# FORM ADV

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

### Primary Business Name: VIRTUS FIXED INCOME ADVISERS, LLC

**Annual Amendment - All Sections** 

3/27/2024 4:35:14 PM

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

#### Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you. If you are filing an *umbrella registration*, the information in Item 1 should be provided for the *filing adviser* only. General Instruction 5 provides information to assist you with filing an *umbrella registration*.

- A. Your full legal name (if you are a sole proprietor, your last, first, and middle names): VIRTUS FIXED INCOME ADVISERS, LLC
- B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A. **VIRTUS FIXED INCOME ADVISERS, LLC**

List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.

(2) If you are using this Form ADV to register more than one investment adviser under an *umbrella registration*, check this box 🗖

If you check this box, complete a Schedule R for each relying adviser.

C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.(1)), enter the new name and specify whether the name change is of

your legal name or vour primary business name:

D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: 801-68743
(2) If you report to the SEC as an *exempt reporting adviser*, your SEC file number:
(3) If you have one or more Central Index Key numbers assigned by the SEC ("CIK Numbers"), all of your CIK numbers:

No Information Filed

E. (1) If you have a number ("CRD Number") assigned by the FINRA's CRD system or by the IARD system, your CRD number: 146029

If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.

(2) If you have additional CRD Numbers, your additional CRD numbers:

No Information Filed

F. Principal Office and Place of Business

(1) Address (do not use a P.O. Box):Number and Street 1:Number and Street 2:ONE FINANCIAL PLAZACity:State:Country:HARTFORDConnecticutUnited States

ZIP+4/Postal Code: 06103 CRD Number: 146029

Rev. 10/2021

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

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

(2) Days of week that you normally conduct business at your *principal office and place of business:* • Monday - Friday • Other:

Normal business hours at this location: 8:30 TO 5:00

(3) Telephone number at this location: 877-332-8172

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

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

G.	Mailing address, if different	t from your <i>principal office and place c</i>	of business address:			
	Number and Street 1:	5 1 1 1	Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	-	_				
	If this address is a private	e residence, check this box: $\square$				
H.	If you are a sole proprietor	r, state your full residence address, i	f different from your <i>principal</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:	Vee	Na
I.	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	Yes	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 pub ore than one portal address. D tent. Do not provide the individ	ly available social media platforms on Section 1.1. of S olished on the web, you may list the portal without list To not provide the addresses of websites or accounts o dual electronic mail (e-mail) addresses of employees o	ting on publie	
J.	Chief Compliance Officer					
		contact information of your Chief Con Compliance Officer, if you have one.		n <i>exempt reporting adviser</i> , you must provide the cor m 1.K. below.	ntact	
	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 for mber (if any):		you, a <i>related person</i> or an investment company reg officer services to you, provide the <i>person's</i> name ar		
K.	• •	tact Person: If a person other than t may provide that information here.	he Chief Compliance Officer is	s authorized to receive information and respond to	questic	ons
	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	No
L.	•	all of the books and records you are ur <i>principal office and place of busines</i> .		on 204 of the Advisers Act, or similar state law,	۲	0
	If "yes," complete Section 1	I.L. of Schedule D.			Yes	No
M.	Are you registered with a a	foreign financial regulatory authority?				©
	•	registered with a foreign financial regu s," complete Section 1.M. of Schedule I		ave an affiliate that is registered with a foreign financi	al	
					Yes	No
N.	Are you a public reporting	company under Sections 12 or 15(d)	of the Securities Exchange A	Act of 1934?	0	$\odot$
					Yes	No
Ο.	•	more in assets on the last day of you mate amount of your assets: \$10 billion	ur most recent fiscal year?		0	⊙
	-u*					

O \$10 billion to less than \$50 billion

For purposes of Item 1.0. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.

P. Provide your *Legal Entity Identifier* if you have one: 549300L7I4W19C7JV575

A legal entity identifier is a unique number that companies use to identify each other in the financial marketplace. You may not have a legal entity identifier.

#### SECTION 1.B. Other Business Names

List your other business names and the jurisdictions in which you use them. You must complete a separate Schedule D Section 1.B. for each business name.

#### Name: SEIX INVESTMENT ADVISORS

Jurisdictions			
🗹 AL		₩ NE	I SC
R AK	IN IN		☑ SD
₽ AZ		☑ NH	🗹 TN
R AR	✓ KS	LN 🗹	🗹 тх
☑ CA	KY KY		🗹 UT
<b>₽</b> co		NY NY	✓ VT
🗹 СТ	ME ME	✓ NC	
🗹 DE	MD MD	ND ND	✓ VA
DC	MA MA	🗹 ОН	🗹 WA
🗹 FL	MI MI	🗹 ок	₽ wv
🔽 GA	MN MN	☑ OR	₽ WI
🗖 GU	MS	₽ PA	₽ WY
🗹 ні	MO	PR	Cother:
☑ ID	MT	RI RI	

List your other business names and the jurisdictions in which you use them. You must complete a separate Schedule D Section 1.B. for each business name.

### Name: NEWFLEET ASSET MANAGEMENT

Jurisdictions

I AL		□ NE	□ sc
ПАК	🗖 IN	□ NV	🗖 SD
□ AZ		nh 🗖	T TN
AR AR	🗖 KS	🗖 NJ	T TX
CA CA	П кү	□ NM	🗖 UT
Гсо	🗖 LA	□ NY	ΓVT
🗹 СТ	Г ME		
DE	MD MD	ND	□ VA
	П МА	Г он	🗖 WA
🗖 FL	ПМІ	Гок	□ wv
GA GA	MN MN	C OR	□ wi
🗖 GU	☐ MS	🗖 РА	□ wy
Пні	Гмо	PR	Cother:
D ID	T MT	RI	

List your other business names and the jurisdictions in which you use them. You must complete a separate Schedule D Section 1.B. for each business name.

#### Name: STONE HARBOR INVESTMENT PARTNERS

#### Jurisdictions

🗖 AL		ne 🗖	□ sc	
🗖 АК	IN IN	□ NV	🗖 SD	
🗖 AZ		I NH	T TN	
🗖 AR	□ KS	LN L	П тх	
CA	Г КҮ		🗖 UT	
Со		₽ NY	T VT	
🗖 СТ	I ME	□ NC		
🗖 de	MD MD	nd ND	□ VA	
DC	□ MA	Г ОН	□ WA	
🗖 FL	□ MI	Гок	□ wv	
🗖 GA	I MN	C OR	□ wi	
🗖 GU	MS MS	E PA	□ WY	
🗖 ні	Г мо	PR	C Other:	
🗖 ID	MT MT	🗖 RI		

#### SECTION 1.F. Other Offices

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:		Number and Street 2:	
301 PINE STREET		SUITE 500	
City:	State:	Country:	ZIP+4/Postal Code:
ORLANDO	Florida	United States	32801

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

Telephone Number: 407-674-1270

4

Facsimile Number, if any: 407-674-1271

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many employees perform investment advisory functions from this office location?

Are other business activities conducted at this office location? (check all that apply)

- (1) Broker-dealer (registered or unregistered)
- $\square$  (2) Bank (including a separately identifiable department or division of a bank)

(3) Insurance broker or agent

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

- (5) Registered municipal advisor
- $\square$  (6) Accountant or accounting firm
- 🗖 (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location: RESEARCH, PORTFOLIO MANAGEMENT, AND TRADING.

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1: 48 DOVER City:

State:

Number and Street 2: 5TH FLOOR Country:

ZIP+4/Postal Code:

LONDON	Ur	nited Kingdom	W1S 4FF							
If this address is a private residence, check this bo	x: 🗖									
Telephone Number: 20-3205-4100	Facsimile Number, i 20-3205-4196	if any:								
If this office location is also required to be registere adviser on the Uniform Branch Office Registration F			y as a branch office location for a broker-dealer or invest anch Number here:	ment						
How many <i>employees</i> perform investment advisory 10	functions from this	office location?								
Are other business activities conducted at this offic	e location? (check a	II that apply)								
$\square$ (1) Broker-dealer (registered or unregistered)										
$\square$ (2) Bank (including a separately identifiable departure)	artment or division o	of a bank)								
(3) Insurance broker or agent										
(4) Commodity pool operator or commodity trad	ing advisor (whether	r registered or exempt	from registration)							
(5) Registered municipal advisor										
<ul> <li>(6) Accountant or accounting firm</li> <li>(7) Lawyer or law firm</li> </ul>										
Describe any other <i>investment-related</i> business act	ivities conducted fro	om this office location:								
	1.F. for each location	n. If you are applying f	<i>business</i> , at which you conduct investment advisory bus for SEC registration, if you are registered only with the SI hbers of <i>employees</i> ).							
Number and Street 1:		Number and Stree	+ 0.							
3 KILLINEY ROAD		WINSLAND HOUSE								
City: SINGAPORE	State:	Country: Singapore	ZIP+4/Postal Code: 239519							
If this address is a private residence, check this bo	x: 🗖			If this address is a private residence, check this box:						
Telephone Number:										
65-6671-9711	Facsimile Num 65-6671-9712	•								
65-6671-9711	65-6671-9712 ed with FINRA or a s	state securities authorit	y as a branch office location for a broker-dealer or invest anch Number here:	ment						
65-6671-9711 If this office location is also required to be registered	65-6671-9712 ed with FINRA or a s form (Form BR), plea	state securities authorit	-	ment						
65-6671-9711 If this office location is also required to be registered adviser on the Uniform Branch Office Registration F How many <i>employees</i> perform investment advisory 2 Are other business activities conducted at this offic	65-6671-9712 ed with FINRA or a s form (Form BR), plea functions from this o	state securities authorit ase provide the <i>CRD</i> Bra office location?	-	ment						
65-6671-9711 If this office location is also required to be registered adviser on the Uniform Branch Office Registration F How many <i>employees</i> perform investment advisory 2 Are other business activities conducted at this office (1) Broker-dealer (registered or unregistered)	65-6671-9712 ed with FINRA or a s form (Form BR), plea functions from this o e location? (check a	state securities authorit ase provide the <i>CRD</i> Bra office location? Il that apply)	-	ment						
<ul> <li>65-6671-9711</li> <li>If this office location is also required to be registered adviser on the Uniform Branch Office Registration F</li> <li>How many <i>employees</i> perform investment advisory 2</li> <li>Are other business activities conducted at this office</li> <li>(1) Broker-dealer (registered or unregistered)</li> <li>(2) Bank (including a separately identifiable depart</li> </ul>	65-6671-9712 ed with FINRA or a s form (Form BR), plea functions from this o e location? (check a	state securities authorit ase provide the <i>CRD</i> Bra office location? Il that apply)	-	ment						
<ul> <li>65-6671-9711</li> <li>If this office location is also required to be registered adviser on the Uniform Branch Office Registration F</li> <li>How many <i>employees</i> perform investment advisory 2</li> <li>Are other business activities conducted at this office</li> <li>(1) Broker-dealer (registered or unregistered)</li> <li>(2) Bank (including a separately identifiable departies</li> <li>(3) Insurance broker or agent</li> </ul>	65-6671-9712 ed with FINRA or a s form (Form BR), plea functions from this o e location? (check a artment or division o	state securities authority ase provide the <i>CRD</i> Bra office location? Il that apply) of a bank)	anch Number here:	ment						
<ul> <li>65-6671-9711</li> <li>If this office location is also required to be registered adviser on the Uniform Branch Office Registration F</li> <li>How many <i>employees</i> perform investment advisory 2</li> <li>Are other business activities conducted at this office</li> <li>(1) Broker-dealer (registered or unregistered)</li> <li>(2) Bank (including a separately identifiable depart</li> </ul>	65-6671-9712 ed with FINRA or a s form (Form BR), plea functions from this o e location? (check a artment or division o	state securities authority ase provide the <i>CRD</i> Bra office location? Il that apply) of a bank)	anch Number here:	ment						
<ul> <li>65-6671-9711</li> <li>If this office location is also required to be registered adviser on the Uniform Branch Office Registration F</li> <li>How many <i>employees</i> perform investment advisory 2</li> <li>Are other business activities conducted at this offic</li> <li>(1) Broker-dealer (registered or unregistered)</li> <li>(2) Bank (including a separately identifiable depairs</li> <li>(3) Insurance broker or agent</li> <li>(4) Commodity pool operator or commodity trade</li> </ul>	65-6671-9712 ed with FINRA or a s form (Form BR), plea functions from this o e location? (check a artment or division o	state securities authority ase provide the <i>CRD</i> Bra office location? Il that apply) of a bank)	anch Number here:	ment						
<ul> <li>65-6671-9711</li> <li>If this office location is also required to be registered adviser on the Uniform Branch Office Registration F</li> <li>How many <i>employees</i> perform investment advisory 2</li> <li>Are other business activities conducted at this offic</li> <li>(1) Broker-dealer (registered or unregistered)</li> <li>(2) Bank (including a separately identifiable depairs</li> <li>(3) Insurance broker or agent</li> <li>(4) Commodity pool operator or commodity trades</li> <li>(5) Registered municipal advisor</li> </ul>	65-6671-9712 ed with FINRA or a s form (Form BR), plea functions from this o e location? (check a artment or division o	state securities authority ase provide the <i>CRD</i> Bra office location? Il that apply) of a bank)	anch Number here:	ment						
<ul> <li>65-6671-9711</li> <li>If this office location is also required to be registered adviser on the Uniform Branch Office Registration F</li> <li>How many <i>employees</i> perform investment advisory 2</li> <li>Are other business activities conducted at this office <ul> <li>(1) Broker-dealer (registered or unregistered)</li> <li>(2) Bank (including a separately identifiable depaid</li> <li>(3) Insurance broker or agent</li> <li>(4) Commodity pool operator or commodity trades</li> <li>(5) Registered municipal advisor</li> <li>(6) Accountant or accounting firm</li> </ul> </li> </ul>	65-6671-9712 ed with FINRA or a s form (Form BR), plea functions from this o te location? (check a artment or division o ing advisor (whether	state securities authority ase provide the <i>CRD</i> Bra office location? Il that apply) of a bank) r registered or exempt	anch Number here:	ment						
<ul> <li>65-6671-9711</li> <li>If this office location is also required to be registered adviser on the Uniform Branch Office Registration F</li> <li>How many <i>employees</i> perform investment advisory 2</li> <li>Are other business activities conducted at this offic</li> <li>(1) Broker-dealer (registered or unregistered)</li> <li>(2) Bank (including a separately identifiable depairs</li> <li>(3) Insurance broker or agent</li> <li>(4) Commodity pool operator or commodity trad</li> <li>(5) Registered municipal advisor</li> <li>(6) Accountant or accounting firm</li> <li>(7) Lawyer or law firm</li> </ul>	65-6671-9712 ed with FINRA or a s form (Form BR), plea functions from this o te location? (check a artment or division o ing advisor (whether	state securities authority ase provide the <i>CRD</i> Bra office location? Il that apply) of a bank) r registered or exempt	anch Number here:	ment						

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:		Number and Street 2:	
31 WEST 52ND STREET		17TH FLOOR	
City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10019
If this address is a private residence, check this b	box:		
Telephone Number:	Facsimile Number, if an	IV:	
212-548-1022	866-302-6524	5	
If this office location is also required to be registe adviser on the Uniform Branch Office Registration		•	s a branch office location for a broker-dealer or investment h Number here:
How many <i>employees</i> perform investment advisor 22	ry functions from this offi	ice location?	
Are other business activities conducted at this off	ice location? (check all the	hat apply)	
$\square$ (1) Broker-dealer (registered or unregistered)			
$\square$ (2) Bank (including a separately identifiable de	partment or division of a	a bank)	
$\square$ (3) Insurance broker or agent			
☑ (4) Commodity pool operator or commodity tra	ading advisor (whether re	egistered or exempt fro	m registration)
$\square$ (5) Registered municipal advisor			
$\square$ (6) Accountant or accounting firm			
🗖 (7) Lawyer or law firm			
Describe any other investment-related business a	ctivities conducted from	this office location:	
	n 1.F. for each location.	If you are applying for S	<i>siness</i> , at which you conduct investment advisory business. SEC registration, if you are registered only with the SEC, or rs of <i>employees</i> ).
Number and Street 1: 1 MAYNARD DRIVE		Number and Street SUITE 3200	2:
5	State: New Jersey	Country: United States	ZIP+4/Postal Code: 07656
	New sersey	United States	0,000
If this address is a private residence, check this b	box:		
Telephone Number:	Facsimile Number, if any	:	
201-391-0300	201-391-5023		
If this office location is also required to be registe adviser on the Uniform Branch Office Registration		•	a branch office location for a broker-dealer or investment h Number here:
How many <i>employees</i> perform investment advisor 27	ry functions from this offi	ice location?	
Are other business activities conducted at this off $\Box$ (1) Broker-dealer (registered or unregistered)	ice location? (check all the	hat apply)	
$\square$ (2) Bank (including a separately identifiable de	partment or division of a	a bank)	
$\square$ (3) Insurance broker or agent			
☑ (4) Commodity pool operator or commodity tra	ading advisor (whether re	egistered or exempt fro	m registration)
$\square$ (5) Registered municipal advisor			
$\square$ (6) Accountant or accounting firm			
🗖 (7) Lawyer or law firm			
Describe any other investment-related business a	ctivities conducted from	this office location:	

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or

If you are an <i>exempt reporting adviser</i> , list only	the largest twenty-five o	ffices (in terms of numbers	of <i>employees</i> ).	
Number and Chreat 1		November and Charact 2		
Number and Street 1:		Number and Street 2:		
3333 PIEDMONT ROAD		SUITE 1500		
City:	State:	Country:	ZIP+4/Postal Code:	
ATLANTA	Georgia	United States	30305	
If this address is a private residence, check th	is box: 🗖			
Telephone Number:	Facsimile Number, i	f any:		
404-845-7700	404-845-7691	5		
If this office location is also required to be reg adviser on the Uniform Branch Office Registrat			branch office location for a broker-dealer or inves Number here:	stment
How many <i>employees</i> perform investment adv 1	isory functions from this c	office location?		
Are other business activities conducted at this	office location? (check al	l that apply)		
$\Box$ (1) Broker-dealer (registered or unregistered		11 37		
$\Box$ (1) Broker-dealer (registered of dimegistered $\Box$ (2) Bank (including a separately identifiable		f a bank)		
$\Box$ (2) During (including a separately identifiable $\Box$ (3) Insurance broker or agent				
$\Box$ (4) Commodity pool operator or commodity	trading advisor (whether	registered or exempt from	registration)	
□ (1) commonly pool operator of commonly □ (5) Registered municipal advisor				
$\Box$ (6) Accountant or accounting firm				
$\Box$ (0) Accountant of accounting mini-				
Describe any other <i>investment-related</i> busines RESEARCH	as activities conducted from	m this office location:		
SECTION 1.I. Website Addresses				
List your website addresses, including address			atforms where you control the content (including, 1.1. for each website or account on a publicly avail	
List your website addresses, including address limited to, Twitter, Facebook and/or LinkedIn)	. You must complete a sep	oarate Schedule D Section	.I. for each website or account on a publicly avail	
List your website addresses, including address limited to, Twitter, Facebook and/or LinkedIn) social media platform.	. You must complete a sep ble Social Media Platform:	HTTPS://WWW.LINKEDI	I. for each website or account on a publicly avail.	
List your website addresses, including address limited to, Twitter, Facebook and/or LinkedIn) social media platform. Address of Website/Account on Publicly Availa	. You must complete a sep ble Social Media Platform: ble Social Media Platform:	HTTPS://WWW.LINKEDI	I.I. for each website or account on a publicly avail.	
List your website addresses, including address limited to, Twitter, Facebook and/or LinkedIn) social media platform. Address of Website/Account on Publicly Availa Address of Website/Account on Publicly Availa	. You must complete a sep ble Social Media Platform: ble Social Media Platform: ble Social Media Platform:	HTTP://WWW.VIRTUS.CO	I.I. for each website or account on a publicly avail I.COM/COMPANY/65266/ SORS.COM	
List your website addresses, including address limited to, Twitter, Facebook and/or LinkedIn) social media platform. Address of Website/Account on Publicly Availa Address of Website/Account on Publicly Availa	. You must complete a sep ble Social Media Platform: ble Social Media Platform: ble Social Media Platform:	HTTP://WWW.VIRTUS.CO	I.I. for each website or account on a publicly avail I.COM/COMPANY/65266/ SORS.COM	
List your website addresses, including address limited to, Twitter, Facebook and/or LinkedIn) social media platform. Address of Website/Account on Publicly Availa Address of Website/Account on Publicly Availa Address of Website/Account on Publicly Availa	. You must complete a sep ble Social Media Platform: ble Social Media Platform: ble Social Media Platform: ble Social Media Platform:	https://www.newfleet.co	I.I. for each website or account on a publicly avail I.COM/COMPANY/65266/ SORS.COM	
List your website addresses, including address limited to, Twitter, Facebook and/or LinkedIn) social media platform. Address of Website/Account on Publicly Availa Address of Website/Account on Publicly Availa	. You must complete a sep ble Social Media Platform: ble Social Media Platform: ble Social Media Platform: ble Social Media Platform: ble Social Media Platform:	https://www.linkedin.co	I.I. for each website or account on a publicly avail I.COM/COMPANY/65266/ GORS.COM DM COM m/company/newfleet-asset-management/	

## SECTION 1.L. Location of Books and Records

Complete the following information for each location at which you keep your books and records, other than your *principal office and place of business*. You must complete a separate Schedule D. Section 1.L. for each location.

Name of entity where books and rec			
INSTITUTIONAL SHAREHOLDER SERV	ICES INC.		
Number and Street 1:		Number and Street 2:	
702 KING FARM BLVD		400	
City:	State:	Country:	ZIP+4/Postal Code:
ROCKVILLE	Maryland	United States	20850
If this address is a private residence,	check this box:		
Telephone Number: 301-566-0550	Facsimile numbe	r, if any:	
This is (check one):	ates.		
<ul> <li>a third-party unaffiliated recordket</li> </ul>			
o other.			
~			
Briefly describe the books and record PROXY VOTING RECORDS	ls kept at this location.		
Name of entity where books and rec COMPLYSCI / FTT	ords are kept:		
Number and Street 1:		Number and Street 2:	
136 MADISON AVENUE		8TH FLOOR	
City:	State:	Country:	ZIP+4/Postal Code:
NEW YORK	New York	United States	10016
If this address is a private residence,	check this box:		
Telephone Number: 202-327-1533	Facsimile number	r, if any:	
This is (check one): o one of your branch offices or affili	ates.		
👩 a third-party unaffiliated recordke	eeper.		
o other.			
Briefly describe the books and record	ls kept at this location.		
BACKUP COMPLIANCE RECORDS, INC	LUDING PERSONAL TRADING DA	ATA AND POLITICAL CONTRIBUT	ION RECORDS
Name of entity where books and recovered virtual investment partners, INC.	ords are kept:		
Number and Street 1: ONE FINANCIAL PLAZA		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
HARTFORD	Connecticut	United States	06103
If this address is a private residence,	check this box:		
Telephone Number:	Facsimile number,	if any:	
860-248-7971	860-241-1024		
This is (check one):			
one of your branch offices or affili	ates.		
o a third-party unaffiliated recorded	eeper.		
o other.			
~			

Briefly describe the books and records kept at CORPORATE RECORDS	this location.		
Name of entity where books and records are k IRON MOUNTAIN ROCKY HILL	kept:		
Number and Street 1: 71 HAMMER MILL ROAD		Number and Street 2:	
City: ROCKY HILL	State: Connecticut	Country: United States	ZIP+4/Postal Code: 06067
If this address is a private residence, check th	is box:		
Telephone Number: 800-899-4766	Facsimile number, if any:		
This is (check one): O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at BACK-UP TAPES FOR FILE SERVER, APX SERVER		CROSOFT ACTIVE DIRECTORY S	SERVERS
Name of entity where books and records are k GRM	kept:		
Number and Street 1: 215 COLES STREET		Number and Street 2:	
City: JERSEY CITY	State: New Jersey	Country: United States	ZIP+4/Postal Code: 07310
JERSET CITT	New Jersey	United States	07310
If this address is a private residence, check th	is box:		
Telephone Number:	Facsimile number, if any:		
201-798-7100	201-239-3986		
This is (check one): o one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at CLIENT ACCOUNT AND CORPORATE RELATED D			
Name of entity where books and records are k IRON MOUNTAIN	kept:		
Number and Street 1: 1100 KENNERY ROAD		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
WINDSOR	Connecticut	United States	06095
If this address is a private residence, check th	is box:		
Telephone Number:	Facsimile number, if any:		

860-298-3400

This is (check one):			
o one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
o other.			
Briefly describe the books and records kept at this I OPERATIONAL AND BUSINESS RECORDS	ocation.		
Name of entity where books and records are kept: SMARSH			
Number and Street 1: 11 TIMES SQUARE		Number and Street 2: 31ST FLOOR	
5	State:	Country:	ZIP+4/Postal Code:
NEW YORK	New York	United States	10036
If this address is a private residence, check this box	:: <b>D</b>		
Telephone Number: 866-762-7741	Facsimile number, if	any:	
This is (check one): o one of your branch offices or affiliates.			
<ul> <li>a third-party unaffiliated recordkeeper.</li> </ul>			
o other.			
Briefly describe the books and records kept at this I EMAIL ARCHIVES	ocation.		
Name of entity where books and records are kept: SUNTRUST BANK ORLANDO ARCHIVES FACILITY			
Number and Street 1: 7474 CHANCELLOR DRIVE		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
ORLANDO	Florida	United States	32809
If this address is a private residence, check this box	:: 🗖		
Telephone Number: 407-762-1914	Facsimile number, 407-762-1676	if any:	
This is (check one): $\mathbf{O}$ one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
⊙ other.			
Briefly describe the books and records kept at this I STATEMENTS AND OTHER RECORDS OF CLOSED ACC			
Name of entity where books and records are kept: SEIX INVESTMENT ADVISORS			
Number and Street 1:			
3333 PIEDMONT ROAD		Number and Street 2: SUITE 1500	
	State: Georgia		ZIP+4/Postal Code: 30305

Telephone Number: 404-845-7700	Facsimile number, 404-845-7691	if any:	
This is (check one): one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this lo CORPORATE RECORDS	ocation.		
Name of entity where books and records are kept: SEIX INVESTMENT ADVISORS			
Number and Street 1: 301 PINE STREET		Number and Street 2: SUITE 500	
City:	State:	Country:	ZIP+4/Postal Code:
ORLANDO	Florida	United States	32801
If this address is a private residence, check this box			
Telephone Number: 407-674-1270	Facsimile number, 407-674-1271	if any:	
This is (check one): o one of your branch offices or affiliates.			
o a third-party unaffiliated recordkeeper.			
o other.			
Briefly describe the books and records kept at this locule CLIENT ACCOUNT RELATED DOCUMENTS	ocation.		
Name of entity where books and records are kept: RECORD MANAGEMENT/SUNTRUST BANK			
Number and Street 1: 58 EDGEWOOD AVENUE		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
ATLANTA	Georgia	United States	30303
If this address is a private residence, check this box			
Telephone Number: 404-588-7214	Facsimile number, 404-724-3760	if any:	
This is (check one): O one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
⊙ other.			
Briefly describe the books and records kept at this loss STATEMENTS AND OTHER RECORDS OF CLOSED ACC			
Name of entity where books and records are kept: IRON MOUNTAIN			

City: HAYWARD	State: California	Country: United States	ZIP+4/Postal Code: 94545
If this address is a private residence, check this bo	x: 🗖		
Telephone Number: 510-785-5651	Facsimile number, if a	iny:	
<ul> <li>This is (check one):</li> <li>o one of your branch offices or affiliates.</li> <li>o a third-party unaffiliated recordkeeper.</li> <li>o other.</li> </ul>			
Briefly describe the books and records kept at this TRADE TICKETS, GENERAL OFF-SITE STORAGE FOR		FIRM	
Name of entity where books and records are kept: GLOBAL RELAY			
Number and Street 1:		Number and Street 2:	
1155 AVENUE OF THE AMERICAS City:	State:	38TH FLOOR Country:	ZIP+4/Postal Code:
NEW YORK	New York	United States	10036
If this address is a private residence, check this bo	x: 🗖		
Telephone Number: 866-484-6630	Facsimile number, if a 604-608-2941	ny:	
This is (check one): O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
o other.			
Briefly describe the books and records kept at this EMAIL ARCHIVING AND RETENTION.	location.		
Name of entity where books and records are kept: ARKIVE			
Number and Street 1: 6751 DISCOVERY BOULEVARD		Number and Street 2:	
City: MABLETON	State: Georgia	Country: United States	ZIP+4/Postal Code: 30126
If this address is a private residence, check this bo	_	United States	30120
- · · ·			
Telephone Number: 770-941-5375	Facsimile number, if 771-941-8234	any:	
This is (check one): O one of your branch offices or affiliates.			
${f O}$ a third-party unaffiliated recordkeeper.			
other.			
Briefly describe the books and records kept at this STATEMENTS AND OTHER RECORDS OF CLOSED AC			

Name of entity where books and records are kept: KAYNE ANDERSON RUDNIK INVESTMENT MANAGEMEN	IT, LLC		
Number and Street 1:		Number and Street 2:	
2000 AVENUE OF THE STARS		SUITE 1110	
	itate: California	Country: United States	ZIP+4/Postal Code: 90067
If this address is a private residence, check this box:			
Telephone Number: F 310-556-2721	acsimile number, if a	ny:	
This is (check one): one of your branch offices or affiliates.			
o a third-party unaffiliated recordkeeper.			
o other.			
Briefly describe the books and records kept at this lo CUSTOMER ACCOUNT STATEMENTS, CLIENT FILES AN		ENT REPORTS.	
Name of entity where books and records are kept: STAR COMPLIANCE, LLC			
Number and Street 1: 9200 CORPORATE BLVD		Number and Street 2: SUITE 440	
City: S	State:	Country:	ZIP+4/Postal Code:
ROCKVILLE	laryland	United States	20850
If this address is a private residence, check this box:			
Telephone Number: F 301-340-3900	acsimile number, if a	ny:	
This is (check one):			
o one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this lo BACK-UP COMPLIANCE RECORDS, INCLUDING PERSO		OLITICAL CONTRIBUTION RECORD	S
Name of entity where books and records are kept: DATASAFE INC			
Number and Street 1: 574 ECCLES AVENUE		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
SOUTH SAN FRANCISCO	California	United States	94080
If this address is a private residence, check this box:			
Telephone Number: 650-875-38000	Facsimile number, 604-608-2941	if any:	
This is (check one): o one of your branch offices or affiliates.			
<ul> <li>a third-party unaffiliated recordkeeper.</li> </ul>			
o other.			

