# **FORM ADV**

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

Prin	mary Business Name: STELLARIS CAPITAL MANAG	EMENT LLC	CRD Number: 314714
Ann	nual Amendment - All Sections		Rev. 10/2021
2/2	2/2024 5:29:38 PM		
WA	/ARNING: Complete this form truthfully. False statement prosecution. You must keep this form update	•	your application, revocation of your registration, or criminal orm ADV General Instruction 4.
Iter	em 1 Identifying Information		
	esponses to this Item tell us who you are, where you a formation in Item 1 should be provided for the filing ad	•	tact you. If you are filing an <i>umbrella registration</i> , the sinformation to assist you with filing an <i>umbrella registration</i> .
A.	Your full legal name (if you are a sole proprietor, you STELLARIS CAPITAL MANAGEMENT LLC	ur last, first, and middle names):	
B.	(1) Name under which you primarily conduct your ac STELLARIS CAPITAL MANAGEMENT LLC	Ivisory business, if different from Item 1.	A.
	List on Section 1.B. of Schedule D any additional nam	es under which you conduct your advisory	business.
	(2) If you are using this Form ADV to register more	than one investment adviser under an $u$	mbrella registration, check this box $\square$
	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 name change is of  your legal name or your primary business name		tem 1.B.(1)), enter the new name and specify whether the
D.	(1) If you are registered with the SEC as an investm	nent adviser, your SEC file number:	
	(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 num	pers 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 IAF	RD system, your <i>CRD</i> number: <b>314714</b>
	If your firm does not have a CRD number, skip this Ite	em 1.E. Do not provide the CRD number of	f one of your officers, employees, or affiliates.
	(2) If you have additional CRD Numbers, your additi	onal <i>CRD</i> numbers:	
		No Information Filed	
F.	Principal Office and Place of Business		
	(1) Address (do not use a P.O. Box):		
	Number and Street 1:	Number and Street 2:	
	City: State:	Country:	ZIP+4/Postal Code:
	If this address is a private residence, check this	box: 🗹	
	you are applying for registration, or are registere which you are applying for registration or with wh	d, with one or more state securities author nom you are registered. If you are applying	isiness, at which you conduct investment advisory business. If rities, you must list all of your offices in the state or states to for SEC registration, if you are registered only with the SEC, or offices in terms of numbers of employees as of the end of your
	(2) Days of week that you normally conduct busine Monday - Friday Other:	ss at your <i>principal office and place of bus</i>	siness:
	Normal business hours at this location:		
	9AM TO 5PM (3) Telephone number at this location:		
	(802) 379-8010		

(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

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

the end of your most recently completed fiscal year?

