business Development Companies	16 %
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	53 %
(x) Cash and Cash Equivalents	5 %
(x	i) Other	25 %

Generally describe any assets included in "Other"

OTHER INVESTMENT ADVISORS.

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

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

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

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

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

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

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

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

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

(i) Mid-Year

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

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

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

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

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

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

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

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

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

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings
Less than 10%	\$ 271,767,925	\$ O
10-149%	\$ 0	\$ O
150% or more	\$ O	\$ 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	managed account
regulatory assets under management	

(a) Legal name of custodian:

FIDELITY FAMILY OFFICE SERVICES

(b) Primary business name of custodian:

FIDELITY FAMILY OFFICE SERVICES

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

City: State: Country:
BOSTON Massachusetts 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 any)

(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? \$ 215,500,217

(a) Legal name of custodian:

GOLDMAN SACHS & CO. LLC

(b) Primary business name of custodian:

	GOLDMAN SACHS & CC). LLC		
(c)	The location(s) of the o	custodian's office(s) responsible for <i>custody</i> of	of the assets :	
	City: NEW YORK	State: New York	Country: United States	
				Yes No
(d)	Is the custodian a rela	ted person of your firm?		0 ⊙
(e)	If the custodian is a br	oker-dealer, provide its SEC registration nun	nber (if any)	
(f)	If the custodian is not any)	a broker-dealer, or is a broker-dealer but do	ees not have an SEC registration number, provide its	legal entity identifier (if
(g)	What amount of your i	egulatory assets under management attribu	utable to separately managed accounts is held at the	e custodian?
(a)	Legal name of custodia	 n:		
	BNY MELLON WEALTH N	IANAGEMENT		
(b)	Primary business name BNY MELLON	of custodian:		
(c)		ustodian's office(s) responsible for custody o	f the assets :	
	City:	State:	Country:	
	BOSTON	Massachusetts	United States	
				Yes No
(d)	Is the custodian a relat	ed person of your firm?		o
(e)	If the custodian is a bro	oker-dealer, provide its SEC registration num	ber (if any)	
(f)	- If the custodian is not a any)	a broker-dealer, or is a broker-dealer but do	es not have an SEC registration number, provide its	legal entity identifier (if
(g)	What amount of your re \$ 31,679,486	egulatory assets under management attribu	table to separately managed accounts is held at the	custodian?
(a) (b)	Legal name of custodia NORTHERN TRUST Primary business name			
	NORTHERN TRUST			
(c)		custodian's office(s) responsible for <i>custody</i> of		
	City: CHICAGO	State: Illinois	Country: United States	
				Yes No
(d)	Is the custodian a relat	ted person of your firm?		0 0
(e)	If the custodian is a bro	oker-dealer, provide its SEC registration num	aber (if any)	
(0)	-			
(f)	any)	a broker-dealer, or is a broker-dealer but do	es not have an SEC registration number, provide its	legal entity identifier (if
(g)	What amount of your r \$ 3,240,806,304	egulatory assets under management attribu	itable to separately managed accounts is held at the	custodian?
tem 6	Other Business Activities			
n this	Item, we request information	on about your firm's other business activities		
A. Yo	(1) broker-dealer (registered representation(2) registered representation	usiness as a (check all that apply): stered or unregistered) ntative of a broker-dealer		
	(4) futures commission(5) real estate broker,	dealer, or agent	registered or exempt from registration)	
	(6) insurance broker or	agent		

	(7) bank (including a separately identifiable department of 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):	
	ou engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D.	∕es No
В.	Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?	0 0
	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 nar	ne.
		es No
	Do you sell products or provide services other than investment advice to your advisory clients?	0 0
	If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name	ne.
EC	N 6.A. Names of Your Other Businesses	
	No Information Filed	
EC	N 6.B.(2) Description of Primary Business	
	e your primary business (not your investment advisory business):	
lf y	ngage in that business under a different name, provide that name:	
	N 6.B.(3) Description of Other Products and Services	
Des	e other products or services you sell to your <i>client</i> . You may omit products and services that you listed in Section 6.B.(2) above.	
lf y	ngage in that business under a different name, provide that name:	
ten	inancial Industry Affiliations	
	tem, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interes etween you and your <i>clients</i> .	t may
Д.	s part of Item 7 requires you to provide information about you and your related persons, including foreign affiliates. Your related persons are all visory affiliates and any person that is under common control with you.	of your
	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	
	te that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representative oker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of on'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.

SEC	TON 7.A. Financial Industry Affiliations	
Co	plete a separate Schedule D Section 7.A. for each <i>related person</i> listed in Item 7.A.	
1.	Legal Name of <i>Related Person</i> : GRANGER MANAGEMENT HOLDINGS LLC	
2.	Primary Business Name of <i>Related Person</i> : GRANGER MANAGEMENT HOLDINGS LLC	
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	
	- or Other	
4.	Related Person's (a) CRD Number (if any):	
	(b) CIK Number(s) (if any): No Information Filed	
5.	Related Person is: (check all that apply) (a) broker-dealer, municipal securities dealer, or government securities broker or dealer (b) other investment adviser (including financial planners) (c) registered municipal advisor (d) registered security-based swap dealer (e) major security-based swap participant (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) futures commission merchant (h) banking or thrift institution (i) trust company (j) accountant or accounting firm (k) lawyer or law firm (l) insurance company or agency (m) pension consultant (n) real estate broker or dealer (o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes No
6.	Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	0 @
7.	Are you and the <i>related person</i> under common <i>control</i> ?	© 0
8.	(a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0 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 related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?	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>clie</i> Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:	ents' assets
0	(a) If the related percents an investment advisor, is it exempt from registration?	Yes No
9.	(a) If the related person is an investment adviser, is it exempt from registration?(b) If the answer is yes, under what exemption?	0 0
	(2) 2	

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

12.	Do you and the <i>related person</i> share the same physical location?	•	0
1.	Legal Name of <i>Related Person</i> : CHAPROC MANAGEMENT LLC		
2.	Primary Business Name of <i>Related Person</i> : CHAPROC MANAGEMENT LLC		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's (a) CRD Number (if any):		
	(b) CIK Number(s) (if any): No Information Filed		
5.	Related Person is: (check all that apply) (a) broker-dealer, municipal securities dealer, or government securities broker or dealer (b) other investment adviser (including financial planners) (c) registered municipal advisor (d) registered security-based swap dealer (e) major security-based swap participant (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) futures commission merchant (h) banking or thrift institution (i) trust company (j) accountant or accounting firm (k) lawyer or law firm (l) insurance company or agency (m) pension consultant (n) real estate broker or dealer (o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles	Yes	: No
6.	Do you control or are you controlled by the related person?	0	•
7.	Are you and the related person under common control?	•	0
8.	 (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i>? (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i>' funds or securities that are maintained at the <i>related person</i>? (c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i>'s office responsible for <i>custody</i> of your <i>clients</i>. Number and Street 1: 	o o s'ass	o o 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?	0	•
4.0			
IU.	(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 registNo Information Filed	C ered.	•
11.	Do you and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
12.	Do you and the <i>related person</i> share the same physical location?	•	0

12. Do you and the *related person* share the same physical location?

B. Are you an adviser to any <i>private fund</i> ?	⊙ ○
sentence and in Instruction 6 of the Instruction reporting adviser, and another SEC-registere	advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next tions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt d adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section fryou are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, e.D.
	nonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical e 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or
SECTION 7.B.(1) Private Fund Reporting	
	Funds per Page: 15 Total Funds: 8
A. PRIVATE FUND	
Information About the Private Fund	
1. (a) Name of the <i>private fund</i> :	
CARNEGIE GM PARTNERS LLC	
(b) <i>Private fund</i> identification number: (include the "805-" prefix also)	
805-5006438495	
2. Under the laws of what state or countr	y is the <i>private fund</i> organized:
State:	Country:
Delaware	United States

(a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity): Name of General Partner, Manager, Trustee, or Director CARNEGIE GM MANAGEMENT LLC (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. No Information Filed 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 List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. No Information Filed Yes No (a) Is this a "master fund" in a master-feeder arrangement? 0 0 (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund? No Information Filed Yes No (c) Is this a "feeder fund" in a master-feeder arrangement? \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:							
	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 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 it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.							
		Yes	s No					
8.	(a) Is this private fund a "fund of funds"?	\odot	0					
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	nt						
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	•					
		Yes	s 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> ?							
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private equity fund O other priv	ate fui	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> : \$ 182,211,628							
Ow	nership							
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 100,000							
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).	е						
13.	Approximate number of the <i>private fund's</i> beneficial owners: 114							
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 10%							
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%							
		Yes	s No					
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	•	0					
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%							
Υοι	ur Advisory Services							
17.	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	s No ⊙					
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	r to						
	No Information Filed							
10		Yes	s 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	0	•					