Briefly describe the books and records kept at this location. TAPE BACK-UPS OF HARD DRIVE FILES

#### SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

#### No Information Filed

#### Item 2 SEC Registration/Reporting

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting an *annual updating amendment* to your SEC registration. If you are filing an *umbrella registration*, the information in Item 2 should be provided for the *filing adviser* only.

A. To register (or remain registered) with the SEC, you must check **at least one** of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an *annual updating amendment* to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you may affirmatively respond to each of these items.

You (the adviser):

(1) are a large advisory firm that either:

- (a) has regulatory assets under management of \$100 million (in U.S. dollars) or more; or
- (b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent *annual updating amendment* and is registered with the SEC;
- (2) are a **mid-sized advisory firm** that has regulatory assets under management of \$25 million (in U.S. dollars) or more but less than \$100 million (in U.S. dollars) and you are either:
  - (a) not required to be registered as an adviser with the *state securities authority* of the state where you maintain your *principal office and place of business*; or
  - (b) not subject to examination by the state securities authority of the state where you maintain your principal office and place of business;

Click **HERE** for a list of states in which an investment adviser, if registered, would not be subject to examination by the state securities authority.

- (3) Reserved
- (4) have your principal office and place of business outside the United States;
- (5) are an investment adviser (or subadviser) to an investment company registered under the Investment Company Act of 1940;
- (6) are an investment adviser to a company which has elected to be a business development company pursuant to section 54 of the Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under management;
- (7) are a pension consultant with respect to assets of plans having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a);
- (8) are a related adviser under rule 203A-2(b) that controls, is controlled by, or is under common control with, an investment adviser that is registered with the SEC, and your principal office and place of business is the same as the registered adviser;

If you check this box, complete Section 2.A.(8) of Schedule D.

(9) are an adviser relying on rule 203A-2(c) because you expect to be eligible for SEC registration within 120 days;

If you check this box, complete Section 2.A.(9) of Schedule D.

(10) are a **multi-state adviser** that is required to register in 15 or more states and is relying on rule 203A-2(d);

If you check this box, complete Section 2.A. (10) of Schedule D.

- (11) are an Internet adviser relying on rule 203A-2(e);
- (12) have **received an SEC order** exempting you from the prohibition against registration with the SEC;

If you check this box, complete Section 2.A. (12) of Schedule D.

(13) are no longer eligible to remain registered with the SEC.

#### State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers

C. Under state laws, SEC-registered advisers may be required to provide to *state securities authorities* a copy of the Form ADV and any amendments they file with the SEC. These are called *notice filings*. In addition, *exempt reporting advisers* may be required to provide *state securities authorities* with a copy of reports and any amendments they file with the SEC. If this is an initial application or report, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to direct your *notice filings* or reports to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this an amendment to your registration to stop your *notice filings* or reports from going to state(s) that currently receive them, uncheck the box(es) next to those state(s).

Jurisdictions

Sansalotions			
R AL		✓ NE	✓ SC
R AK	☑ IN	✓ NV	✓ SD
🗹 AZ	IA IA	☑ NH	ν TN
R AR	✓ KS	NJ NJ	▼ <sub>TX</sub>
CA CA	✓ KY	NM NM	🗹 UT
CO CO	☑ LA	✓ NY	VT VT
☑ CT	ME ME	NC NC	
₽ DE	MD MD	ND ND	VA VA
☑ DC	MA MA	🗹 он	₩A
₽ FL	MI MI	🗹 ок	₩v
🔽 GA	MN MN	☑ OR	₩I
🗖 GU	MS	PA	VY WY
IZ ні	MO	PR	
₽ ID	MT MT	🗹 RI	

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

#### SECTION 2.A.(8) Related Adviser

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

Name of Registered Investment Adviser

CRD Number of Registered Investment Adviser

SEC Number of Registered Investment Adviser

#### SECTION 2.A.(9) Investment Adviser Expecting to be Eligible for Commission Registration within 120 Days

If you are relying on rule 203A-2(c), the exemption from the prohibition on registration available to an adviser that expects to be eligible for SEC registration within 120 days, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these representations:

- I am not registered or required to be registered with the SEC or a state securities authority and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective.
- I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.

#### SECTION 2.A.(10) Multi-State Adviser

If you are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.

If you are applying for registration as an investment adviser with the SEC, you must make both of these representations:

- I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the state securities authorities in those states.
- I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the state securities authorities of those states.

If you are submitting your *annual updating amendment*, you must make this representation:

Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the *state securities authorities* in those states.

#### SECTION 2.A.(12) SEC Exemptive Order

If you are relying upon an SEC order exempting you from the prohibition on registration, provide the following information:

Application Number:

803-

### 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? O Corporation Sole Proprietorship Limited Liability Partnership (LLP) 0 Partnership $\circ$ Limited Liability Company (LLC) $\odot$ Limited Partnership (LP) $\circ$ Other (specify): 0 If you are changing your response to this Item, see Part 1A Instruction 4. In what month does your fiscal year end each year? В. 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

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)?

Yes No

 $\odot$ 

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.
   100
- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
   79
  - (2) Approximately how many of the employees reported in 5.A. are registered representatives of a broker-dealer?

32

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

0

- (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?
  - 0

(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?
  - 4

2

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*?
     10%

D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

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

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

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

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

Type of <i>Client</i>	(1) Number of <i>Client(s)</i>	(2) Fewer than 5 <i>Clients</i>	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)			\$
(b) High net worth individuals	16		\$ 654,629,071
(c) Banking or thrift institutions			\$
(d) Investment companies	75		\$ 12,109,254,952
(e) Business development companies			\$
(f) Pooled investment vehicles (other than investment companies and business development companies)	16		\$ 3,398,532,961
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	87		\$ 6,061,882,368
(h) Charitable organizations	20		\$ 545,141,284
(i) State or municipal <i>government entities</i> (including government pension plans)	24		\$ 4,990,939,784
(j) Other investment advisers	18		\$ 1,639,789,741
(k) Insurance companies	17		\$ 1,671,231,443
(I) Sovereign wealth funds and foreign official institutions	5		\$ 1,618,975,172
(m) Corporations or other businesses not listed above	8		\$ 93,234,839
(n) Other: PRIMARILY NGOS, SUPERANNUATION SCHEMES			\$

E.	You are compensated for	r your investment	t advisory services b	y (check all	that apply):
<u> </u>	i ou al o oomponoutou n			J (0110011 an	

- (1) A percentage of assets under your management
- (2) Hourly charges
- (3) Subscription fees (for a newsletter or periodical)
- (4) Fixed fees (other than subscription fees)
- □ (5) Commissions
- ☑ (6) Performance-based fees
- (7) Other (specify):

#### Item 5 Information About Your Advisory Business - Regulatory Assets Under Management **Regulatory Assets Under Management** Yes No F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios? $\odot$ $\circ$ (2) If yes, what is the amount of your regulatory assets under management and total number of accounts? U.S. Dollar Amount **Total Number of Accounts** Discretionary: (a) \$ 32,594,685,100 (d) 284 Non-Discretionary: (b) \$188,926,515 (e) 2 Total: (c) \$ 32,783,611,615 (f) 286

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

- (3) What is the approximate amount of your total regulatory assets under management (reported in Item 5.F.(2)(c) above) attributable to *clients* who are non-*United States persons*?
  - \$ 10,989,966,573

## Item 5 Information About Your Advisory Business - Advisory Activities

### **Advisory Activities**

- What type(s) of advisory services do you provide? Check all that apply.
  - (1) Financial planning services
  - (2) Portfolio management for individuals and/or small businesses
  - (3) Portfolio management for investment companies (as well as "business development companies" that have made an election pursuant to section 54 of the Investment Company Act of 1940)
  - (4) Portfolio management for pooled investment vehicles (other than investment companies)
  - ✓ (5) Portfolio management for businesses (other than small businesses) or institutional *clients* (other than registered investment companies and other pooled investment vehicles)
  - $\Box$  (6) Pension consulting services
  - (7) Selection of other advisers (including *private fund* managers)
  - $\square$  (8) Publication of periodicals or newsletters
  - $\square (9) Security ratings or pricing services$
  - (10) Market timing services
  - □ (11) Educational seminars/workshops
  - (12) Other(specify):

Do not check Item 5.G. (3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G. (3), report the 811 or 814 number of the investment company or investment companies to which you provide advice in Section 5.G. (3) of Schedule D.

. If you provide financial planning services, to how many *clients* did you provide these services during your last fiscal year?

- **⊙** 0
- o 1 10
- o 11 25
- O 26 50
- O 51 100
- o 101 250
- O 251 500
- More than 500
- If more than 500, how many? (round to the nearest 500)

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

	(2) If you participate in a wrap fee program, what is the amount of your regulatory assets under management attributable to acting as:		
	(a) <i>sponsor</i> to a <i>wrap fee program</i> \$ 0		
	(b) portfolio manager for a <i>wrap fee program</i> ? \$ 1,639,789,741		
	(c) <i>sponsor</i> to and portfolio manager for the same <i>wrap fee program</i> ? \$ 0		
	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 Sche	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).	hroug	h a
		Yes	No
J.	(1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?	0	$\odot$
	(2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management?	0	o
K.	Separately Managed Account Clients		
	(1) Do you have regulatory assets under management attributable to <i>clients</i> other than those listed in Item 5.D.(3)(d)-(f) (separately managed account <i>clients</i> )?		No O
	If yes, complete Section 5.K.(1) of Schedule D.		
	(2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise?	o	0
	If yes, complete Section 5.K.(2) of Schedule D.		
	(3) Do you engage in derivative transactions on behalf of any of the separately managed account <i>clients</i> that you advise?	$\odot$	0
	If yes, complete Section 5.K.(2) of Schedule D.		
	(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management?	©	0
	If yes, complete Section 5.K. (3) of Schedule D for each custodian.		
L.	Marketing Activities		
	(1) Do any of your <i>advertisements</i> include:	Yes	NO
	(a) Performance results?	o	0
	(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	o	0
	(c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	o
	(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> ?	o	0
	(3) Do any of your advertisements include hypothetical performance?	$\odot$	0
	(4) Do any of your advertisements include predecessor performance?	o	0

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

If you check Item 5.G.(3), what is the SEC file number (811 or 814 number) of each of the registered investment companies and business development companies to which you act as an adviser pursuant to an advisory contract? You must complete a separate Schedule D Section 5.G.(3) for each registered

investment company and business development company to which you act as an adviser.
SEC File Number 811 - 00945
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed
SEC File Number 811 - 03364
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed
SEC File Number 811 - 04642
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed
SEC File Number 811 - 04708
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed
SEC File Number 811 - 04739
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed

811 -	05601
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Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed
SEC File Number 811 - 05620
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed
SEC File Number 811 - 07257
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed
SEC File Number 811 - 07455
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed
SEC File Number 811 - 07705
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed
SEC File Number 811 - 07923
Provide the regulatory assets under management of all parallel managed accounts related to a registered investment company (or series thereof) or

business development company that you advise. No Information Filed SEC File Number 811 - 22037 Provide the regulatory assets under management of all parallel managed accounts related to a registered investment company (or series thereof) or business development company that you advise. No Information Filed SEC File Number 811 - 22110 Provide the regulatory assets under management of all parallel managed accounts related to a registered investment company (or series thereof) or business development company that you advise. No Information Filed SEC File Number 811 - 22153 Provide the regulatory assets under management of all parallel managed accounts related to a registered investment company (or series thereof) or business development company that you advise. No Information Filed SEC File Number 811 - 22153 Provide the regulatory assets under management of all parallel managed accounts related to a registered investment company (or series thereof) or business development company that you advise. No Information Filed SEC File Number 811 - 22473

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

SEC File Number 811 - 22608
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.
No Information Filed
SEC File Number
811 - 22716
Provide the regulatory assets under management of all parallel managed accounts related to a registered investment company (or series thereof) or
business development company that you advise.
No Information Filed
SEC File Number
811 - 22819
811 - 22819
Provide the regulatory assets under management of all parallel managed accounts related to a registered investment company (or series thereof) or
business development company that you advise.
No Information Filed
SEC File Number
811 - 22906
Provide the regulatory assets under management of all parallel managed accounts related to a registered investment company (or series thereof) or
business development company that you advise.
No Information Filed
SEC File Number
811 - 23078
Provide the regulatory assets under management of all parallel managed accounts related to a registered investment company (or series thereof) or
business development company that you advise.
No Information Filed

SEC File Number 811 - 23207

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

### SECTION 5.1.(2) Wrap Fee Programs

If you are a portfolio manager for one or more *wrap fee programs*, list the name of each program and its *sponsor*. You must complete a separate Schedule D Section 5.1.(2) for each *wrap fee program* for which you are a portfolio manager.

Name of *Wrap Fee Program* ACCESS ADVISORY PROGRAM

Name of *Sponsor* UBS FINANCIAL SERVICES, INC.

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* CONSULTING SOLUTIONS

Name of *Sponsor* RBC

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* DMA

Name of *Sponsor* WELLS FARGO ADVISORS

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* FIDUCIARY SERVICES PROGRAM

Name of *Sponsor* CITI PRIVATE BANK Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):

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Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* FIRST REPUBLIC

Name of *Sponsor* FIRST REPUBLIC

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* MANAGED DIVERSIFIED PORTFOLIO

Name of *Sponsor* WELLS FARGO PRIVATE BANK

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* MASTERS

Name of *Sponsor* WELLS FARGO ADVISORS

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* MERRILL LYNCH CONSULTS/ UMA, U.S. TRUST SPS/MERRILL LYNCH ONE

Name of *Sponsor* BANK OF AMERICA MERRILL LYNCH/ U.S. TRUST

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

Sponsor's CRD Number (if any):

SCHWAB MANAGED ACCOUNT ACCESS PROGRAM Name of Sponsor CHARLES SCHWAB & CO., INC. Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-): Sponsor's CRD Number (if any): Name of Wrap Fee Program SELECT Name of Sponsor CHARLES SCHWAB & CO., INC. Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-): Sponsor's CRD Number (if any): Name of Wrap Fee Program SELECT UMA Name of Sponsor MORGAN STANLEY SMITH BARNEY, LLC Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-): \_ Sponsor's CRD Number (if any): Name of Wrap Fee Program STIFEL NICOLAUS OPPORTUNITY PROGRAM Name of Sponsor STIFEL Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-): \_ Sponsor's CRD Number (if any): Name of Wrap Fee Program STRATEGIC INVESTMENT SERVICES (STRATIS)

Name of *Sponsor* JP MORGAN SECURITIES

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* STRATEGIC WEALTH PROGRAM

Name of *Sponsor* UBS FINANCIAL SERVICES, INC.

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* UMA (ADVISORY PORTFOLIOS)

Name of *Sponsor* CITI PRIVATE BANK

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* UNIFIED MANAGED ACCOUNT

Name of *Sponsor* JP MORGAN SECURITIES

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* UNIFORM OVERLAY MANAGER PROGRAM

Name of *Sponsor* DYNASTY WEALTH MANAGEMENT

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

Sponsor's CRD Number (if any):

Name of *Wrap Fee Program* VIRTUS PARTNERS INC.

Name of Sponsor

MORGAN STANLEY

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

Sponsor's CRD Number (if any):

#### 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.

Asset Type		Mid-year	End of year
(i)	Exchange-Traded Equity Securities	0 %	0 %
(ii)	Non Exchange-Traded Equity Securities	0 %	0 %
(iii)	U.S. Government/Agency Bonds	13 %	13 %
(iv)	U.S. State and Local Bonds	3 %	3 %
(v)	Sovereign Bonds	1 %	0 %
(vi)	Investment Grade Corporate Bonds	21 %	21 %
(vii)	Non-Investment Grade Corporate Bonds	34 %	35 %
(viii)	Derivatives	0 %	0 %
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	7 %	8 %
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	1 %	1 %
(xi)	Cash and Cash Equivalents	3 %	3 %
(xii)	Other	16 %	16 %

Generally describe any assets included in "Other" ABS, NON-AGENCY ABS, LEVERAGED LOANS

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

Generally describe any assets included in "Other"

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

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

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

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

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

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

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

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

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

#### (i) Mid-Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings	(3) Derivative Exposures					
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative	(c) Credit Derivative	(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$ 3,294,317,900	\$ O	0 %	24 %	0 %	0 %	0 %	0 %
10-149%	\$ 2,346,955,504	\$ 108,193,122	0 %	22 %	1 %	0 %	0 %	22 %
150% or more	\$ 2,506,629,487	\$ O	0.1 %	104 %	14 %	64 %	0 %	34 %

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

#### (ii) End of Year

Gross Notion Exposure	al (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	\$ 2,805,668,100	\$	0 %	20 %	0 %	0 %	0 %	0 %
10-149%	\$ 2,670,910,914	\$ 100,964,872	0 %	28 %	0 %	0 %	0 %	26 %
150% or mo	e \$ 2,680,129,048	\$	1 %	103 %	18 %	56 %	0 %	33 %

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

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

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

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

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

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

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

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

SECTION	5.K.(3) Custodians for Sep	arately Managed Accounts							
	e a separate Schedule D Sec ry assets under managemer		at holds ten percent or more of your aggregate s	eparately managed account					
(a)	Legal name of custodian:								
	CITIGROUP, NA								
(b)	Primary business name of	custodian:							
	CITIGROUP, NA								
(C)	The location(s) of the custodian's office(s) responsible for <i>custody</i> of the assets :								
	City: LONDON	State:	Country: United Kingdom						
				Yes No					
(d)	Is the custodian a related	person of your firm?		00					
(e)	If the custodian is a broke	r-dealer, provide its SEC registrati	on number (if any)						
(f)	- If the custodian is not a b any)	roker-dealer, or is a broker-dealer	but does not have an SEC registration number,	provide its <i>legal entity identifier</i> (if					
(g)	What amount of your regi \$ 2,222,650,000	ulatory assets under management	attributable to separately managed accounts is	held at the custodian?					

#### Item 6 Other Business Activities

In this Item, we request information about your firm's other business activities.

- A. You are actively engaged in business as a (check all that apply):
  - (1) broker-dealer (registered or unregistered)
  - $\Box$  (2) registered representative of a broker-dealer
  - (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
  - $\Box$  (4) futures commission merchant
  - □ (5) real estate broker, dealer, or agent
  - $\Box$  (6) insurance broker or agent
  - (7) bank (including a separately identifiable department or division of a bank)
  - (8) trust company
  - □ (9) registered municipal advisor
  - □ (10) registered security-based swap dealer
  - □ (11) major security-based swap participant
  - $\square$  (12) accountant or accounting firm
  - (13) lawyer or law firm
  - (14) other financial product salesperson (specify):

If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D.

B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?

(2) If yes, is this other business your primary business?

If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.

Yes No

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(3) Do you sell products or provide services other than investment advice to your advisory *clients*?

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.

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SECTION 6.A. Names of Your Other Businesses

No Information Filed

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

Describe your primary business (not your investment advisory business):

If you engage in that business under a different name, provide that name:

#### SECTION 6.B.(3) Description of Other Products and Services

Describe other products or services you sell to your *client*. You may omit products and services that you listed in Section 6.B.(2) above.

If you engage in that business under a different name, provide that name:

#### Item 7 Financial Industry Affiliations

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

A. This part of Item 7 requires you to provide information about you and your *related persons*, including foreign affiliates. Your *related persons* are all of your *advisory affiliates* and any *person* that is under common *control* with you.

You have a *related person* that is a (check all that apply):

- (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)
- (2) other investment adviser (including financial planners)
- (3) registered municipal advisor
- □ (4) registered security-based swap dealer
- □ (5) major security-based swap participant
- (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (7) futures commission merchant
- (8) banking or thrift institution
- (9) trust company
- $\Box$  (10) accountant or accounting firm
- (11) lawyer or law firm
- (12) insurance company or agency
- (13) pension consultant
- (14) real estate broker or dealer
- (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).

Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.

For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.

You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.

You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

#### SECTION 7.A. Financial Industry Affiliations

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

1.	Legal Name of <i>Related Person:</i> SEIX CLO MANAGEMENT GP LLC		
2.	Primary Business Name of <i>Related Person:</i> SEIX CLO MANAGEMENT GP 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         (j)       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 control or are you controlled by the related person?		0
7.	Are you and the <i>related person</i> under common <i>control</i> ?	o	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	o
	(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 require to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?		0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>client</i> Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	No O
	(b) If the answer is yes, under what exemption?	0	0
10.	(a) Is the related person registered with a foreign financial regulatory authority?	0	o
	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is regist No Information Filed		
11.	Do you and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	0
12.	Do you and the <i>related person</i> share the same physical location?	0	o
,			

1. Legal Name of *Related Person*: VIRTUS INVESTMENT ADVISERS, INC.

2. Primary Business Name of *Related Person*: VIRTUS INVESTMENT ADVISERS, INC.

3.		<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or	- 5995		
	Othe			
4.	Relat	ted Person's		
	(a)	CRD Number (if any):		
	(b)	106982 CIK Number(s) (if any):		
	(0)	CIK Number		
		19481		
5.		ted Person is: (check all that apply)		
		broker-dealer, municipal securities dealer, or government securities broker or dealer		
		<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> </ul>		
	• •	registered security-based swap dealer		
	• •	major security-based swap participant		
	. ,	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
		T trust company		
		<ul> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> </ul>		
	• •	insurance company or agency		
	• •	pension consultant		
	(n)	real estate broker or dealer		
	• •	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6	Πο γ	ou control or are you controlled by the related person?	/es	
0.	D0 y		0	$\odot$
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	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	$\odot$
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	0
		presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <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's</i> office responsible for <i>custody</i> of your <i>clients</i> .	9550	te
	(0)	Number and Street 1: Number and Street 2:	1330	13.
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$	-	
0	(a)		/es	_
9.		If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	Θ
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	$\overline{\mathbf{o}}$
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is register	~	e
	(~)	No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	$\odot$	0
12.	Do y	ou and the related person share the same physical location?	0	$\odot$
1.	Lega	I Name of <i>Related Person</i> :		
	-	US GLOBAL PARTNERS PTE. LTD.		
		ary Business Name of <i>Related Person:</i> 'US GLOBAL PARTNERS PTE. LTD.		
	VIKI	US GLODAL FARTNERS FTE. ETD.		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			

Other

4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
5.	<ul> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(d)</li> <li>(e)</li> <li>(f)</li> <li>(g)</li> <li>(h)</li> <li>(i)</li> <li>(j)</li> <li>(k)</li> </ul>	ted Person is: (check all that apply)         broker-dealer, municipal securities dealer, or government securities broker or dealer         other investment adviser (including financial planners)         registered municipal advisor         registered security-based swap dealer         major security-based swap participant         commodity pool operator or commodity trading advisor (whether registered or exempt from registration)         futures commission merchant         banking or thrift institution         trust company         accountant or accounting firm         lawyer or law firm		
	(m) (n) (o)	<ul> <li>real estate broker or dealer</li> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6.	Do y	you control or are you controlled by the related person?	Yes O	
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	o	~
			e	0
8.	(a) (b)	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> ? If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	0 0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients'         Number and Street 1:       Number and Street 2:         City:       State:       Country:       ZIP+4/Postal Code:         If this address is a private residence, check this box:       I	ass∈	∙ts:
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\odot$	0
	(b)	If the answer is yes, under what exemption? FOREIGN ADVISOR		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	$\odot$	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 register	ed.	
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		Singapore - Monetary Authority of Singapore		
11.	Do y	you and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
12.	Do y	you and the <i>related person</i> share the same physical location?	0	o
1.	•	al Name of <i>Related Person</i> : NE ANDERSON RUDNICK INVESTMENT MANAGEMENT, LLC		
2.		nary Business Name of <i>Related Person:</i> NE ANDERSON RUDNICK INVESTMENT MANAGEMENT, LLC		
3.	801	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 24241		
	or Othe	er		
4.	<i>Rela</i> (a)	ited Person's CRD Number (if any): 104599		

(b) <u>CIK Number(s) (if any)</u>:

		CIK Number		
		1021223		
5.	Rela	ted 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		
		major security-based swap participant		
	• •	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(0)	futures commission merchant		
	• •	banking or thrift institution		
		trust company		
		accountant or accounting firm		
	• •	lawyer or law firm		
	.,	insurance company or agency		
	(m)			
		real estate broker or dealer		
		<ul> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> <li>sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</li> </ul>		
	(p)		/es	No
6	Do γ			
0.	D0 y		0	$\odot$
7	A		_	
1.	Are	you and the <i>related person</i> under common <i>contro</i> ?	$\odot$	0
	<i>(</i> )			
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	$\odot$
	(b)		0	$^{\circ}$
		presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		
	(C)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' a	asse	ts:
		Number and Street 1:     Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$	/es	No
9.	$(\mathbf{a})$			
9.			0	$\odot$
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered		
		No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	$\odot$	$\circ$
12.	Do y	ou and the related person share the same physical location?	0	$\odot$
1.	-	Il Name of <i>Related Person</i> :		
	VIRI	US ETF ADVISERS LLC		
2	Prim	ary Business Name of <i>Related Person</i> :		
2.		US ETF ADVISERS LLC		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	801	- 78585		
	or			
	Othe			
4	Rela	ted Person's		
••		CRD Number (if any):		
	<u>()</u>	168955		
	(b)	CIK Number(s) (if any):		
		CIK Number		
		1587281		
				1