G.	Mailing address, if differer	nt from your <i>principal office and place</i> o	of business address:		
	Number and Street 1:		Number and Street 2:		
	City:	State:	Country:	ZIP+4/Postal Code:	
	If this address is a privat	e residence, check this box: $\Box$			
Н.	If you are a sole proprieto	or, state your full residence address, i	if different from your <i>princip</i> .	al office and place of business address in Item 1.F.:	
	Number and Street 1:		Number and Street 2:		
	City:	State:	Country:	ZIP+4/Postal Code:	
					Yes No
1.	Do you have one or more LinkedIn)?	websites or accounts on publicly available	ilable social media platforms	s (including, but not limited to, Twitter, Facebook and	d
	If a website address serves addresses for all of the oth available social media platf	s as a portal through which to access o er information. You may need to list m	other information you have pure than one portal address. Itent. Do not provide the indiv	licly available social media platforms on Section 1.1. of Sublished on the web, you may list the portal without list Do not provide the addresses of websites or accounts of vidual electronic mail (e-mail) addresses of employees of	ting on publicly
J.	Chief Compliance Officer				
	(1) Provide the name and	contact information of your Chief Cor Compliance Officer, if you have one.		an <i>exempt reporting adviser</i> , you must provide the contemporary tem 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) a	ddress, if Chief Compliance Officer ha	is one:		
K.	Employer Identification Nu Name: IRS Employer Identificatio Additional Regulatory Con	n Number:	he Chief Compliance Officer	is authorized to receive information and respond to	questions
	about this Form ADV, you	may provide that information here.			
	Name:		Titles:		
	Telephone number:		Facsimile number, if any:		
	Number and Street 1:	State	Number and Street 2:	7ID . 4 /Destal Code.	
	City:	State:	Country:	ZIP+4/Postal Code:	
	Electronic mail (e-mail) a	ddress, if contact person has one:			
					Yes No
L.	•	all of the books and records you are our principal office and place of busines	·	tion 204 of the Advisers Act, or similar state law,	0 0
	If "yes," complete Section	1.L. of Schedule D.			
					Yes No
M.	Are you registered with a	foreign financial regulatory authority?			0 0
		registered with a foreign financial regus," complete Section 1.M. of Schedule		have an affiliate that is registered with a foreign financi	
NI	Are you a public reporting	company under Sections 12 or 15(d)	of the Securities Eychange	Act of 10242	Yes No
N.	And you a public reporting	company under Sections 12 or 15(d)	, or the securities exchange	7.00 OF 1704:	0 0
	Did you have \$1 billion	more in access on the last day of	ur most rosont flood voor		Yes No
Ο.	•	more in assets on the last day of you imate amount of your assets:	ur most recent fiscal year?		0 0
	S \$1 billion to less than	•			
	\$10 billion to less that	an \$50 billion			
	C \$50 billion or more				
	-				

	For purposes of Item 1.O. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.								
P.	Provide your <i>Legal Entity Identifier</i> if yo	u have one:							
	A <i>legal entity identifier</i> is a unique numb identifier.	per that companies use to identify each	n other in the financial marketplace. Yo	ou may not have a <i>legal entity</i>					
SECT	ION 1.B. Other Business Names								
		No Informati	on Filed						
SECT	ION 1.F. Other Offices								
		No Informati	on Filed						
SECT	ION 1.I. Website Addresses								
limit socia	your website addresses, including add ted to, Twitter, Facebook and/or Linked al media platform. ress of Website/Account on Publicly Av	IIn). You must complete a separate Sci	hedule D Section 1.I. for each website	-					
SECT	ION 1.L. Location of Books and Reco	rds							
		No Informati	on Filed						
SECT	ION 1.M. Registration with Foreign F	inancial Regulatory Authorities							
		No Informati	on Filed						
Item	2 SEC Registration/Reporting								
State	e Securities Authority Notice Filings	and State Reporting by Exempt Repo	orting Advisers						
	to receive notice of this and all subseq additional state(s), check the box(es)	ce filings. In addition, exempt reporting ile with the SEC. If this is an initial appuent filings or reports you submit to the next to the state(s) that you would lik	advisers may be required to provide solication or report, check the box(es) radio SEC. If this is an amendment to direct to receive notice of this and all subse	tate securities authorities with a copy next to the state(s) that you would like					
	Jurisdictions								
	□ AL	□ IL	□ NE	□ sc					
	□ AK	□ IN	□ NV	□ sD					
	□ AZ	□ IA	□ NH	□ TN					
	□ AR	□ KS	□ N1	<b>☑</b> TX					
	CA	□ KY	□ NM	UT					
	□ co	LA	NY NY	□ VT					
	СТ	□ ME	□ NC	□ VI					
	□ DE	MD	ND ND	□ VA					
	DC DC	MA MA	ОН	□ wa					
	□ FL	□ MI	ОК	□ wv					
	□ GA	□ MN	OR	□ wi					
	□ GU	□ MS	РА	□ wy					
	□н	МО	□ PR						