	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	•	0
	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> ? 28%		
Priv	vate Offering		
21	Heathe writes find over relied on an exponential from registration of its accomities under Degulation D of the Cooperities Act of 10222	_	No -
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?	0	⊙
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
3. SI	ERVICE PROVIDERS		
Auc	<u>litors</u>	Ye:	s No
23.	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	•	0
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	0
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one aud you must complete questions (b) through (f) separately for each auditing firm.	ting firn	n,
	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: ANCHIN, BLOCK & ANCHIN		
	(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:		
	NEW YORK New York United States	Yes I	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: 168		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
	(g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	Yes ©	S No
	(h) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified	opinior	ıs?
	⊙ 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 repor	' is availa	able.
Prir	ne Broker		
0.1	(c) Dear the private fundamental and the Co	Yes	s No
∠4.	(a) Does the <i>private fund</i> use one or more prime brokers? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If	the <i>priv</i>	⊙ ate
	fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	tile priv	аге

		No Inf	ormation Filed	
stodia	<u>an</u>			
. (a)	Does the <i>private fund</i> use any o	ustodians (including the prime broke	s listed above) to hold some or all of its assets?	Yes N
	If the answer to question 25.(a) is "yes," respond to questions (b) t	nrough (g) below for each custodian the <i>private fu</i>) through (g) separately for each custodian.	-
		No Inf	ormation Filed	
minis	<u>trator</u>			V .
(a)	Does the <i>private fund</i> use an ac	ministrator other than your firm?		Yes No
	If the answer to question 26.(a	•	nrough (f) below. If the <i>private fund</i> uses more that trator.	
	Additional Administrator Info	rmation : 1 Record(s) Filed.		
		(a) is "yes," respond to questions (b) plete questions (b) through (f) separa	through (f) below. If the <i>private fund</i> uses more tely for each administrator.	than one
	(b) Name of administrator: SS&C TECHNOLOGIES, IN	IC.		
	(c) Location of administrator	(city, state and country):		
	City:	State:	Country:	
	NEW YORK	New York	United States	Yes No
	(d) Is the administrator a real	ated person of your firm?		○ ●
			tements to the <i>private fund's</i> investors? ut not all investors) © No (provided to no investo	ors)
			the investor account statements to the (rest of trest of the) private fund's investors, respond "not	· •
you 0% Incl rele	related person? ude only those assets where (i)	such <i>person</i> carried out the valuation used for purposes of investor sub	(by value) was valued by a <i>person</i> , such as an acount of the second of	uding obtaining any
<u>rkete</u>	ers			., -
. (a)	Does the <i>private fund</i> use the s	ervices of someone other than you or	your <i>employees</i> for marketing purposes?	Yes N
	You must answer "yes" whether similar person. If the answer to	r the <i>person</i> acts as a placement age question 28.(a) is "yes," respond to	nt, consultant, finder, introducer, municipal advisor questions (b) through (g) below for each such ma plete questions (b) through (g) separately for each	or or other solicitor, or or or other solicitor, or or or o
		No Inf	ormation Filed	

Info	ormation About the <i>Private Fund</i>		
1	(a) Name of the <i>private fund</i> :		
	CHAPROC LLC		
	(b) Private fund identification number:		
	(include the "805-" prefix also)		
	805-2494436014		
2.	Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country:		
	Delaware United States		
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):		
	Name of General Partner, Manager, Trustee, or Director		
	CHAPROC MANAGEMENT LLC		
	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.		
	No Information Filed		
4.	The private fund (check all that apply; you must check at least one):		
	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940		
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940)	
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes	No.
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	•
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?		
	No Information Filed		
	(c) Is this a "fooder fund" in a master fooder arrangement?		No -
	(c) Is this a "feeder fund" in a master-feeder arrangement?(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?	0	⊙
	Name of private fund:		
	Private fund identification number: (include the "805-" prefix also)		
	(melade the Goo prenx disc)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section for the master feeder arrangement or reporting on the funds congretally.	on 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 eac	ch of
	the feeder funds answer the following questions:		
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially	all of t	hoir
	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		
	multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
			No.
8.	(a) Is this <i>private fund</i> a "fund of funds"?	_	0
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investme vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	∍nt	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	•
		~	
		Yes	No.
9.	During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment	0	•

10.	What type of fund is the <i>private fund</i> ?		
	C hedge fund C liquidity fund for private equity fund C real estate fund C securitized asset fund C venture capital fund C Other private fund C necessary.	te fun	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> : \$ 101,274,479		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :		
	\$ 100,000 NOTE: Report the amount routinely required of investors who are not your <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: 0		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 1%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	076	Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	•	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0% ur Advisory Services		
Υοι	0% ur Advisory Services	Yes	No
<u> You</u>	0% ur Advisory Services (a) Are you a subadviser to this private fund?	0	No ⊙
<u> You</u>	0% ur Advisory Services	0	
<u> Yoı</u>	ur Advisory Services (a) Are you a subadviser to this <i>private fund</i> ? (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer	0	
You	ur Advisory Services (a) Are you a subadviser to this <i>private fund</i> ? (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank. No Information Filed	to Yes	© No
You	ur Advisory Services (a) Are you a subadviser to this <i>private fund</i> ? (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank. No Information Filed (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	C to	No ©
You	ur Advisory Services (a) Are you a subadviser to this <i>private fund</i> ? (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank. No Information Filed (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> ?	C to	⊙ No ⊙
You	ur Advisory Services (a) Are you a subadviser to this <i>private fund?</i> (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank. No Information Filed (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.	C to	No • er
17.	ur Advisory Services (a) Are you a subadviser to this <i>private fund?</i> (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank. No Information Filed (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.	Yes O answ	No • er
17.	ur Advisory Services (a) Are you a subadviser to this <i>private fund?</i> (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank. No Information Filed (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. No Information Filed	to Yes O answ	No © //er
17. 18.	ur Advisory Services (a) Are you a subadviser to this <i>private fund</i> ? (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank. No Information Filed (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. No Information Filed	to Yes O answ	No © //er
17. 18.	ur Advisory Services (a) Are you a subadviser to this <i>private fund</i> ? (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank. No Information Filed (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. No Information Filed Are your <i>clients</i> solicited to invest in the <i>private fund</i> ? NOTE: For purposes of this question, do not consider feeder funds of the private fund. Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?	to Yes O answ	No © //er
17. 18. 19. 20.	ur Advisory Services (a) Are you a subadviser to this private fund? (b) If the answer to question 17. (a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer question 17. (a) is "no," leave this question blank. No Information Filed (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund? (b) If the answer to question 18. (a) is "yes," provide the name and SEC file number, if any, of the other advisers to the private fund. If the to question 18. (a) is "no," leave this question blank. No Information Filed Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of the private fund. Approximately what percentage of your clients has invested in the private fund?	to Yes O answ	No © ver
17. 18. 19. 20. Priv	ur Advisory Services (a) Are you a subadviser to this private fund? (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer question 17.(a) is "no," leave this question blank. No Information Filed (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund? (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the private fund. If the to question 18.(a) is "no," leave this question blank. No Information Filed Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of the private fund. Approximately what percentage of your clients has invested in the private fund? 1%	Yes O answ Yes O	No o rer

(a) (1	I) Are the <i>private fund's</i> financial statements subject to an annual audit?	Ye	es *
	2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	e e	
Ιf	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 auditou must complete questions (b) through (f) separately for each auditing firm.		
ı	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm: ANCHIN, BLOCK & ANCHIN LLC		
	(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:		
	NEW YORK New York United States	.,	
	(d) Is the auditing firm an independent public accountant?	Yes	O
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	
		~	_
	If yes, Public Company Accounting Oversight Board-Assigned Number: 168		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	C
ir	re the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> evestors?	6	
	o 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	opinic	ns
	Yes No Report Not Yet Received		
11	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	ilai
e Bro	<u>oker</u>	Υe	es
(a) D	oes the <i>private fund</i> use one or more prime brokers?	(5
	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 and uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	:he <i>pr</i>	ivai
	No Information Filed		
odian			
		Ye	es
 If	oes the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the und uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	privat	
	No Information Filed		
nistr	<u>ator</u>	Υe	es
a) D	oes the <i>private fund</i> use an administrator other than your firm?		5

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.