5.	Relat	ted 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)	Iawyer or law firm		
	(I)	insurance company or agency		
	(m)			
	• •	real estate broker or dealer		
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	• •	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(P)		Yes	No
6	Πο γι	ou control or are you controlled by the related person?		
0.	D0 yt	ou control of alle you controlled by the related person?	0	Θ
_	_			
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	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	$\odot$
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	0
		presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required	~	~
		to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?		
	(C)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i>	asse	ets:
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:		
			Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	$\odot$
	(b)	If the answer is yes, under what exemption?	~	~
	(0)	in the answer is yes, under what exemption:		
10	(2)	Is the related person registered with a foreign financial regulatory authority?	_	_
10.				$\odot$
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is register	∋d.	
		No Information Filed		
11.	Do yo	ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	$\circ$
12.	Do yo	ou and the related person share the same physical location?	0	$\odot$
,				
1.	Legal	I Name of <i>Related Person</i> :		
	WEST	TCHESTER CAPITAL PARTNERS, LLC		
2.	Prima	ary Business Name of <i>Related Person</i> :		
	WEST	TCHESTER CAPITAL PARTNERS, LLC		
3.	Relat	<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	801 -	- 73214		
	or			
	Othe	r		
4.	Relat	ted Person's		
	(a)	CRD Number (if any):		
		135955		
	(b)	CIK Number(s) (if any):		
		CIK Number		
		1277372		
				]
5	Relat	ted Person is: (check all that apply)		
5.	(a)			
	(~)			

(b) 🗹 other investment adviser (including financial planners)

(c) 🗖 registered municipal advisor

(d) 🗖 registered security-based swap dealer

	(f) (g) (h) (i) (j) (k) (l) (m) (n) (o)	<ul> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> <li>banking or thrift institution</li> <li>trust company</li> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> <li>insurance company or agency</li> <li>pension consultant</li> <li>real estate broker or dealer</li> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> <li>sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</li> </ul>		
6.	Do y	ou control or are you controlled by the related person?	Yes Ö	No ©
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	o	0
8.	(b)	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> ? 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> ? 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: Number and Street 2:	O O	O O
		City:State:Country:ZIP+4/Postal Code:If this address is a private residence, check this box:Image: Country:Image: Country:		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	
7.		If the answer is yes, under what exemption?	0	o
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registe No Information Filed	red.	
11.	Do y	ou and the related person share any supervised persons?	$oldsymbol{\circ}$	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	o
	NFJ I	l Name of <i>Related Person</i> : NVESTMENT GROUP, LLC ary Business Name of <i>Related Person</i> :		
	NFJ I	NVESTMENT GROUP, LLC		
3.		<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 119686		
	or Othe	r		
4.	(a)	<i>ted Person's</i> <i>CRD</i> Number (if any): 310902		
		CIK Number(s) (if any):		
		No Information Filed		
5.	(a) (b) (c) (d) (e)	<ul> <li>ted Person is: (check all that apply)</li> <li>broker-dealer, municipal securities dealer, or government securities broker or dealer</li> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> <li>registered security-based swap dealer</li> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> <li>banking or thrift institution</li> <li>trust company</li> <li>accountant or accounting firm</li> </ul>		

	(k)	Iawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do ک	you control or are you controlled by the related person?	0	$\odot$
7.	Are	you and the related person under common control?	$\odot$	0
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	$\odot$
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	0
		presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required		~
		to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the related person?		
	(C)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients	asse	ets:
		Number and Street 1:     Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$		
		If the related person is an investment edular, is it even at from registration?	Yes	
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	Θ
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	$\circ$	$\odot$
	(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 registe	ed.	
		No Information Filed		
11.	Do ک	you and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	0
12.	Do ک	you and the <i>related person</i> share the same physical location?	$\circ$	$\odot$
1	Logr	al Name of <i>Related Person</i> :		
1.	0	DISTRIBUTORS LLC		
	VI 2			
2.	Prim	nary Business Name of <i>Related Person:</i>		
		DISTRIBUTORS LLC		
3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	8 - 1	14100		
	or			
	Othe	er		
	- ·			
4.		ered Person's		
	(a)	CRD Number (if any): 3036		
	(b)	CIK Number(s) (if any):		
	(0)	CIK Number		
		78272		
5.	Rela	nted 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)	T trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		

- (n) 🗖 real estate broker or dealer
- (o) **I** 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 control or are you controlled by the related person?	0	$\odot$
7.	Are you and the <i>related person</i> under common <i>control</i> ?	$\odot$	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	$\odot$
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	<ul> <li>(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:</li> </ul>	asse	ts:
		Yes	No
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	$\odot$
	(b) If the answer is yes, under what exemption?		
10.	. (a) Is the related person registered with a foreign financial regulatory authority?	0	$oldsymbol{\circ}$
	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is register No Information Filed	ed.	
11.	. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	0
12.	. Do you and the <i>related person</i> share the same physical location?	0	$\odot$
1. 2. 3.	Legal Name of <i>Related Person</i> : SUSTAINABLE GROWTH ADVISERS, LP Primary Business Name of <i>Related Person</i> : SUSTAINABLE GROWTH ADVISERS, LP <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 62151 or Other		
4.	Related Person's         (a)       CRD Number (if any): 127447         (b)       CIK Number(s) (if any):         CIK Number         1290668		
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)  $\square$  accountant or accounting firm
- (k) 🗖 lawyer or law firm
- (I) 🗖 insurance company or agency
- (m) 🗖 pension consultant
- (n) 🗖 real estate broker or dealer
- (o) 🗖 sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p) 🗖 sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

7.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	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	$\odot$
	(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	0	-0-
	(c)	to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ? 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 Country City Country City Country City City City City City City City Cit	asse	ets:
		City:     State:     Country:     ZIP+4/Postal Code:       If this address is a private residence, check this box:		
			Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	$\circ$	$\odot$
	(b)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority?	~	~
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is register	~~~	0
	()	Name of Country/English Name of Foreign Financial Regulatory Authority		
		Canada - Alberta Securities Commission		
		Canada - Ontario Securities Commission		
		Ireland - Central Bank of Ireland		
11	Do ک	you and the related person share any supervised persons?	0	$\odot$
12	Do y	you and the <i>related person</i> share the same physical location?	$\circ$	$\odot$
1.	-	al Name of <i>Related Person</i> :		
	VIRT	FUS ALTERNATIVE INVESTMENT ADVISERS, INC.		
2	Prim	nary Business Name of <i>Related Person</i> :		
2.		TUS ALTERNATIVE INVESTMENT ADVISERS, INC.		
3.		<i>ited Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
		- 67924		
	or Othe	er		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(b)	143732 CIK Number(s) (if any):		
	(0)			
		1591068		
5.		ted Person is: (check all that apply)		
	(a)	<ul> <li>broker-dealer, municipal securities dealer, or government securities broker or dealer</li> <li>other investment adviser (including financial planners)</li> </ul>		
	(b) (c)	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> </ul>		
	(c) (d)	<ul> <li>registered maneiparadvisor</li> <li>registered security-based swap dealer</li> </ul>		
	(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) (l)	<ul> <li>lawyer or law firm</li> <li>insurance company or agency</li> </ul>		
	(n) (m)	pension consultant		
	(n)	<ul> <li>real estate broker or dealer</li> </ul>		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do ک	you control or are you controlled by the related person?	$\circ$	$\odot$
	Δ			
/.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	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	$\odot$
		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> ?	õ	õ
	(c)	If you have answered "yes" to question 8. (a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> Number and Street 1: Number and Street 2:	asse	ets:
		City:State:Country:ZIP+4/Postal Code:If this address is a private residence, check this box:		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	No ©
	(b)	If the answer is yes, under what exemption?	~	~
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	o
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is register	_	~
11.	Do y	No Information Filed ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	0
10		ou and the <i>related person</i> share the same physical location?		
12.			0	o
1.	-	I Name of <i>Related Person</i> : US INTERNATIONAL MANAGEMENT LLP		
2	Drim	ary Rusiness Name of Related Person		
Ζ.		ary Business Name of <i>Related Person</i> : US INTERNATIONAL MANAGEMENT LLP		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- or			
	Othe	r		
4.		ted Person's CRD Number (if any):		
		CIK Number(s) (if any):		
		No Information Filed		
5.	Relat	ted Person is: (check all that apply)		
	~ /	<ul> <li>broker-dealer, municipal securities dealer, or government securities broker or dealer</li> <li>ether investment adviser (including financial planners).</li> </ul>		
	• •	<ul> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> </ul>		
	. ,	registered security-based swap dealer		
		<ul> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>		
	.,	futures commission merchant		
		banking or thrift institution		
		Turust company		
	0,	<ul> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> </ul>		
	• •	insurance company or agency		
	(m)	pension consultant		
	· ·	real estate broker or dealer		
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	
6.	Do yo	ou control or are you controlled by the related person?	° o	©
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	o	0
0	(a)	Doos the related percenter as a qualified sustation for your elients in connection with advisory convicts to stimute?	-	
8.		Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ? If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	•
		presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

		Number and Street 1: Number and Street 2:			
			ZIP+4/Postal Code:		
		If this address is a private residence, check this box: $\square$		Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?			0
				e	~
		FOREIGN ADVISOR			
10.	(a)	Is the related person registered with a foreign financial regulatory authority?		o	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 register	ed.	
		Name of Country/English Name of Foreign Financial Regulatory Authority			
		United Kingdom - Financial Conduct Authority			
11.	Do y	you and the related person share any supervised persons?		$\odot$	0
12.	Do y	you and the <i>related person</i> share the same physical location?		0	o
,					
1.	Lega	gal Name of <i>Related Person</i> :			
	VIRT	RTUS INTERNATIONAL FUND MANAGEMENT LIMITED			
2.	Prima	mary Business Name of <i>Related Person</i> :			
		RTUS INTERNATIONAL FUND MANAGEMENT LIMITED			
3.	Relat	lated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	- or				
	Othe	her			
4.	Relat	lated Person's			
					I
	(b)	CIK Number(s) (if any):			
		No Information Filed			
_	- <i>, ,</i>				
5.		lated Person is: (check all that apply)			
	()				
	. ,				
	. ,				
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt	from registration)		
	(g)	futures commission merchant			
	(h)				
	.,	trust company			
		accountant or accounting firm lawver or law firm			
	( )	<ul> <li>lawyer or law firm</li> <li>insurance company or agency</li> </ul>			
	.,				
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investm	ent vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehi			
6.	Do yo	you control or are you controlled by the related person?		Yes	No ©
	-				
1.	Are y	e you and the <i>related person</i> under common <i>control</i> ?		$\odot$	0
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advis	ory services you provide to <i>clients</i> ?	0	$\odot$
	• •			$\circ$	$\circ$
		presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) f to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at			
				asse	ts:
		Number and Street 1:     Number and Street 2:       Oits:     Output			
		City: State: Country: If this address is a private residence, check this box:	ZIP+4/Postal Code:		

9.	(a)	If the related person is an investment adviser, is it exempt from registration?	$\odot$	$\circ$
	(b)	If the answer is yes, under what exemption? FOREIGN ADVISOR		
10	(a)	Is the related person registered with a foreign financial regulatory authority?	~	0
		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.		0
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		Ireland - Central Bank of Ireland		
11.	Do y	you and the related person share any supervised persons?	$\odot$	0
12.	Do ک	you and the <i>related person</i> share the same physical location?	0	$\odot$
P				
1.	-	al Name of <i>Related Person</i> : HASIMPLEX GROUP, LLC		
2.		ary Business Name of <i>Related Person:</i> HASIMPLEX GROUP, LLC		
3.		<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 62448		
	or			
	Othe	er		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
		128356		
	(b)	CIK Number(s) (if any): CIK Number		
		1387941		
	<ul> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(d)</li> <li>(e)</li> <li>(f)</li> <li>(g)</li> <li>(h)</li> <li>(i)</li> <li>(j)</li> <li>(k)</li> <li>(l)</li> <li>(m)</li> <li>(n)</li> <li>(o)</li> </ul>	<ul> <li>broker-dealer, municipal securities dealer, or government securities broker or dealer</li> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> <li>registered security-based swap dealer</li> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> <li>banking or thrift institution</li> <li>trust company</li> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> <li>insurance company or agency</li> <li>pension consultant</li> <li>real estate broker or dealer</li> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
6.	Do y	you control or are you controlled by the related person?	0	o
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	©	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	$\odot$
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?		0
	(C)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> Number and Street 1:       Number and Street 2:         City:       State:       Country:       ZIP+4/Postal Code:	s'assi	ets:
		City:State:Country:ZIP+4/Postal Code:If this address is a private residence, check this box:		
			Yes	No
9.	(a) (b)	If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption?	0	o
11				

10.	(a)	Is the related person registered with a foreign financial regulatory authority?	$\circ$	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is register No Information Filed	·ed.	
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	0
1.	0	I Name of <i>Related Person</i> : F & PHELPS INVESTMENT MANAGEMENT CO.		
2.		ary Business Name of <i>Related Person:</i> * & PHELPS INVESTMENT MANAGEMENT CO.		
3.		<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 14813 r		
4.		'ed Person's		
т.		CRD Number (if any): 107296		
	(b)	CIK Number(s) (if any):		
		CIK Number           765443		
5.	<ul> <li>(a)</li> <li>(b)</li> <li>(c)</li> <li>(d)</li> <li>(e)</li> <li>(f)</li> <li>(g)</li> <li>(h)</li> <li>(i)</li> <li>(j)</li> <li>(k)</li> <li>(l)</li> <li>(m)</li> <li>(o)</li> <li>(p)</li> </ul>	ed Person is: (check all that apply)         broker-dealer, municipal securities dealer, or government securities broker or dealer         other investment adviser (including financial planners)         registered municipal advisor         registered security-based swap dealer         major security-based swap participant         commodity pool operator or commodity trading advisor (whether registered or exempt from registration)         futures commission merchant         banking or thrift institution         trust company         accountant or accounting firm         lawyer or law firm         insurance company or agency         pension consultant         real estate broker or dealer         sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles         sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	0
8.		Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ? 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> ?	00	© 0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:	asse	ts:
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	
		If the answer is yes, under what exemption?	0	O
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	o
		If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is register No Information Filed	~~~	J
11.	Do y	ou and the related person share any supervised persons?	$\odot$	0

 $\circ$   $\circ$ 

0	$\odot$
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1.	. Legal Name of <i>Related Person</i> : CEREDEX VALUE ADVISORS LLC			
2.	Primary Business Name of <i>Related Person:</i> CEREDEX VALUE ADVISORS LLC			
3.	<i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 68739 or			
	Other			
4.	Related Person's         (a)       CRD Number (if any):         146023         (b)       CIK Number(s) (if any):         CIK Number         1738726			
5.	Related Person is: (check all that apply)         (a)       broker-dealer, municipal securities dealer, or government securities broker or dealer         (b)       other investment adviser (including financial planners)         (c)       registered municipal advisor         (d)       registered security-based swap dealer         (e)       major security-based swap participant         (f)       commodity pool operator or commodity trading advisor (whether registered or exempt from registration)         (g)       futures commission merchant         (h)       banking or thrift institution         (i)       trust company         (j)       accountant or accounting firm         (k)       lawyer or law firm         (i)       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> ?	$\odot$	0	
8.	<ul> <li>(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>?</li> <li>(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>?</li> <li>(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: <ul> <li>City:</li> <li>State:</li> <li>Country:</li> <li>ZIP+4/Postal Code:</li> </ul> </li> </ul>	O O asse	O O	
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes Ō	No ©	
	(b) If the answer is yes, under what exemption?			
10.	<ul> <li>(a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i>?</li> <li>(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is register</li> <li>No Information Filed</li> </ul>	C red.	O	
11.	Do you and the related person share any supervised persons?	۲	0	
12.	Do you and the <i>related person</i> share the same physical location?	©	0	

1.	•	al Name of <i>Related Person:</i> ( CLO MANAGEMENT LLC		
2.		ary Business Name of <i>Related Person:</i> CLO MANAGEMENT LLC		
3.		<i>ted Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 108565		
	or Othe			
4.	<i>Rela</i> (a) (b)	ted Person's CRD Number (if any): 285354 CIK Number(s) (if any): No Information Filed		
5.	<i>Rela</i> (a) (b) (c) (d)	<ul> <li>ted Person is: (check all that apply)</li> <li>broker-dealer, municipal securities dealer, or government securities broker or dealer</li> <li>other investment adviser (including financial planners)</li> <li>registered municipal advisor</li> <li>registered security-based swap dealer</li> </ul>		
	(e) (f) (g) (h) (i) (j) (k) (l) (m)	<ul> <li>major security-based swap participant</li> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> <li>futures commission merchant</li> <li>banking or thrift institution</li> <li>trust company</li> <li>accountant or accounting firm</li> <li>lawyer or law firm</li> <li>insurance company or agency</li> </ul>		
	(o) (p)	<ul> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> <li>sponsor, general partner, managing member (or equivalent) of pooled investment vehicles</li> </ul>		
6.	Do y	you control or are you controlled by the related person?	Yes ©	
7.	Are	you and the <i>related person</i> under common <i>contro</i> ?	$\odot$	c
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	$\mathbf{\Theta}$
	(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> ?	õ	_
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients'         Number and Street 1:       Number and Street 2:         City:       State:       Country:       ZIP+4/Postal Code:         If this address is a private residence, check this box:       I		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	
	(b)	If the answer is yes, under what exemption?	V	
10	. (a)	Is the related person registered with a foreign financial regulatory authority?	0	$\odot$
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is register No Information Filed		
11	. Do y	you and the related person share any supervised persons?	۲	0
12	. Do y	you and the <i>related person</i> share the same physical location?	$\odot$	0

1. Legal Name of *Related Person*: VIRTUS FUND ADVISERS, LLC

2. Primary Business Name of *Related Person*: VIRTUS FUND ADVISERS, LLC

3.	<i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 23163				
	or	- 23103			
	Othe	r			
4.		ted Person's			
	(a)	CRD Number (if any):			
	(b)	107346 CIK Number(s) (if any):			
	(0)	CIK Number			
		1319111	_		
5.	Relat	ted 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			
	• •	registered security-based swap dealer			
	. ,	major security-based swap participant			
		commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			
	(0)	futures commission merchant			
		banking or thrift institution			
	.,	<ul> <li>trust company</li> <li>accountant or accounting firm</li> </ul>			
	0,	lawyer or law firm			
		insurance company or agency			
	(m)				
		real estate broker or dealer			
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles			
			Yes	No	
6.	Do y	ou <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	$\odot$	0	
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	0	
0					
8.		Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	$\odot$	
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	0	
		presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <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's</i> office responsible for <i>custody</i> of your <i>clients</i> '	asse	sts.	
	(0)	Number and Street 1: Number and Street 2:	1000		
		City: State: Country: ZIP+4/Postal Code:			
		If this address is a private residence, check this box: $lacksquare$			
-	, .		Yes	No	
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	$\odot$	
	(b)	If the answer is yes, under what exemption?			
	<i>(</i> )				
10.		Is the related person registered with a foreign financial regulatory authority?	$\circ$	$\odot$	
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is register	∋d.		
11	Davi	No Information Filed	_	_	
11.	D0 у	ou and the <i>related person</i> share any <i>supervised persons</i> ?	$\odot$	0	
12	Πο γ	ou and the <i>related person</i> share the same physical location?	~	~	
12.	D0 y	ou and the related person share the same physical location:	$\odot$	o	
1.	Lega	I Name of <i>Related Person</i> :			
	SILV	ANT CAPITAL MANAGEMENT LLC			
~	<b>.</b> .				
2.		ary Business Name of <i>Related Person</i> : ANT CAPITAL MANAGEMENT LLC			
	JILV				
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
		- 68741			
	or				
	Othe				

4.	Related Person's					
	(a) CRD Number (if any): 146025					
	(b)					
	CIK Number					
		1738728				
5.	Rela	ted 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) (k)	accountant or accounting firm				
	(k)	Iawyer or law firm				
	(I) (m)	<ul> <li>insurance company or agency</li> <li>pension consultant</li> </ul>				
	(n)	real estate broker or dealer				
	(n) (o)	<ul> <li>sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles</li> </ul>				
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles				
			Yes	No		
6.	Do y	you control or are you controlled by the related person?	0	$\odot$		
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	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	$oldsymbol{\circ}$		
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	$\circ$		
		presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required				
	<i>.</i>	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's</i> office responsible for <i>custody</i> of your <i>clients'</i> a	isse	ts:		
		Number and Street 1:Number and Street 2:City:State:Country:ZIP+4/Postal Code:				
		If this address is a private residence, check this box:				
			Yes	No		
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		$\odot$		
	(b)	If the answer is yes, under what exemption?	~	~		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	$\odot$		
		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	€ €d.	e		
	()	No Information Filed				
11.	Do y	you and the related person share any supervised persons?	$\odot$	0		
			~	~		
12.	Do y	you and the <i>related person</i> share the same physical location?	$\odot$	0		
			~	~		
,						
1.	-	al Name of <i>Related Person</i> :				
	WES	TCHESTER CAPITAL MANAGEMENT, LLC				
	Б <i>і</i>					
∠.		ary Business Name of <i>Related Person:</i> TCHESTER CAPITAL MANAGEMENT, LLC				

 Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 72002 or Other

- 4. Related Person's
  - (a) *CRD* Number (if any): 155686
  - (b) CIK Number(s) (if any): CIK Number

	1512805						
5.	Dolar	tod Porson is: (chock all that apply)					
5.	Related Person is: (check all that apply) (a) D broker-dealer, municipal securities dealer, or government securities broker or dealer						
	<ul> <li>(a) I broker-dealer, manicipal securities dealer, or government securities broker or dealer</li> <li>(b) I other investment adviser (including financial planners)</li> </ul>						
	• •	registered municipal advisor					
	• •	registered security-based swap dealer					
	• •	major security-based swap detail					
	• •	<ul> <li>commodity pool operator or commodity trading advisor (whether registered or exempt from registration)</li> </ul>					
	• •	futures commission merchant					
	ιO,	banking or thrift institution					
	• •	trust company					
	.,	accountant or accounting firm					
	0,	I lawyer or law firm					
	• •	insurance company or agency					
	(m)						
		real estate broker or dealer					
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles					
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles					
			Yes	No			
6.	Do y	ou control or are you controlled by the related person?	0	$\odot$			
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	$\odot$	$\circ$			
8.		Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	$\odot$			
		If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0			
	(C)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients	asse	ets:			
		Number and Street 1:     Number and Street 2:					
		City: State: Country: ZIP+4/Postal Code:					
		If this address is a private residence, check this box: 🗖					
			Yes	No			
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	$\circ$	$\odot$			
	(b)	If the answer is yes, under what exemption?					
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	~			
10.		If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registe	~	o			
	(b)	No Information Filed	EU.				
11.	Do y	ou and the related person share any supervised persons?	$\odot$	0			
12.	Do y	ou and the <i>related person</i> share the same physical location?	$\circ$	$\odot$			

#### Item 7 Private Fund Reporting

B. Are you an adviser to any private fund?

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

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

# SECTION 7.B.(1) Private Fund Reporting

A. Pl	RIVATE FUND		
Info	ormation About the Private Fund		
1.	(a) Name of the <i>private fund</i> :		
	MOUNTAIN VIEW CLO 2013-1 LTD		
	(b) <i>Private fund</i> identification number: (include the "805-" prefix also)		
	805-9243147251		
0			
2.	Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country: Cayman Islands		
	Cayman Islands		
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		
	LAURA CHISOLM		
	WENDY EBANKS		
	(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	
	<ul> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of</li> </ul>		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes I	No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	$\odot$
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?	~	~
	No Information Filed		
		Yes I	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	$\circ$
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?	~	~
	Name of <i>private fund</i> :		
	Private fund identification number:		
	(include the "805-" prefix also)		

Yes No

⊙ ○

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.