		ID L	MT	RI		
	-	u are amending your registration to stop 's notice filing or report filing fee for the				pay that
SEC	ΓΙΟΝ	2.B. <i>Private Fund</i> Assets				
		eck Item 2.B.(2) or (3), what is the amo	ount of the <i>private fund</i> assets th	at you manage?		\$
		rivate fund assets" has the same meani outside the United States only include				lace of
ltem	ı 3 Fo	rm of Organization				
		filing an <i>umbrella registration</i> , the infor	mation in Item 3 should be provi	ded for the filing adviser only.		
A.		are you organized? Corporation				
	0	Sole Proprietorship				
	0	Limited Liability Partnership (LLP)				
	0	Partnership				
	•	Limited Liability Company (LLC)				
	0	Limited Partnership (LP)				
		Other (specify):				
	If you	u are changing your response to this Ite	m, see Part 1A Instruction 4.			
B.		nat month does your fiscal year end ea EMBER	nch year?			
C.	Stat Dela If you name	er the laws of what state or country are e Country aware United States  u are a partnership, provide the name of e of the state or country where you residuate changing your response to this Item	the state or country under whose le.	· laws your partnership was form	ned. If you are a sole proprietor, provide	e the
		her Business Activities em, we request information about your	firm's other business activities.			
		are actively engaged in business as a (				
		(1) broker-dealer (registered or unregistered representative of a broker commodity pool operator or agent (1) insurance broker or agent (1) bank (including a separately identify) trust company (1) registered municipal advisor (10) registered security-based swap particular (11) major security-based swap particular (12) accountant or accounting firm (13) lawyer or law firm (14) other financial product salespersor all engage in other business using a name of the commodity pool operator or commodity pool o	egistered) oker-dealer modity trading advisor (whether ent tifiable department or division of dealer cipant on (specify):	a bank)		
						Yes No
B.	(1)	Are you actively engaged in any other If yes, is this other business your prin		(other than giving investment a	advice)?	0 0
	121	. 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	101 A MASH (£22);			(C) (C)

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.

If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.	
SECTION 6.A. Names of Your Other Businesses	
No Information Filed	
SECTION 6.B.(2) Description of Primary Business	
Describe your primary business (not your investment advisory business):	
If you engage in that business under a different name, provide that name:	
SECTION 6.B.(3) Description of Other Products and Services	
Describe other products or services you sell to your <i>client</i> . You may omit products and services that you listed in Section 6.B.(2) above.	
If you engage in that business under a different name, provide that name:	
tem 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 <i>clients</i> .	y
A. This part of Item 7 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates. Your <i>related persons</i> are all of you <i>advisory affiliates</i> and any <i>person</i> that is under common <i>control</i> with you.	 ur
You have a related person that is a (check all that apply):  (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)  (2) other investment adviser (including financial planners)  (3) registered municipal advisor  (4) registered security-based swap dealer  (5) major security-based swap participant  (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)  (7) futures commission merchant  (8) banking or thrift institution  (9) trust company  (10) accountant or accounting firm  (11) lawyer or law firm  (12) insurance company or agency  (13) pension consultant  (14) real estate broker or dealer  (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles	
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 the rel	th

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

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

Yes No

operationally independent under rule 206(4)-2 of the Advisers Act.

	· · ·	Yes	No
Iten	m 7 <i>Private Fund</i> Reporting		
12.	Do you and the <i>related person</i> share the same physical location?		0
11.	No Information Filed  Do you and the <i>related person</i> share any <i>supervised persons</i> ?	ea. <b>⊙</b>	0
10.	<ul><li>(a) Is the related person registered with a foreign financial regulatory authority?</li><li>(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.</li></ul>	_	•
9.	<ul><li>(a) If the related person is an investment adviser, is it exempt from registration?</li><li>(b) If the answer is yes, under what exemption?</li></ul>	0	0
	If this address is a private residence, check this box:	Yes	
	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's</i> Number and Street 1:  City: State: Country: ZIP+4/Postal Code:	asse	ts:
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> </ul>	_	0
7.	Are you and the related person under common control?	•	0
	Do you control or are you controlled by the related person?	0	
	(k) □ lawyer or law firm  (l) □ insurance company or agency  (m) □ pension consultant  (n) □ real estate broker or dealer  (o) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles  (p) ▼ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
5.	(a)		
5	No Information Filed  Related Person is: (check all that apply)		
4.	Related Person's  (a) CRD Number (if any):  (b) CIK Number(s) (if any):		
4	Other  Selected Sergen's		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
2.	Primary Business Name of <i>Related Person</i> : STELLARIS CAPITAL PARTNERS GP		
1.	Legal Name of <i>Related Person</i> : STELLARIS CAPITAL PARTNERS GP, LP		