Auditors

	(b)	Name of administrator:			
		SS&C TECHNOLOGIES, INC.			
	(c)	Location of administrator (ci	ty, state and country):		
		City: NEW YORK	State: New York	Country: United States	
	(d)	Is the administrator a relate	ed person of your firm?		Yes No ○ •
	(e)	• •		statements to the <i>private fund's</i> investors? be but not all investors) No (provided to no	o investors)
	(f)	•		nds the investor account statements to the lee (rest of the) private fund's investors, resp	•
yc	our <i>relat</i> %	red person?		ets (by value) was valued by a <i>person</i> , such	
re	levant o	quotes, and (ii) the valuation s) was the valuation determi		ubscriptions, redemptions or distributions, a	
re al	levant o			·	and fee calculations (including
re al <u>Marke</u>	levant of location ters) Does	s) was the valuation determing the private fund use the serv	ned by such <i>person</i> . ices of someone other than you	ubscriptions, redemptions or distributions, a construction of the	and fee calculations (including Yes
re al <u>Marke</u>	levant of location ters) Does You notes	the <i>private fund</i> use the serv nust answer "yes" whether to preson. If the answer to que	ned by such <i>person</i> . Fices of someone other than you he <i>person</i> acts as a placement a estion 28.(a) is "yes," respond t	ubscriptions, redemptions or distributions, a	Yes In a solicitor, or such marketer the private fund
re al <u>Marke</u>	levant of location ters) Does You notes	the <i>private fund</i> use the serv nust answer "yes" whether to preson. If the answer to que	ned by such <i>person</i> . Fices of someone other than you he <i>person</i> acts as a placement a estion 28.(a) is "yes," respond to than one marketer you must contain the standard section 28.	or your <i>employees</i> for marketing purposes? gent, consultant, finder, introducer, municipor questions (b) through (g) below for each	Yes In a solicitor, or such marketer the private fund
re al <u>Marke</u>	levant of location ters) Does You notes	the <i>private fund</i> use the serv nust answer "yes" whether to preson. If the answer to que	ned by such <i>person</i> . Fices of someone other than you he <i>person</i> acts as a placement a estion 28.(a) is "yes," respond to than one marketer you must contain the standard section 28.	or your <i>employees</i> for marketing purposes? Igent, consultant, finder, introducer, municipe o questions (b) through (g) below for each complete questions (b) through (g) separate	Yes In a solicitor, or such marketer the private fund
re al Marke 28. (a	levant of location ters) Does You notes	the <i>private fund</i> use the serve must answer "yes" whether the result of the private fund uses more	ned by such <i>person</i> . Fices of someone other than you he <i>person</i> acts as a placement a estion 28.(a) is "yes," respond to than one marketer you must contain the standard section 28.	or your <i>employees</i> for marketing purposes? Igent, consultant, finder, introducer, municipe o questions (b) through (g) below for each complete questions (b) through (g) separate	Yes In a solicitor, or such marketer the private fund
re al Marke 28. (a	levant of location ters) Does You n simila uses. ATE FUN	the <i>private fund</i> use the serve must answer "yes" whether the result of the private fund uses more	ned by such <i>person</i> . Fices of someone other than you he <i>person</i> acts as a placement a estion 28.(a) is "yes," respond to than one marketer you must contain the standard section 28.	or your <i>employees</i> for marketing purposes? Igent, consultant, finder, introducer, municipe o questions (b) through (g) below for each complete questions (b) through (g) separate	Yes In a solicitor, or such marketer the private fund
re al Marke 28. (a	levant of location ters) Does You not similar uses. ATE FUN ation All) Name	the private fund use the serve must answer "yes" whether the private fund uses more also bout the private fund. bout the private fund:	ned by such <i>person</i> . Fices of someone other than you he <i>person</i> acts as a placement a estion 28.(a) is "yes," respond to than one marketer you must contain the standard section 28.	or your <i>employees</i> for marketing purposes? Igent, consultant, finder, introducer, municipe o questions (b) through (g) below for each complete questions (b) through (g) separate	Yes In a solicitor, or such marketer the private fund
real Marke 28. (a PRIV	levant of location ters) Does You n simila uses. ATE FUN ation All) Name CHLO) Privat (inclu	the <i>private fund</i> use the serve must answer "yes" whether the private fund uses more as the private fund uses more with the private fund with the p	ned by such <i>person</i> . Fices of someone other than you he <i>person</i> acts as a placement a estion 28.(a) is "yes," respond to than one marketer you must contain the standard section 28.	or your <i>employees</i> for marketing purposes? Igent, consultant, finder, introducer, municipe o questions (b) through (g) below for each complete questions (b) through (g) separate	Yes In a solicitor, or such marketer the private fund
real Marke 28. (a PRIV	ters) Does You n simila uses. ATE FUN ation Al) Name CHLO) Private (inclu 805-2	the private fund use the serve must answer "yes" whether the private fund uses more all the private fund uses more whether the private fund uses more all the private fund: The GB PARTNERS LLC the fund identification number: and the "805-" prefix also) 2676050161	rices of someone other than you he <i>person</i> acts as a placement a estion 28.(a) is "yes," respond to than one marketer you must contain the contained by the co	or your <i>employees</i> for marketing purposes? Igent, consultant, finder, introducer, municipe o questions (b) through (g) below for each complete questions (b) through (g) separate	Yes In a solicitor, or such marketer the private fund
real Marke 28. (a PRIV nform 1. (a (b)	ters) Does You n simila uses. ATE FUN ation Al) Name CHLO) Private (inclu 805-2	the private fund use the serve must answer "yes" whether the private fund uses more. If the private fund: The GB PARTNERS LLC the fund identification number: and the "805-" prefix also). 2676050161	ned by such <i>person</i> . Fices of someone other than you he <i>person</i> acts as a placement a estion 28.(a) is "yes," respond to than one marketer you must contain the standard section 28.	or your <i>employees</i> for marketing purposes? gent, consultant, finder, introducer, municipe or questions (b) through (g) below for each complete questions (b) through (g) separate distribution Filed	Yes In a solicitor, or such marketer the private fund

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

No Information Filed

Additional Administrator Information : 1 Record(s) Filed.

4.	The private fund (check all that apply; you must check at least one):		
	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes	No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	•
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?		•
	No Information Filed		
		Yes	Nc
	(c) Is this a "feeder fund" in a master-feeder arrangement?		•
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?	~	~
	Name of private fund:		
	Private fund identification number: (include the "805-" prefix also)		
7.	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section of the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions:		
	No Information Filed		
8.	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all 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. (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	issue Yes O	ed N a
	vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.		
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	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	0
10.	What type of fund is the <i>private fund</i> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private	e fun	ıd:
	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> : \$ 7,815,556		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 100,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).		

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

14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 21%	
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 qualified clients?	© 0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%	
You	ur Advisory Services	V N-
17	(a) Are you a subadviser to this <i>private fund</i> ?	Yes No
.,.	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the ar question 17.(a) is "no," leave this question blank.	O
	No Information Filed	
		Yes No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0 0
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . I to question 18.(a) is "no," leave this question blank.	f the answer
	No Information Filed	
		Yes No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	O
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.	
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 10%	
<u>Pri</u>	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?	Yes No
	у под достовно под д	0 0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):	
	No Information Filed	
B. S	SERVICE PROVIDERS	
Aud	<u>ditors</u>	
22	(a) (1) Are the private fund's financial etatements subject to an entirely sudject	Yes No
23.	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	• o
	(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 auyou must complete questions (b) through (f) separately for each auditing firm.	⊙ Cuditing 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:	
	ANCHIN, BLOCK & ANCHIN	
	(c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):	
	City: State: Country:	
	NEW YORK New York United States	
		Yes No
	(d) Is the auditing firm an independent public accountant?	⊙ ○

	If yes, Public Company Accounting Oversight Board-Assigned Number: 168			
(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		С
			.,	
	the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> stors?		Ye: ⊙	•
Do a	all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualifie	d opir	nior	s′
⊙ ·	es O No O Report Not Yet Received			
If yo	ou check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the repo	rt is a	vail	зb
Broke			.	
Doe	s the <i>private fund</i> use one or more prime brokers?		Ye:	•
If th	te answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. It uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	f the	priv	
	No Information Filed			
	s the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? The answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the		Ye: O	
			arc	
	uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	-		
	Vuses more than one custodian, you must complete questions (b) through (g) separately for each custodian. No Information Filed			
	No Information Filed			
fund	No Information Filed or		Ye	· ·
strate Doe	No Information Filed		Ye:	
strate Doe If the mus	No Information Filed Some the private fund use an administrator other than your firm? The answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator other than one administ		Ye:	
strate Doe If the muse Adde	No Information Filed s the <i>private fund</i> use an administrator other than your firm? se answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one admin tomplete questions (b) through (f) separately for each administrator.		Ye:	•
strate Doe If th mus Add	No Information Filed Some the private fund use an administrator other than your firm? The answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator to the private fund uses more than one administrator. Some than the private fund uses more than one administrator. Some than the private fund uses more than one than one answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one		Ye:	•
strate Doe If th mus Add	No Information Filed So the <i>private fund</i> use an administrator other than your firm? The answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator to the private questions (b) through (f) separately for each administrator. Solutional Administrator Information: 1 Record(s) Filed. The answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one deministrator, you must complete questions (b) through (f) separately for each administrator. Name of administrator: SS&C TECHNOLOGIES, INC.		Ye:	; I
Doe If the must Add (b)	No Information Filed Solution of administrator: No Information Filed If the private fund uses more than one administrator. Information Filed No Information Filed No Information Filed If the private fund uses more than one administrator Information Filed Information Filed No In		Ye:	; I
strate Doe If the muse Adde (b)	No Information Filed So the <i>private fund</i> use an administrator other than your firm? The ending an ending and the private fund uses more than one administrator to questions (b) through (f) below. If the private fund uses more than one administrators to complete questions (b) through (f) separately for each administrator. Solutional Administrator Information: 1 Record(s) Filed. The answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one iministrator, you must complete questions (b) through (f) separately for each administrator. Name of administrator: SS&C TECHNOLOGIES, INC. Location of administrator (city, state and country): City: State: Country:		Ye: ⊙	;;
Strate Doe If the muse Add (b)	No Information Filed So the <i>private fund</i> use an administrator other than your firm? So the <i>private fund</i> use an administrator other than your firm? So answer to question 26 (a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator. Solutional Administrator Information: 1 Record(s) Filed. The answer to question 26 (a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one iministrator, you must complete questions (b) through (f) separately for each administrator. Name of administrator: SS&C TECHNOLOGIES, INC. Location of administrator (city, state and country): City: State: Country: NEW YORK New York United States United States	Yes	Ye: Or,	; I I
Strate Doe If the muse Add (b)	No Information Filed So the <i>private fund</i> use an administrator other than your firm? The answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator to complete questions (b) through (f) separately for each administrator. Sittional Administrator Information: 1 Record(s) Filed. The answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one liministrator, you must complete questions (b) through (f) separately for each administrator. In Name of administrator: SS&C TECHNOLOGIES, INC. Location of administrator (city, state and country): City: State: Country: NEW YORK New York United States	Yes	Ye: Or,	;;
Strate Doe If the muse Add (b)	No Information Filed Step private fund use an administrator other than your firm? The answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator to questions (b) through (f) separately for each administrator. Stitional Administrator Information: 1 Record(s) Filed. The answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one iministrator, you must complete questions (b) through (f) separately for each administrator. Name of administrator: SS&C TECHNOLOGIES, INC. Location of administrator (city, state and country): City: State: Country: NEW YORK New York United States United States Does the administrator prepare and send investor account statements to the private fund's investors? OYes (provided to all investors) Some (provided to some but not all investors) No (provided to no investors)	Yes O	Ye: Or,	is .

		investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable." NOT APPLICABLE		
27.		ing your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as an administrator, that r related person?	is not	t
	Incl rele	ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including obtaining a evant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (included that it is a cations) was the valuation determined by such <i>person</i> .	-	
/laı	kete	<u>ers</u>		
28	(a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	Yes	_
.0.		You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor 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</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.		•
		No Information Filed		
PI	RIVA	TE FUND		
<u>nfo</u>	rmat	tion About the <i>Private Fund</i>		
	(a)	Name of the <i>private fund</i> :		
		GRACE GM PARTNERS LLC Private fund identification number: (include the "805-" prefix also)		
		805-9283478099		
<u>)</u> .		State: Country: Delaware United States		
3.	(a)	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):		
		me of General Partner, Manager, Trustee, or Director ANGER MANAGEMENT LLC		
	(b)	If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> . No Information Filed		
		No Illioi Hation Filed		
l .		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		
).	List	the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
		No Information Filed		
	()		Yes	No
).		Is this a "master fund" in a master-feeder arrangement? If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?	0	•
		No Information Filed		
			Yes	Nο
	(c)	Is this a "feeder fund" in a master-feeder arrangement?	0	⊙
		If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		
		Private fund identification number:		

	NOTE. Value report as regulate appearing / for each regarder fooder arrangement regardless of whether you are filling a single Cahadula D. Castian 7	, D /	(1)
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7 for the master-feeder arrangement or reporting on the funds separately.	.В.((1)
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 the feeder funds answer the following questions:	eacl	h of
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of 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.		
		⁄es	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	⊙	0
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.		
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	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> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private	e fur	าd:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 327,489,030		
<u>Ow</u>	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 100,000		
	NOTE: Report the amount routinely required of investors who are not your <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: 122		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 15%		
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.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
Υοι	ur Advisory Services		
17	(a) Are you a subadviser to this <i>private fund</i> ?	_	No
. / .	(a) Are you a subadviser to this private rand:(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.	to	•

No Information Filed

(include the "805-" prefix also)

		Yε	es	No
8.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	C	5	•
1	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fun</i> to question 18.(a) is "no," leave this question blank.	d. If the ans	SW€	:r
	No Information Filed			
		Υє	es	No
9. 1	Are your clients solicited to invest in the private fund?	•	9	0
i	NOTE: For purposes of this question, do not consider feeder funds of the private fund.			
	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 33%			
Priva	ate Offering			
		Υє	es	No
1. 1	Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	, c)	•
2.	If yes, provide the <i>private fund's</i> Form D file number (if any):			
	No Information Filed			
SEF	RVICE PROVIDERS			
<u>\udi</u>	<u>itors</u>	Υ¢	es	Ν¢
3.	(a) (1) Are the private fund's financial statements subject to an annual audit?	6	•	C
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	6	•	C
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one	auditing fir	rm,	
	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 auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	one		
	(b) Name of the auditing firm:			
	ANCHIN, BLOCK & ANCHIN			
	(c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country):			
	City: State: Country:			
	NEW YORK New York United States			_
	(d) Is the auditing firm an <i>independent public accountant</i> ?	Yes		
	(a) is the additing firm an independent public accountant:	•	C)
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	C)
	If yes, Public Company Accounting Oversight Board-Assigned Number: 168			
	(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 💿	c)
		V		N I
	(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>		es	
,	investors?	6	•	С
	(h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqual	alified opinic	ons	?
		,		

24. (a	a) Does the <i>private fund</i> use one or more prime brokers?	0 0
	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> use <i>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	s. If the <i>private</i>
	No Information Filed	
Custo	<u>odian</u>	
25. (a	(a) Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?	Yes No ○ ⊙
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. I fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	
	No Information Filed	
Admin	<u>inistrator</u>	
26. (a	(a) Does the <i>private fund</i> use an administrator other than your firm?	Yes No
·	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one adr must complete questions (b) through (f) separately for each administrator.	
	Additional Administrator Information : 1 Record(s) Filed.	
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.	
	(b) Name of administrator: SS&C TECHNOLOGIES, INC.	
	(c) Location of administrator (city, state and country):	
	City: State: Country: NEW YORK New York United States	
	NEW TORK	Yes No
	(d) Is the administrator a <i>related person</i> of your firm?	○ ⊙
	(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors? Or Yes (provided to all investors) Or Some (provided to some but not all investors) Or No (provided to no investors)	
	(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable NOT APPLICABLE	
yc	During your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as an administrate your <i>related person</i> ? 20%	
re	nclude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including obtatelevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations allocations) was the valuation determined by such <i>person</i> .	
<u>Marke</u>	<u>eters</u>	Yes No
28. (a	(a) Does the private fund use the services of someone other than you or your employees for marketing purposes?	O O
	You 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 the uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer	solicitor, or private fund
	No Information Filed	

	nformation About the <i>Private Fund</i>						
1110	Thation About the Trivate Fund						
1.	(a) Name of the private fund:						
	GRANGER VEP CO-INVESTMENT FUND LLC						
	(b) Private fund identification number:						
	(include the "805-" prefix also)						
	805-5284638403						
2.	Under the laws of what state or country is the <i>private fund</i> organized: State: Country:						
	Delaware United States						
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):						
	Name of General Partner, Manager, Trustee, or Director						
	GRANGER MANAGEMENT LLC						
	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.						
	No Information Filed						
4.	The private fund (check all that apply; you must check at least one):						
	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940						
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940						
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.						
	No Information Filed						
		Yes	No				
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	•				
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?						
	No Information Filed						
	(a) In this a "feeder fund" in a master feeder arrangement?	Yes					
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	•				
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?						
	Name of private fund:						
	Private fund identification number:						
	(include the "805-" prefix also)						
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section	7 R (1)				
	for the master-feeder arrangement or reporting on the funds separately.	7.5.(.,				
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 the feeder funds answer the following questions:	or each	n of				
	the recael raines answer the rollowing questions.						
	No Information Filed						
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially al	II of +L	noir				
	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						
	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	(a) Is this private fund a "fund of funda"?	Yes					
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 investmen		•				
	vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ί					

	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	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> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private	ate fun	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> : \$ 12,090,407		
<u>Ow</u>	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 100,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in thorganizational documents of the fund).	е	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 5		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 1%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes ©	No O
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
You	r Advisory Services		
17	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	_
17.	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i>. If the answer question 17.(a) is "no," leave this question blank.	r 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	O	⊙
	to question 18.(a) is "no," leave this question blank.		
	No Information Filed		
10	Are your eligited to invest in the private fund.	Yes	_
19.	Are your <i>clients</i> solicited to invest in the <i>private fund?</i> NOTE: For purposes of this question, do not consider feeder funds of the private fund.	•	0
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 1%		
Driv	vate Offering		
<u>r11\</u>	rate onemig	Yes	No
21.	Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	0	•

No Information Filed

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

Auditor	$ar{2}$	Voi	s No					
23. (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?	•	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.	ting firn	n,					
	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: ANCHIN, BLOCK & ANCHIN							
	(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:							
	NEW YORK New York United States	Yes	Nο					
	(d) Is the auditing firm an independent public accountant?	_	0					
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0					
	If yes, Public Company Accounting Oversight Board-Assigned Number: 168							
	(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					
		Yes	s No					
(g)	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	•	0					
(h)	Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified	opinior	ıs?					
	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 avail	able.					
<u>Prime E</u>	<u>sroker</u>	Va	. Ne					
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	0	s No					
	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 fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	the <i>priv</i>	_					
	No Information Filed							
Custodi	<u>an</u>	Yes	s No					
25. (a)	Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?	0	•					
25. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	0)					

No Information Filed

26. (a) Does the <i>private fund</i> use an admin	istrator other than your firm?		⊙ ○
	If the answer to question 26.(a) is must complete questions (b) through	•	rrough (f) below. If the <i>private fund</i> uses more the	nan one administrator, you
	Additional Administrator Informa	•		
	•	is "yes," respond to questions (b) e questions (b) through (f) separa	through (f) below. If the <i>private fund</i> uses more tely for each administrator.	than one
	(b) Name of administrator: SS&C TECHNOLOGIES, INC.			
	(c) Location of administrator (city	y, state and country): State:	Country:	
	NEW YORK	New York	United States	
	(d) Is the administrator a related	person of your firm?		Yes No ○ •
	(e) Does the administrator prepare	are and send investor account sta	tements to the <i>private fund's</i> investors?	
	C Yes (provided to all investo	ors) C Some (provided to some b	ut not all investors) 👩 No (provided to no invest	ors)
	· ·		the investor account statements to the (rest of rest of the) private fund's investors, respond "no	
/larke	<u>ters</u>			Yes No
8. (a) Does the <i>private fund</i> use the service	ces of someone other than you or	your employees for marketing purposes?	0 0
	similar person. If the answer to que	stion 28.(a) is "yes," respond to d	nt, consultant, finder, introducer, municipal advis questions (b) through (g) below for each such m plete questions (b) through (g) separately for ea	arketer the <i>private fund</i>
		No Info	ormation Filed	
PRIV	ATE FUND			
<u>iform</u>	ation About the <i>Private Fund</i>			
. (a) Name of the <i>private fund</i> : MORANGIE LLC			
(b) <i>Private fund</i> identification number: (include the "805-" prefix also)			
	805-5779764084			
. Ur	nder the laws of what state or country	y is the <i>private fund</i> organized:		
	State:	Country: United Stat		
	Delaware	onited Stat	ರು	
. (a) Name(s) of General Partner, Manag	er, Trustee, or Directors (or perso	ons serving in a similar capacity):	

Name of General Partner, Manager, Trustee, or Director

	ng an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>re</i>	formation Filed		
The <i>priva</i> :	te fund (check all that apply; you must check at least one):			
		mpany under section 3(c)(1) of the Investment Company Act of 194	0	
🗖 (2) qu	ualifies for the exclusion from the definition of investment cor	mpany under section 3(c)(7) of the Investment Company Act of 194	0	
List the n	ame and country, in English, of each foreign financial regulate	ory authority with which the private fund is registered.		
	No In	formation Filed		
			Yes	No
(a) Is thi	s a "master fund" in a master-feeder arrangement?		•	С
(b) If yes	s, 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		
GRANGEF	R OFFSHORE FUND (BVI ENTITY)	805-5385322978		
			Yes	No
(c) Is this	s a "feeder fund" in a master-feeder arrangement?		0	0
(d) If yes	s, what is the name and private fund identification number (if	any) of the master fund in which this private fund invests?		
Name	e of <i>private fund</i> :			
	te fund identification number:			
(inclu	de the "805-" prefix also)			
tire reede	r funds answer the following questions:	ler arrangement according to the instructions to this Section 7.B.(1),	,	
	r funds answer the following questions:		, , , , , , , , , , , , , , , , , , , ,	
	r funds answer the following questions:	ler arrangement according to the instructions to this Section 7.B.(1),		
NOTE: Fo	r funds answer the following questions: No In r purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feede		/ all of tl f it issue	heir
NOTE: Fo assets in	r funds answer the following questions: No In r purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feede	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question i	/ all of tl f it issue	neir
NOTE: Fo assets in multiple c	r funds answer the following questions: No In r purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feede	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question i	/ all of the fit issue	neir
NOTE: Fo assets in multiple c (a) Is this	r funds answer the following questions: No In r purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feede classes (or series) of shares or interests, and each class (or series) are private fund a "fund of funds"?	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question is series) invests substantially all of its assets in a single master fund vests 10 percent or more of its total assets in other pooled investm	/ all of tl f it issue Yes ⊙	neir ed • N o
NOTE: Fo assets in multiple of (a) Is this NOTE: Fo vehicles,	r funds answer the following questions: No In r purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feede classes (or series) of shares or interests, and each class (or series) of funds"? r purposes of this question only, answer "yes" if the fund in	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question is series) invests substantially all of its assets in a single master fund vests 10 percent or more of its total assets in other pooled investment companies.	/ all of the fit issued to the fit issued to the fit is the fit i	neir ed • N o
NOTE: Fo assets in multiple control (a) Is this NOTE: Fo vehicles,	r funds answer the following questions: No In r purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feede classes (or series) of shares or interests, and each class (or series) s private fund a "fund of funds"? r purposes of this question only, answer "yes" if the fund integrandless of whether they are also private funds or register	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question is series) invests substantially all of its assets in a single master fund vests 10 percent or more of its total assets in other pooled investment companies.	/ all of the fit issue of the fit issue of the fit issue of the fit is the f	neir ed No
NOTE: Fo assets in multiple of (a) Is this NOTE: Fo vehicles, (b) If yes	r funds answer the following questions: No In r purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feede classes (or series) of shares or interests, and each class (or series) as private fund a "fund of funds"? r purposes of this question only, answer "yes" if the fund incregardless of whether they are also private funds or register as, does the private fund invest in funds managed by you or by	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question is series) invests substantially all of its assets in a single master fund vests 10 percent or more of its total assets in other pooled investment investment companies. Year elated person?	v all of the fit issue. Yes enent C	neir ed No
NOTE: Fo assets in multiple of (a) Is this NOTE: Fo vehicles, (b) If yes	r funds answer the following questions: No In r purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feede classes (or series) of shares or interests, and each class (or series) as private fund a "fund of funds"? r purposes of this question only, answer "yes" if the fund incregardless of whether they are also private funds or register as, does the private fund invest in funds managed by you or by	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question is series) invests substantially all of its assets in a single master fund vests 10 percent or more of its total assets in other pooled investment investment companies. If y a related person?	v all of the fit issue. Yes enent C	neir ed No
NOTE: Fo assets in multiple of the control of the c	r funds answer the following questions: No In r purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feede lasses (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) are purposes of this question only, answer "yes" if the fund integardless of whether they are also private funds or registers, does the private fund invest in funds managed by you or by the first of the private fund invest in securities is securities.	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question is series) invests substantially all of its assets in a single master fund vests 10 percent or more of its total assets in other pooled investment investment companies. If y a related person?	v all of the fit issue. Yes enent C	neir ed No
NOTE: Fo assets in multiple of (a) Is this NOTE: Fo vehicles, (b) If yes During yo Company	r funds answer the following questions: No In Tripurposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feeded asses (or series) of shares or interests, and each class (or series) of funds"? Tripurposes of this question only, answer "yes" if the fund interegardless of whether they are also private funds or registers, does the private fund invest in funds managed by you or by ur last fiscal year, did the private fund invest in securities is act of 1940 (other than "money market funds," to the exters of fund is the private fund?	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question is series) invests substantially all of its assets in a single master fund vests 10 percent or more of its total assets in other pooled investment investment companies. If y a related person?	v all of the fit issue. Yes onent Yes	neir ed No
NOTE: For assets in multiple of the control of the	r funds answer the following questions: No In Tripurposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feeded asses (or series) of shares or interests, and each class (or series) of funds"? Tripurposes of this question only, answer "yes" if the fund interegardless of whether they are also private funds or registers, does the private fund invest in funds managed by you or by ur last fiscal year, did the private fund invest in securities is act of 1940 (other than "money market funds," to the exters of fund is the private fund?	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question is series) invests substantially all of its assets in a single master fund vests 10 percent or more of its total assets in other pooled investment investment companies. By a related person? Sued by investment companies registered under the Investment and provided in Instruction 6.e.)?	v all of the fit issue. Yes onent Yes	neir ed No
NOTE: Fo assets in multiple of (a) Is this NOTE: Fo vehicles, (b) If yes During yo Company What type hedge NOTE: Fo	r funds answer the following questions: No In Property purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feeder classes (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of this question only, answer "yes" if the fund interegardless of whether they are also private funds or registers, does the private fund invest in funds managed by you or by the private fund invest in securities is securities and the private fund? Fund Of the private fund? Fund Of liquidity fund Of private equity fund Of real estates.	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question is series) invests substantially all of its assets in a single master fund vests 10 percent or more of its total assets in other pooled investment investment companies. By a related person? Sued by investment companies registered under the Investment and provided in Instruction 6.e.)?	v all of the fit issue. Yes onent Yes	neir ed No
NOTE: Fo assets in multiple of (a) Is this NOTE: Fo vehicles, (b) If yes During yo Company What type hedge NOTE: Fo	No In purposes of questions 6 and 7, in a master-feeder arrange a single fund ("master fund"). A fund would also be a "feeder also good of series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) of shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or series) or shares or interests, and each class (or shares) or shares or interests, and each class (or shares) or shares or	ement, one or more funds ("feeder funds") invest all or substantially er fund" investing in a "master fund" for purposes of this question is series) invests substantially all of its assets in a single master fund vests 10 percent or more of its total assets in other pooled investment investment companies. By a related person? Sued by investment companies registered under the Investment and provided in Instruction 6.e.)?	v all of the fit issue. Yes onent Yes	neil ed N