No information Field       Notify: For purposes of questions 4 and 7, in a master fraster arrangement, one or more funds ("Godin funds") most all or substantially all of their sets in a single time ("master fund" 4.4.net would give be a "recorr fund" investing in a "matrix classes in a single time ("master fund" 4.4.net would give be a "recorr fund" investing in a "matrix classes in a single time ("master fund").       Vest No         6. (a) Is the private Acid a "limit of funds"       Vest No       Vest No       Vest No         7. (b) If yes, does the private fund index?       Vest No       Vest No       Vest No         8. (b) Is the private Acid a "limit of funds."       Vest No       Vest No       Vest No         9. (b) If yes, does the private fund index?       Vest No       Vest No       Vest No         9. (b) If yes, does the private fund index?       Vest No       Vest No       Vest No       Vest No         9. (b) Uring your last fitsed year: (d) the private fund invest in securities issued by investment companies registered under the investment companies.       Vest No       Vest No         9. Unding your last fitsed year: (d) the private fund?       Or real estate rund @ securitized asset rund @ vesture capital rund @ Orther private rund.       Vest No         10. Unding your last fitsed year: (d) the private Aux?       O real estate rund @ securitized asset rund @ vesture capital rund @ Orther private rund.       Vest No         11. Unrent westment commitment resolated dr an investor in the private rund.       Securitize	1.	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:	· eacr	1 OT
<ul> <li>assets in a single fund ("moster fund"). A fund would also be a "feeder fund" investing in a "imaster fund" for puppess of this question if it issues i maintiple classes (or series) of shnees or inderests, and each class (or series) (investis substantially all or its assets in a single master trud.</li> <li>(a) (b) Is this private fund of funds?"         <ul> <li>(b) (b) Is this private fund of funds?</li> <li>(c) (c) It yes, does the private fund invest in the decay or egastered investment companies.</li> <li>(c) It yes, does the private fund invest in the private fund of registered investment companies registered under the Investment companies registered under the Investment companies registered under the Investment companies funds (Inter fund)</li> <li>(c) Private fund (Inter fund) invest in the private fund (Inter fund)</li> <li>(c) Private fund (Inter fu</li></ul></li></ul>		No Information Filed		
<ul> <li>a) (a) Is this private fund a "fund of funds?</li> <li>A) Performance of this question any, answer "yes" If the fund invests 10 percent or more of its total assets in other pooled investment twiches. registered investment companies.</li> <li>b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i>?</li> <li>c) b) thy es, does the <i>private fund</i> invest in sociarities issued by investment companies registered under the investment companies. <i>P</i>(<i>x</i>) is the <i>private fund</i>?</li> <li>c) b) thy es, does the <i>private fund</i> invest in sociarities issued by investment companies registered under the investment companies. <i>P</i>(<i>x</i>) is the <i>private fund</i>?</li> <li>c) b) thy es, does the <i>private fund</i>?</li> <li>c) b) the <i>private fund</i>?</li> <li>c) b) the <i>private fund</i>?</li> <li>c) the <i>pr</i></li></ul>		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	issue	d
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, regarates to whether they are also private funds or registered investment companies.       C       C         (b) It yes, dues the private fund invest in successful examples and power investment companies registered under the investment incompanies in the private fund. C real estate fund C securitized asset fund C venture capital fund C other private fund:       Image fund C liquidity fund C other private fund:         10       What is the adjoint of the private fund:       C real estate fund C securitized asset fund C venture capital fund C other private fund:         11       Current press asset value of the private fund:       C real estate fund C fund:       Figure 2 (Figure 2 (Fi	8.	(a) Is this <i>private fund</i> a "fund of funds"?		
Ves No  During your last fixed year, did the private fund invest in securities issued by investment companies registered under the investment  Company Act of 1940 (other than "money market funds," to the extent provided in instruction 6.e. )?  We that type of fund is the private fund?  O hedge fund O inpublic fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O other private fund.  NOTE: For definitions of these fund types, please see instruction 6 of the Instructions to Part 1A.  Current gross asset value of the private fund.  S 336, 109, 341  Connership  Another private fund of an investor in the private fund.  S 200,000  NOTE: Report the amount required of an investor in the private fund.  S 200,000  NOTE: Report the amount required of an investor in the private fund.  S 200,000  NOTE: Report the amount required of an investor in the private fund.  S 200,000  NOTE: Report the amount required of an investor in the private fund.  S 200,000  NOTE: Report the amount outlinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the trud's beneficially owned by you and your related persons.  (what is the approximate percentage of the private fund beneficially owned (in the aggregate) by funds of runds:  (b) Ur 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 sails of the fund beneficially owned by non-United States persons.  We that is the approximate percentage of the private fund beneficially owned by non-United States persons.  We that is the approximate percentage of the private fund beneficially owned by non-United States persons.  We that is the approximate percentage of the private fund beneficially owned by non-United States persons.  We that is the approximate percentage of the private fund beneficially owned by non-United States persons.  We have a subadviser to this private fun		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	_	e
<ul> <li>During your last fixed year, did the private fund invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in instruction 6.e.?)</li> <li>What type of fund is the private fund?         <ul> <li>Investment Company Act of 1940 (other than "money market funds," to the extent provided in instruction 6.e.?)</li> </ul> </li> <li>What type of fund is the private fund?         <ul> <li>Investment Company Act of 1940 (other than "money market funds," to the extent provided in instruction 6.e.?)</li> <li>What type of fund is the private fund?             <ul> <li>Investment Company Act of 1940 (other than "money market funds," to the extent of 0 securitized asset than 0 venture capital fund 0 ther private fund:                 <ul> <li>S 363,109,341</li> <li>Current grass asset value of the private fund;</li> <li>S 250,000</li> <li>NOTE: Report the amount routinely required of an investor in the private fund;</li> <li>S 250,000</li> <li>NOTE: Report the amount routinely required of investors who are not your related pervars (even if different from the amount set forth in the organizational documents of the fund);</li></ul></li></ul></li></ul></li></ul>		(b) If yes, does the private fund invest in funds managed by you or by a related person?	0	0
Company Act of 1940 (other than "money market funds," to the extent provided in instruction 6.c.)?  10. What type of fund is the <i>private fund</i> Company Act of 1940 (different fund) Company Act of 1940, are sales of the <i>private fund</i> beneficially comed by you and your <i>related persons</i> Company Act of 1940, are sales of the fund beneficially comed by non-Unifed States porsons: Company Act of 1940, are sales of the <i>private fund</i> beneficially comed by non-Unifed States porsons: Company Act of 1940, are sales of the <i>private fund</i> beneficially comed by non-Unifed States porsons: Company Act of 1940, are sales of the <i>private fund</i> beneficially comed by non-Unifed States porsons: Company Act of 1940, are sales of the <i>private fund</i> beneficially comed by non-Unifed States porsons: Company Act of 1940, are sales of the <i>private fund</i> beneficially comed by non-Unifed States porsons: Company Act of 1940, are sales of the <i>private fund</i> beneficially comed by non-Unifed States porsons: Company Act of 1940, are sales of the <i>private fund</i> beneficially comed by non-Unifed States porsons: Company Act of 1940, are sales of the <i>private fund</i> beneficially comed by non-Unifed States porsons:			Yes	No
<ul> <li>O hedge fund <sup>O</sup> liquidity fund <sup>O</sup> private equity fund <sup>O</sup> real estate fund <sup>O</sup> securitized asset fund <sup>O</sup> venture capital fund <sup>O</sup> Other <i>private fund</i>: NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.</li> <li>Current gross asset value of the <i>private fund</i>: s 363,109,341</li> <li><b>Ownership</b></li> <li>Minimul investment commitment required of an investor in the <i>private fund</i>: s 250,000 NOTE: Report the amount routinely required of nevestors who are not your <i>related persons</i> (even it different from the amount set forth in the organizational documents of the <i>private fund</i>'s beneficial owners: 10</li> <li>Approximate number of the <i>private fund</i>'s beneficial owners: 13</li> <li>(a) What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i>: 13%</li> <li>(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 <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> </ul>	9.		0	o
NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.         11. Current gross asset value of the private fund:         \$ 363,109,341         Ownership         12. Minimum Investment commitment required of an investor in the private fund:         \$ 250,000         NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund).         13. Approximate number of the private fund's beneficial owners:         10         14. What is the approximate percentage of the private fund beneficially owned by you and your related persons:         10%         (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment         (c)         (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment         (c)         (d) What is the approximate percentage of the private fund beneficially owned by non-United States persons:         10%         (e) What is the approximate percentage of the private fund beneficially owned by non-United States persons:         10%         Year Advisory Services         Year Advisory Services         Year No         (f) (a) Are you a subadviser to this private fund?	10.	What type of fund is the private fund?		
<ul> <li>11. Current gross asset value of the <i>private fund</i>: \$ 363,109,341</li> <li>Ownership</li> <li>12. Minimum investment commitment required of an investor in the <i>private fund</i>: \$ 250,000 NOTE: Report the amount routinely required of investors who are not your <i>rolated persons</i> (even if different from the amount set forth in the organizational documents of the <i>private fund's</i> beneficial owners: 10</li> <li>13. Approximate number of the <i>private fund's</i> beneficial owners: 10</li> <li>14. What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>rolated persons</i>: 19%</li> <li>(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 10%</li> <li>(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 <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>(b) What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>(c) What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>(d) What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>(e) (a) Are you a subadviser to this <i>private fund</i></li> </ul>		O hedge fund O liquidity fund O private equity fund O real estate fund ⊙ securitized asset fund O venture capital fund O Other privat	te fun	d:
s 363,109,341  Coursership  12. Minimum investment commitment required of an investor in the <i>private fund</i> : s 250,000 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: 10  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: 10%  16. What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 10%  16. What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 10%  17. (a) Are you a subadviser to this <i>private fund</i> ?   5. (a) Are you a subadviser to this <i>private fund</i> ?		NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
<ul> <li>12. Minimum investment commitment required of an investor in the <i>private fund</i>:</li> <li>\$ 250,000 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).</li> <li>13. Approximate number of the <i>private fund</i>'s beneficial owners:</li> <li>10</li> <li>14. What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i>:</li> <li>1%</li> <li>15. (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:</li> <li>10%</li> <li>Yes No</li> <li>(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 <i>private fund</i> beneficially owned by non-United States persons:</li> <li>10%</li> <li>Your Advisory Services</li> <li>Yes No</li> <li>17. (a) Are you a subadviser to this <i>private fund</i>?</li> </ul>	11.			
<ul> <li>\$ 250,000 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).</li> <li>13. Approximate number of the <i>private fund's</i> beneficial owners: 10</li> <li>14. What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i>: 1%</li> <li>15. (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 10%</li> <li>(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 <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>20</li> &lt;</ul>	<u>Ow</u>	nership		
<ul> <li>organizational documents of the fund).</li> <li>Approximate number of the <i>private fund</i>'s beneficial owners: 10</li> <li>What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i>: 1%</li> <li>(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 10%</li> <li>(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 <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>Your Advisory Services</li> <li>Yes No</li> <li>(a) Are you a subadviser to this <i>private fund</i>?</li> </ul>	12.			
<ul> <li>10</li> <li>14. What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i>: 1%</li> <li>15. (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 10%</li> <li>(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment of understand the private of 1940, are sales of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>16. What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>17. (a) Are you a subadviser to this <i>private fund</i>?</li> </ul>				
1%         15. (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:         10%         (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment         (b) If the private fund qualifies of the fund limited to <i>qualified clients</i> ?         16. What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :         10%         Your Advisory Services         Yes         17. (a) Are you a subadviser to this <i>private fund</i> ?	13.			
10%       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       •       •         16. What is the approximate percentage of the private fund beneficially owned by non-United States persons:       •       •       •         10%       Your Advisory Services       Yes       No       •       •       •         17. (a) Are you a subadviser to this private fund?       •       •       •       •       •       •	14.			
<ul> <li>(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>?</li> <li>16. What is the approximate percentage of the <i>private fund</i> beneficially owned by non-<i>United States persons</i>: 10%</li> <li>Your Advisory Services</li> <li>17. (a) Are you a subadviser to this <i>private fund</i>?</li> </ul>	15.			
10%         Your Advisory Services         Yes         17. (a) Are you a subadviser to this private fund?				_
Yes No         17. (a) Are you a subadviser to this private fund?         O	16.			
17. (a) Are you a subadviser to this <i>private fund</i> ?	<u>Yoı</u>	<u>ur Advisory Services</u>		
	17	(a) Are you a subadvisor to this private fund	_	_
	17.			O

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

 $\odot$ 

0

	to question rollar in the reave this question blank.		
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
<u>Pri</u>	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?	$\odot$	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		

#### B. SERVICE PROVIDERS

#### **Auditors**

	Yes No
23. (a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	0 0
(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with	U.S. GAAP? O 💿

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

No	Information Filed	

		Yes	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	0

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

○ Yes ○ No ○ Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

#### Prime Broker

		Yes	; N	lo
24. (a	) Does the <i>private fund</i> use one or more prime brokers?	0	¢	•
If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fu</i> <i>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.		e priva	ate	

No Information Filed

#### Custodian

Yes No
 25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?
 If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

Additional Custodian Information : 1 Record(s) Filed.

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

(b) Legal name of custodian:

	DEUTSCHE BANK TRUST CO	MPANY AMERICAS		
	(c) Primary business name of c DEUTSCHE BANK TRUST CO			
	(d) The location of the custodia	n's office responsible for <i>custody</i> c	of the <i>private fund's</i> assets (city, state and country):	
	City:	State:	Country: United States	
	SANTA ANA	California	United States	Yes No
	(e) Is the custodian a <i>related p</i>	erson of your firm?		0 ⊙
	(f) If the custodian is a broker	dealer, provide its SEC registration	n number (if any):	
	CRD Number (if any):			
	(g) If the custodian is not a bro <i>identifier</i> (if any)	oker-dealer, or is a broker-dealer k	out does not have an SEC registration number, provide its <i>lega</i>	al entity
<u>Admini</u>	<u>strator</u>			Yes No
26. (a)	Does the <i>private fund</i> use an adm	inistrator other than your firm?		• •
	• • • •	s "yes," respond to questions (b) t ugh (f) separately for each adminis	through (f) below. If the <i>private fund</i> uses more than one adm strator.	
	Additional Administrator Inform	nation : 1 Record(s) Filed.		
		) is "yes," respond to questions (b) te questions (b) through (f) separa	) through (f) below. If the <i>private fund</i> uses more than one ately for each administrator.	
	(c) Location of administrator (c	ity, state and country):		
	City:	State:	Country:	
	GEORGE TOWN		Cayman Islands	
	(d) Is the administrator a relate	ed person of your firm?		Yes No
	•	•	atements to the <i>private fund's</i> investors? but not all investors) <sub>()</sub> No (provided to no investors)	
	investors? If investor accou	int statements are not sent to the	s the investor account statements to the (rest of the) <i>private</i> (rest of the) <i>private fund's</i> investors, respond "not applicable. 'S WEBSITE AND ARE ACCESSIBLE BY INVESTORS.	
you 100 Inc rele allo	ur <i>related person</i> ? 0% Clude only those assets where (i) su evant quotes, and (ii) the valuation ocations) was the valuation determ	uch <i>person</i> carried out the valuation in used for purposes of investor sub	s (by value) was valued by a <i>person</i> , such as an administrator on procedure established for that asset, if any, including obtair oscriptions, redemptions or distributions, and fee calculations	ning any
<u>Market</u>	<u>ers</u>			Yes No
28. (a)	Does the private fund use the serve	vices of someone other than you o	or your employees for marketing purposes?	0 0
	You must answer "yes" whether	the <i>person</i> acts as a placement age	ent, consultant, finder, introducer, municipal advisor or other s	solicitor, or

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

A. P	PRIVATE FUND		
Info	ormation About the Private Fund		
1.	<ul> <li>(a) Name of the <i>private fund</i>: MOUNTAIN VIEW CLO 2014-1 LTD.</li> <li>(b) <i>Private fund</i> identification number: (include the "805-" prefix also) 805-9863282844</li> </ul>		
2.	Under the laws of what state or country is the <i>private fund</i> organized: State: Country: Cayman Islands		
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		
	LAURA CHISOLM WENDY EBANKS		_
	(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. 5.	<ul> <li>The <i>private fund</i> (check all that apply; you must check at least one):</li> <li>□ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>☑ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.</li> </ul>		
	No Information Filed		
6.	<ul> <li>(a) Is this a "master fund" in a master-feeder arrangement?</li> <li>(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>?</li> </ul>	Yes I	No ©
	No Information Filed		
		Yes	No
	<ul> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(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>:</li> </ul>		•
	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.	on 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), the feeder funds answer the following questions:	for 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 of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued

multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

Yes No

8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	$\odot$
	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?		
	○ hedge fund ○ liquidity fund ○ private equity fund ○ real estate fund ⊙ securitized asset fund ○ venture capital fund ○ Other priva	te fur	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> : \$ 1,823,829		
<u>Ow</u>	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).	5	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 10		
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: 10%		
	(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	No O
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 10%		
<u>Yoı</u>	ur Advisory Services		
		Yes	s No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	$\odot$
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	to	
	No Information Filed		
		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 private fund?	0	$\odot$
	(b) If the answer to question 18. (a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18. (a) is "no," leave this question blank.	answ	/er
	No Information Filed		
4.0		Yes	s No
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	$\odot$
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
<u>Priv</u>	vate Offering		
0.1		Yes	s No

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

 $<sup>\</sup>circ$   $\circ$ 

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

No	Information	Filed

# B. SERVICE PROVIDERS

#### P

Auditors		
	Yes	No
23. (a) (1) Are the private fund's financial statements subject to an annual audit?	0	$\odot$
(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	$\odot$

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

No Information Filed

			Yes N	lo
(g	(g) Are the <i>private fund's</i> audited financial statements for the most recently cor investors?	npleted fiscal year distributed to the <i>private fund's</i>	0	D
(۲	(h) Do all of the reports prepared by the auditing firm for the private fund since	your last annual updating amendment contain unqualifie	ed opinions?	
	O 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 repo	ort is available	<u>)</u>
<u>Prime</u>	me Broker		Yes N	
24. (a	(a) Does the <i>private fund</i> use one or more prime brokers?		O (	
	If the answer to question 24.(a) is "yes," respond to questions (b) through <i>fund</i> uses more than one prime broker, you must complete questions (b) th	•	_	
	No Information	on Filed		
Custo	stodian			
			Yes N	lo
25. (a	. (a) Does the <i>private fund</i> 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 uses more than one custodian, you must complete questions (b) through (		he private fur	ıd
	Additional Custodian Information : 1 Record(s) Filed.			
	If the answer to question 25.(a) is "yes," respond to questions (b) throug fund uses more than one custodian, you must complete questions (b) thr (b) Legal name of custodian:		the <i>private</i>	
	DEUTSCHE BANK TRUST COMPANY AMERICAS			
	(c) Primary business name of custodian: DEUTSCHE BANK TRUST COMPANY AMERICAS			
	(d) The location of the custodian's office responsible for <i>custody</i> of the <i>p</i>	ivate fund's assets (city, state and country):		
	City: State:	Country:		
	SANTA ANA California	United States	Yes No	
	(e) Is the custodian a <i>related person</i> of your firm?		C ⊙	
	(f) If the custodian is a broker-dealer, provide its SEC registration numb	er (if any):		
	- CRD Number (if any):			
				11

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

## Administrator

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

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

Additional Administrator Information : 1 Record(s) Filed.

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

(b) Name of administrator: MAPLESFS LIMITED

(c) Location of administrator (city, state and country):

City:	State:	Country:
GEORGE TOWN		Cayman Islands

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

(e) Does the administrator prepare and send investor account statements to the *private fund's* investors?

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 investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."
   MONTHLY REPORTS ARE POSTED ON THE INDENTURE TRUSTEE'S WEBSITE AND ARE ACCESSIBLE BY INVESTORS.
- 27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

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

#### **Marketers**

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

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

No Information Filed

A. PRIVATE FUND

Information About the Private Fund

- 1. (a) Name of the *private fund*: MOUNTAIN VIEW CLO 2017-2
  - (b) Private fund identification number: (include the "805-" prefix also) 805-9804615546

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Yes No

0



⊙ ○

Yes No

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2.	Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country:		
	Cayman Islands		
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):		
J.	Name of General Partner, Manager, Trustee, or Director		
	STACY BODDEN	_	
	WENDY EBANKS		
	(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 <i>private fund</i> (check all that apply; you must check at least one):		
	<ul> <li>(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> </ul>		
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the investment company Act of 1940		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
0.	No Information Filed		
,		es	No
6.		0	$\odot$
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?		
	No Information Filed		
		es	No
		0	$\odot$
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?		
	Name of <i>private fund</i> :		
	Private fund identification number:		
	(include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.E	3.(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 the feeder funds answer the following questions:	ach	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 iss		
	multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	ueu	J
		es	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	$\odot$
	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	0
	Y	es	No
9.	During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment	0	$\odot$
	Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	2	e
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 💿 securitized asset fund O venture capital fund O Other private a	func	d:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		

11.	Current gross asset value of the private fund:
	\$ 366,781,422

# <u>Ownership</u>

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

\$ 250,000

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

- 13. Approximate number of the *private fund's* beneficial owners:
  - 3
- 14. What is the approximate percentage of the private fund beneficially owned by you and your related persons: 0%
- 15. (a) What is the approximate percentage of the private fund 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  $^{\circ}$ 0 Company Act of 1940, are sales of the fund limited to qualified clients?

Yes No

Yes No

 $\mathbf{O}$ 

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Yes No

0

 $^{\circ}$ 

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16. What is the approximate percentage of the private fund beneficially owned by non-United States persons: 10%

# Your Advisory Services 17. (a) Are you a subadviser to this private fund? (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer to

- question 17.(a) is "no," leave this question blank. No Information Filed
- Yes No 18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?  $^{\circ}$ 
  - (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the private fund. If the answer to question 18.(a) is "no," leave this question blank.

		No Information Filed		
			Yes	No
19.	Are y	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
	Appr 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	vate C	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?	$\odot$	0
22.	lf ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		

# **B. SERVICE PROVIDERS**

# **Auditors**

- 23. (a) (1) Are the private fund'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 private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

No Information F	iled
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				Yes No
(g)	Are the <i>private fund's</i> audited financial statements for investors?	the most recently completed fisc	al year distributed to the private fund's	0 0
(h)	Do all of the reports prepared by the auditing firm for	the private fund since your last a	nnual updating amendment contain unqualified	d opinions?
	O Yes O No O Report Not Yet Received			
	If you check "Report Not Yet Received," you must prom	otly file an amendment to your For	m ADV to update your response when the repor	rt is available.
<u>Prime E</u>	Broker			Yes No
24. (a)	Does the private fund use one or more prime brokers?			0 0
	If the answer to question 24.(a) is "yes," respond to <i>fund</i> uses more than one prime broker, you must com			the <i>private</i>
		No Information Filed		
<u>Custodi</u>	an			
				Yes No
25. (a)	Does the <i>private fund</i> use any custodians (including th	•		
	If the answer to question 25. (a) is "yes," respond to uses more than one custodian, you must complete qu			e private rund
	Additional Custodian Information : 1 Record(s) File	ed.		
	<ul> <li>fund uses more than one custodian, you must comp</li> <li>(b) Legal name of custodian: THE BANK OF NEW YORK MELLON TRUST COMPA</li> <li>(c) Primary business name of custodian:</li> </ul>		Parately for each custodian.	
	THE BANK OF NEW YORK MELLON			
	(d) The location of the custodian's office responsible	e for <i>custody</i> of the <i>private fund's</i>		
	City: State: PITTSBURGH Pennsy	vlvania	Country: United States	
	-			Yes No
	(e) Is the custodian a <i>related person</i> of your firm?			00
	(f) If the custodian is a broker-dealer, provide its S	SEC registration number (if any):		
	CRD Number (if any):			
	(g) If the custodian is not a broker-dealer, or is a k <i>identifier</i> (if any)	proker-dealer but does not have a	an SEC registration number, provide its <i>legal</i> e	entity
<u>Adminis</u>	strator			Yes No
26. (a)	Does the private fund use an administrator other than	your firm?		• 0
	If the answer to question 26.(a) is "yes," respond to must complete questions (b) through (f) separately for		If the <i>private fund</i> uses more than one admini	~ ~

Additional Administrator Information : 1 Record(s) Filed.

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

	administrator, you must complete questions (b) through (f) separately for each administrator.	
	(b) Name of administrator:	
	MAPLESFS LIMITED	
	(c) Location of administrator (city, state and country): City: State: Country:	
	City:     State:     Country:       GEORGE TOWN     Cayman Islands	
	Ye	es No
	(d) Is the administrator a <i>related person</i> of your firm?	$\odot$
	(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?	
	O Yes (provided to all investors) O Some (provided to some but not all investors) O No (provided to no investors)	
	(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's	
	investors? If investor account statements are not sent to the (rest of the) <i>private fund's</i> investors, respond "not applicable."	
	MONTHLY REPORTS ARE POSTED ON THE INDENTURE TRUSTEE'S WEBSITE AND ARE ACCESSIBLE BY INVESTORS.	
	During your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as an administrator, that your <i>related person</i> ? 00% nclude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including obtaining a elevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (includ illocations) was the valuation determined by such <i>person</i> .	ny
<u>Mar</u>	<u>eters</u>	Voc No
28.	a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	Yes No
	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.	r, or
	No Information Filed	
A. PR	VATE FUND	
<u>I nfor</u>	nation About the Private Fund	
1.	a) Name of the <i>private fund</i> :	
	MOUNTAIN VIEW CLO IX LTD.	
	b) Private fund identification number:	
	(include the "805-" prefix also) 805-8661120712	
2.	Inder the laws of what state or country is the private fund organized:	
2.	State: Country:	
2.		
	State: Country:	
	State: Country: Cayman Islands	
	State:       Country: Cayman Islands         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         KAREN PERKINS	
	State:       Country: Cayman Islands         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	
	State: Country: Cayman Islands 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 KAREN PERKINS WENDY EBANKS	
	State:       Country: Cayman Islands         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 Directors         KAREN PERKINS         WENDY EBANKS         b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.	
	State: Country: Cayman Islands 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 KAREN PERKINS WENDY EBANKS	

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

	<ul> <li>(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> </ul>		
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 N	o
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0 0	0
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed		
	(c) Is this a "feeder fund" in a master-feeder arrangement?	Yes N	
	(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 0	9
	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)	
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 o	f
	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 i multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0.6	
	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 private fund invest in funds managed by you or by a related person?	0 0	0
0		Yes N	
9.	During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0 0	Ð
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 privat	e 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> : \$ 543,322,996		
<u>Ov</u>	<u>/nership</u>		
12.	Minimum investment commitment required of an investor in the private fund:		
	\$ 250,000		
	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 t	he <i>private fund's</i> beneficial owners:

10

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

15.	(a) 10%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: %		
			Yes	No
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	Wh 109	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : %		
Υοι	ur Ac	dvisory Services		
17	(a)	Are you a subadviser to this private fund?	Yes	-
17.		If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	C to	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	$\odot$
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank.	answ	er
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Арр	proximately what percentage of your clients has invested in the private fund?		
	0%			
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?	$\odot$	0
22.	lf y	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
B. S	ERVI	CE PROVIDERS		
Auc	ditor	S		
			Yes	No
23.	(a)	(1) Are the private fund's financial statements subject to an annual audit?	0	$\odot$
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	$\odot$
		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.	រ firm	,
		No Information Filed		
		Are the private fund's sudited financial statements for the most recently completed final year distributed to the universe for the	Yes	
	(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	0
	(h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified op	inions	\$?
		O Yes O No O Report Not Yet Received		
		If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is	availa	ble.
<u>Prir</u>	me E	Broker		
<b>ე</b> ∦	(a)	Doos the private funduse one or more prime brakers?		No
∠4.	(a)	Does the <i>private fund</i> use one or more prime brokers?	0	$\odot$

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private

fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker

		No Info	rmation Filed	
<u>dian</u>				
) Doos the p	rivato fund uso any cust	odians (including the prime brokers	listed above) to hold some or all of its assets?	Yes
If the answ	er to question 25.(a) is	s "yes," respond to questions (b) the	rough (g) below for each custodian the <i>private fund</i> u ugh (g) separately for each custodian.	• uses. If the <i>private</i>
Additional	Custodian Informatio	n : 1 Record(s) Filed.		
fund uses (b) Legal			through g) below for each custodian the <i>private func</i> b) through (g) separately for each custodian.	uses. If the <i>privat</i>
	ary business name of cu ANK, N.A.	ustodian:		
(d) The l	ocation of the custodia	n's office responsible for <i>custody</i> of	the <i>private fund's</i> assets (city, state and country):	
City: NEW	YORK	State: New York	Country: United States	
(e) Is the	e custodian a <i>related p</i> e	erson of your firm?		Yes
(f) If the	e custodian is a broker-	dealer, provide its SEC registration i	number (if any):	
CRD I	Number (if any):			
(a) If the	austadian is not a bra	kar daalar, ar is a broker daalar bu	t does not have an SEC registration number, provide	its logal optity

#### **Administrator**

$\gamma$	(_)	Deee the	a multicata filmadilia		o duna indiction to r	0 + kn 0 m	+	VICING floor	
2n	(a)	DOPS IN	e <i>private fund</i> use	i an	aoministrator	OTHEL	Inan		
20.	(4)	D000 th	o privato rana asc	, an	aanningtrator	011101	triari	yoon 111111	

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.

Yes No  $\odot$   $\circ$ 

	"yes," respond to questions (b) th questions (b) through (f) separate	rough (f) below. If the <i>private fund</i> uses mor y for each administrator.	re than one
b) Name of administrator:			
MAPLESFS LIMITED			
a) Lagatian of administrator (situ	, state and country):		
c) Location of administrator (city,	5.		
City:	State:	Country:	
	•	Country: Cayman Islands	
City:	•	5	Yes No

- (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable." MONTHLY REPORTS ARE POSTED ON THE INDENTURE TRUSTEE'S WEBSITE AND ARE ACCESSIBLE BY INVESTORS.
- 27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

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

#### Marketers

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

Yes No

Yes No

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 $\mathbf{O}$ 

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

No Information Filed

#### A. PRIVATE FUND

#### Information About the Private Fund

- 1. (a) Name of the *private fund*: MOUNTAIN VIEW CLO X LTD.
  - (b) *Private fund* identification number: (include the "805-" prefix also) 805-2587762335
- Under the laws of what state or country is the *private fund* organized: State: Country: Cayman Islands

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 KAREN PERKINS

WENDY EBANKS

(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?	$\circ$ $\circ$
	(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 "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests? Name of *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 all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	$\odot$
	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 private fund invest in funds managed by you or by a related person?	0	$\circ$
		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	O
10.	What type of fund is the private fund?		
	O hedge fund O liquidity fund O private equity fund O real estate fund ⊙ securitized asset fund O venture capital fund O Other privat	e fun	d:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the private fund:		
	\$ 1,432,746		
<u> </u>	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 10		
11	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
14.	0%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 10%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 10%		
Υοι	Ir Advisory Services		

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

Yes No

 $\circ$   $\circ$ 

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

		question 17.(a) is "no," leave this question blank.		
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	$\odot$
		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.	answe	er
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
	App 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	ate	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?	$\odot$	0
22.	lf y€	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
3 SF	RVI	CE PROVIDERS		
51 02				
<u>Audi</u>	itors		Yes	No
23.	(a)	(1) Are the private fund's 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?	0	õ
		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.	l firm	,
		No Information Filed		
			Vaa	Ne
	(a)	Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's	Yes	
		investors?	0	0
	(h)	Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified op	nions	?
		O Yes O No O Report Not Yet Received		
		If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is	availai	ble.
<u>Prim</u>	ne B	roker		
~ (			Yes	No
24.		Does the <i>private fund</i> use one or more prime brokers?	0	$\odot$
		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>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	priva	te
		No Information Filed		
Cust	odia	an		
			Yes	No
25.	(a)	Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?	$\odot$	$\circ$
		If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	vate f	fund

Additional Custodian Information : 1 Record(s) Filed.