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

B. Are you an adviser to any private fund?

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

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

	Funds per Page: 15 Total Funds: 1		
A. Pl	RIVATE FUND		
Info	ormation About the <i>Private Fund</i>		
1.	(a) Name of the <i>private fund</i> :  STELLARIS CAPITAL PARTNERS, LP		
	(b) Private fund identification number:  (include the "805-" prefix also)		
	805-2972206405		
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 persons serving in a similar capacity):		
	Name of General Partner, Manager, Trustee, or Director		
	STELLARIS CAPITAL PARTNERS GP, LP		
	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.		
	(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.			
4.	No Information Filed		
4.	No Information Filed  The private fund (check all that apply; you must check at least one):		
4.	No Information Filed  The private fund (check all that apply; you must check at least one):  (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940		
	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  ✓ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
	No Information Filed  The <i>private fund</i> (check all that apply; you must check at least one):  ✓ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  ✓ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940  List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.	Yes	s N
	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  ✓ (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 <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.	Yes	
5.	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  ✓ (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 <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.  No Information Filed	_	s N
5.	No Information Filed  The private fund (check all that apply; you must check at least one):  ✓ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  ✓ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  (a) Is this a "master fund" in a master-feeder arrangement?	_	
5.	No Information Filed  The private fund (check all that apply; you must check at least one):  ✓ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  ✓ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  (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?	0	6
5.	No Information Filed  The private fund (check all that apply; you must check at least one):  ✓ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  ✓ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  (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?	_	6
5.	No Information Filed  The private fund (check all that apply; you must check at least one):  ✓ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940  ✓ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940  List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.  No Information Filed  (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	s N

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

for the master-feeder arrangement or reporting on the funds separately.

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)

	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 assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single	this question if it issue	
		Yes	s No
8.			$\odot$
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other purposes of whether they are also <i>private funds</i> or registered investment companies.	ooled investment	
	(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	s No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Incompany Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	nvestment	•
10.	0. What type of fund is the <i>private fund</i> ?		
	$oldsymbol{\circ}$ hedge fund $oldsymbol{\circ}$ liquidity fund $oldsymbol{\circ}$ private equity fund $oldsymbol{\circ}$ real estate fund $oldsymbol{\circ}$ securitized asset fund $oldsymbol{\circ}$ venture capital fur	nd Other <i>private fu</i>	nd:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	1. Current gross asset value of the <i>private fund</i> : \$ 7,934,658		
<u>Ow</u>	<u>wnership</u>		
12.	2. Minimum investment commitment required of an investor in the private fund:		
	\$ 500,000		
	NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amou organizational documents of the fund).	nt set forth in the	
13.	<ul><li>3. Approximate number of the <i>private fund's</i> beneficial owners:</li></ul>		
14.	4. What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 4%		
15.	5. (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	0%	Yes	s No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Act of 1940, are sales of the fund limited to qualified clients?	vestment <b>©</b>	0
16.	6. What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :  0%		
Υοι	our Advisory Services		
17		Yes	s No
17.	<ul><li>(a) Are you a subadviser to this private fund?</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 private functions.</li></ul>	ond If the answer to	•
	question 17.(a) is "no," leave this question blank.	na. If the answer to	
	No Information Filed		
			s 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 private fund</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 private fund</li><li>to question 18.(a) is "no," leave this question blank.</li></ul>	v	<b>⊙</b> ver
	No Information Filed		