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

CARNEGIE GM MANAGEMENT LLC

	NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth i organizational documents of the fund).	n the	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 36		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 3%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes •	O
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
You	ur Advisory Services	Yes	Nic
17	(a) Are you a subadviser to this <i>private fund</i> ?		
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 private fund. If the an question 17.(a) is "no," leave this question blank.		•
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	•
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If to question 18.(a) is "no," leave this question blank.	the answ	er
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	•	0
	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> ? 14%		
Priv	vate Offering		
		Yes	No
21.	Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	0	•
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. SE	SERVICE PROVIDERS		
Aud	<u>ditors</u>		
7 2	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	Yes	
2 J.	(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 au you must complete questions (b) through (f) separately for each auditing firm.	oditing firm	, 0
	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: ANCHIN, BLOCK & ANCHIN LLC		

\$ 100,000

	(c) The location of the auditin	g firm's office responsible for the pri	vale rund's addit (city, state and country):		
	City: NEW YORK	State: New York	Country: United States		
	(d) Is the auditing firm an ind	anandant nublic accountant?			No -
	(d) Is the auditing firm an ind	ependent public accountant?		0	•
	(e) Is the auditing firm registe	ered with the Public Company Accou	nting Oversight Board?	•	0
	If yes, Public Company Ac	counting Oversight Board-Assigned N	Number:		
	(f) If "yes" to (e) above, is the accordance with its rules?		spection by the Public Company Accounting Oversight Board in	•	0
				Ye	es No
(g)	Are the <i>private fund's</i> audited fin investors?	ancial statements for the most recer	ntly completed fiscal year distributed to the private fund's	e	• 0
(h)	Do all of the reports prepared by	the auditing firm for the private fun	nd since your last annual updating amendment contain unqualifi	ed opinio	ons?
	• Yes • No • Report Not Yet	Received			
	If you check "Report Not Yet Rece	ived," you must promptly file an ame	ndment to your Form ADV to update your response when the rep	ort is ava	ailable.
<u>Prime I</u>	<u>Broker</u>				
				Ye	es No
24. (a)	Does the <i>private fund</i> use one or	·	through (a) below for each prime broker the private funduage		O O
	•		through (e) below for each prime broker the <i>private fund</i> uses. s (b) through (e) separately for each prime broker.	ii the pr	ivate
		No Inf	formation Filed		
Custod	<u>ian</u>			V	oo Na
25. (a)	Does the <i>private fund</i> use any cu	stodians (including the prime broke	rs listed above) to hold some or all of its assets?		es No O ⊙
	•		through (g) below for each custodian the <i>private fund</i> uses. If to through (g) separately for each custodian.	:he <i>priva</i> i	
		No Inf	formation Filed		
Admini	strator			Y	es No
26. (a)	Does the private fund use an adr	ninistrator other than your firm?		¢	• 0
	•	is "yes," respond to questions (b) the ough (f) separately for each adminis	hrough (f) below. If the <i>private fund</i> uses more than one adminstrator.	nistrator	, you
	Additional Administrator Infor				
		` '			
		a) is "yes," respond to questions (b) lete questions (b) through (f) separa	through (f) below. If the <i>private fund</i> uses more than one ately for each administrator.		
	(b) Name of administrator:				
	SS&C TECHNOLOGIES, INC	<u>)</u> .			
	(c) Location of administrator	(city, state and country):			
	City:	State:	Country:		
	NEW YORK	New York	United States	Yes N	No
	(d) Is the administrator a rela	ted person of your firm?			©

		(e) Does the administrator prepare and send investor account stateme	,	
		O Yes (provided to all investors) O 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 i investors? If investor account statements are not sent to the (rest of NOT APPLICABLE		
27.		ng your last fiscal year, what percentage of the <i>private fund's</i> assets (by v related person?	alue) was valued by a <i>person</i> , such as an administrator, that is i	not
	relev	de only those assets where (i) such <i>person</i> carried out the valuation procant quotes, and (ii) the valuation used for purposes of investor subscriptiations) was the valuation determined by such <i>person</i> .		
Ma	rkete	<u>s</u>		
				es No
28.		Ooes the <i>private fund</i> use the services of someone other than you or your		0 0
	9	ou must answer "yes" whether the <i>person</i> acts as a placement agent, coming imilar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questing uses. If the <i>private fund</i> uses more than one marketer you must complete	ons (b) through (g) below for each such marketer the <i>private full</i>	
		No Informat	on Filed	
A. P	RIVAT	E FUND		
1 6-	4 :	an Abaut the Drivete Fund		
Inic	ormati	on About the <i>Private Fund</i>		
1.	(a) I	lame of the <i>private fund</i> :		
	I	POONEY GM PARTNERS LLC		
	` '	Private fund identification number:		
		include the "805-" prefix also) 105-5126931362		
2	Unda	r the laws of what state or country is the <i>private fund</i> organized:		
۷.		State: Country:		
		Delaware United States		
0	<i>(</i>) .	. () (O		
3.		lame(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> se	ving in a similar capacity):	
		NEGIE GM MANAGEMENT LLC		
	(b)	f filing an umbrella registration, identify the filing adviser and/or relying adv	ser(s) that sponsor(s) or manage(s) this private fund.	
		No Information	Filed	
4	Tho	private fund (about all that apply, you must about at least and).		
4.		private fund (check all that apply; you must check at least one): 1) qualifies for the exclusion from the definition of investment company ur	der section 3(c)(1) of the Investment Company Act of 1940	
		 qualifies for the exclusion from the definition of investment company ur 	•	
5.	List	he name and country, in English, of each foreign financial regulatory author	· · · · · · · · · · · · · · · · · · ·	
		No Information		
L	(0)	e this a "master fund" in a master feeder errongement?		es No
6.		s this a "master fund" in a master-feeder arrangement? f yes, what is the name and <i>private fund</i> identification number (if any) of		⊙ ○
	, ,	e of private fund	Private fund identification number	
		NEY GM PARTNERS OFFSHORE LIMITED	805-2242518038	

	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	⊙
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		
	Private fund identification number: (include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section for the master-feeder arrangement or reporting on the funds separately.	7.B.(1 <u>)</u>)
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 the feeder funds answer the following questions:	· each	of
	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 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	issued	
8.	(a) Is this <i>private fund</i> a "fund of funds"?	Yes N	
Ο.	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
		Yes N	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.)?		•
10.	What type of fund is the private fund?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private	te fund	:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 36,874,707		
Ow	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 100,000		
	NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 54		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 15%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes I	
16	What is the approximate percentage of the private fund beneficially owned by non-United States percent		

7%

our Ac	dvisory Services		
7. (a)	Are you a subadviser to this <i>private fund</i> ?	Yes	s No ⊙
	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.		
	No Information Filed		
		Yes	s No
3. (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 to question 18.(a) is "no," leave this question blank.	ansv	ver
	No Information Filed		
) A	ways allow to collect and to invest in the private 6 men	Yes	s No
	e your <i>clients</i> solicited to invest in the <i>private fund?</i> ITE: For purposes of this question, do not consider feeder funds of the private fund.	•	0
	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
119			
ivate	e Offering		
		Yes	s No
i. Has	s the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	0
2. If y	ves, provide the <i>private fund's</i> Form D file number (if any):		
For	rm D file number		
02	ICE PROVIDERS	Ye	
02 SERVI	ICE PROVIDERS S (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	•	С
02 SERVI	(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 auditing	©	0
02 SERVI	(1) Are the <i>private fund</i> 's 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 auditing you must complete questions (b) through (f) separately for each auditing firm.	©	c
02 SERVI	(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 auditing 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	©	O
02 SERVI	(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 auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed.	©	c
02 SERVI	(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 auditing 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	©	c
02 SERVI	(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 auditing 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: ANCHIN, BLOCK & ANCHIN LLP (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):	©	c
02 SERVI	(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 auditing 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: ANCHIN, BLOCK & ANCHIN LLP	©	c
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02 SERVI	(1) Are the <i>private fund</i> 's 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 auditing 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: ANCHIN, BLOCK & ANCHIN LLP (c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country): City: State: Country: NEW YORK New York United States (d) Is the auditing firm an <i>independent public accountant</i> ?	⊙ ⊙ g firr	No.
02 SERVI	(1) Are the <i>private fund</i> 's 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 (f) below. If the <i>private fund</i> uses more than one auditing 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 (f) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: ANCHIN, BLOCK & ANCHIN LLP (c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country): City: State: Country: NEW YORK New York United States (d) Is the auditing firm an <i>independent public accountant</i> ?	⊙ of firm	No C
02 SERVI	(1) Are the <i>private fund</i> 's 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 auditing 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: ANCHIN, BLOCK & ANCHIN LLP (c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country): City: State: Country: NEW YORK New York United States (d) Is the auditing firm an <i>independent public accountant</i> ?	⊙ of firm	No O

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

 \circ

	investors?	
h)	Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqu	ualified opinions?
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the	e report is available
		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
e I	<u>Broker</u>	Voc No
a)	Does the <i>private fund</i> use one or more prime brokers?	Yes No
,	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund us	
	fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	,
	No Information Filed	
nd.	lian_	
<u>Ju</u>		Yes No
a)	Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?	0 @
	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses	. If the <i>private</i>
	fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	
	No Information Filed	
ni	<u>istrator</u>	Voc N
		Yes No
	Does the <i>private fund</i> use an administrator other than your firm?	⊙ 0
		⊙ 0
	Does the <i>private fund</i> 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 <i>private fund</i> uses more than one a	⊙ 0
	Does the <i>private fund</i> 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 <i>private fund</i> uses more than one a must complete questions (b) through (f) separately for each administrator. Additional Administrator Information: 1 Record(s) Filed.	⊙ Condministrator, you
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	Does the <i>private fund</i> 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 <i>private fund</i> uses more than one a must complete questions (b) through (f) separately for each administrator. Additional Administrator Information: 1 Record(s) Filed. If the answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator. (b) Name of administrator: SS&C TECHNOLOGIES, INC. (c) Location of administrator (city, state and country): City: State: Country: NEW YORK New York United States (d) Is the administrator a <i>related person</i> of your firm? (e) Does the administrator prepare and send investor account statements to the <i>private fund</i> 's investors? O Yes (provided to all investors) Some (provided to some but not all 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> (the) private fund statements to the (rest of the) private fund statements to the fund statements to the (rest of the) private fund statements to the fund statements to	Yes No C atte fund's
	Does the <i>private fund</i> 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 <i>private fund</i> uses more than one a must complete questions (b) through (f) separately for each administrator. Additional Administrator Information: 1 Record(s) Filed. If the answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator. (b) Name of administrator: SS&C TECHNOLOGIES, INC. (c) Location of administrator (city, state and country): City: NEW YORK New York United States (d) Is the administrator a <i>related person</i> of your firm? (e) Does the administrator prepare and send investor account statements to the <i>private fund</i> 's investors? O Yes (provided to all investors) Some (provided to some but not all investors) No (provided to no investors)	Yes No C atte fund's

0%

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

		Yes	No
28.	(a) Does the private fund use the services of someone other than you or your employees for marketing purposes?	0	\odot
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicito 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</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.		
	No Information Filed		
. PI	RIVATE FUND		
nfo	ormation About the <i>Private Fund</i>		
1	(a) Name of the private fund		
1.	(a) Name of the <i>private fund</i> : ROONEY GM PARTNERS OFFSHORE LIMITED		
	(b) Private fund identification number: (include the "805-" prefix also) 805-2242518038		
0			
2.	Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country: Jersey		
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar capacity):		
	Name of General Partner, Manager, Trustee, or Director		
	DOMINIC HERBERT, LAURA HAZZARD AND ANDREW WALTER		
	No Information Filed		
4.	The <i>private fund</i> (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes	No
Ó.	(a) Is this a "master fund" in a master-feeder arrangement?	0	\odot
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?		
	No Information Filed		
		V = =	N
	(c) Is this a "feeder fund" in a master-feeder arrangement?	Yes	_
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?	⊙	0
	Name of <i>private fund</i> : ROONEY GM PARTNERS LLC		
	Private fund identification number: (include the "805-" prefix also)		
	805-5126931362		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section for the master-feeder arrangement or reporting on the funds separately.	7.B.(1)
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), fo the feeder funds answer the following questions:	- each	n of
	No Information Filed		

	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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?		⊙
	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.	t	
	(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 private fund?		
	O hedge fund O liquidity fund oprivate equity fund O real estate fund O securitized asset fund O venture capital fund O Other private	ate fui	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> : \$ 1,707,699		
<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 100,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).	е	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 0		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
		Yes	
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to qualified clients?	•	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 100%		
You	ur Advisory Services		
		Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	⊙
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	- to 	
	No Information Filed		
1.0	(a) De any investment advisors (allega the grades advisors listed in Coation 7 D (1) A 2 (b)) advise the univerted for D	Yes	
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	O	Or
	to question 18.(a) is "no," leave this question blank.		vei
	No Information Filed		
4.0		Yes	
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	⊙
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		

20. Approximately what percentage of your $\emph{clients}$ has invested in the $\emph{private fund}$?

<u>rivate</u>	e Offering	Yes	s No
21. Ha	s 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	yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
. SERV	ICE PROVIDERS		
Audito			
)3 (a)	(1) Are the private fund's financial statements subject to an annual audit?		s N
.o. (u)	(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 private fund uses more than one aud		
	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: ANCHIN, BLOCK & ANCHIN LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country: NEW YORK New York United States		
	NEW TOTAL	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: 168		
	(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
		٧	- N
(g)	Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's	e e	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	l opinio	ns?
	• 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 repor	t is avai	ilabla
	If you check Report Not Tel Received, you must promptly file all amendment to your Form ADV to apade your response when the repor	i is avai	Iabic
Prime	<u>Broker</u>		
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	Ye	s No
, ,	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 <i>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.		
	No Information Filed		

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

		No Info	mation Filed	
nis	<u>trator</u>			
				Yes
	If the answer to question 26.(a)	ministrator other than your firm? is "yes," respond to questions (b) thr rough (f) separately for each administr	rough (f) below. If the <i>private fund</i> uses more than crator.	one administrator, y
	Additional Administrator Infor	rmation : 1 Record(s) Filed.		
		(a) is "yes," respond to questions (b) to lete questions (b) through (f) separate	hrough (f) below. If the <i>private fund</i> uses more tha ely for each administrator.	n one
	(b) Name of administrator:			
	APEX GROUP LTD, 12 CAS	TLE STREET		
	(c) Location of administrator	(city, state and country):		
	City: ST. HEILER	State:	Country: United States	
	SI. HEILEK	New Jersey	United States	Yes No
	(d) Is the administrator a rela	ated person of your firm?		0 0
	(e) Does the administrator pr	repare and send investor account stat	ements to the <i>private fund's</i> investors?	
			t not all investors) ਨ No (provided to no investors)	
			the investor account statements to the (rest of the)	•
			the investor account statements to the (rest of the) est of the) private fund's investors, respond "not ap	•
	investors? If investor acco			•
/oui	investors? If investor acco	ount statements are not sent to the (r		plicable."
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roui ncl ele illo ete	investors? If investor accounts investors? If investor accounts investors? Ing your last fiscal year, what per related person? Indee only those assets where (i) want quotes, and (ii) the valuation determinations) was the valuation determinations. In person in the investor accounts are accounts as a second person in the investor accounts are accounts as a second person in the investor accounts are accounts and investor accounts are accounts. If investor accounts are accounts and accounts are accounts are accounts and accounts are accounts are accounts and accounts are accounts are accounts and accounts are	ercentage of the <i>private fund's</i> assets (such <i>person</i> carried out the valuation on used for purposes of investor subsemined by such <i>person</i> . ervices of someone other than you or the <i>person</i> acts as a placement agent question 28.(a) is "yes," respond to question 28.(a) is "yes," respond to question one marketer you must compare than one marketer you must compare the private fund's assets (a) is "yes," respond to question the private fund's assets (b) and the private fund's assets (b) and the private fund's assets (c) and the private fund (c) an	by value) was valued by a <i>person</i> , such as an admit procedure established for that asset, if any, including procedure established for that asset, if any, including procedure, redemptions or distributions, and fee calculations, redemptions or distributions, and fee calculations (b) through (consultant, finder, introducer, municipal advisor consultant, finder,	plicable." nistrator, that is not
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In this Item, we request information about your participation and interest in your *clients*' transactions. This information identifies additional areas in which conflicts of interest may occur between you and your *clients*. Newly-formed advisers should base responses to these questions on the types of participation and interest that you expect to engage in during the next year.

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

Pro	priet	tary Interest in Client Transactions		
Α.	Do	you or any <i>related person</i> :	Yes	No
	(1)	buy securities for yourself from advisory clients, or sell securities you own to advisory clients (principal transactions)?	0	\odot
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	\odot	0
	(3)	recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	•	0
Sal	es In	nterest in Client Transactions		
B.	Do	you or any <i>related person</i> :	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory 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	•
Inv	estm	nent 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 client's account?	•	0
	(2)	amount of securities to be bought or sold for a client's account?	•	0
	(3)	broker or dealer to be used for a purchase or sale of securities for a client's account?	•	0
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	•	0
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	•
E.	Doy	you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ?	•	0
F.	If y	ou answer "yes" to E. above, are any of the brokers or dealers related persons?	0	•
G.	(1)	Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	0	•
	(2)	If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	0	0
Н.	(1)	Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	0	•
	(2)	Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)?	0	•
l.		you or any related person, including any employee, directly or indirectly, receive compensation from any person (other than you or any related son) for client referrals?	0	•
	In y	our response to Item 8.1., do not include the regular salary you pay to an employee.		
	fron	esponding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or re in (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amoun errals.		