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

Primary business name of cust	todian:		
CITIBANK, N.A.			
The location of the custodian's	s office responsible for <i>custody</i> of th	ne private fund's assets (city, state and country):	
City: NEW YORK	State: New York	Country: United States	
			١
s the custodian a related pers	son of your firm?		(
f the custodian is a broker-de	aler, provide its SEC registration nu	umber (if any):	
CRD Number (if any):			
	r-dealer, or is a broker-dealer but	does not have an SEC registration number, provide its $l\epsilon$	egal entit
	•	rugh (f) below. If the <i>private fund</i> uses more than one ad Itor.	Iministra
answer to question 26.(a) is " omplete questions (b) through onal Administrator Informat e answer to question 26.(a) is nistrator, you must complete	yes," respond to questions (b) thro h (f) separately for each administra ion : 1 Record(s) Filed.	rough (f) below. If the <i>private fund</i> uses more than one	Iministra
answer to question 26.(a) is "yoomplete questions (b) through onal Administrator Informat e answer to question 26.(a) is	yes," respond to questions (b) thro h (f) separately for each administra tion : 1 Record(s) Filed.	rough (f) below. If the <i>private fund</i> uses more than one	Iministra
answer to question 26.(a) is " omplete questions (b) through onal Administrator Informat e answer to question 26.(a) is nistrator, you must complete Name of administrator: MAPLESFS LIMITED	yes," respond to questions (b) thro h (f) separately for each administra ion : 1 Record(s) Filed. "yes," respond to questions (b) th questions (b) through (f) separatel	rough (f) below. If the <i>private fund</i> uses more than one y for each administrator.	Iministra
answer to question 26.(a) is " omplete questions (b) through onal Administrator Informat e answer to question 26.(a) is nistrator, you must complete Name of administrator: MAPLESFS LIMITED	yes," respond to questions (b) thro h (f) separately for each administra tion : <b>1 Record(s) Filed</b> .	rough (f) below. If the <i>private fund</i> uses more than one	Iministra
answer to question 26.(a) is " omplete questions (b) through onal Administrator Informat e answer to question 26.(a) is nistrator, you must complete Name of administrator: MAPLESFS LIMITED Location of administrator (city, City: GEORGE TOWN	yes," respond to questions (b) thro h (f) separately for each administra ion : 1 Record(s) Filed. "yes," respond to questions (b) th questions (b) through (f) separatel , state and country): State:	rough (f) below. If the <i>private fund</i> uses more than one y for each administrator. Country:	
answer to question 26.(a) is " omplete questions (b) through onal Administrator Informat e answer to question 26.(a) is nistrator, you must complete Name of administrator: MAPLESFS LIMITED Location of administrator (city, City:	yes," respond to questions (b) thro h (f) separately for each administra ion : 1 Record(s) Filed. "yes," respond to questions (b) th questions (b) through (f) separatel , state and country): State:	rough (f) below. If the <i>private fund</i> uses more than one y for each administrator. Country:	
answer to question 26. (a) is " omplete questions (b) through onal Administrator Informat e answer to question 26. (a) is nistrator, you must complete Name of administrator: MAPLESFS LIMITED Location of administrator (city, City: GEORGE TOWN s the administrator a <i>related</i> p Does the administrator prepar	yes," respond to questions (b) thro h (f) separately for each administra ion : 1 Record(s) Filed. "yes," respond to questions (b) th questions (b) through (f) separatel , state and country): State: person of your firm? re and send investor account state	rough (f) below. If the <i>private fund</i> uses more than one y for each administrator. Country:	Ye
	The location of the custodian's City: NEW YORK s the custodian a <i>related pers</i> f the custodian is a broker-de CRD Number (if any):	The location of the custodian's office responsible for <i>custody</i> of the City: State: NEW YORK New York s the custodian a <i>related person</i> of your firm? f the custodian is a broker-dealer, provide its SEC registration nu CRD Number (if any): f the custodian is not a broker-dealer, or is a broker-dealer but	The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country): City: State: Country: NEW YORK New York United States s the custodian a <i>related person</i> of your firm? f the custodian is a broker-dealer, provide its SEC registration number (if any): CRD Number (if any): f the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>le</i>

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

## **Marketers**

	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 t</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.	
	No Information Filed	
A. PI	RIVATE FUND	
<u>Info</u>	rmation About the Private Fund	
1.	(a) Name of the <i>private fund</i> :	
	MOUNTAIN VIEW CLO XIV LTD.	
	(b) <i>Private fund</i> identification number: (include the "805-" prefix also)	
	805-7894808639	
2.	Under the laws of what state or country is the <i>private fund</i> organized:	
	State: Country:	
	Cayman Islands	
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	
	STACY BODDEN	
	WENDY EBANKS	
	(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.	<ul> <li>The private fund (check all that apply; you must check at least one):</li> <li>(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> </ul>	
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.	
	No Information Filed	
		Yes No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	00
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?	
	No Information Filed	
		Yes No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0 0
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :	
	<i>Private fund</i> 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 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), 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.		
		Yes	No
8.	<ul> <li>(a) Is this <i>private fund</i> a "fund of funds"?</li> <li>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.</li> </ul>		o
	(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> ?		
	$^{\circ}$ hedge fund $^{\circ}$ liquidity fund $^{\circ}$ private equity fund $^{\circ}$ real estate fund $^{\circ}$ securitized asset fund $^{\circ}$ venture capital fund $^{\circ}$ Other priva	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> : \$ 411,784,597		
<u>0w</u>	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :		
	\$ 250,000 NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).	ý	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 10		
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: 10%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 10%		
Υοι	ur Advisory Services		
		Yes	No
17.	(a) Are you a subadviser to this private fund?	0	$\odot$
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	to	
	No Information Filed		
10	(a) Do any investment of viscos (ather the investment of viscos listed in Section 7 $P_{i}(1) \wedge 2_{i}(b)$ ) of viscostic private function	Yes	
18.	<ul> <li>(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>?</li> <li>(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.</li> </ul>	O answ	© er
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		

20. Approximately what percentage of your *clients* has invested in the *private fund*?0%

## Private Offering

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

Yes No

 $\odot$   $\circ$ 

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

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

No Information Filed

#### **B. SERVICE PROVIDERS**

## Auditors

	Yes	INO	
23. (a) (1) Are the private fund's financial statements subject to an annual audit?	0	$\odot$	
(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	$\odot$	
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 au	diting firm,		

No Information Filed Yes No (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's 0 0 investors? (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions? ○ Yes ○ No ○ Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available. Prime Broker Yes No 24. (a) Does the *private fund* use one or more prime brokers? 0  $\odot$ If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker. No Information Filed Custodian Yes No 25. (a) Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?  $\odot$ 0 If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information : 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: CITIBANK, N.A. (c) Primary business name of custodian: CITIBANK, N.A. (d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country): Citv: State: Country: NEW YORK United States New York

(f)	If the custodian is a broke	r-dealer, provide its SE	EC registration number	(if any):
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CRD Number (if any):

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

#### **Administrator**

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

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

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 administrator, you must complete questions (b) through (f) separately for each administrator.				
(	b) Name of administrator: MAPLESFS LIMITED			
(0	c) Location of administrator (city, s	state and country):		
	City:	State:	Country:	
	GEORGE TOWN		Cayman Islands	
6	d) Is the administrator a <i>related pe</i>	erson of your firm?		Yes No
				0.0
(1	<ul> <li>f) If the answer to question 26. (e investors? If investor account s</li> </ul>	) is "no" or "some," who sends t tatements are not sent to the (re	not all investors) No (provided to no invest ne investor account statements to the (rest of est of the) <i>private fund's</i> investors, respond "n WEBSITE AND ARE ACCESSIBLE BY INVESTORS	f the) <i>private fund's</i> ot applicable."
our <i>re</i> . 00% nclude elevan	e only those assets where (i) such p	<i>person</i> carried out the valuation person carried out the valuation performed for purposes of investor subsc	by value) was valued by a <i>person</i> , such as an a procedure established for that asset, if any, inc riptions, redemptions or distributions, and fee	cluding obtaining any
eters				
a) Dou	es the <i>nrivate fund</i> use the services	of someone other than you or y	our <i>employees</i> for marketing purposes?	Yes
	es the private rand use the set vices	si someone other than you or y	our employees for marketing purposes!	0
Vo	I must answer "yes" whether the	parcon acts as a placomont acont	, consultant, finder, introducer, municipal advi	isor or other solicitor or

No Information Filed

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

# A. PRIVATE FUND

# Information About the Private Fund

- 1. (a) Name of the *private fund*: MOUNTAIN VIEW CLO XV LTD.
  - (b) *Private fund* identification number:

	(include the "805-" prefix also)		
	805-9818009602		
2.	Under the laws of what state or country is the private fund organized:		
	State: Country:		
	Cayman Islands		
_			
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		
	STACY BODDEN		
	WENDY EBANKS		
	(b) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> .		
	No Information Filed		
4.	The private fund (check all that apply; you must check at least one):		
	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company 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	$\odot$
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?	_	_
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	$\odot$
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?	$\sim$	e
	Name of <i>private fund</i> :		
	Private fund identification number:		
	(include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section	7.B.(	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	r oach	h of
7.	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 al 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.	13300	.u
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	•
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investmen		-
	vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.		
	(b) If yes, does the private fund invest in funds managed by you or by a related person?	0	0
		Yes	No
9.	During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment	_	
	Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	$\odot$

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	$^{ m O}$ hedge fund $^{ m O}$ liquidity fund $^{ m O}$ private equity fund $^{ m O}$ real estate fund $^{ m O}$ securitized asset fund $^{ m O}$ venture capital fund $^{ m O}$ Other <i>priv</i>	'ate fun	d:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 414,586,716		
Эw	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).	ıe	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 10		
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: 10%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
Υοι	ur Advisory Services		
17.	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	No
	<ul> <li>(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.</li> </ul>	~	e
	No Information Filed		
		Yes	No
18.	<ul> <li>(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>?</li> <li>(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.</li> </ul>	C e answ	© er
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
Priv	vate Offering		
21.	Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes ©	Ô
22.	If yes, provide the private fund's Form D file number (if any):		
	No Information Filed		
3. S	ERVICE PROVIDERS		
Auc	ditors		
23.	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	Yes	No O
2.			

(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 auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

#### No Information Filed

	Yes	s No
(g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?	0	0

(h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions?

○ Yes ○ No ○ Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

#### Prime Broker

24. (a) Does the *private fund* use one or more prime brokers?

Yes No

Yes No

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

No Information Filed

#### **Custodian**

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

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

#### Additional Custodian Information : 1 Record(s) Filed.

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

- (b) Legal name of custodian: US BANK, N.A.
- (c) Primary business name of custodian: US BANK NA

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

	City:	State:	Country:		
	CINCINATTI	Ohio	United States		
				Yes	No
(e)	Is the custodian a <i>related person</i> of your firm?			0	$\odot$
(f)	If the custodian is a broker-dealer, provide its	SEC registration number (i	f any):		
	-				
	CRD Number (if any):				

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

#### **Administrator**

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

0

 $\odot$ 

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.

	Add	itional Administrator Information	: 1 Record(s) Filed.		
		he answer to question 26.(a) is "ye ministrator, you must complete que		nrough (f) below. If the <i>private fund</i> use ly for each administrator.	s more than one
	(b)	Name of administrator: MAPLESFS LIMITED			
	(c)	Location of administrator (city, sta City:	ate and country): State:	Country:	
		GEORGE TOWN		Cayman Islands	Yes No
	(d)	Is the administrator a related pers	son of your firm?		00
	(e)			ements to the <i>private fund's</i> investors? not all investors)	) investors)
	(f)	investors? If investor account sta	tements are not sent to the (re	ne investor account statements to the ( est of the) <i>private fund's</i> investors, resp WEBSITE AND ARE ACCESSIBLE BY INVE	ond "not applicable."
yo 10 Ind rel	ur <i>relat</i> 0% clude o evant	ted person? only those assets where (i) such pe	<i>rson</i> carried out the valuation p for purposes of investor subscr	by value) was valued by a <i>person</i> , such procedure established for that asset, if a riptions, redemptions or distributions, a	any, including obtaining any
<u>Market</u>	ers				Yes No
28. (a)	You r simila	must answer "yes" whether the <i>pe</i> l ar <i>person</i> . If the answer to question	<i>rson</i> acts as a placement agent, 28.(a) is "yes," respond to que	our <i>employees</i> for marketing purposes? , consultant, finder, introducer, municip estions (b) through (g) below for each ete questions (b) through (g) separatel	al advisor or other solicitor, or such marketer the <i>private fund</i>
			No Inform	mation Filed	
A. PRIVA	ATE FUI	ND			
<u>Informa</u>	ation A	bout the Private Fund			
	MOUI <i>Priva</i> (inclu	e of the <i>private fund</i> : NTAIN VIEW CLO XVI LTD. <i>te fund</i> identification number: ude the "805-" prefix also) 7885004302			
2. Un	der the State	e laws of what state or country is t ::	he <i>private fund</i> organized: Country: Cayman Islands		
		e(s) of General Partner, Manager, T • General Partner, Manager, Trust	•	s serving in a similar capacity):	
		/INODKUMAR EBANKS			
VV					

(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):		
	<ul> <li>(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> </ul>		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes	No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	$\odot$
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?		
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	$\odot$
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		
	Private fund identification number: (include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section for the master-feeder arrangement or reporting on the funds separately.	ı 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), for the feeder funds answer the following questions:	or each	n 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 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.		d
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	$\odot$
	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.	ıt	
	(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 priva	ate fun	d:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 309,882,132		
<u>Ow</u>	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 250,000		

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13.	Арр 10	roximate number of the <i>private fund's</i> beneficial owners:		
14.	Wha 1%	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15.	(a) 10%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 6		
		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 Ö	No Õ
16.	Wha 10%	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 6		
<u>You</u>	ır Ad	lvisory Services		
47			Yes	No
17.		Are you a subadviser to this <i>private fund</i> ?	0	$\odot$
		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		
			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	$\odot$
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank.	answ	er
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$
	NOT	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	App 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	vate	Offering		
21.	Has	the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes ©	No O
22.	lf ye	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
B. SI	ERVI	CE PROVIDERS		
<u>Auc</u>	ditors	<u>S</u>		
			Yes	No
23.		(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	0	$\odot$
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	$\odot$
		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.	g firm	'
		No Information Filed		
				<b>.</b> .
	$(\alpha)$	Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's	Yes	
	.0.	investors?	0	0
	(h)	Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified op	inions	s?

# O Yes O No O Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

### Prime Broker

24. (a) Does the *private fund* 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 private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

# **Custodian**

25. (a) Does the private fund use any custodians (including the prime brokers listed above	to hold some or all of its assets?
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If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

•		through g) below for each custodian the <i>private fund</i> uses. (b) through (g) separately for each custodian.	If the p
(b) Legal name of custodian: CITIBANK, N.A.			
(c) Primary business name of c CITIBANK NA	ustodian:		
(d) The location of the custodia	in's office responsible for <i>custody</i> of	the <i>private fund's</i> assets (city, state and country):	
City:	State:	Country:	
NEW YORK	New York	United States	Y
(e) Is the custodian a <i>related p</i>	erson of vour firm?		c
,	5		
(f) If the custodian is a broker-	dealer, provide its SEC registration	number (if any):	
CRD Number (if any):			
identifier (if any)			
trator			
Does the <i>private fund</i> use an adm	-	rough (f) below. If the private funduses more than one add	ministrat
Does the <i>private fund</i> use an adm If the answer to question 26.(a) i	-	rrough (f) below. If the <i>private fund</i> uses more than one adr trator.	ministrat
Does the <i>private fund</i> use an adm If the answer to question 26.(a) i	s "yes," respond to questions (b) th ugh (f) separately for each administ		ministrat
Does the <i>private fund</i> use an adm If the answer to question 26.(a) i must complete questions (b) thro Additional Administrator Inform If the answer to question 26.(a)	s "yes," respond to questions (b) th ugh (f) separately for each administ nation : 1 Record(s) Filed.	trator. through (f) below. If the <i>private fund</i> uses more than one	ministrat
Does the <i>private fund</i> use an adm If the answer to question 26.(a) i must complete questions (b) thro Additional Administrator Inform If the answer to question 26.(a)	s "yes," respond to questions (b) th ugh (f) separately for each administ nation : 1 Record(s) Filed. ) is "yes," respond to questions (b)	trator. through (f) below. If the <i>private fund</i> uses more than one	ministrat
Does the <i>private fund</i> use an adm If the answer to question 26.(a) i must complete questions (b) thro Additional Administrator Inform If the answer to question 26.(a) administrator, you must complet	s "yes," respond to questions (b) th ugh (f) separately for each administ nation : 1 Record(s) Filed. ) is "yes," respond to questions (b)	trator. through (f) below. If the <i>private fund</i> uses more than one	ministrat
Does the <i>private fund</i> use an adm If the answer to question 26. (a) i must complete questions (b) thro Additional Administrator Inform If the answer to question 26. (a) administrator, you must complet (b) Name of administrator: MAPLESFS LIMITED	s "yes," respond to questions (b) th ugh (f) separately for each administ nation : 1 Record(s) Filed. ) is "yes," respond to questions (b) ete questions (b) through (f) separat	trator. through (f) below. If the <i>private fund</i> uses more than one	ministrat
Does the <i>private fund</i> use an adm If the answer to question 26.(a) i must complete questions (b) thro Additional Administrator Inform If the answer to question 26.(a) administrator, you must complete (b) Name of administrator:	s "yes," respond to questions (b) th ugh (f) separately for each administ nation : 1 Record(s) Filed. ) is "yes," respond to questions (b) ete questions (b) through (f) separat	trator. through (f) below. If the <i>private fund</i> uses more than one	ministrat

0  $\odot$ 

Yes No

• •

(e)	Does the administrator prepare and send investor account statements to the private fund's investors?
	• Yes (provided to all investors) • Some (provided to some but not all investors) • No (provided to no investors)

- (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."
   MONTHLY REPORTS ARE POSTED ON THE INDENTURE TRUSTEE'S WEBSITE AND ARE ACCESSIBLE BY INVESTORS.
- 27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

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

#### Marketers

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

Yes No

Yes No

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0

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

No Information Filed

#### A. PRIVATE FUND

#### Information About the Private Fund

- 1. (a) Name of the *private fund*: MOUNTAIN VIEW CLO XVII LTD
  - (b) *Private fund* identification number: (include the "805-" prefix also) 805-4245879554
- Under the laws of what state or country is the *private fund* organized: State:
   Country: Cayman Islands
  - -
- 3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

ANAND VINODKUMAR		ANAND VINODKUMAR	
WENDY FRANKS	VENDY EBANKS		
		WENDY EBANKS	

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

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

No Information Filed

		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	$\circ$	$\odot$
	(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 <i>private fund</i> :		
	<i>Private fund</i> 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 for the master-feeder arrangement or reporting on the funds separately.	7.B.( <sup>^</sup>	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:	each	ו 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 i multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	$\odot$
	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	0
		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	۲
10.	What type of fund is the private fund?		
	O hedge fund O liquidity fund O private equity fund O real estate fund ⊙ securitized asset fund O venture capital fund O Other privat	e fun	d:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the private fund:		
	\$ 307,115,081		
_			
<u>Ow</u>	inership		
12.	Minimum investment commitment required of an investor in the private fund:		
	\$ 250,000		
	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:		
	10		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
	1%		
15.	<ul> <li>(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:</li> <li>10%</li> </ul>		
		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 *private fund* beneficially owned by non-*United States persons*:10%

<u> Yoı</u>	ur Ao	dvisory Services		
			Yes	No
17.		Are you a subadviser to this private fund?	$\circ$	$\odot$
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	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 private fund?	$\circ$	$\odot$
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the a to question 18.(a) is "no," leave this question blank.	nsw	эr
		No Information Filed		
			Yes	No
19.	Are	e your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\circ$	$\odot$
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Арр 0%	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Det		Offering		
Priv	vate	Offering	Yes	No
21.	Has	s the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	o	0
22.	lf y	ves, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
	ERVI <u>ditor</u>	ice providers		
			Yes	No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	0	$\odot$
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	$\odot$
		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.	firm	'
		No Information Filed		
			Yes	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	0
	(h)	Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opi	nions	?
		O Yes O No O Report Not Yet Received		
		If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is a	vaila	ble.
<u>Pri</u> i	me E	Broker		
			Yes	No
24.	(a)	Does the <i>private fund</i> use one or more prime brokers?	0	$\odot$
		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>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	priva	te

No Information Filed

# <u>Custodian</u>

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

 $\odot$   $\circ$ 

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

	the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> use Ind uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	es. If the $\mu$
(b)	Legal name of custodian: THE BANK OF NEW YORK MELLON CORPORATION	
(c)	Primary business name of custodian: THE BANK OF NEW YORK MELLON CORPORATION	
(d)	The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country):	
	City:State:Country:NEW YORKNew YorkUnited States	
		Ņ
(e)	Is the custodian a <i>related person</i> of your firm?	1
(f)	If the custodian is a broker-dealer, provide its SEC registration number (if any):	
	- CRD Number (if any):	
(g)	If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>identifier</i> (if any)	legal entit
f the	<b>r</b> the <i>private fund</i> use an administrator other than your firm? e 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 complete questions (b) through (f) separately for each administrator.	administra
oes f the nust	the <i>private fund</i> use an administrator other than your firm? e 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	administra
)oes f the nust <b>Addi</b> If th	the <i>private fund</i> use an administrator other than your firm? e 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 complete questions (b) through (f) separately for each administrator.	
Does f the nust <b>Addi</b> If th adn	<ul> <li>the <i>private fund</i> use an administrator other than your firm?</li> <li>e 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 complete questions (b) through (f) separately for each administrator.</li> <li>itional Administrator Information : 1 Record(s) Filed.</li> </ul>	
)oes f the nust <b>Addi</b> If th adn (b)	<ul> <li>the <i>private fund</i> use an administrator other than your firm?</li> <li>a 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 complete questions (b) through (f) separately for each administrator.</li> <li><b>itional Administrator Information : 1 Record(s) Filed.</b></li> <li>the answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than on ministrator, you must complete questions (b) through (f) separately for each administrator.</li> <li>Name of administrator:</li> </ul>	
)oes f the nust <b>Addi</b> If th adn (b)	the private fund use an administrator other than your firm? a answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one a complete questions (b) through (f) separately for each administrator. itional 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 on ministrator, you must complete questions (b) through (f) separately for each administrator. Name of administrator: MAPLESFS LIMITED Location of administrator (city, state and country): City: State: Country:	
)oes f the nust <b>Addi</b> If th adn (b)	<ul> <li>the <i>private fund</i> use an administrator other than your firm?</li> <li>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 complete questions (b) through (f) separately for each administrator.</li> <li>itional Administrator Information : 1 Record(s) Filed.</li> <li>the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than on ministrator, you must complete questions (b) through (f) separately for each administrator.</li> <li>Name of administrator:</li> <li>MAPLESFS LIMITED</li> <li>Location of administrator (city, state and country):</li> </ul>	
oes f the nust <b>Addi</b> If th adn (b) (c)	the private fund use an administrator other than your firm? a answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one a complete questions (b) through (f) separately for each administrator. itional 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 on ministrator, you must complete questions (b) through (f) separately for each administrator. Name of administrator: MAPLESFS LIMITED Location of administrator (city, state and country): City: State: Country:	e
)oes f the nust Addi If th adn (b) (c) (d)	the private fund use an administrator other than your firm? a answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one a complete questions (b) through (f) separately for each administrator. <b>itional Administrator Information : 1 Record(s) Filed.</b> the answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one ministrator, you must complete questions (b) through (f) separately for each administrator. Name of administrator: MAPLESFS LIMITED Location of administrator (city, state and country): City: State: Country: GEORGE TOWN Cayman Islands	e Ye
)oes f the nust Addi If th adn (b) (c) (d)	the <i>private fund</i> use an administrator other than your firm? a 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 complete questions (b) through (f) separately for each administrator. <b>itional Administrator Information : 1 Record(s) Filed.</b> 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 ministrator, you must complete questions (b) through (f) separately for each administrator. Name of administrator: MAPLESFS LIMITED Location of administrator (city, state and country): City: State: Country: GEORGE TOWN Cayman Islands Is the administrator a <i>related person</i> of your firm?	e Ye

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1	()	)%

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

# **Marketers**

		Yes	s No
8. (a)	Does the private fund use the services of someone other than you or your employees for marketing purposes?	0	$\overline{\mathbf{O}}$
	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		
PRIVA	ATE FUND		
orma	ation About the Private Fund		
(a)	Name of the <i>private fund</i> :		
(u)	SEIX CLO CAYMAN LP		
(b)	<ul> <li>Private fund identification number:</li> <li>(include the "805-" prefix also)</li> <li>805-9598670823</li> </ul>		
Un	Ider the laws of what state or country is the <i>private fund</i> organized:		
	State: Country: Cayman Islands		
	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):		_
	ame of General Partner, Manager, Trustee, or Director EIX CLO MANAGEMENT GP LLC		
(b)	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.		
	No Information Filed		
Th	e <i>private fund</i> (check all that apply; you must check at least one):		
	<ul> <li>(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> </ul>		
Lis	t 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	C
(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	N
(C)	Is this a "feeder fund" in a master-feeder arrangement?	0	G
(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> :		
	<i>Private fund</i> identification number: (include the "805-" prefix also)		
	DTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section the master-feeder arrangement or reporting on the funds separately.	7.B.(	1)
	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	or eac	h of

		TE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all	of th	oir
	asse	ets 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 Itiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	issue	d
8.	$(\mathbf{a})$	Is this <i>private fund</i> a "fund of funds"?	Yes	
0.	• •	TE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment	_	$\odot$
		icles, regardless of whether they are also private funds or registered investment companies.		
	(b)	If yes, does the private fund invest in funds managed by you or by a related person?	$\circ$	0
0	Dur		Yes	
9.		ing your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment npany Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	O
10.	Wha	at type of fund is the <i>private fund</i> ?		
	0	hedge fund <sup>O</sup> liquidity fund <sup>O</sup> private equity fund <sup>O</sup> real estate fund <sup>©</sup> securitized asset fund <sup>O</sup> venture capital fund <sup>O</sup> Other <i>priva</i>	te fur	nd:
	NOT			
	NOI	TE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.		rent gross asset value of the <i>private fund</i> : 49,771		
<u>Ow</u>	ners	hip		
12.	Mini	imum investment commitment required of an investor in the private fund:		
	\$ 2!	50,000		
		TE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the anizational documents of the fund).		
13.	Арр	proximate number of the private fund's beneficial owners:		
	7			
14.		at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
	729			
15.	(a) 10%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: %		
			Yes	No
	(d)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.		at is the approximate percentage of the private fund beneficially owned by non-United States persons:		
	10%	6		
<u>You</u>	ır Ad	dvisory Services		
	<i>.</i>		Yes	No
17.		Are you a subadviser to this <i>private fund</i> ?	0	$\odot$
	(a)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	10	
		No Information Filed		
			Yes	No
18.		Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	$\circ$	$\odot$
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank.	answ	er
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	0	$\odot$

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

0 0

20. Approximately what percentage of your clients has invested in the private fund?
0%
Private Offering

# Yes No

 $\odot$ 

0

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

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

No Information Filed

B. SERVICE PROVIDERS

# Auditors

		Yes	No
23.	(a) (1) Are the private fund's financial statements subject to an annual audit?	$\odot$	$^{\circ}$
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	$\odot$	$^{\circ}$

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

lf t	he answer to question 23.(a)(1) is "yes,"	respond to questions (b)	through (h) below. If the private fund uses more than one a	uditing	J
firn	n, you must complete questions (b) throug	gh (f) separately for each	auditing firm.		
(b)	Name of the auditing firm:				
	DELOITTE & TOUCHE				
(C)	The location of the auditing firm's office	responsible for the <i>private</i>	e fund's audit (city, state and country):		
	City:	State:	Country:		
	GEORGE TOWN		Cayman Islands		
				Yes	s No
(d)	Is the auditing firm an independent public	c accountant?		$\odot$	0
(e)	Is the auditing firm registered with the P	ublic Company Accounting	g Oversight Board?	o	0
	If yes, Public Company Accounting Overs 1096	ight Board-Assigned Num	ber:		
(f)	If "yes" to (e) above, is the auditing firm accordance with its rules?	subject to regular inspec	tion by the Public Company Accounting Oversight Board in	o	0

		Yes	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	$\odot$

(h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?