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>Priv</u>	vate Offering		
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Ye:	s No
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-402286		
B. S	ERVICE PROVIDERS		
Auc	<u>ditors</u>	.,	
23	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?		s No
20.	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	• •	
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one audi you must complete questions (b) through (f) separately for each auditing firm.	_	
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one a firm, you must complete questions (b) through (f) separately for each auditing firm.	uditing	
	(b) Name of the auditing firm:  SPICER JEFFRIES LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country:		
	DENVER Colorado United States	Yes	No
	(d) Is the auditing firm an independent public accountant?	•	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number:  349		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
		Ye	s No
	(g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	•	0
	(h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified	d opinior	าร?
	O Yes O 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	t is avail	lable.
<u>Prir</u>	me Broker		
24	(a) Does the <i>private fund</i> use one or more prime brokers?	Ye •	s No
<u>-</u> 7.	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.		-
	Additional Prime Broker Information : 1 Record(s) Filed.		

•		e broker.
ered with the SEC, its registration r	number:	
fice used principally by the <i>private</i>	fund (city, state and country):	
State: New York	Country: United States	
		Yes No
s custodian for some or all of the p	private fund's assets?	<b>⊙</b> ○
		Yes No
	s listed above) to hold some or all of its assets?	0 0
	nrough (g) below for each custodian the <i>private fur</i> bugh (g) separately for each custodian.	nd uses. If the <i>private fund</i>
n : 1 Record(s) Filed.		
	through g) below for each custodian the <i>private fo</i> (b) through (g) separately for each custodian.	und uses. If the private
ustodian:		
n's office responsible for <i>custody</i> of	the private fund's assets (city, state and country):	
State: New York	Country: United States	
New TOLK	Utilited States	Yes No
erson of your firm?		○ ●
dealer, provide its SEC registration	number (if any):	
cer-dealer, or is a broker-dealer bu	ut does not have an SEC registration number, prov	ride its <i>legal entity</i>
		Yes No
nistrator other than your firm?		• o
	•	n one administrator, you
ation : 1 Record(s) Filed.		
;		s "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more that ugh (f) separately for each administrator.

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:				
		NAV FUND ADMINISTRATION GROUP				
	(c)	Location of administrator (city, state and	country):			
		City: OAKBROOK TERRACE		State: Illinois	Country: United States	
		OMBROOK TEMPOE		11111013	Office States	Yes No
	(d)	Is the administrator a related person of you	our firm?			0 0
	(e)	Does the administrator prepare and send			•	
		• Yes (provided to all investors) • Some	e (provided to some l	out not all inves	stors) ONo (provided to no invest	ors)
	(f)	If the answer to question 26.(e) is "no" of investors? If investor account statements				
you	r <i>relat</i>	our last fiscal year, what percentage of the ted person?	e private fund's assets	(by value) was	s valued by a <i>person</i> , such as an a	ndministrator, that is not
rele	ude o vant o	nly those assets where (i) such <i>person</i> car quotes, and (ii) the valuation used for pur is) was the valuation determined by such	poses of investor sub	•	-	
<u>Markete</u>	<u>ers</u>					
20 (2)	Doos	the <i>private fund</i> use the services of some	and other than you o	r vour omplovo	as for markating nurnosas?	Yes No
20. (d)		must answer "yes" whether the person act	3	, ,		C ©
	simila	ar person. If the answer to question 28.(a)  If the private fund uses more than one ma	is "yes," respond to	questions (b) t	hrough (g) below for each such m	arketer the <i>private fund</i>
			No In	formation Filed		
			Funds per Page: 15	5 Total Funds	:: 1	
CCTLON:	7 D (2	)) Drivata Fund Danartina				
DECTION	/ .D. (2	2) <i>Private Fund</i> Reporting				
			No Inform	ation Filed		
tem 10 C	ontrol	Persons				
n this Iter	n, we	ask you to identify every <i>person</i> that, dire ded for the <i>filing adviser</i> only.	ctly or indirectly, con	trols you. If you	ı are filing an <i>umbrella registration</i> ,	the information in Item 10
and execu	tive of	itting an initial application or report, you m fficers. Schedule B asks for information ab ule A or Schedule B (or both) that you filed	out your indirect own	ners. If this is a	n amendment and you are updation	ng information you reported
A. Does	any p	erson not named in Item 1.A. or Schedules	s A, B, or C, directly o	r indirectly, <i>cont</i>	trol your management or policies?	Yes No
	<i>3</i> 1°			<b>y</b> ,		0 6
If yes	, comp	plete Section 10.A. of Schedule D.				
		on named in Schedules A, B, or C or in Sect act of 1934, please complete Section 10.B.		e D is a public re	eporting company under Sections	12 or 15(d) of the Securities
SECTION .	10.A.	Control Persons				