Item 9 Custody

In this Item, we ask you whether you or a *related person* has *custody* of *client* (other than *clients* that are investment companies registered under the Investment Company Act of 1940) assets and about your custodial practices.

A. ((1) Do you have <i>custody</i> of any advisory <i>clients'</i> :	Yes No
	(a) cash or bank accounts?	© 0
	(b) securities?	6 0

If you are registering or registered with the SEC, answer "No" to Item 9.A. (1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your clients' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.

(2) If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of client funds and securities and total number of clients for which

	(a) \$ 4,909,265,116	(b) 17		
	include the amount of those assets and the number	d you have custody solely because you deduct your advisory fees directly from your clients' accoun r of those clients in your response to Item 9.A.(2). If your related person has custody of client ass ents, do not include the amount of those assets and number of those clients in your response to 9 to Item 9.B.(2).	sets in	
В.	(1) In connection with advisory services you prov	vide to clients, do any of your related persons have custody of any of your advisory clients':	Yes	No
	(a) cash or bank accounts?		•	0
	(b) securities?		•	0
	You are required to answer this item regardless of h	now you answered Item 9.A.(1)(a) or (b).		
	(2) If you checked "yes" to Item 9.B.(1)(a) or (b) your <i>related persons</i> have <i>custody</i> :), what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for	which	I
	U.S. Dollar Amount	Total Number of <i>Clients</i>		
	(a) \$ 729,377,728	(b) 9		
Э.	If you or your <i>related persons</i> have <i>custody</i> of <i>clier</i> that apply:	nt funds or securities in connection with advisory services you provide to <i>clients</i> , check all the f		ng
		ments at least quarterly to the investors in the pooled investment vehicle(s) you manage. ally the pooled investment vehicle(s) that you manage and the audited financial statements	V	
	·	annual surprise examination of <i>client</i> funds and securities.	V	
	(4) An <i>independent public accountant</i> prepares an are qualified custodians for <i>client</i> funds and s	internal control report with respect to custodial services when you or your related persons securities.		
		ection 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or (2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provide dvise in Section 7.B.(1) of Schedule D).		~e
D.	Do you or your related person(s) act as qualified cr	ustodians for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	Yes	No
	(1) you act as a qualified custodian		0	\odot
	(2) your related person(s) act as qualified custodi	ian(s)	0	•
		rsons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule f Schedule D, regardless of whether you have determined the related person to be operationally inc		lent
E.	If you are filing your annual updating amendment a fiscal year, provide the date (MM/YYYY) the examination of the control of the date (MM/YYYY) and the control of the cont	and you were subject to a surprise examination by an <i>independent public accountant</i> during you nation commenced:	ur last	
F.	If you or your <i>related persons</i> have <i>custody</i> of <i>clier</i> as qualified custodians for your <i>clients</i> in connecti 5	nt funds or securities, how many <i>persons</i> , including, but not limited to, you and your <i>related per</i> ion with advisory services you provide to <i>clients?</i>	rsons, .	act
EC	TION 9.C. Independent Public Accountant			
pod		independent public accountant engaged to perform a surprise examination, perform an audit of are an internal control report. You must complete a separate Schedule D Section 9.C. for each	fа	
(1) Name of the <i>independent public accountant</i> : ANCHIN, BLOCK & ANCHIN			
(2) The location of the independent public accountant	's office responsible for the services provided:		
	Number and Street 1:	Number and Street 2:		

Total Number of Clients

you have *custody*:
U.S. Dollar Amount

1375 BROADWAY

State:

New York

Country:

United States

ZIP+4/Postal Code:

10018

City:

NEW YORK

(3	3) Is the <i>independent public accountant</i> registered with the Public Company Accounting Oversight Board?	⊙	0
	If "yes," Public Company Accounting Oversight Board-Assigned Number: 168		
(4	4) If "yes" to (3) above, is the <i>independent public accountant</i> subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
(5	5) The independent public accountant is engaged to:		
	 A. ■ audit a pooled investment vehicle B. ■ perform a surprise examination of <i>clients'</i> assets C. ■ prepare an internal control report 		
(6	6) Since your last annual updating amendment, did all of the reports prepared by the independent public accountant that audited the pooled invest vehicle or that examined internal controls contain unqualified opinions?	men	t
	⊙ Yes		
	C No		
	C Report Not Yet Received		
	If you check "Report Not Yet Received", you must promptly file an amendment to your Form ADV to update your response when the accountant's repo available.	ort is	
	m 10 Control Persons		
	this Item, we ask you to identify every <i>person</i> that, directly or indirectly, <i>controls</i> you. If you are filing an <i>umbrella registration</i> , the information in It build be provided for the <i>filing adviser</i> only.	em 1	0
and	you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your dire d executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you re either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.		
		Ye	s No
A.	Does any person not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, control your management or policies?	0	•
	If yes, complete Section 10.A. of Schedule D.		
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 Section 20.B. of Schedule D.	ecurit	ies
SEC	CTION 10.A. Control Persons		
	No Information Filed		
SEC	CTION 10.B. <i>Control Person</i> Public Reporting Companies		
JLO	711-01 10.B. Gonital Letson Lable Reporting Companies		
	No Information Filed		
1.7	and Discharge Information		
	m 11 Disclosure Information		
dete inve one	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 restment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to be of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the filing adviser and all relying advisers abrella registration.	as ar more	than

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 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

disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating 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

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.

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

(3) Is the independent public accountant registered with the Public Company Accounting Oversight Board?

orders, judgments, or decrees lapsed.

Yes No

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

Do	any of the events below involve you or any of your supervised persons?	0	\odot
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?	\circ	\odot
	(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	
B.	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	0	•
	(2) been <i>charged</i> with a <i>misdemeanor</i> 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?	\circ	⊙
	(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 <i>order</i> against you or any <i>advisory affiliate</i> in connection with <i>investment-related</i> 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	•
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	0	•
	(3) ever found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, 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	\odot
	(2) found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	0	⊙
	(3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	⊙
	(4) disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities?	0	•
F.	Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or suspended?	0	•
G.	Are you or any <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?	0	⊙
	(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?	\circ	⊙
	(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	•

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
A.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	0	C
If "y	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	С
	(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	С

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

Schedule A

Direct Owners and Executive Officers

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

FULL LEGAL NAME (Individuals:	DE/FE/I	Title or Status	Date Title or Status	Ownership	Control	PR CRD No. If None: S.S. No. and
Last Name, First Name, Middle			Acquired	Code	Person	Date of Birth, IRS Tax No. or
Name)			MM/YYYY			Employer I D No.
WALTER, ANDREW, CONRIED	I	MANAGING MEMBER	08/2013	NA	Υ	N 2508912

GRANGER MANAGEMENT HOLDINGS	DE	HOLDING COMPANY PARENT	08/2013	E	Υ	N	
LLC							
MCMANUS, GERALDINE, FRANCES	I	MANAGING MEMBER	05/2014	NA	Υ	N	1185752
BLIEDEN, MARC, FARELL	I	CHIEF OPERATING OFFICER /	08/2020	NA	Υ	N	7094217
		CHIEF COMPLIANCE					
		OFFICER					

Schedule B

Indirect Owners

- 1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
- 2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
 - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;
 - For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
 - (b) in the case of an owner that is a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
 - (c) in the case of an owner that is a trust, the trust and each trustee; and
 - (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
- 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
- 5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: C 25% but less than 50% E 75% or more
 - D 50% but less than 75% F Other (general partner, trustee, or elected manager)
- 7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Entity in Which Interest is Owned		Date Status Acquired MM/YYYY		Control Person		CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
WALTER, ANDREW, CONRIED	I	GRANGER MANAGEMENT HOLDINGS LLC	MANAGING MEMBER	08/2013	С	Υ	N	2508912
MCMANUS, GERALDINE, FRANCES	I	GRANGER MANAGEMENT	MANAGING MEMBER	05/2014	С	Y	N	1185752

Schedule D - Miscellaneous

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

Schedule R

No Information Filed

DRP Pages

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed
CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)
No Information Filed

Part 2

Exemption from brochure delivery requirements for SEC-registered advisers

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

Yes No

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

0 0

If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
107457	GRANGER MANAGEMENT LLC FORM ADV	High net worth individuals, Foundations/charities,
	PART 2A 2023	Selection of Other Advisers/Solicitors, Includes
		material about supervised persons that would
		otherwise be in a supplement (state-registered
		advisers only)

Part 3			
CRS	Type(s)	Affiliate Info	Retire
及	Investment Advisor		
<u>,</u>	Investment Advisor	~	

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: MARC BLIEDEN

02/27/2024

Date: MM/DD/YYYY

Printed Name:

Title:

MARC BLIEDEN

CHIEF COMPLIANCE OFFICER

Adviser CRD Number:

168096

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

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

1. Appointment of Agent for Service of Process

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

2. Appointment and Consent: Effect on Partnerships

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

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

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

Signature

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

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

Signature: Date: MM/DD/YYYY

Printed Name: Title:

Adviser CRD Number:

168096