○ Yes ○ No ⊙ Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

# Prime Broker

		Yes	No
24. (	a) Does the <i>private fund</i> use one or more prime brokers?	0	$\odot$
	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>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	e priva	te

No Information Filed

Additional Custodian Informa	tion : 1 Record(s) Filed.		
		b) through g) below for each custodian the <i>prive</i> s s (b) through (g) separately for each custodian.	
(b) Legal name of custodian: CITIBANK, N.A.			
(c) Primary business name of CITIBANK NA	f custodian:		
(d) The location of the custod	dian's office responsible for <i>custody</i>	of the <i>private fund's</i> assets (city, state and coun	itry):
City: NEW YORK	State: New York	Country: United States	
NEW TORK	New TOTK	United States	Y
(e) Is the custodian a related	<i>I person</i> of your firm?		c
(f) If the custodian is a broke	er-dealer, provide its SEC registration	on number (if any):	
- CRD Number (if any):			
identifier (if any)	proker-dealer, or is a broker-dealer	but does not have an SEC registration number,	provide its <i>legal entity</i>
<i>identifier</i> (if any) trator Does the <i>private fund</i> use an ad If the answer to question 26.(a)	ministrator other than your firm?	through (f) below. If the <i>private fund</i> uses more	
<i>identifier</i> (if any) trator Does the <i>private fund</i> use an ad If the answer to question 26.(a)	ministrator other than your firm? ) is "yes," respond to questions (b) rough (f) separately for each admir	through (f) below. If the <i>private fund</i> uses more	
<i>identifier</i> (if any) trator Does the <i>private fund</i> use an ad If the answer to question 26. (a) must complete questions (b) th Additional Administrator Info If the answer to question 26.	ministrator other than your firm? ) is "yes," respond to questions (b) rough (f) separately for each admir <b>rmation : 1 Record(s) Filed</b> .	through (f) below. If the <i>private fund</i> uses more istrator.	e than one administrat
<i>identifier</i> (if any) trator Does the <i>private fund</i> use an ad If the answer to question 26. (a) must complete questions (b) th Additional Administrator Info If the answer to question 26. administrator, you must comp (b) Name of administrator:	ministrator other than your firm? ) is "yes," respond to questions (b) rough (f) separately for each admir <b>rmation : 1 Record(s) Filed.</b> (a) is "yes," respond to questions ( blete questions (b) through (f) sepa	through (f) below. If the <i>private fund</i> uses more istrator.	e than one administrat
trator Does the <i>private fund</i> use an ad If the answer to question 26. (a) must complete questions (b) th Additional Administrator Info If the answer to question 26. administrator, you must comp (b) Name of administrator: FIS GLOBAL (c) Location of administrator City:	ministrator other than your firm? ) is "yes," respond to questions (b) rough (f) separately for each admin rmation : 1 Record(s) Filed. (a) is "yes," respond to questions ( blete questions (b) through (f) sepa (city, state and country): State:	through (f) below. If the <i>private fund</i> uses more istrator. b) through (f) below. If the <i>private fund</i> uses more rately for each administrator.	e than one administrat
trator Does the private fund use an ad If the answer to question 26. (a) must complete questions (b) th Additional Administrator Info If the answer to question 26. administrator, you must comp (b) Name of administrator: FIS GLOBAL (c) Location of administrator	ministrator other than your firm? ) is "yes," respond to questions (b) rough (f) separately for each admir <b>rmation : 1 Record(s) Filed.</b> (a) is "yes," respond to questions ( blete questions (b) through (f) sepa (city, state and country):	through (f) below. If the <i>private fund</i> uses more istrator. b) through (f) below. If the <i>private fund</i> uses more rately for each administrator.	e than one administrat
trator Does the <i>private fund</i> use an ad If the answer to question 26. (a) must complete questions (b) th Additional Administrator Info If the answer to question 26. administrator, you must comp (b) Name of administrator: FIS GLOBAL (c) Location of administrator City:	ministrator other than your firm? ) is "yes," respond to questions (b) rough (f) separately for each admin rmation : 1 Record(s) Filed. (a) is "yes," respond to questions ( blete questions (b) through (f) sepa (city, state and country): State: Texas	through (f) below. If the <i>private fund</i> uses more istrator. b) through (f) below. If the <i>private fund</i> uses more rately for each administrator.	e than one administrat

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

100%

Include only those assets where (i) such person carried out the valuation procedure established for that asset, if any, including obtaining any

relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such person.

(a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	0
You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solici 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>priva</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.	
uses. In the private rand uses more than one marketer you must complete questions (b) through (g) separately for each marketer.	
No Information Filed	
RIVATE FUND	
rmation About the Private Fund	
(a) Name of the <i>private fund</i> :	
SEIX CLO MANAGEMENT LP (b) <i>Private fund</i> identification number:	
(include the "805-" prefix also)	
805-1721650104	
Under the laws of what state or country is the <i>private fund</i> organized:	
State: Country:	
Cayman Islands	
(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	
SEIX CLO MANAGEMENT GP LLC	
(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.	
No Information Filed	
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	
(1) qualifies for the exclusion from the definition of investment company under section $3(c)(1)$ of the Investment Company Act of 1940 (2) qualifies for the exclusion from the definition of investment company under section $3(c)(7)$ of the Investment Company Act of 1940	
(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940	
<ul> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.</li> </ul>	
<ul> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.</li> <li>No Information Filed</li> <li>(a) Is this a "master fund" in a master-feeder arrangement?</li> </ul>	
<ul> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.</li> <li>No Information Filed</li> <li>(a) Is this a "master fund" in a master-feeder arrangement?</li> <li>(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>?</li> </ul>	Ye
<ul> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.</li> <li>No Information Filed</li> <li>(a) Is this a "master fund" in a master-feeder arrangement?</li> </ul>	Ye
<ul> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.         <ul> <li>No Information Filed</li> <li>(a) Is this a "master fund" in a master-feeder arrangement?</li> <li>(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>?</li> <li>No Information Filed</li> </ul> </li> </ul>	Ye: O
<ul> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.</li> <li>No Information Filed</li> <li>(a) Is this a "master fund" in a master-feeder arrangement?</li> <li>(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>?</li> <li>No Information Filed</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> </ul>	Ye:
<ul> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.         <ul> <li>No Information Filed</li> <li>(a) Is this a "master fund" in a master-feeder arrangement?</li> <li>(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>?</li> <li>No Information Filed</li> </ul> </li> </ul>	Ye: O Ye:
<ul> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> <li>List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.</li> <li>No Information Filed</li> <li>(a) Is this a "master fund" in a master-feeder arrangement?</li> <li>(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>?</li> <li>No Information Filed</li> <li>(c) Is this a "feeder fund" in a master-feeder arrangement?</li> <li>(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?</li> </ul>	Yes O Yes

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

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

		Yes	No
8.	(a) Is this private fund a "fund of funds"?	0	$\odot$
	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 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	۲
10.	What type of fund is the private fund?		
	○ hedge fund ○ liquidity fund ○ private equity fund ○ real estate fund ⊙ securitized asset fund ○ venture capital fund ○ Other priva	te 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> : \$ 15,663,245		
<u>Ow</u>	nership		
12.	Minimum investment commitment required of an investor in the private fund:		
	\$ 250,000		
	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: 7		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 72%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 10%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 10%		
<u>You</u>	Ir Advisory Services		
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 answer question 17.(a) is "no," leave this question blank.	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 private fund?	0	o
	(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.	answ	
	No Information Filed		

19. 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 <i>clients</i> has invested in the <i>private fund</i> ? 0%		
<u>Priv</u>	ate Offering		
21.	Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Ye	s No
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. SE	RVICE PROVIDERS		
<u>Aud</u>	<u>itors</u>	Ye	s No
23.	(a) (1) Are the private fund's financial statements subject to an annual audit?	o	0
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	o	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.	iting firr	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 a firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: DELOITTE & TOUCHE	uutting	
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):         City:       State:         GEORGE TOWN       Cayman Islands		
	(d) Is the auditing firm an <i>independent public accountant</i> ?	Yes	-
		$\odot$	°
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	o	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1096		
	(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
			s No
	<ul><li>(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?</li><li>(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</li></ul>	•	
	O Yes O No ⊙ Report Not Yet Received	ropinoi	13.
	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 avail	lable.
<u>Prin</u>	ne Broker		
21	(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.	ט the <i>pri</i> ג	) <b>©</b> vate

No Information Filed

#### **Custodian**

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

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

Additional Custodian Informa	tion : 1 Record(s) Filed.		
		(b) through g) below for each custodian the <i>priv</i> ns (b) through (g) separately for each custodian	
(b) Legal name of custodian: CITIBANK, N.A.			
(c) Primary business name of CITIBANK NA	f custodian:		
(d) The location of the custor	dian's office responsible for <i>custod</i>	y of the <i>private fund's</i> assets (city, state and cour	ntry):
City:	State:	Country:	
NEW YORK	New York	United States	
(e) Is the custodian a <i>related</i>	<i>person</i> of your firm?		Ye
			Ũ
(f) If the custodian is a broke	er-dealer, provide its SEC registrat	ion number (if any):	
- CRD Number (if any):			
(g) If the custodian is not a b <i>identifier</i> (if any)	proker-dealer, or is a broker-deale	r but does not have an SEC registration number,	provide its <i>legal entity</i>
<i>identifier</i> (if any) <u>rator</u> Does the <i>private fund</i> use an ad	ministrator other than your firm?		
<i>identifier</i> (if any) <u>rator</u> Does the <i>private fund</i> use an ad f the answer to question 26.(a)	ministrator other than your firm?	) through (f) below. If the <i>private fund</i> uses more	
<i>identifier</i> (if any) <u>rator</u> Does the <i>private fund</i> use an ad f the answer to question 26.(a)	ministrator other than your firm? ) is "yes," respond to questions (b rough (f) separately for each admi	) through (f) below. If the <i>private fund</i> uses more	
<i>identifier</i> (if any) <u>rator</u> Does the <i>private fund</i> use an ad f the answer to question 26. (a) nust complete questions (b) the Additional Administrator Info If the answer to question 26.	ministrator other than your firm? ) is "yes," respond to questions (b rough (f) separately for each admi <b>rmation : 1 Record(s) Filed</b> .	) through (f) below. If the <i>private fund</i> uses more nistrator. (b) through (f) below. If the <i>private fund</i> uses mo	e than one administrato
<i>identifier</i> (if any) <u>rator</u> Does the <i>private fund</i> use an ad f the answer to question 26. (a) nust complete questions (b) the Additional Administrator Info If the answer to question 26.	ministrator other than your firm? ) is "yes," respond to questions (b rough (f) separately for each admi <b>rmation : 1 Record(s) Filed.</b> (a) is "yes," respond to questions	) through (f) below. If the <i>private fund</i> uses more nistrator. (b) through (f) below. If the <i>private fund</i> uses mo	e than one administrato
identifier (if any) rator Does the private fund use an ad f the answer to question 26. (a) nust complete questions (b) th Additional Administrator Info If the answer to question 26 administrator, you must comp (b) Name of administrator:	ministrator other than your firm? ) is "yes," respond to questions (b rough (f) separately for each admi <b>rmation : 1 Record(s) Filed.</b> (a) is "yes," respond to questions blete questions (b) through (f) sep	) through (f) below. If the <i>private fund</i> uses more nistrator. (b) through (f) below. If the <i>private fund</i> uses mo	e than one administrato
identifier (if any)         rator         Does the private fund use an ad         f the answer to question 26. (a)         nust complete questions (b) th         Additional Administrator Info         If the answer to question 26. (a)         administrator Info         (b) Name of administrator:         FIS GLOBAL         (c) Location of administrator	ministrator other than your firm? ) is "yes," respond to questions (b rough (f) separately for each admi <b>rmation : 1 Record(s) Filed.</b> (a) is "yes," respond to questions blete questions (b) through (f) sep	) through (f) below. If the <i>private fund</i> uses more nistrator. (b) through (f) below. If the <i>private fund</i> uses me arately for each administrator.	e than one administrato
identifier (if any)         rator         Does the private fund use an ad         f the answer to question 26. (a)         nust complete questions (b) th         Additional Administrator Info         If the answer to question 26         administrator, you must comp         (b) Name of administrator:         FIS GLOBAL         (c) Location of administrator	ministrator other than your firm? ) is "yes," respond to questions (b rough (f) separately for each admi <b>rmation : 1 Record(s) Filed.</b> (a) is "yes," respond to questions blete questions (b) through (f) sep (city, state and country):	) through (f) below. If the <i>private fund</i> uses more nistrator. (b) through (f) below. If the <i>private fund</i> uses mo arately for each administrator.	e than one administrato
identifier (if any)         rator         Does the private fund use an ad         f the answer to question 26. (a)         nust complete questions (b) th         Additional Administrator Info         If the answer to question 26. (a)         administrator Info         (b) Name of administrator:         FIS GLOBAL         (c) Location of administrator	ministrator other than your firm? ) is "yes," respond to questions (b rough (f) separately for each admi rmation : 1 Record(s) Filed. (a) is "yes," respond to questions blete questions (b) through (f) sep (city, state and country): State: Texas	) through (f) below. If the <i>private fund</i> uses more nistrator. (b) through (f) below. If the <i>private fund</i> uses me arately for each administrator.	e than one administrato
identifier (if any)         rator         Does the private fund use an ad f the answer to question 26. (a) nust complete questions (b) th         Additional Administrator Info         If the answer to question 26.1 administrator, you must comp         (b) Name of administrator: FIS GLOBAL         (c) Location of administrator City: HOUSTON         (d) Is the administrator a relation	ministrator other than your firm? ) is "yes," respond to questions (b rough (f) separately for each admi rmation : 1 Record(s) Filed. (a) is "yes," respond to questions blete questions (b) through (f) sep (city, state and country): State: Texas ated person of your firm?	) through (f) below. If the <i>private fund</i> uses more nistrator. (b) through (f) below. If the <i>private fund</i> uses me arately for each administrator.	e than one administrato ore than one Yes

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

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

 $\odot$  $\circ$ 

#### 100%

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

#### **Marketers**

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

Yes No  $^{\circ}$  $\odot$ 

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

No Information Filed

### A. PRIVATE FUND

#### Information About the Private Fund

1. (a) Name of the private fund:

STONE HARBOR GLOBAL FUNDS PLC - STONE HARBOR EMERGING MARKETS DEBT BLEND PORTFOLIO

- (b) Private fund identification number: (include the "805-" prefix also) 805-8287396919
- Under the laws of what state or country is the private fund organized: 2. State:

Country Ireland

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

ame of General Partner, Manager, Trustee, or Director
ARL O'SULLIVAN, DIRECTOR
EORGE AYLWARD, DIRECTOR
ICHAEL ANGERTHAL, DIRECTOR
ATRICK BRADLEY, DIRECTOR
ETER WILBY, DIRECTOR
INCENT DODD, DIRECTOR
ERNER SCHWANBERG, DIRECTOR

(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): 4

- (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. 5.

Name of Country/English Name of Foreign Financial Regulatory Authority Ireland - Central Bank of Ireland	Name of Country/English Name of Foreign Financial Regulatory Authority			
	Ireland - Central Bank of Ireland			
		Yes	No	
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	$\odot$	
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?			
	No Information Filed			

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

Yes No  $\circ$  $\odot$ 

(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 all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	$\odot$	$\circ$
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.		
	(b) If yes, does the private fund invest in funds managed by you or by a related person?	$\odot$	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.)?		o
10.	What type of fund is the private fund?		
	○ hedge fund ○ liquidity fund ○ private equity fund ○ real estate fund ○ securitized asset fund ○ venture capital fund ● Other private IRISH AIF FUND OF FUND HOLDING IRISH UCITS PRIMARILY FIXED INCOME	te fur	id:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the private fund:		
	\$ 86,136,433		
<u>Ow</u>	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> :		
	\$ 5,000,000 NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 6		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
15.	<ul> <li>(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:</li> <li>0%</li> </ul>		
	(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	No O
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 36%		

#### Your Advisory Services

	No Information Filed		
		Ye	s N
(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	C	
(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If to question 18.(a) is "no," leave this question blank.	he ans	wer
	No Information Filed		
		Ye	s N
Are	e your <i>clients</i> solicited to invest in the <i>private fund</i> ?	G	) (
NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
Арр 3%	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
ate	Offering		
		Ye	s N
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?		) (
	yes, provide the <i>private fund's</i> Form D file number (if any):		
	rm D file number 21-162483		
RVI	ICE PROVIDERS		
RVI <u>tor</u>		Ye	es N
tor		Ye	
tor	<u>rs</u>		
tor	rs (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	e c	
tor	<ul> <li>(1) Are the <i>private fund's</i> financial statements subject to an annual audit?</li> <li>(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?</li> <li>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</li> </ul>	e c	
tor	<ul> <li>(1) Are the <i>private fund's</i> financial statements subject to an annual audit?</li> <li>(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?</li> <li>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.</li> </ul>	ting fir	
tor	(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 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 a	ting fir	
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tor	(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 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 and you must complete questions (b) through (f) separately for each auditing firm. 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 and firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: PRICEWATERHOUSECOOPERS (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:	ting fir	
tor	<ul> <li>(1) Are the <i>private fund's</i> financial statements subject to an annual audit?</li> <li>(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?</li> <li>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.</li> <li>Additional Auditor Information : 1 Record(s) Filed.</li> <li>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 and you must complete questions (b) through (f) separately for each auditing firm.</li> <li>(b) Name of the auditing firm: PRICEWATERHOUSECOOPERS</li> <li>(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):</li> </ul>	d ting fir uditing	) ( m,
tor	(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 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 and you must complete questions (b) through (f) separately for each auditing firm. 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 and firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: PRICEWATERHOUSECOOPERS (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:	ting fir	) ( m,
tor	(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 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 audity ou must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: PRICEWATERHOUSECOOPERS (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: DUBLIN Ireland	ting fir uditing Yes	No
tor	(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 audity unust 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 audity unust complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: PRICEWATERHOUSECOOPERS (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: DUBLIN (d) Is the auditing firm an <i>independent public accountant</i> ?	ting fir uditing Yes	No 0

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

(h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?

 $^{\circ}$ 

● Yes ● No ● Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

### Prime Broker

24. (a) Does the *private fund* 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 private fund uses. If the private fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

# **Custodian**

25. (a) Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?  $\odot$   $\odot$ If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the private fund

Addit	tional Custodian Informa	ation : 1 Record(s) Filed.		
			through g) below for each custodian the <i>priv</i> (b) through (g) separately for each custodian	
(b)	Legal name of custodian THE BANK OF NEW YORK	MELLON SA/NV, DUBLIN BRANCH		
(c)	Primary business name of THE BANK OF NEW YORK	f custodian: MELLON SA/NV, DUBLIN BRANCH		
(d)	The location of the custo	dian's office responsible for <i>custody</i> o	f the <i>private fund's</i> assets (city, state and cou	ntry):
	City: DUBLIN	State:	Country: Ireland	
(e)	Is the custodian a related	d person of your firm?		Yes No
(f)	If the custodian is a brok	er-dealer, provide its SEC registration	number (if any):	
	CRD Number (if any):			
(g)	If the custodian is not a <i>identifier</i> (if any)	broker-dealer, or is a broker-dealer b	ut does not have an SEC registration number,	, provide its <i>legal entity</i>

# **Administrator**

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

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

Additional Administrator Information : 1 Record(s) Filed.

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

- (b) Name of administrator: BNY MELLON FUND SERVICES (IRELAND) DESIGNATED ACTIVITY COMPANY
- (c) Location of administrator (city, state and country): City: State:
  - DUBLIN

Country: Ireland

Yes No

 $\odot$ 0

# 0 0

Yes No

# Yes No

		(d) Is the administrator a <i>related person</i> of your firm?	0	$\odot$
		(e) Does the administrator prepare and send investor account st		
		$_{igodot}$ Yes (provided to all investors) $_{igodot}$ Some (provided to some t	ut not all investors) ${igcar_{igcar{O}}}$ No (provided to no investors)	
		(f) If the answer to question 26.(e) is "no" or "some," who send investors? If investor account statements are not sent to the	the investor account statements to the (rest of the) <i>private fund's</i> (rest of the) <i>private fund's</i> (rest of the) <i>private fund's</i> investors, respond "not applicable."	
27.		ng your last fiscal year, what percentage of the <i>private fund's</i> assets <i>related person</i> ? %	(by value) was valued by a <i>person</i> , such as an administrator, that is	s not
	Inclu relev	ude only those assets where (i) such <i>person</i> carried out the valuatio vant quotes, and (ii) the valuation used for purposes of investor sub cations) was the valuation determined by such <i>person</i> .		-
Ma	irkete	<u>rs</u>		
20		Deep the private fundance the consistence of company, other then you a	we want and the manufacting average 2	Yes No
28.		Does the <i>private fund</i> use the services of someone other than you o		00
		You must answer "yes" whether the <i>person</i> acts as a placement age similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to uses. If the <i>private fund</i> uses more than one marketer you must con	questions (b) through (g) below for each such marketer the private	
		No In	ormation Filed	
Α. Ρ	RIVAT	E FUND		
Infe	ormati	ion About the Private Fund		
<u>1111C</u>	Jimat	ion about the <i>Private Fund</i>		
1.	(a)	Name of the <i>private fund</i> :		
	(b)	STONE HARBOR INVESTMENT FUNDS PLC - STONE HARBOR EMERGING	MARKETS DEBT FUND	
	• •		MARKETS DEBT FUND	
		STONE HARBOR INVESTMENT FUNDS PLC - STONE HARBOR EMERGING <i>Private fund</i> identification number: (include the "805-" prefix also)	MARKETS DEBT FUND	
		Private fund identification number:	MARKETS DEBT FUND	
		Private fund identification number: (include the "805-" prefix also)	MARKETS DEBT FUND	
		Private fund identification number: (include the "805-" prefix also) 805-5099022599	5 MARKETS DEBT FUND	
2.	Unde	<i>Private fund</i> identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the <i>private fund</i> organized:	5 MARKETS DEBT FUND	
2.	Unde	Private fund identification number: (include the "805-" prefix also) 805-5099022599	5 MARKETS DEBT FUND	
2.	Unde	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the <i>private fund</i> organized: State: Country:	5 MARKETS DEBT FUND	
2.	Unde	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the <i>private fund</i> organized: State: Country:		
	Unde (a) Nar	Private fund identification number:         (include the "805-" prefix also)         805-5099022599         er the laws of what state or country is the private fund organized:         State:       Country:         Ireland         Name(s) of General Partner, Manager, Trustee, or Directors (or pers         me of General Partner, Manager, Trustee, or Director		
	Unde (a) Nar	Private fund identification number:         (include the "805-" prefix also)         805-5099022599         er the laws of what state or country is the private fund organized:         State:       Country:         Ireland         Name(s) of General Partner, Manager, Trustee, or Directors (or pers		
	(a) (A) CAR GEC	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the <i>private fund</i> organized: State: Country: Ireland Name(s) of General Partner, Manager, Trustee, or Directors (or <i>pers</i> <b>me of General Partner, Manager, Trustee, or Director</b> RL O'SULLIVAN, DIRECTOR DRGE AYLWARD, DIRECTOR		
	(a) (a) Nar GEC MIC	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the <i>private fund</i> organized: State: Country: Ireland Name(s) of General Partner, Manager, Trustee, or Directors (or <i>pers</i> <b>ne of General Partner, Manager, Trustee, or Director</b> RL O'SULLIVAN, DIRECTOR CRE AYLWARD, DIRECTOR CHAEL ANGERTHAL, DIRECTOR		
	(a) Nar CAR GEC MIC PAT	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the private fund organized: State: Country: Ireland Name(s) of General Partner, Manager, Trustee, or Directors (or pers me of General Partner, Manager, Trustee, or Director RL O'SULLIVAN, DIRECTOR CRGE AYLWARD, DIRECTOR CHAEL ANGERTHAL, DIRECTOR RICK BRADLEY, DIRECTOR		
	(a) Nar GEC MIC PAT PET	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the <i>private fund</i> organized: State: Country: Ireland Name(s) of General Partner, Manager, Trustee, or Directors (or <i>pers</i> <b>ne of General Partner, Manager, Trustee, or Director</b> RL O'SULLIVAN, DIRECTOR CORGE AYLWARD, DIRECTOR CHAEL ANGERTHAL, DIRECTOR RICK BRADLEY, DIRECTOR FRICK BRADLEY, DIRECTOR FRICK BRADLEY, DIRECTOR		
	(a) Nar GEC MIC PAT PET	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the private fund organized: State: Country: Ireland Name(s) of General Partner, Manager, Trustee, or Directors (or pers me of General Partner, Manager, Trustee, or Director RL O'SULLIVAN, DIRECTOR CRGE AYLWARD, DIRECTOR CHAEL ANGERTHAL, DIRECTOR RICK BRADLEY, DIRECTOR		
	(a) Nar CAR GEC MIC PAT PET VIN	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the <i>private fund</i> organized: State: Country: Ireland Name(s) of General Partner, Manager, Trustee, or Directors (or <i>pers</i> <b>ne of General Partner, Manager, Trustee, or Director</b> RL O'SULLIVAN, DIRECTOR CORGE AYLWARD, DIRECTOR CHAEL ANGERTHAL, DIRECTOR RICK BRADLEY, DIRECTOR FRICK BRADLEY, DIRECTOR FRICK BRADLEY, DIRECTOR		
	(a) Nar CAR GEC MIC PAT PET VIN WER	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the <i>private fund</i> organized: State: Country: Ireland Name(s) of General Partner, Manager, Trustee, or Directors (or <i>pers</i> <b>ne of General Partner, Manager, Trustee, or Director</b> RL O'SULLIVAN, DIRECTOR RL O'SULLIVAN, DIRECTOR CHAEL ANGERTHAL, DIRECTOR CHAEL ANGERTHAL, DIRECTOR RICK BRADLEY, DIRECTOR ER WILBY, DIRECTOR CENT DODD, DIRECTOR RNER SCHWANBERG, DIRECTOR	ons serving in a similar capacity):	
	(a) Nar CAR GEC MIC PAT PET VIN WER	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the private fund organized: State: Country: Ireland Name(s) of General Partner, Manager, Trustee, or Directors (or pers me of General Partner, Manager, Trustee, or Director RL O'SULLIVAN, DIRECTOR RL O'SULLIVAN, DIRECTOR CHAEL ANGERTHAL, DIRECTOR CHAEL ANGERTHAL, DIRECTOR RICK BRADLEY, DIRECTOR ER WILBY, DIRECTOR CENT DODD, DIRECTOR RNER SCHWANBERG, DIRECTOR If filing an umbrella registration, identify the filing adviser and/or relying the filing adviser adviser adviser and/or relying the filing adviser advis	bns serving in a similar capacity):	
	(a) Nar CAR GEC MIC PAT PET VIN WER	Private fund identification number: (include the "805-" prefix also) 805-5099022599 er the laws of what state or country is the private fund organized: State: Country: Ireland Name(s) of General Partner, Manager, Trustee, or Directors (or pers me of General Partner, Manager, Trustee, or Director RL O'SULLIVAN, DIRECTOR RL O'SULLIVAN, DIRECTOR CHAEL ANGERTHAL, DIRECTOR CHAEL ANGERTHAL, DIRECTOR RICK BRADLEY, DIRECTOR ER WILBY, DIRECTOR CENT DODD, DIRECTOR RNER SCHWANBERG, DIRECTOR If filing an umbrella registration, identify the filing adviser and/or relying the filing adviser adviser adviser and/or relying the filing adviser advis	ons serving in a similar capacity):	

(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

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

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

	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Ireland - Central Bank of Ireland		
		Yes	No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	$\odot$
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	$\odot$
	(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 <i>private fund</i> :		
	<i>Private fund</i> 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, Sectio for the master-feeder arrangement or reporting on the funds separately.	n 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), the feeder funds answer the following questions:	for each	ı of
	No Information Filed		
8.	<ul> <li>(a) Is this <i>private fund</i> a "fund of funds"?</li> <li>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.</li> <li>(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i>?</li> </ul>		©
_		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	o
10.	. What type of fund is the <i>private fund</i> ?		
	○ hedge fund ○ liquidity fund ○ private equity fund ○ real estate fund ○ securitized asset fund ○ venture capital fund ◎ Other priv IRISH UCITS PRIMARILY FIXED INCOME	vate fun	d:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	. Current gross asset value of the <i>private fund</i> : \$ 165,739,444		
<u>0v</u>	vnership		
12.	. Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 5,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in t organizational documents of the fund).	he	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 22		
14.	. What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		

0%

15.	<ul> <li>(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:</li> <li>45%</li> </ul>		
		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	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 93%		
<u>You</u>	ur Advisory Services		
		Yes	s No
17.	<ul> <li>(a) Are you a subadviser to this <i>private fund</i>?</li> <li>(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 an question 17.(a) is "no," leave this question blank.</li> </ul>	O Iswer to	o
	No Information Filed		
		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 private fund?	0	$\odot$
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If to question 18.(a) is "no," leave this question blank.	the ansv	wer
	No Information Filed		
		Yes	s No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\odot$	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> ? 11%		
<u>Priv</u>	vate Offering		
		Yes	s No
21.	Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	0	o
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		
B. SE	ERVICE PROVIDERS		
Aud	ditors	Ve	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?	õ	~
	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.	_	
	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 firm, you must complete questions (b) through (f) separately for each auditing firm.	auditing	
	(b) Name of the auditing firm: PRICEWATERHOUSECOOPERS		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):City:State:Country:		
		Yes	No
	(d) Is the auditing firm an <i>independent public accountant</i> ?	o	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	o	0
	If yes, Public Company Accounting Oversight Board-Assigned Number:		

1366	
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(f)	If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in	$\odot$	0
	accordance with its rules?		