SEC	CTION 10.B. Control Person Public Reporting Companies		
	No Information Filed		
Iter	n 11 Disclosure Information		
det inve one	this Item, we ask for information about your disciplinary history and the disciplinary history of all your advisory affiliates. We use this information to the ermine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities a sestment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to be of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the filing adviser and all relying advisers brella registration.	as an more	than
of y	our advisory affiliates are: (1) all of your current employees (other than employees performing only clerical, administrative, support or similar function your officers, partners, or directors (or any person performing similar functions); and (3) all persons directly or indirectly controlling you or controlled out are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your advisory affiliates are.	d by y	
follo disc calc	rou 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 to owing 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 you closure 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 purpose 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 prefers, judgments, or decrees lapsed.	ur poses	of
You	ı must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.		
		Yes	s No
Do	any of the events below involve you or any of your supervised persons?	0	•
For	"yes" answers to the following questions, complete a Criminal Action DRP:		
A.		Yes	s No
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?	0	•
	(2) been charged with any felony?	0	•
B.	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A. (2) charges that are currently pending.  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?	to	•
	(2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)?	0	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) charges that are currently pending.	to	
<u>For</u>	"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?	0	$\odot$
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	0	•
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	0	$\odot$
	(5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity?	0	•
_			
D.	Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:  (1) ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical?	-	_
		O	•
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	0	•
	(3) ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?  (4) in the past ten years, entered an order against you or any advisory affiliate in connection with an investment related activity?	0	•
	(4) in the past ten years, entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with an <i>investment-related</i> activity?	0	⊙
	(5) ever denied, suspended, or revoked your or any 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	•

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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?

(2)	found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	0	•		
(3)	found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•		
(4)	disciplined you or any <i>advisory affiliate</i> by expelling or suspending you or the <i>advisory affiliate</i> from membership, barring or suspending you or the <i>advisory affiliate</i> from association with other members, or otherwise restricting your or the <i>advisory affiliate's</i> activities?	0	•		
Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or suspended?					
	you or any <i>advisory affiliate</i> now the subject of any regulatory <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.C., D., or 11.E.?	0	•		
"yes	" answers to the following questions, complete a Civil Judicial Action DRP:				
(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	•		
	(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	•		

 $\circ$ 

#### Schedule A

F.

For H.

#### **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) 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)?

- 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.

(c) complete each column.								
FULL LEGAL NAME (Individuals: Last	DE/FE/I	Title or	Date Title or Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date of	
Name, First Name, Middle Name)		Status	Acquired MM/YYYY	Code	Person		Birth, IRS Tax No. or Employer ID No.	
SILBER, STEPHEN	I	MANAGER,	05/2021	D	Υ	N	7381596	
		MEMBER						
MASTYLO, DAIMAN	I	MANAGER,	05/2021	D	Υ	N	7381597	
		MEMBER						

## Schedule B

#### **Indirect Owners**

1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.

- 2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
  - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

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

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

No Information Filed

## Schedule D - Miscellaneous

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

# 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

## **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: STEPHEN SILBER Printed Name: STEPHEN SILBER Date: MM/DD/YYYY 02/02/2024
Title:

**MANAGER** 

Adviser CRD Number:

314714

#### NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

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

#### 1. Appointment of Agent for Service of Process

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

2. Appointment and Consent: Effect on Partnerships

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

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

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

## Signature

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

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

Signature: Date: MM/DD/YYYY

Printed Name: Title:

Adviser *CRD* Number:

314714