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

(h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?

● Yes ○ No ○ Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

#### Prime Broker

24. (a) Does the *private fund* use one or more prime brokers?

Yes No 0  $\odot$ 

Yes No

 $\odot$  $\circ$ 

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

# No Information Filed

#### Custodian

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

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

	•	• • • •	through g) below for each custodian the <i>priv</i> (b) through (g) separately for each custodiar	
	gal name of custodian: E BANK OF NEW YORK MELL	ON SA/NV, DUBLIN BRANCH		
(c) Prir	mary business name of cus	todian:		
THE	E BANK OF NEW YORK MELL	ON SA/NV, DUBLIN BRANCH		
(d) The	e location of the custodian's	s office responsible for <i>custody</i> of	the <i>private fund's</i> assets (city, state and cou	ntry):
City		State:	Country:	
DUI	BLIN		Ireland	
(-)  - +				Yes I
(e) is t	the custodian a <i>related pers</i>	ion of your firm?		0
(f) Iftl	he custodian is a broker-de	aler, provide its SEC registration	number (if any):	
-				
CRI	D Number (if any):			
(a) If ±	ha custodian is not a brake	r dealer, er is e breker dealer bi	it does not have an SEC registration surplus	provide its legal entity
	ntifier (if any)	i -dealer, of is a broker-dealer bu	It does not have an SEC registration number,	provide its <i>legar entity</i>

#### **Administrator**

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

Yes No

 $\odot$ 

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

Additional Administrator Information : 1 Record(s) Filed.

			(a) is "yes," respond to questions (b) plete questions (b) through (f) separa	through (f) below. If the <i>private fund</i> uses tely for each administrator.	more than one
		(b) Name of administrator:			
			CES (IRELAND) DESIGNATED ACTIVIT	( COMPANY	
		(c) Location of administrator	(city, state and country):		
		City:	State:	Country:	
		DUBLIN		Ireland	
					Yes No
		(d) Is the administrator a rela	ated person of your firm?		00
		(e) Does the administrator p	repare and send investor account sta	tements to the <i>private fund's</i> investors?	
		Yes (provided to all inv	vestors) ${igcodot}$ Some (provided to some b	ut not all investors) ${igcar_{igcar{O}}}$ No (provided to no i	nvestors)
				the investor account statements to the (refrest of the) <i>private fund's</i> investors, respon	
27.	your 1009 Inclu relev	related person? 6 de only those assets where (i)	such <i>person</i> carried out the valuation ion used for purposes of investor sub-	(by value) was valued by a <i>person</i> , such as a procedure established for that asset, if an scriptions, redemptions or distributions, and	y, including obtaining any
Mar	keter	~			
<u>Iviai</u>	Keter	<u> </u>			Yes No
28.	(a) [	Does the <i>private fund</i> use the se	ervices of someone other than you or	your <i>employees</i> for marketing purposes?	0 0
	Y	ou must answer "yes" whethe similar <i>person</i> . If the answer to	r the <i>person</i> acts as a placement age question 28.(a) is "yes," respond to a	nt, consultant, finder, introducer, municipal questions (b) through (g) below for each su plete questions (b) through (g) separately	advisor or other solicitor, or ich marketer the <i>private fund</i>
			No Inf	ormation Filed	
A. PF	RIVATE	E FUND			
<u>Info</u>	rmatio	on About the Private Fund			
1.	(b) (	Name of the <i>private fund</i> : STONE HARBOR INVESTMENT FL Private fund identification numbe (include the "805-" prefix also) 805-1671141585		MARKETS LOCAL CURRENCY DEBT FUND	
2.	Unde				
			untry is the <i>private fund</i> organized:		
		er the laws of what state or cou State:	Country:		
			,		
3	(a) №	State:	Country: Ireland	ons serving in a similar capacity).	
3.		State: Name(s) of General Partner, Ma	Country: Ireland nager, Trustee, or Directors (or <i>perso</i>	ons serving in a similar capacity):	
3.	Nam	State:	Country: Ireland nager, Trustee, or Directors (or <i>perso</i>	ons serving in a similar capacity):	
3.	Nam CAR	State: Name(s) of General Partner, Ma <b>ne of General Partner, Manage</b> L O'SULLIVAN, DIRECTOR	Country: Ireland nager, Trustee, or Directors (or <i>perso</i>	ons serving in a similar capacity):	
3.	Nam CAR GEO	State: Name(s) of General Partner, Ma <b>ne of General Partner, Manage</b> L O'SULLIVAN, DIRECTOR RGE AYLWARD, DIRECTOR	Country: Ireland nager, Trustee, or Directors (or <i>perso</i>	ons serving in a similar capacity):	
3.	Nam CARI GEO MICI	State: Name(s) of General Partner, Ma <b>ne of General Partner, Manage</b> L O'SULLIVAN, DIRECTOR RGE AYLWARD, DIRECTOR HAEL ANGERTHAL, DIRECTOR	Country: Ireland nager, Trustee, or Directors (or <i>perso</i>	ons serving in a similar capacity):	
3.	Nam CAR GEO MICH PATF	State: Name(s) of General Partner, Ma <b>ne of General Partner, Manage</b> L O'SULLIVAN, DIRECTOR RGE AYLWARD, DIRECTOR	Country: Ireland nager, Trustee, or Directors (or <i>perso</i>	ons serving in a similar capacity):	

	WERNER SCHWANBERG, DIRECTOR		
	(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 <i>private fund</i> (check all that apply; you must check at least one): $\Box_{i}$ (1) qualifies for the evolution from the definition of investment component approximate evolution $2(a)(1)$ of the investment Component Act of 1040.		
	<ul> <li>(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940</li> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940</li> </ul>		
	(2) qualities for the exclusion from the demittor of investment company under section 3(c)(7) of the investment company Act of 1940		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Other - IRISH FINANCIAL SERVICES REGULATORY AUTHORITY		
		Yes	No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	$\odot$
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?		
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	$\odot$
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?		
	Name of <i>private fund</i> :		
	Private fund identification number:		
	(include the "805-" prefix also)		
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:	<sup>-</sup> each	n 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.		d
8.	(a) Is this <i>private fund</i> a "fund of funds"?		o
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment 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 private fund invest in securities issued by investment companies registered under the Investment		o
	Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?		~
10.	. What type of fund is the <i>private fund</i> ?		
	○ hedge fund ○ liquidity fund ○ private equity fund ○ real estate fund ○ securitized asset fund ○ venture capital fund ◎ Other priva IRISH UCITS PRIMARILY FIXED INCOME	te fun	d:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	. Current gross asset value of the <i>private fund</i> : \$ 83,962,830		

12.		imum investment commitment required of an investor in the <i>private fund</i> :		
		,000,000		
		TE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the anizational documents of the fund).	Ş	
13.	Арр 10	proximate number of the <i>private fund's</i> beneficial owners:		
14.	Wha 0%	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
15.	(a) 769	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: %		
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes O	No O
16.	Wha 979	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : %		
<u>Yo</u>	ır Ad	dvisory Services	Vaa	No
17.	(a)	Are you a subadviser to this private fund?	Yes	©
		If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.		e
		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	$\odot$
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank.	answ	'er
		No Information Filed		
		No Information Filed	Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	Yes ©	No
19.			_	_
	NOT	your <i>clients</i> solicited to invest in the <i>private fund</i> ? TE: For purposes of this question, do not consider feeder funds of the private fund. proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?	_	_
20.	<i>NО</i> 7 Арр 5%	your <i>clients</i> solicited to invest in the <i>private fund</i> ? TE: For purposes of this question, do not consider feeder funds of the private fund. proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?	©	O
20. <u>Priv</u>	N07 App 5% <u>vate</u>	your <i>clients</i> solicited to invest in the <i>private fund</i> ? TE: For purposes of this question, do not consider feeder funds of the private fund. proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?	_	O
20. <b>Priv</b> 21.	NO7 App 5% <u>/ate</u> Has	your <i>clients</i> solicited to invest in the <i>private fund</i> ? TE: For purposes of this question, do not consider feeder funds of the private fund. proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? Offering	© Yes	No
20. <b>Priv</b> 21.	NOT App 5% <u>/ate</u> Has	your <i>clients</i> solicited to invest in the <i>private fund</i> ? TE: For purposes of this question, do not consider feeder funds of the private fund. proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? Offering Is 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
20. <b>Priv</b> 21.	NOT App 5% Vate Has If ye	your <i>clients</i> solicited to invest in the <i>private fund</i> ? <i>TE: For purposes of this question, do not consider feeder funds of the private fund.</i> proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? <u>Offering</u> es, provide the <i>private fund</i> 's Form D file number (if any):	© Yes	No
20. <b>Pri</b> 21. 22.	NOT App 5% Vate Has If ye 02 <sup>-</sup>	your <i>clients</i> solicited to invest in the <i>private fund</i> ? <i>TE: For purposes of this question, do not consider feeder funds of the private fund.</i> proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? <u>Offering</u> is the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? es, provide the <i>private fund's</i> Form D file number (if any): rm D file number 1-350290	© Yes	No
20. <b>Pri</b> 21. 22.	NOT App 5% Vate Has If ye 02 <sup>-</sup>	your <i>clients</i> solicited to invest in the <i>private fund</i> ? <i>TE: For purposes of this question, do not consider feeder funds of the private fund.</i> proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? <u>Offering</u> es the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? es, provide the <i>private fund's</i> Form D file number (if any): rm D file number	© Yes	No
20. <b>Pri</b> 21. 22. B. S	NOT App 5% Vate Has If ye 02 <sup>-</sup>	your <i>clients</i> solicited to invest in the <i>private fund</i> ? <i>TE: For purposes of this question, do not consider feeder funds of the private fund.</i> proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? <b>Offering</b> is the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? es, provide the <i>private fund's</i> Form D file number (if any): <b>rm D file number</b> 1-350290 CE PROVIDERS	<ul> <li>Yes</li> <li>Image: Second s</li></ul>	No O
20. <u>Pri</u> 21. 22. B. S <u>Auc</u>	NOT App 5% Vate Has If yo 02 <sup>-</sup> ERVIO	your <i>clients</i> solicited to invest in the <i>private fund</i> ? <i>TE: For purposes of this question, do not consider feeder funds of the private fund.</i> proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? <b>Offering</b> is the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? es, provide the <i>private fund's</i> Form D file number (if any): <b>rm D file number</b> 1-350290 CE PROVIDERS	<ul> <li>Yes</li> <li>Yes</li> </ul>	
20. <u>Pri</u> 21. 22. B. S <u>Auc</u>	NOT App 5% Vate Has If yo 02 <sup>-</sup> ERVIO	your <i>clients</i> solicited to invest in the <i>private fund</i> ? <i>TE: For purposes of this question, do not consider feeder funds of the private fund.</i> proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? <b>Offering</b> is the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? es, provide the <i>private fund</i> 's Form D file number (if any): <b>rm D file number</b> 1-350290 CE PROVIDERS <b>S</b>	<ul> <li>♥</li> <li>Yes</li> <li>♥</li> <li>Yes</li> <li>●</li> </ul>	
20. <u>Pri</u> 21. 22. B. S <u>Auc</u>	NOT App 5% Vate Has If yo 02 <sup>-</sup> ERVIO	your <i>clients</i> solicited to invest in the <i>private fund</i> ?  TE: For purposes of this question, do not consider feeder funds of the private fund.  proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?  Offering  is the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?  es, provide the <i>private fund</i> 's Form D file number (if any):  TD file number  1-350290  CE PROVIDERS  (1) Are the <i>private fund</i> 's financial statements subject to an annual audit?	€ Yes € Yes €	
20. <b>Pri</b> 21. 22. B. S <u>Auc</u>	NOT App 5% Vate Has If yo 02 <sup>-</sup> ERVIO	your clients solicited to invest in the private fund? TE: For purposes of this question, do not consider feeder funds of the private fund. proximately what percentage of your clients has invested in the private fund? Offering is the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? es, provide the private fund's Form D file number (if any): rm D file number 1-350290 CE PROVIDERS s (1) Are the private fund'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 private fund uses more than one auditing	€ Yes € Yes €	

	(b) Name of the auditing firm: PRICEWATERHOUSECOOPERS		
	<ul> <li>(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):</li> <li>City: State: Country:</li> </ul>		
	DUBLIN Ireland		
	(d) Is the auditing firm an <i>independent public accountant</i> ?	Yes	-
		O	°
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	$\odot$	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 1366		
	(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?	۲	0
		Ye	s No
(g)	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	C	0
(h)	Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified	opinio	ns?
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report	is avai	lable.
Prime	Broker		
24 (a)	Does the <i>private fund</i> use one or more prime brokers?		s No
21. (u)	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	C the <i>pri</i> v	
	fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.		
	fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker. No Information Filed		
Custod	No Information Filed		
	ian	Ye	s No
	No Information Filed	c	0
	ian       Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?	c	0
	ian         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	c	0
	ian         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 uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	<b>e</b> private	o o e fund
	ian         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 uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.         Additional Custodian Information : 1 Record(s) Filed.         If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the uses more than one custodian is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the uses more to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the uses more to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the uses more to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the uses more to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private fund uses. If the uses more to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private fund uses. If the uses more to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private fund uses. If the uses more to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private fund uses. If the uses more to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private fund uses.	<b>e</b> private	o o e fund
	ian         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 uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.         Additional Custodian Information : 1 Record(s) Filed.         If the answer to question 25. (a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the fund uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the fund uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the fund uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.         (b) Legal name of custodian:	<b>e</b> private	o o e fund
	Image: Instruction of the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?         If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.         Additional Custodian Information : 1 Record(s) Filed.         If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian.         Additional Custodian Information : 1 Record(s) Filed.         If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the private fund uses. If the fund uses more than one custodian, you must complete questions (b) through g) below for each custodian the private fund uses. If the fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.         (b) Legal name of custodian:         THE BANK OF NEW YORK MELLON SA/NV, DUBLIN BRANCH         (c) Primary business name of custodian:	e private	te
	Image: Instant of the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?         If the answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.         Additional Custodian Information : 1 Record(s) Filed.         If the answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.         Additional Custodian Information : 1 Record(s) Filed.         If the answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.         (b) Legal name of custodian: THE BANK OF NEW YORK MELLON SA/NV, DUBLIN BRANCH         (c) Primary business name of custodian: THE BANK OF NEW YORK MELLON SA/NV, DUBLIN BRANCH         (d) The location of the custodian's office responsible for custody of the private fund's assets (city, state and country): City:         (c) The location of the custodian's office responsible for custody of the private fund's assets (city, state and country): City:	<b>e</b> private	te
	Image: No Information Filed         Image: No Information Filed <td>e private</td> <td>te No</td>	e private	te No

CRD Number (if any):

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

#### Administrator

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

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

Country:

Ireland

#### Additional Administrator Information : 1 Record(s) Filed.

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

- (b) Name of administrator:
  - BNY MELLON FUND SERVICES (IRELAND) DESIGNATED ACTIVITY COMPANY
- (c) Location of administrator (city, state and country):City: State:DUBLIN

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

- (e) Does the administrator prepare and send investor account statements to the *private fund's* investors?
   Yes (provided to all investors)
   Some (provided to some but not all investors)
   No (provided to no investors)
- (f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) *private fund's* investors? If investor account statements are not sent to the (rest of the) *private fund's* investors, respond "not applicable."
- 27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

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

#### **Marketers**

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

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

No Information Filed

#### A. PRIVATE FUND

#### Information About the Private Fund

1. (a) Name of the *private fund*:

STONE HARBOR INVESTMENT FUNDS PLC - STONE HARBOR INVESTMENT GRADE EMERGING MARKETS CORPORATE DEBT FUND

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

805-1755683229

Yes No

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 $\odot$ 

Yes No

⊙ O

Yes No

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

State:

Country: Ireland

(a) Name(s) of General Partner, Manager, Trustee, or Directors (or persons serving in a similar cap	pacity):
Name of General Partner, Manager, Trustee, or Director	
CARL O'SULLIVAN, DIRECTOR	
GEORGE AYLWARD, DIRECTOR	
MICHAEL ANGERTHAL, DIRECTOR	
PATRICK BRADLEY, DIRECTOR	
PETER WILBY, DIRECTOR	
VINCENT DODD, DIRECTOR	
WERNER SCHWANBERG, DIRECTOR	
(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	
<ul> <li>The private fund (check all that apply; you must check at least one):</li> <li>(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1)</li> <li>(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7)</li> </ul>	
List the name and country, in English, of each foreign financial regulatory authority with which the p	rivate fund is registered.
Name of Country/English Name of Foreign Financial Regulatory Authority	
Ireland - Central Bank of Ireland	
	Yes N
(a) Is this a "master fund" in a master-feeder arrangement?	0.0
(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds inve	
No Information Filed	
	Yes N
(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 w	bish this private fund invests?
Name of <i>private fund</i> :	
Name of <i>private rund</i> .	
<i>Private fund</i> identification number: (include the "805-" prefix also)	
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether y for the master-feeder arrangement or reporting on the funds separately.	you are filing a single Schedule D, Section 7.B.(1)
If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the feeder funds answer the following questions:	the instructions to this Section 7.B.(1), for each o
No Information Filed	
	eeder funde") invest all ar substantially all of t
NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("fe assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master multiple classes (or series) of shares or interests, and each class (or series) invests substantially a	er fund" for purposes of this question if it issued
assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master	er fund" for purposes of this question if it issued

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

0 0

Yes No

10.	What	type	of	fund	is	the	private	fund?	

10.	what type of fund is the <i>private fund?</i>	
	• hedge fund • liquidity fund • private equity fund • real estate fund • securitized asset fund • venture capital fund • Other <i>private fund</i> : IRISH UCITS PRIMARILY FIXED INCOME	
	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> :	
	\$ 14,568,894	
<u>Ow</u>	nership	
12.	Minimum investment commitment required of an investor in the private fund:	
	\$ 5,000,000	
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).	
13.	Approximate number of the <i>private fund's</i> beneficial owners:	
	5	
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: 64%	
	<ul> <li>(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment</li> <li>(c) Company Act of 1940, are sales of the fund limited to <i>qualified clients</i>?</li> </ul>	

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*: 64%

# Your Advisory Services

		Yes	No
17. (a)	Are you a subadviser to this private fund?	0	$\odot$
(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	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 private fund?	$\circ$ $\circ$
(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 a to question 18.(a) is "no," leave this question blank.	answer

	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\odot$	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> ? 2%		
<u>Priv</u>	ate 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	$\odot$
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	No Information Filed		

B. SERVICE PROVIDERS

Auditors

<ul> <li>(1) Are the <i>private fund's</i> financial statements subject to an annual audit?</li> <li>(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?</li> <li>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.</li> <li>Additional Auditor Information : 1 Record(s) Filed.</li> <li>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 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 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 question 23.(a)(1) is "yes," respond to questions (b) through (h) below.</li> </ul>	1	⊙ ( ○ ( irm,
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.  Additional Auditor Information : 1 Record(s) Filed.		_
you must complete questions (b) through (f) separately for each auditing firm.          Additional Auditor Information : 1 Record(s) Filed.	diting fi	rm,
If the answer to question 23 (a)(1) is "yes" respond to questions (b) through (b) below. If the private fund uses more than one		
firm, you must complete questions (b) through (f) separately for each auditing firm.	auditing	]
(b) Name of the auditing firm: PRICEWATERHOUSECOOPERS		
(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
City: State: Country:		
DUBLIN Ireland	Vo	s No
(d) Is the auditing firm an <i>independent public accountant</i> ?	•	0
	e	0
(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	$\odot$	0
If yes, Public Company Accounting Oversight Board-Assigned Number: 1366		
(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	o	0
	Y	′es N
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?	1	•
Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualifi	ed opini	ons?
• Yes O No O Report Not Yet Received		
If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the rep	ort is ava	ailable
Broker		
Does the <i>private fund</i> use one or more prime brokers?		es N
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. <i>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.		o ( rivate
No Information Filed		
lian	Y	′es N
Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets?		•
If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If t uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	ne <i>priva</i>	te fur
Additional Custodian Information : 1 Record(s) Filed.		

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

- (b) Legal name of custodian: THE BANK OF NEW YORK MELLON SA/NV, DUBLIN BRANCH
- (c) Primary business name of custodian: THE BANK OF NEW YORK MELLON SA/NV, DUBLIN BRANCH

(d) The location of the custodian's office responsible for custody of the private fund's assets (city, state and country):         City:       State:       Country:         DUBLIN       Ireland         (e) Is the custodian a related person of your firm?       If the custodian is a broker-dealer, provide its SEC registration number (if any):         -       CRD Number (if any):         (g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entitidentifier (if any)         Administrator         26. (a) Does the private fund use an administrator other than your firm?         If the answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator.		No
DUBLIN       Ireland         (e) Is the custodian a related person of your firm?       (f) If the custodian is a broker-dealer, provide its SEC registration number (if any): - CRD Number (if any):         (g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>legal enti identifier</i> (if any)         Administrator         26. (a) 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 administrator	<b>o</b>	
<ul> <li>(f) If the custodian is a broker-dealer, provide its SEC registration number (if any): <ul> <li>CRD Number (if any):</li> </ul> </li> <li>(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>legal entidentifier</i> (if any)</li> </ul> Administrator 26. (a) 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 administrator	<b>o</b>	
<ul> <li>(f) If the custodian is a broker-dealer, provide its SEC registration number (if any): <ul> <li>CRD Number (if any):</li> </ul> </li> <li>(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>legal entidentifier</i> (if any)</li> </ul> Administrator 6. (a) 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 administrator	tity	•
<ul> <li>CRD Number (if any):</li> <li>(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>legal entidentifier</i> (if any)</li> <li><b>administrator</b></li> <li>6. (a) 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 administrator</li> </ul>		
<ul> <li>(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>legal entitientifier</i> (if any)</li> <li>dministrator</li> <li>6. (a) 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 administrator</li> </ul>		
<ul> <li><i>identifier</i> (if any)</li> <li>dministrator</li> <li>6. (a) 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 administrator</li> </ul>		
<ul> <li>6. (a) Does the <i>private fund</i> use an administrator other than your firm?</li> <li>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 administr</li> </ul>	Ye	
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administr	Υe	
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administr		es No
	ator,	you
Additional Administrator Information : 1 Record(s) Filed.		
administrator, you must complete questions (b) through (f) separately for each administrator. (b) Name of administrator: BNY MELLON FUND SERVICES (IRELAND) DESIGNATED ACTIVITY COMPANY		
(c) Location of administrator (city, state and country):		
City: State: Country:		
DUBLIN Ireland		
Y	′es N	lo
(d) Is the administrator a <i>related person</i> of your firm?	0 (	•
(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors? • Yes (provided to all investors) • Some (provided to some but not all investors) • No (provided to no investors)		
	's	

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

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

Yes No

 $\odot$ 

 $^{\circ}$ 

No Information Filed

A. PF	RIVATE FUND		
<u>Info</u>	rmation About the Private Fund		
1.	<ul> <li>(a) Name of the <i>private fund</i>:</li> <li>STONE HARBOR INVESTMENT FUNDS PLC - STONE HARBOR INVESTMENT GRADE EMERGING MARKETS DEBT FUND</li> <li>(b) <i>Private fund</i> identification number:</li> <li>(include the "805-" prefix also)</li> <li>805-8101342909</li> </ul>		
2.	Under the laws of what state or country is the <i>private fund</i> organized: State: Ireland		
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		
	CARL O'SULLIVAN, DIRECTOR		
	GEORGE AYLWARD, DIRECTOR		_
	MICHAEL ANGERTHAL, DIRECTOR		
	PATRICK BRADLEY, DIRECTOR		
	PETER WILBY, DIRECTOR		
	VINCENT DODD, DIRECTOR		
	WERNER SCHWANBERG, DIRECTOR		
4.	No Information Filed         The private fund (check all that apply; you must check at least one):         Image: (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940         Image: (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Ireland - Central Bank of Ireland		
		Yes I	No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	•
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?		
	No Information Filed		
		Yes I	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	•
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?	0	e
	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)	)
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:	r 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.		
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	$\circ$	$\odot$
	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	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	۲
10.	What type of fund is the <i>private fund</i> ?		
	○ hedge fund ○ liquidity fund ○ private equity fund ○ real estate fund ○ securitized asset fund ○ venture capital fund ◎ Other private in the private in	'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> :		
	\$ 19,919,492		
<u>Ow</u>	vnership		
12	Minimum investment commitment required of an investor in the <i>private fund</i> :		
12.	\$ 5,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 5		
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: 51%		
	(b) If the private fund qualifies for the evolution from the definition of investment company under costion $2(a)(1)$ of the Investment		No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 51%		
<u>Yo</u>	ur Advisory Services		
17	(a) Are you a subadviser to this <i>private fund</i> ?	-	No
.,.	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer	C to	O
	question 17.(a) is "no," leave this question blank.		
	No Information Filed	V -	
18	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	Yes	No
2.	<ul><li>(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.</li></ul>		-0-
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\odot$	0

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

20. Approximately what percentage of your *clients* has invested in the *private fund*?2%

# Private Offering

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

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

No Information Filed

# B. SERVICE PROVIDERS

# Auditors

		Yes	NO
23.	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	$\odot$	$\circ$
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0	$\odot$

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

		(a)(1) is "yes," respond to questions (l stions (b) through (f) separately for eac	b) through (h) below. If the <i>private fund</i> us In auditing firm.	es more than one auditi	ing	
(b)	Name of the auditing firm	1:				
	PRICEWATERHOUSECOO	PERS				
(C)	The location of the auditi	ng firm's office responsible for the priva	te fund's audit (city, state and country):			
	City:	State:	Country:			
	DUBLIN		Ireland			
				Y	'es	N
(d)	Is the auditing firm an inc	dependent public accountant?		e	•	C
(e)	Is the auditing firm regis	tered with the Public Company Account	ng Oversight Board?	e	•	C
	If yes, Public Company A	ccounting Oversight Board-Assigned Nu	mber:			
	1366					
(f)	If "yes" to (e) above, is t accordance with its rules		ection by the Public Company Accounting (	Oversight Board in	•	Ċ

(g)	Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's	$\odot$	0
	investors?		

(h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?

● Yes ● No ● Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

# Prime Broker

			Yes	No	С
24.	(a)	Does the <i>private fund</i> use one or more prime brokers?	0	e	5
		If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the	e priva	te	
		fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.			

No Information Filed

Custodian

Yes No

0 0

Additional Custodian Info	rmation : 1 Record(s) Filed.		
·		b) through g) below for each custodian the <i>private func</i> ss (b) through (g) separately for each custodian.	luses. If the <i>p</i> i
(b) Legal name of custodi THE BANK OF NEW YO	ian: RK MELLON SA/NV, DUBLIN BRANCH		
(c) Primary business nam THE BANK OF NEW YO	ne of custodian: RK MELLON SA/NV, DUBLIN BRANCH		
(d) The location of the cu	stodian's office responsible for <i>custody</i>	of the <i>private fund's</i> assets (city, state and country):	
City:	State:	Country:	
DUBLIN		Ireland	Y
(e) Is the custodian a rela	ated person of your firm?		Ċ
(f) If the custodian is a b	roker-dealer, provide its SEC registration	on number (if any):	
- CRD Number (if any):			
(g) If the custodian is not <i>identifier</i> (if any)	t a broker-dealer, or is a broker-dealer	but does not have an SEC registration number, provide	e its <i>legal entit</i> y
identifier (if any)	t a broker-dealer, or is a broker-dealer	but does not have an SEC registration number, provide	e its <i>legal entit</i> y
<i>identifier</i> (if any)	t a broker-dealer, or is a broker-dealer	but does not have an SEC registration number, provide	e its <i>legal entit</i> y
<i>identifier</i> (if any) trator Does the <i>private fund</i> use ar If the answer to question 26	n administrator other than your firm?	through (f) below. If the <i>private fund</i> uses more than o	
<i>identifier</i> (if any) trator Does the <i>private fund</i> use ar If the answer to question 26 must complete questions (b	n administrator other than your firm? 5.(a) is "yes," respond to questions (b)	through (f) below. If the <i>private fund</i> uses more than o	
<i>identifier</i> (if any) trator Does the <i>private fund</i> use ar If the answer to question 26 must complete questions (b Additional Administrator I If the answer to question	n administrator other than your firm? 6.(a) is "yes," respond to questions (b) ) through (f) separately for each admin nformation : 1 Record(s) Filed.	through (f) below. If the <i>private fund</i> uses more than o istrator.	ne administrat
<i>identifier</i> (if any) trator Does the <i>private fund</i> use ar If the answer to question 26 must complete questions (b Additional Administrator I If the answer to question	n administrator other than your firm? 6. (a) is "yes," respond to questions (b) ) through (f) separately for each admin <b>nformation : 1 Record(s) Filed.</b> 26. (a) is "yes," respond to questions (b omplete questions (b) through (f) separ	through (f) below. If the <i>private fund</i> uses more than o istrator.	ne administrat
identifier (if any) trator Does the private fund use ar If the answer to question 26 must complete questions (b) Additional Administrator I If the answer to question administrator, you must c (b) Name of administrator	n administrator other than your firm? 6. (a) is "yes," respond to questions (b) ) through (f) separately for each admin <b>nformation : 1 Record(s) Filed.</b> 26. (a) is "yes," respond to questions (b omplete questions (b) through (f) separ	through (f) below. If the <i>private fund</i> uses more than o istrator. b) through (f) below. If the <i>private fund</i> uses more than rately for each administrator.	ne administrat
identifier (if any) trator Does the private fund use ar If the answer to question 26 must complete questions (b Additional Administrator I If the answer to question administrator, you must c (b) Name of administrator BNY MELLON FUND SE	n administrator other than your firm? 6. (a) is "yes," respond to questions (b) ) through (f) separately for each admin <b>nformation : 1 Record(s) Filed.</b> 26. (a) is "yes," respond to questions (b omplete questions (b) through (f) separ	through (f) below. If the <i>private fund</i> uses more than o istrator. b) through (f) below. If the <i>private fund</i> uses more than rately for each administrator.	ne administrat
trator Does the private fund use an If the answer to question 26 must complete questions (b) Additional Administrator I If the answer to question administrator, you must c (b) Name of administrator BNY MELLON FUND SE (c) Location of administrator City:	n administrator other than your firm? 5.(a) is "yes," respond to questions (b) ) through (f) separately for each admin <b>nformation : 1 Record(s) Filed.</b> 26.(a) is "yes," respond to questions (b omplete questions (b) through (f) separately r: RVICES (IRELAND) DESIGNATED ACTIVI	through (f) below. If the <i>private fund</i> uses more than o istrator. b) through (f) below. If the <i>private fund</i> uses more than rately for each administrator. TY COMPANY Country:	ne administrat
trator Does the private fund use an If the answer to question 26 must complete questions (b) Additional Administrator I If the answer to question administrator, you must c (b) Name of administrator BNY MELLON FUND SE (c) Location of administrate	n administrator other than your firm? 6. (a) is "yes," respond to questions (b) ) through (f) separately for each admin <b>nformation : 1 Record(s) Filed.</b> 26. (a) is "yes," respond to questions (k omplete questions (b) through (f) separ r: RVICES (IRELAND) DESIGNATED ACTIVI	through (f) below. If the <i>private fund</i> uses more than o istrator. b) through (f) below. If the <i>private fund</i> uses more than rately for each administrator.	ne administrat
trator Does the <i>private fund</i> use ar If the answer to question 26 must complete questions (b Additional Administrator I If the answer to question administrator, you must c (b) Name of administrator BNY MELLON FUND SE (c) Location of administra City: DUBLIN	n administrator other than your firm? 6. (a) is "yes," respond to questions (b) ) through (f) separately for each admin <b>nformation : 1 Record(s) Filed.</b> 26. (a) is "yes," respond to questions (k omplete questions (b) through (f) separ r: RVICES (IRELAND) DESIGNATED ACTIVI	through (f) below. If the <i>private fund</i> uses more than o istrator. b) through (f) below. If the <i>private fund</i> uses more than rately for each administrator. TY COMPANY Country:	ne administrat
trator Does the <i>private fund</i> use ar If the answer to question 26 must complete questions (b) Additional Administrator I If the answer to question administrator, you must c (b) Name of administrator BNY MELLON FUND SE (c) Location of administrator City: DUBLIN (d) Is the administrator a	n administrator other than your firm? 6. (a) is "yes," respond to questions (b) ) through (f) separately for each admin <b>nformation : 1 Record(s) Filed.</b> 26. (a) is "yes," respond to questions (k omplete questions (b) through (f) separ r: RVICES (IRELAND) DESIGNATED ACTIVI ator (city, state and country): State:	through (f) below. If the <i>private fund</i> uses more than o istrator. b) through (f) below. If the <i>private fund</i> uses more than rately for each administrator. TY COMPANY Country:	ne administrat

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

100%

Include only those assets where (i) such person carried out the valuation procedure established for that asset, if any, including obtaining any

relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such person

#### **Marketers**

Α.

allocations) was the valuation determined by such person	).	
with a tama		

Yes	No
-----	----

Yes No

 $\odot$ 

Yes No  $\odot$ 

 $\odot$ 

28.	a. (a) Does the private fund use the services of someone other than you or your employees for marketing purposes?	0				
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solici 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>priva</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					
Α. Ρ	PRIVATE FUND					
<u>Info</u>	formation About the Private Fund					
1.	(a) Name of the <i>private fund</i> :					
	STONE HARBOR LEVERAGED LOAN FUND LLC					
	(b) <i>Private fund</i> identification number: (include the "805-" prefix also)					
	805-3436622091					
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					
	VIRTUS FIXED INCOME ADVISERS, 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.					
0.	No Information Filed					
		Yes				
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0				
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?					
	No Information Filed					
		Yes				
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0				
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :					
	Private fund identification number:					
	(include the "805-" prefix also)					

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

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

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	$\odot$
	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.	ent	
	(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 private fund invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	O
10.	What type of fund is the private fund?		
	○ hedge fund ○ liquidity fund ○ private equity fund ○ real estate fund ○ securitized asset fund ○ venture capital fund ○ Other pri BANK LOAN FUND WITHOUT BORROWING/DERIVATIVES/LEVERAGE	vate fur	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 private fund:		
	\$ 22,234,518		
<u>0w</u>	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 5,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in a organizational documents of the fund).	he	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 1		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
<u>Yo</u>	ur Advisory Services		
17	(a) Are you a subadvisor to this private fund	-	No
17.	<ul> <li>(a) Are you a subadviser to this <i>private fund</i>?</li> <li>(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 answ question 17.(a) is "no," leave this question blank.</li> </ul>	O ver to	©
	No Information Filed		
		Yee	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?		

No Information Filed

(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the private fund. If the answer

to question 18.(a) is "no," leave this question blank.

19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	$\odot$	0
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Арр 1%	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Priv</u>	/ate	Offering		
21.	Has	s the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes Ō	s No
22.	lfy	ves, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
B. SI	-RVI	CE PROVIDERS		
<u>Auc</u>	litor	<u>s</u>		
			Yes	s No
23.	(a)	<ul> <li>(1) Are the <i>private fund's</i> financial statements subject to an annual audit?</li> <li>(2) If the answer to guardiana 22 (a) (1) is "uses " are the financial statements prepared in accordance with U.S. CAAP2</li> </ul>	$\odot$	
		(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	ting firm	_
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one audi you must complete questions (b) through (f) separately for each auditing firm.		1,
		Additional Auditor Information : 1 Record(s) Filed.		
		If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one au firm, you must complete questions (b) through (f) separately for each auditing firm.	uditing	
		(b) Name of the auditing firm: PRICEWATERHOUSECOOPERS		
		<ul> <li>(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):</li> <li>City: State: Country:</li> <li>DUBLIN Ireland</li> </ul>		
			Yes	No
		(d) Is the auditing firm an <i>independent public accountant</i> ?	$\odot$	0
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	©	0
		If yes, Public Company Accounting Oversight Board-Assigned Number: 1366		
		(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?	۲	0
			Va	s No
	(g)	Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?	o €	
	(h)	Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified	opinion	ıs?
		Yes ○ No ○ Report Not Yet Received     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 availa	able.
<u>Prir</u>	ne E	Broker		
<u>.</u>	, -			s No
24.	(a)	Does the <i>private fund</i> use one or more prime brokers?		© vato
		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

#### **Custodian**

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

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

Additional Cus	odian Information : 1 Record(s) Filed.		
	o question 25.(a) is "yes," respond to questions ( than one custodian, you must complete question	(b) through g) below for each custodian the <i>private</i> ns (b) through (g) separately for each custodian.	<i>fund</i> uses. If the <i>private</i>
	e of custodian: OF NEW YORK MELLON SA/NV, DUBLIN BRANCH		
	siness name of custodian: OF NEW YORK MELLON SA/NV, DUBLIN BRANCH		
(d) The locati	n of the custodian's office responsible for <i>custody</i>	y of the <i>private fund's</i> assets (city, state and country)	):
City: DUBLIN	State:	Country: Ireland	
(e) Is the cus	odian a related person of your firm?		Yes No
(f) If the cust	odian is a broker-dealer, provide its SEC registrati	ion number (if any):	
- CRD Numb	er (if any):		
(g) If the cus identifier (		but does not have an SEC registration number, pro	ovide its <i>legal entity</i>

#### **Administrator**

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

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

Addi	Additional Administrator Information : 1 Record(s) Filed.						
	he answer to question 26.(a) is "yes," respo ninistrator, you must complete questions (b)	• • • • • • • • •	•				
(b)	Name of administrator:						
	BNY MELLON FUND SERVICES (IRELAND) DE	SIGNATED ACTIVITY COMPANY					
(c)	Location of administrator (city, state and co	untry):					
	City: S DUBLIN	tate: Cour Irela	5				
	DODLIN	пела	Yes No	5			
(d)	Is the administrator a related person of your	firm?	0 0	,			
(e)	Does the administrator prepare and send in	nvestor account statements to the priva	ate fund's investors?				
	$\odot$ Yes (provided to all investors) $\odot$ Some (	provided to some but not all investors)	${igodot}$ No (provided to no investors)				
(f)	If the answer to question 26.(e) is "no" or investors? If investor account statements a		nt statements to the (rest of the) <i>private fund's</i> <i>fund's</i> investors, respond "not applicable."				

# Yes No

Yes No

your related person?

100%

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

# <u>Marketers</u>

Yes No

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

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

No Information Filed

#### SECTION 7.B.(2) Private Fund Reporting

1.	Name of the <i>private fund</i> : MOUNTAIN VIEW CLO 2016-1 LTD.	
2.	Private fund identification number:	
	(include the "805-" prefix also)	
	805-5590033800	
3.	Name and SEC File number of adviser that provides information about this private fund in Section 7.B.(1) of Schedule D of its Form ADV filing	
	Name:	
	SEIX CLO MANAGEMENT LLC	
	SEC File Number:	
	801 - 108565	
	Yes No	
4.	Are your <i>clients</i> solicited to invest in this <i>private fund</i> ?	
	In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	
1.	Name of the <i>private fund</i> : MOUNTAIN VIEW CLO 2017-1 LTD.	
	MOUNTAIN VIEW CEO 2017-1 ETD.	
2.	Private fund identification number:	
	(include the "805-" prefix also)	
	805-1594813114	
3.	Name and SEC File number of adviser that provides information about this private fund in Section 7.B.(1) of Schedule D of its Form ADV filing	
	Name:	
	SEIX CLO MANAGEMENT LLC	
	SEC File Number:	
	801 - 108565	
	Yes No	1
4.	Are your <i>clients</i> solicited to invest in this <i>private fund</i> ?	
	In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	
Iten	n 8 Participation or Interest in <i>Client</i> Transactions	

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

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

# Proprietary Interest in Client Transactions Yes A. Do you or any related person: Yes (1) buy securities for yourself from advisory clients, or sell securities you own to advisory clients (principal transactions)? 0 (2) buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients? 0 (3) recommend securities (or other investment products) to advisory clients in which you or any related person has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))? 0

B.	o you or any related person:	Ye	es	No
	<ol> <li>as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisor client securities are sold to or bought from the brokerage customer (agency cross transactions)?</li> </ol>	у с	D	o
	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?	Ø	•	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 that the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	an (	D	•
Inve	tment or Brokerage Discretion			
C.	o you or any related person have discretionary authority to determine the:	Ye	es	No
	<ol> <li>securities to be bought or sold for a <i>client's</i> account?</li> </ol>	G	•	0
	2) amount of securities to be bought or sold for a <i>client's</i> account?	e	•	0
	3) broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?	e	•	0
	4) commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	e	•	0
D.	you answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	c	D	o
E.	o you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ?	e	•	0
F.	you answer "yes" to E. above, are any of the brokers or dealers related persons?	Ċ	D	$\odot$
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?	6	•	0
	<ol> <li>If "yes" to G.(1) above, are all the "soft dollar benefits" you or any related persons receive eligible "research or brokerage services" une section 28(e) of the Securities Exchange Act of 1934?</li> </ol>	der 🤇	•	0
H.	1) Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	e	•	0
	2) Do you or any related person, directly or indirectly, provide any employee compensation that is specifically related to obtaining clients for the firm (cash or non-cash compensation in addition to the employee's regular salary)?	6	•	0
	o you or any <i>related person</i> , including any <i>employee</i> , directly or indirectly, receive compensation from any <i>person</i> (other than you or any <i>rela</i> erson) for client referrals? n your response to Item 8.1., do not include the regular salary you pay to an employee.	ated (	D	o

In responding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or received from (in 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 amount of client referrals.

# 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.

Α.	(1)	Do you have <i>custody</i> of any advisory <i>clients'</i> :	Yes	No
		(a) cash or bank accounts?	$oldsymbol{\circ}$	0
		(b) securities?	$\odot$	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 you have *custody*:

U.S. Dollar Amount	Total Number of Clients
(a) \$ 22,234,518	(b) 1

If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2).

B. (1) In connection with advisory services you provide to *clients*, do any of your *related persons* have *custody* of any of your advisory *clients*': Yes No

(a) cash or bank accounts?

(b) securities?

0 0 0 0 You are required to answer this item regardless of how you answered Item 9.A. (1)(a) or (b).

(2)	If you checked "yes" to Item 9.B.(1)(a) or (b	), what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for which
	your <i>related persons</i> have <i>custody</i> :	
	U.S. Dollar Amount	Total Number of <i>Clients</i>

(a) \$ (b)

- C. If you or your *related persons* have *custody* of *client* funds or securities in connection with advisory services you provide to *clients*, check all the following that apply:
  - (1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage.
  - (2) An *independent public accountant* audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools.
  - (3) An independent public accountant conducts an annual surprise examination of client funds and securities.
  - (4) An *independent public accountant* prepares an internal control report with respect to custodial services when you or your *related persons* are qualified custodians for *client* funds and securities.

If you checked Item 9.C. (2), C. (3) or C. (4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C. (2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the private funds you advise in Section 7.B. (1) of Schedule D).

Yes No

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D.	Do you or your related person(s) act as qualified custodians for your clients in connection with advisory services you provide to clients?	Yes	No	
	(1) you act as a qualified custodian	0	$\odot$	
	(2) your <i>related person(s)</i> act as qualified custodian(s)	0	$oldsymbol{\circ}$	

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

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

# SECTION 9.C. Independent Public Accountant

You must complete the following information for each *independent public accountant* engaged to perform a surprise examination, perform an audit of a pooled investment vehicle that you manage, or prepare an internal control report. You must complete a separate Schedule D Section 9.C. for each *independent public accountant*.

- (1) Name of the *independent public accountant*: COHEN & COMPANY
- (2) The location of the *independent public accountant's* office responsible for the services provided:

Number and Street 1:		Number and Street 2:			
1350 EUCLID AVE		#800			
City:	State:	Country:	ZIP+4/Postal Code:		
CLEVELAND	Ohio	United States	44115		

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

If "yes," Public Company Accounting Oversight Board-Assigned Number: 925

- (4) If "yes" to (3) above, is the *independent public accountant* subject to regular inspection by the Public Company Accounting Oversight Board in concordance with its rules?
- (5) The *independent public accountant* is engaged to:
  - A. 🗹 audit a pooled investment vehicle
  - B.  $\Box$  perform a surprise examination of *clients*' assets

C. 🗖 prepare an internal control report

(6) Since your last annual updating amendment, did all of the reports prepared by the independent public accountant that audited the pooled investment

	vehicle or that examined internal controls contain unqualified opinions?						
	Yes						
	O No						
	C Report Not Yet Received						
	If you check "Report Not Yet Receive available.	ed", you must promptly file a	an amendment to your Form ADV	to update your response when the account	untant's report is		
(1)	Name of the <i>independent public a</i>	ccountant:					
(2)	The location of the independent p	ublic accountant's office resp	ponsible for the services provide	d:			
	Number and Street 1:		Number and Stree	t 2:			
	DELOITTE & TOUCHE HOUSE		EARLSFORT TERRA	CE			
	City:	State:	Country:	ZIP+4/Postal Code:			
	DUBLIN		Ireland				
					Yes No		
(3)	Is the independent public account	ant registered with the Publ	lic Company Accounting Oversig	nt Board?	$\odot$ $\circ$		
	If "yes," Public Company Account 1193	ing Oversight Board-Assign	ed Number:				
(4)	If "yes" to (3) above, is the <i>indep</i> accordance with its rules?	endent public accountant su	bject to regular inspection by th	e Public Company Accounting Oversigh	nt Board in 💿 O		
(5)	The independent public accountan	t is engaged to:					
	<ul> <li>A. ☑ audit a pooled investment v</li> <li>B. □ perform a surprise examination</li> <li>C. □ prepare an internal control</li> </ul>	tion of <i>clients</i> ' assets					
(6)	Since your last <i>annual updating a</i> vehicle or that examined internal			<i>nt public accountant</i> that audited the p	ooled investment		
	€ Yes						
	O NO						
	C Report Not Yet Received						
	If you check "Report Not Yet Receive	ed", vou must promptly file a	an amendment to your Form ADV	to update your response when the account	untant's report is		

available.

#### Item 10 Control Persons

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

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

Yes No

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

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

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

SECTION 10.A. Control Persons

No Information Filed

#### SECTION 10.B. Control Person Public Reporting Companies

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

company):

(1) Full legal name of the public reporting company:

VIRTUS INVESTMENT PARTNERS, INC.

(2) The public reporting company's CIK number (Central Index Key number that the SEC assigns to each reporting 883237 company):

#### Item 11 Disclosure Information

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

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

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.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 orders, judgments, or decrees lapsed.

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

		Yes	No
Do	any of the events below involve you or any of your supervised persons?	0	$\odot$
For	"yes" answers to the following questions, complete a Criminal Action DRP:		
А.	In the past ten years, have you or any advisory affiliate:	Yes	No
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?	0	$\odot$
	(2) been <i>charged</i> with any <i>felony</i> ?	0	$\odot$

If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are currently pending.

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 *misdemeanor* involving: investments or an *investment-related* 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?
 (2) been *charged* with a *misdemeanor* listed in Item 11.B.(1)?

If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are currently pending.

For	"yes" answers to the following questions, complete a Regulatory Action DRP:		
C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	s No
	(1) found you or any advisory affiliate to have made a false statement or omission?	$\circ$	$\odot$
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	0	$\odot$
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	$\odot$
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	0	$\odot$
	(5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity?	0	$\odot$
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	$\odot$
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	0	$\odot$
	(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	$\odot$
	(4) in the past ten years, entered an order against you or any advisory affiliate in connection with an investment-related activity?	$\circ$	$\odot$
	(5) ever denied, suspended, or revoked your or any advisory affiliate's registration or license, or otherwise prevented you or any advisory affiliate, by order, from associating with an investment-related business or restricted your or any advisory affiliate's activity?	0	۲
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?

) O

				400
	(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	$\odot$	
	(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	O	
	(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	٥	
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	۲	
G.	Are you or any advisory affiliate now the subject of any regulatory proceeding that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?	0	۲	
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	$\odot$	
	(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?	0	$\odot$	
	(c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any <i>advisory affiliate</i> by a state or <i>foreign financial regulatory authority</i> ?	0	$\odot$	
	(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	$\odot$	

#### Item 12 Small Businesses

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

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

For purposes of this Item 12 only:

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

		Yes	No
Α.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	0	$\circ$
lf '	'yes," you do not need to answer Items 12.B. and 12.C.		
B.	Do you:		
	(1) control another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0
C.	Are you:		
	(1) controlled by or under common control with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) <i>controlled</i> by or under common <i>control</i> with another <i>person</i> (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0

#### Schedule A

# Direct Owners and Executive Officers

- 1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
- 2. Direct Owners and Executive Officers. List below the names of:
  - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer (Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
  - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);
     Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a

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

- (c) if you are organized as a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
- (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
- (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
- 3. Do you have any indirect owners to be reported on Schedule B? • Yes No
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
- 5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: NA less than 5% B 10% but less than 25% D 50% but less than 75%
  - A 5% but less than 10% C 25% but less than 50% E 75% or more
- 7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
  - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
  - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I		Date Title or Status Acquired MM/YYYY	· ·	Control Person		<i>CRD</i> No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
DILLON, DEIRDRE, ANN	I	CHIEF COMPLIANCE OFFICER	03/2008	NA	N	N	5469512
ANGERTHAL, MICHAEL, AARON	I	EXECUTIVE VICE PRESIDENT, CHIEF FINANCIAL OFFICER	06/2017	NA	Y	N	5632934
VIRTUS PARTNERS, INC.	DE	SHAREHOLDER	06/2017	E	Y	Y	
SMIRL, RICHARD, WILLIAM	I	EXECUTIVE VICE PRESIDENT	07/2022	NA	N	N	4232829
PURKALITIS, ANDRA, CYNTHIA	1	EXECUTIVE VICE PRESIDENT AND CHIEF LEGAL OFFICER	11/2023	NA	Y	N	3070864
RECUPERO, DARREN, PHILIP	I	CHIEF OPERATING OFFICER	01/2022	NA	N	Ν	2147771

# 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	DE/FE/I Entity in Which	n Status	Date Status	Ownership	Control Pl	R CRD No. If None: S.S. No. and
Name, First Name, Middle Name)	Interest is		Acquired	Code	Person	Date of Birth, IRS Tax No. or

		Owned		ΜΜ/ΥΥΥΥ				Employer I D No.
VIRTUS INVESTMENT PARTNERS, INC.	DE	VIRTUS	SOLE	11/2008	E	Y	Y	
		PARTNERS, INC.	SHAREHOLDER					

#### Schedule D - Miscellaneous

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

In addition to the websites noted, the Stone Harbor division of VFIA has reserved two Twitter handles but as of the date of the ADV had not published any tweets to either profile. These "handles" are: @StoneHarbor\_INV and @StoneHarborEMD. In certain situations, responses to item 7.B(1) questions 13 - 16 are unavailable. In respect to Item 5, VFIA utilizes the personnel and/or services of one or more of its affiliates in the performance of its business including, but not limited to, back office operations, legal and compliance, finance and accounting, marketing, sales, information technology, and human resources. Item 5.k.3 custodian identification details are provided on a best efforts basis. VFIA HAS CERTAIN RELATED PERSONS WHICH DO NOT FIT INTO ANY OF THE CATEGORIES LISTED IN SECTION 7.A., INCLUDING VIRTUS INVESTMENT PARTNERS INTERNATIONAL LTD. ("VIRTUS INTERNATIONAL"); VIRTUS INTERNATIONAL FUND LIMITED ("VIRTUS IRELAND") (REF. NO. C182357), WHICH IS AUTHORIZED AND REGULATED BY THE CENTRAL BANK OF IRELAND ("CBI"); VIRTUS INTERNATIONAL MANAGEMENT LLP ("VIRTUS LLP") (FRN 451446) WHICH IS AUTHORIZED AND REGULATED BY THE FINANCIAL CONDUCT AUTHORITY; VIRTUS INTERNATIONAL SERVICES LIMITED (UK) ("VIRTUS UK"), AND VIRTUS GLOBAL PARTNERS PTE. LTD. ("VIRTUS SINGAPORE") (UEN 201018015Z), WHICH IS AUTHORIZED AND REGULATED BY THE MONETARY AUTHORITY OF SINGAPORE ("MAS") (COLLECTIVELY, "INTERNATIONAL ENTITIES"). REPRESENTATIVES OF THE INTERNATIONAL ENTITIES ARE PERMITTED TO INTRODUCE THE INVESTMENT ADVISORY SERVICES OF VFIA AND CERTAIN OF ITS AFFILIATES TO INSTITUTIONAL ENTITIES, SOVEREIGN WEALTH FUNDS, AND OTHER FOREIGN OFFICIAL INSTITUTIONS WITHIN THE UNITED KINGDOM, IN CERTAIN EUROPEAN ECONOMIC AREA MEMBER STATES AND OUTSIDE THE EUROPEAN ECONOMIC AREA, OR IN CERTAIN ASIA-PACIFIC REGIONS. THROUGH A RELATIONSHIP WITH VIRTUS IRELAND, SALESPERSONS WILL BE SECONDED TO CONDUCT SALES AND MARKETING ACTIVITIES IN RESPECT OF THE CBI REGULATED FUNDS OF VIRTUS IRELAND AND ITS AFFILIATES. VIRTUS IRELAND IS THE APPOINTED MANAGEMENT COMPANY TO THE CBI REGULATED FUNDS AFFILIATED WITH THE INTERNATIONAL ENTITIES AND VFIA SUPPLEMENTAL DISCLOSURE TO ITEMS 8.H.(1) AND 8.H.(2): VFIA DOES NOT COMPENSATE ANY THIRD PARTIES WHO ARE NOT EMPLOYEES OR EMPLOYEES OF ITS AFFILIATES FOR CLIENT REFERRALS TO VFIA. VFIA DOES NOT COMPENSATE ANY THIRD PARTIES WHO ARE NOT EMPLOYEES OR EMPLOYEES OF ITS AFFILIATES FOR CLIENT REFERRALS TO VFIA.

#### 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

371504

Exemption from brochure delivery requirements for SEC-registered advisers SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering a brochure to all of your advisory clients, you do not have to prepare a brochure. Yes No Are you exempt from delivering a brochure to all of your clients under these rules?  $\circ$  $\odot$ If no, complete the ADV Part 2 filing below. Amend, retire or file new brochures: Brochure ID **Brochure Name** Brochure Type(s) 311563 SEIX ADV PART 2A High net worth individuals, Pension plans/profit sharing plans, Foundations/charities, Government/municipal, Other institutional, Wrap

NEWFLEET ADV PART 2A

program

High net worth individuals, Pension plans/profit

		sharing plans, Pension consulting,
		Government/municipal, Other institutional, Private
		funds or pools, Wrap program
371505	STONE HARBOR ADV PART 2A	High net worth individuals, Pension plans/profit
		sharing plans, Pension consulting,
		Foundations/charities, Government/municipal, Other
		institutional, Private funds or pools

Part 3			
CRS	Type(s)	Affiliate Info	Retire
¢	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: DEIRDRE A. DILLON Printed Name: DEIRDRE A. DILLON Adviser *CRD* Number: 146029 Date: MM/DD/YYYY 03/27/2024 Title: CHIEF COMPLIANCE OFFICER

# 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: Printed Name: Adviser *CRD* Number: 146029 Date: MM/DD/YYYY Title: