



IARD

Form ADV

## About Form ADV

Form ADV is used by Investment Adviser firms to register with the Securities and Exchange Commission (SEC), as well as to register or notice file with individual states and jurisdictions.

Exempt Reporting Advisers (ERA) also use Form ADV to report to SEC and states. For guidance on whether a firm qualifies as exempt from SEC registration, please refer to [www.sec.gov/iard](http://www.sec.gov/iard). For more information regarding states and jurisdiction requirements, NASAA provides guidance and regulator contact information at [www.nasaa.org](http://www.nasaa.org).

## Revised Form ADV

Effective October 1, 2017, Form ADV was revised. The revisions were intended to fill data gaps, make clarifying and technical changes, and elicit information about Relying Advisers. For more information on recent Form ADV revisions, please visit the [SEC's website](#).

## Protect Personal Information

Provide personal information about individuals in response to specific questions that solicit that information. When responding to more general questions that accept narrative responses, use terms that do not disclose personal information (including account numbers). Please review the guidance provided on the [Protecting Personal Information in Form ADV Filings](#) page for more information.

## Contents:

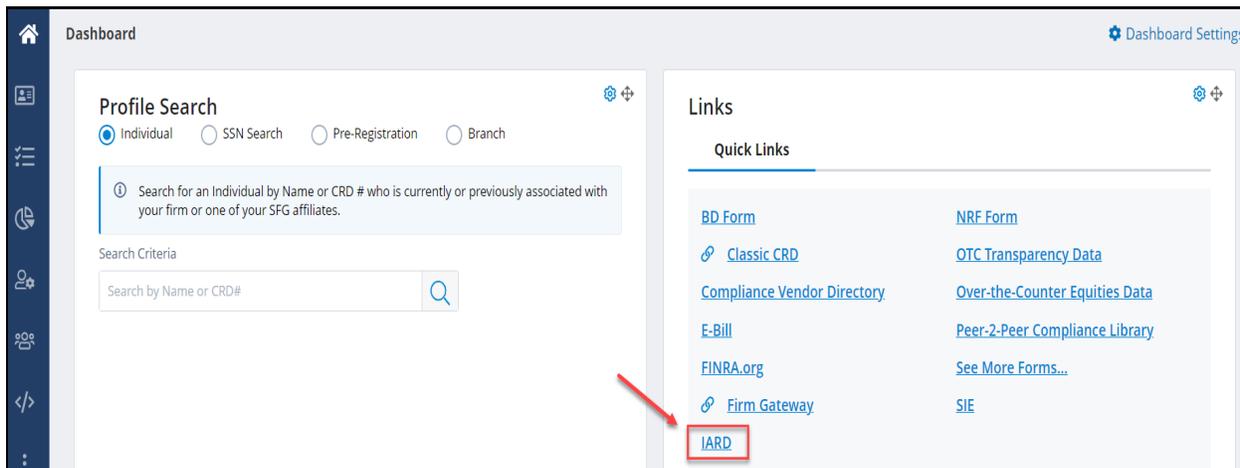
- [Create a New Form ADV Filing](#) (pgs. 2,3)
- [Form ADV Filing Types](#) (pgs.4,5)
- [Item 1 Identifying Information](#) (pg. 6)
- [Item 2 SEC Registration](#) (pg. 7)
- [Item 2.B. SEC Reporting by Exempt Reporting Advisers](#) (pg. 8)
- [Item 2.C. State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers](#) (pg. 9)
- [SEC Regulatory Notifications](#) (pg. 10)
- [Item 5.K. Separately Managed Account Clients](#) (pg. 11)
- [Item 11 Disclosure Information](#) (pg. 12)
- [Direct and Indirect Owners](#) (pg. 15)
- [Schedule D Section 7.A. Financial Industry Affiliations](#) (pg. 17)
- [Schedule D Section 7.B.\(1\) and 7.B.\(2\) Private Fund Reporting](#) (pg.18)
- [Schedule R Relying Advisers](#) (pg. 21)
- [Form ADV Part 1B](#) (pg. 22)
- [Submission Menu](#) (pg. 25)
- [View Historical Form ADV Filings](#) (pg. 27)

**Questions on IARD? Call the IARD Hotline at 240-386-4848**  
8 A.M. - 8 P.M., ET, Monday through Friday.

## Create a New Form ADV Filing

Access IARD directly at <https://crd.finra.org/iad> or through the newly designed FINRA Gateway at <https://gateway.finra.org> as shown below.

If accessing IARD through FINRA Gateway, select **IARD** in the Quick Links section of your firm's dashboard and then navigate to the IARD Main tab.



Select the **New/Draft Filing** link on the Site Map to create a new Form ADV filing. The system will dynamically display filing types based on the firm's current registrations and filing option selection.


 Printer Friendly

Select ADV Filing

- Organization Search
- **New/Draft Filing**
- Historical Filing

## Create a New ADV Filing

**What filing(s) do you want to make? More than one may be selected.**

[Click here for more information regarding your first IARD filing.](#)

Apply for registration as an investment adviser with the SEC

Apply for registration as an investment adviser with one or more States

File an Initial Report as an Exempt Reporting Adviser with the SEC

File an Initial Report as an Exempt Reporting Adviser with one or more States

Create New Filing

ADV Part 2 Guidance:

[IARD System Instructions](#)

[SEC-Registered Advisers](#)

[State-Registered Advisers](#)

If a Form ADV filing has already been created for the firm but not yet submitted, the **Draft Filing** screen will display. The firm will have the option to either continue working on the draft filing or delete it. **After 120 days, draft Form ADV filings that have not been submitted will be automatically deleted from the system and cannot be recovered.**

<b>Draft Filing</b>	
<b>Reference #</b>	0602207908ED62A
<b>Primary Business Name</b>	INVESTMENT ADVISER FIRM
<b>Filing Type(s)</b>	State Initial
<b>Filing Creation Date</b>	8/24/2016 1:36:16 PM
<b>Expected Purge Date</b>	12/22/2016
<b>Submission Status</b>	Pending Submission
<div style="display: flex; justify-content: center; gap: 20px;"> <p style="background-color: #0056b3; color: white; padding: 5px 15px; border: 1px solid black; display: inline-block;">Continue with Filing</p> <p style="background-color: #0056b3; color: white; padding: 5px 15px; border: 1px solid black; display: inline-block;">Delete Filing</p> </div>	

## Form ADV Filing Types

Below is a description of all Form ADV filing types. IARD will display filing type options based on your firm's current registrations and filing selection.

### SEC and State Registered Adviser Filing Types

<p><b>Apply for registration as an investment adviser with the SEC</b></p>	<p>Choose this filing type if you are not registered with the SEC and are filing your first application to do so.</p> <p>The threshold for most investment adviser firms to be eligible for SEC registration is \$100 million in assets under management. Most firms with less than \$100 million in assets under management should apply for registration with a state.</p>
<p><b>Apply for registration as an investment adviser with one or more states</b></p>	<p>Choose this filing type if you are not currently registered with any state and are filing a new application to do so.</p>
<p><b>Submit an Amendment</b></p>	
<p><b>Annual Updating Amendment</b></p>	<p>Choose this filing type if :</p> <ul style="list-style-type: none"> <li>• You are an existing SEC registrant, state registrant, or Exempt Reporting Adviser; and</li> <li>• You have previously filed Form ADV and are now filing your Annual Amendment.</li> </ul> <p>An SEC Investment Adviser must submit its Annual Updating Amendment within 90 days of the firm's fiscal year-end.</p>
<p><b>Other-than-Annual Amendment to your registration</b></p>	<p>Choose this filing type if:</p> <ul style="list-style-type: none"> <li>• You are registered with the SEC, or states, and are amending your existing Form ADV;</li> <li>• You are SEC registered and wish to Notice File with a new state;</li> <li>• You are state registered and wish to seek registration in an additional state; or</li> <li>• You have an application pending with the SEC or states to become registered and are amending a previously filed Form ADV.</li> <li>• You have already reported to the SEC or state as an Exempt Reporting Adviser and are amending a previously filed Form ADV</li> </ul>

## Form ADV Filing Types (Continued)

### Exempt Reporting Adviser Filing Types

<p><b>File an Initial Report as an Exempt Reporting Adviser with one or more States</b></p>	<p>Choose this filing type if you qualify for exemption from registration and this is your first time reporting to a state as an Exempt Reporting Adviser.</p>
<p><b>File an Initial Report as an Exempt Reporting Adviser with the SEC</b></p>	<p>Choose this filing type if you qualify for exemption from registration and this is your first time reporting to the SEC as an Exempt Reporting Adviser.</p>
<p><b>Other-than-Annual Amendment</b></p>	<p><b>To add States</b> you report to as an Exempt Reporting Adviser, file a Form ADV amendment and select the checkbox next to those States you wish to add in Item 2.C.</p> <p><b>To remove individual States</b> that you report to as an Exempt Reporting Adviser (equivalent of filing a Final Report for that specific state), file a Form ADV amendment and uncheck</p>
<p><b>Submit a Final Report as a SEC Exempt Reporting Adviser</b></p>	<p>Choose this filing type if <u>both</u> of the following apply:</p> <ul style="list-style-type: none"> <li>• You already report to the SEC; and</li> <li>• You no longer qualify for exemption from registration or are no longer required to report to the SEC as an Exempt Reporting Adviser.</li> </ul> <p>If this filing type is selected, the system will display additional filing options. Users should select all options that apply.</p> <p>For example, a firm may no longer qualify for exemption from SEC registration and is now required to apply for registration with the SEC and/or the state(s). The firm should select the “Submit a Final Report...” main option, and also select the appropriate “Apply for registration...” sub-option.</p>
<p><b>File a final Report as a State Exempt Reporting Adviser with <u>all</u> States that have received Exempt Reporting Adviser Reports</b></p>	<p>Choose this filing type if <u>both</u> of the following apply:</p> <ul style="list-style-type: none"> <li>• You already report to the state(s); and</li> <li>• You no longer qualify for exemption from registration or are no longer required to report to <u>any state</u> as an Exempt Reporting Adviser</li> </ul>

## Item 1 Identifying Information

### Changing the Firm's Name

Item 1.C. allows firms to change their legal name and/or primary business name. The filer must check the appropriate box(es) for which name they are changing and then enter the new name in the text box.

The name change will take effect after the filing is submitted, and will display on future Form ADV filings. Historical filings will continue to reflect the name of the firm at the time that particular filing was created.

<p>A. Your full legal name (if you are a sole proprietor, your last, first, and middle names): INVESTMENT ADVISER FIRM</p> <p>B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A. INVESTMENT ADVISER FIRM</p> <p><i>List on <a href="#">Section 1.B. of Schedule D</a> any additional names under which you conduct your advisory business.</i></p> <p>(2) If you are using this Form ADV to register more than one investment adviser under an <i>umbrella registration</i>, check this box <input type="checkbox"/></p> <p><i>If you check this box, complete a Schedule R for each relying adviser.</i></p> <p>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</p> <p><input checked="" type="checkbox"/> your legal name or <input checked="" type="checkbox"/> your primary business name: NEW FIRM NAME <input type="text"/></p>
---

## Item 2 SEC Registration

The responses to the questions in Item 2.A. will determine a firm's eligibility to register with the SEC. The SEC provides information about its rules and the Investment Advisers Act of 1940 on its website: [www.sec.gov/iard](http://www.sec.gov/iard). Additional guidance can also be found on the IARD Web site: [www.iard.com](http://www.iard.com).

Item 2 SEC Registration	Other-Than-Annual Amendment
<p>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 <i>annual updating amendment</i> to your SEC registration.</p>	
<p>A. To register (or remain registered) with the SEC, you must check <b>at least one</b> of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an <i>annual updating amendment</i> to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). <a href="#">Part 1A Instruction 2</a> provides information to help you determine whether you may affirmatively respond to each of these items.</p>	
<p>You (the adviser):</p>	
<p><input checked="" type="checkbox"/> (1) are a <b>large advisory firm</b> that ether:</p> <ul style="list-style-type: none"> <li>(a) has regulatory assets under management of \$100 million (in U.S. dollars) or more, or</li> <li>(b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent <i>annual updating amendment</i> and is registered with the SEC;</li> </ul> <p><input type="checkbox"/> (2) are a <b>mid-sized advisory firm</b> 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:</p> <ul style="list-style-type: none"> <li>(a) not required to be registered as an adviser with the <i>state securities authority</i> of the state where you maintain your <i>principal office and place of business</i>, or</li> <li>(b) not subject to examination by the <i>state securities authority</i> of the state where you maintain your <i>principal office and place of business</i>;</li> </ul> <p><i>Click <a href="#">HERE</a> for a list of states in which an investment adviser, if registered, would not be subject to examination by the state securities authority.</i></p>	

## Item 2.B. SEC Reporting by Exempt Reporting Advisers

This section will only display for firms filing an initial report or have already reported to the SEC as an Exempt Reporting Adviser. The responses to the questions in Item 2.B. determine a firm's eligibility for exemption from registration with the SEC.

<b>Item 2 SEC Registration</b>	<b>Other-Than-Annual Amendment</b>
<b>SEC Reporting by Exempt Reporting Advisers</b>	
<p>B. Complete this Item 2.B. only if you are reporting to the SEC as an <i>exempt reporting adviser</i>. Check all that apply. You:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> (1) qualify for the exemption from registration as an adviser solely to one or more venture capital funds;</li> <li><input checked="" type="checkbox"/> (2) qualify for the exemption from registration because you act solely as an adviser to <i>private funds</i> and have assets under management in the United States of less than \$150 million.</li> <li><input type="checkbox"/> (3) act solely as an adviser to <i>private funds</i> but you are no longer eligible to check box 2.B.(2) because you have assets under management in the United States of \$150 million or more.</li> </ul> <p style="text-align: center;">If you check boxes (2) or (3), complete <span style="border: 1px solid red; border-radius: 50%; padding: 2px;">Section 2.B. of Schedule D.</span></p>	

Firms that are exempt from registration under rule 203(m)-1 of the Investment Advisers Act must also provide the amount of private fund assets managed in **Schedule D, Section 2.B Private Fund Assets.**

	<span style="font-size: small;">? Printer Friendly</span>
<b>Submission</b>	<b>SECURITIES FIRM</b> <span style="float: right;">Reference #: 74818166898A91C</span>
<ul style="list-style-type: none"> <li>▪ Completeness Check</li> <li>▪ Submit Filing</li> <li>▪ Print Preview</li> </ul>	<b>SECTION 2.B. Private Fund Assets</b> <span style="float: right;">Other-Than-Annual Amendment</span>
<b>ADY, Schedule D</b>	<p>Certain items in Part 1A of Form ADV require additional information on Schedule D. Use this Schedule D to report details for items listed below. Report only new information or changes/updates to previously submitted information.</p> <p>If you check Item 2.B.(2) or (3), what is the amount of the <i>private fund</i> assets that you manage? <span style="float: right; border: 1px solid red; border-radius: 50%; padding: 2px;">\$ <input style="width: 100px;" type="text"/></span></p> <p style="font-size: x-small;">NOTE: "<i>Private fund</i> assets" has the same meaning here as it has under rule 203(m)-1. If you are an investment adviser with its <i>principal office and place of business</i> outside of the United States only include <i>private fund</i> assets that you manage at a place of business in the United States.</p>
<ul style="list-style-type: none"> <li>▪ Section 1.B. Other Business Names</li> <li>▪ Section 1.F. Other Offices</li> <li>▪ Section 1.I. Website Addresses</li> <li>▪ Section 1.L. Location of Books and Records</li> <li>▪ Section 1.M. Registration with Foreign Financial Regulatory Authorities</li> <li style="border: 1px solid red; border-radius: 50%; padding: 2px;">▪ <b>Section 2.B. Private Fund Assets</b></li> <li>▪ Section 6.A. Names of Your Other Businesses</li> </ul>	<span style="background-color: #4a7ebb; color: white; padding: 2px 10px;">&lt; Previous</span> <span style="background-color: #4a7ebb; color: white; padding: 2px 10px; margin: 0 20px;">Save</span> <span style="background-color: #4a7ebb; color: white; padding: 2px 10px;">Next &gt;</span>

### Item 2.C. State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers

**Notice Filing:** In addition to registration, SEC Registered Advisers are required to provide some state securities authorities a copy of their Form ADV and any amendments they file with the SEC. These are called notice filings. A firm can add a notice filing in Item 2.C. by checking the box next to the state(s) you wish to receive them.

To stop a notice filing create a Form ADV amendment and uncheck the box next to the state in Item 2.C.

**State Reporting:** Exempt Reporting Advisers may be required to report to the state(s). You can report to a state by checking the box next to the state(s) in Item 2.C. (See Page 4 for the filing types used to add states.)

To stop reporting to a state as an Exempt Reporting Adviser (i.e. file a Final Report with a state), create a Form ADV amendment and uncheck the box next to the state in Item 2.C.

**Do not submit a Form ADV-W to stop a notice filing or to stop reporting to a state.**

**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 and all subsequent filings or reports you submit to the SEC. If this is 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

Select All

<input type="checkbox"/> AL	<input type="checkbox"/> ID	<input type="checkbox"/> MO	<input checked="" type="checkbox"/> PA
<input type="checkbox"/> AK	<input type="checkbox"/> IL	<input type="checkbox"/> MT	<input type="checkbox"/> PR
<input type="checkbox"/> AZ	<input type="checkbox"/> IN	<input type="checkbox"/> NE	<input type="checkbox"/> RI
<input type="checkbox"/> AR	<input type="checkbox"/> IA	<input type="checkbox"/> NV	<input type="checkbox"/> SC
<input checked="" type="checkbox"/> CA	<input type="checkbox"/> KS	<input type="checkbox"/> NH	<input type="checkbox"/> SD
<input type="checkbox"/> CO	<input type="checkbox"/> KY	<input checked="" type="checkbox"/> NJ	<input type="checkbox"/> TN
<input type="checkbox"/> CT	<input type="checkbox"/> LA	<input type="checkbox"/> NM	<input checked="" type="checkbox"/> TX
<input type="checkbox"/> DE	<input type="checkbox"/> ME	<input checked="" type="checkbox"/> NY	<input type="checkbox"/> UT
<input type="checkbox"/> DC	<input type="checkbox"/> MD	<input type="checkbox"/> NC	<input type="checkbox"/> VT
<input checked="" type="checkbox"/> FL	<input type="checkbox"/> MA	<input type="checkbox"/> ND	<input type="checkbox"/> VI
<input type="checkbox"/> GA	<input type="checkbox"/> MI	<input type="checkbox"/> OH	<input type="checkbox"/> VA
<input type="checkbox"/> GU	<input type="checkbox"/> MN	<input type="checkbox"/> OK	<input type="checkbox"/> WA
<input type="checkbox"/> HI	<input type="checkbox"/> MS	<input type="checkbox"/> OR	<input type="checkbox"/> WV
			<input type="checkbox"/> WI

*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).*

## SEC Regulatory Notifications

Firms registered with or reporting to the SEC can enter email addresses in Item 1.J. (Chief Compliance Officer) and 1.K. (Additional Regulatory Contact) to receive the following email notifications:

### Event Based Notifications:

- Notify IA Firm when SEC registration is approved
- Notify IA Firm when SEC registration is cancelled (*This email is generated when an IA firm's SEC registration status changes to "Cancelled" or "Revoked" from any other status.*)
- Notify IA Firm when SEC registration is suspended
- Notify IA/ERA Firms when an email address is updated

### Time Based Notifications:

- Notify IA/ERA Firms of obligation to update annual amendment (60 days before filing is due)
- Notify IA/ERA Firms of obligation to update annual amendment (30 days before filing is due)
- Notify IA/ERA Firms of delinquent filing – 30 days past due
- Notify IA/ERA Firms of delinquent filing – 60 days past due
- Notify IA/ERA Firms of delinquent filing – 90 days past due (notice of possible cancellation)
- Notify IA Firm of 120-day Deadline Approaching (60 days before filing is due)
- Notify IA Firm of 120-day Deadline Approaching (30 days before filing is due)
- Notify IA Firm of possible 120-day cancellation

### Relying Adviser Notifications:

- Notify IA Firm when any Schedule R, Section 2.A.(6) is marked (120-day registration eligibility)
- Notify IA Firm when any Schedule R, Section 2.A.(9) is marked (no longer eligible to remain SEC registered)

## Item 5.K Separately Managed Account Clients

Form ADV was revised on October 1, 2017 to add Item 5.K questions and corresponding Schedule D detail pages. Although “separately managed account clients” is not a defined term, the text of question 5.K.(1) mentions clients other than those listed in Item 5.D.(3)(d), (e) and (f). So for the purposes of completing the new questions, “separately managed account clients” are any clients listed in (a), (b), (c), (g), (h), (i), (j), (k), (l), (m) or (n) of Item 5.D.

Filers should complete Item 5.K. using that concept—any clients in Item 5.D. other than investment companies, business development companies, and pooled investment vehicles. Please refer to the [SEC’s Frequently Asked Questions](#) for additional information regarding completing Item 5.K.

K. Separately Managed Account Clients		Yes	No
(1) Do you have regulatory assets under management attributable to <i>clients</i> other than those listed in Item 5.D.(3)(d)-(f) (separately managed account <i>clients</i> )?		<input type="radio"/>	<input type="radio"/>
<i>If yes, complete <a href="#">Section 5.K.(1) of Schedule D</a>.</i>			
(2) Do you engage in borrowing transactions on behalf of any of the separately managed account <i>clients</i> that you advise?		<input type="radio"/>	<input type="radio"/>
<i>If yes, complete <a href="#">Section 5.K.(2) of Schedule D</a>.</i>			
(3) Do you engage in derivative transactions on behalf of any of the separately managed account <i>clients</i> that you advise?		<input type="radio"/>	<input type="radio"/>
<i>If yes, complete <a href="#">Section 5.K.(2) of Schedule D</a>.</i>			
(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?		<input type="radio"/>	<input type="radio"/>
<i>If yes, complete <a href="#">Section 5.K.(3) of Schedule D</a> for each custodian.</i>			

## Item 11 Disclosure Information

If you are registered or registering with the SEC, 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. The questions are broken out into the following categories: Criminal, Regulatory Action, and Civil Judicial.

For each "Yes" answer, provide details of the disclosure event on the corresponding Disclosure Reporting Page (DRP).

State-registered investment advisers must respond to additional Disclosure questions in Part 1B of Form ADV.

Submission	SECURITIES FIRM	Reference #: 6328332613879CE														
<ul style="list-style-type: none"> <li>▪ Completeness Check</li> <li>▪ Submit Filing</li> <li>▪ Print Preview</li> </ul> <hr/> <div style="background-color: #0056b3; color: white; padding: 2px;">Form ADV 1A Disclosure</div> <ul style="list-style-type: none"> <li>▪ <b>Item 11 Disclosure Information</b></li> <li>▪ Part 1A - Criminal DRPs</li> <li>▪ Part 1A - Regulatory Action DRPs</li> <li>▪ Part 1A - Civil Judicial DRPs</li> <li>▪ Return To Form ADV</li> </ul>	<p><b>Item 11 Disclosure Information</b></p> <p>In this Item, we ask for information about your disciplinary history and the disciplinary history of all your <i>advisory affiliates</i>. 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.</p> <p>Your <i>advisory affiliates</i> are: (1) all of your current <i>employees</i> (other than <i>employees</i> performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any <i>person</i> performing similar functions); and (3) all <i>persons</i> directly or indirectly <i>controlling</i> you or <i>controlled</i> by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your <i>advisory affiliates</i> are.</p> <p><i>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.</i></p> <p>You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.</p>	<p><b>Other-Than-Annual Amendment</b></p>														
	<p>Do any of the events below involve you or any of your <i>supervised persons</i>? *</p> <p>For "yes" answers to the following questions, complete a Criminal Action DRP:</p> <p>A. In the past ten years, have you or any <i>advisory affiliate</i>:</p> <p>(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any <i>felony</i>? *</p> <p>(2) been <i>charged</i> with any <i>felony</i>? *</p> <p><i>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.</i></p> <p>B. In the past ten years, have you or any <i>advisory affiliate</i>:</p> <p>(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses? *</p> <p>(2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B(1)? *</p> <p><i>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.</i></p>	<table border="0"> <tr> <td style="padding-right: 10px;"><b>Yes</b></td> <td style="padding-right: 10px;"><b>No</b></td> </tr> <tr> <td style="text-align: center;"><input type="radio"/></td> <td style="text-align: center;"><input checked="" type="radio"/></td> </tr> </table> <table border="0"> <tr> <td style="padding-right: 10px;"><b>Yes</b></td> <td style="padding-right: 10px;"><b>No</b></td> </tr> <tr> <td style="text-align: center;"><input type="radio"/></td> <td style="text-align: center;"><input checked="" type="radio"/></td> </tr> <tr> <td style="text-align: center;"><input type="radio"/></td> <td style="text-align: center;"><input checked="" type="radio"/></td> </tr> </table> <table border="0"> <tr> <td style="padding-right: 10px;"><input type="radio"/></td> <td style="padding-right: 10px;"><input checked="" type="radio"/></td> </tr> <tr> <td style="padding-right: 10px;"><input type="radio"/></td> <td style="padding-right: 10px;"><input checked="" type="radio"/></td> </tr> </table>	<b>Yes</b>	<b>No</b>	<input type="radio"/>	<input checked="" type="radio"/>	<b>Yes</b>	<b>No</b>	<input type="radio"/>	<input checked="" type="radio"/>						
<b>Yes</b>	<b>No</b>															
<input type="radio"/>	<input checked="" type="radio"/>															
<b>Yes</b>	<b>No</b>															
<input type="radio"/>	<input checked="" type="radio"/>															
<input type="radio"/>	<input checked="" type="radio"/>															
<input type="radio"/>	<input checked="" type="radio"/>															
<input type="radio"/>	<input checked="" type="radio"/>															

## Link/Copy Disclosure Reporting Pages (DRPs)

Joint Broker-Dealer/Investment Adviser (BD/IA) firms may be required to report a disclosure event on both their Form BD and Form ADV. The details of that disclosure event may be identical. In such a case, joint firms have the ability to link or copy DRPs from their Form BD.

- Linking a DRP allows the firm to apply that Form BD DRP to an affirmative disclosure question answer on Form ADV. The DRP will display on Form ADV under Linked BD Disclosures. This means that the DRP can only be modified on Form BD, and any changes can then be imported to Form ADV using the “Refresh” function on the next Form ADV amendment filing.
- Copying a Form BD DRP will create a copy on Form ADV will retain the details but can be modified by the firm. In this case, the DRP will display under A Only Disclosures. (Note: Bond and Judgment/Lien DRPs can be copied from Form BD but cannot be linked.)

Part 1A - Regulatory Action DRPs						
<b>IA Only Disclosures</b>						
	Questions	Affiliate List	Date Initiated	Initiator Name	Docket / Case #	
<a href="#">Edit</a>	11E(1)		10/01/2000	SRO	12-25368	
<a href="#">Edit</a>	11E(1)		09/01/2002	SEC	44-555555	
<a href="#">Edit</a>	11C(5)		08/13/2002	SEC	1111111	
<a href="#">Edit</a>	11C(1)		01/08/1998	SRO	12JH735	
<a href="#">Edit</a>	11C(1)		01/08/1998	SRO	12JH735	
<a href="#">Edit</a>	11C(3)		02/02/2003	SEC	55-8465987	
<b>Linked BD Disclosures</b>						
	Needs Updating	Questions	Affiliate List	Date Initiated	Initiator Name	Docket / Case #
<a href="#">View</a>	N	11E(2)		10/01/2003	SRO	88-8888888 <a href="#">Unlink</a>
<a href="#">View</a>	N	11E(2)		05/01/2003	STATereg	55-8888888 <a href="#">Unlink</a>
<a href="#">View</a>	N	11E(1)		10/04/2007	SEC	44448888 <a href="#">Unlink</a>
<a href="#">View</a>	N	11E(3)		05/14/2008	SRO	9509 <a href="#">Unlink</a>
<a href="#">View</a>	N	11E(1)		01/01/2008	SRO	1234 <a href="#">Unlink</a>
<a href="#">View</a>	N	11E(1)		08/11/2005	SEC	888888888888 <a href="#">Unlink</a>
<a href="#">View</a>	N	11E(3)		10/22/2008	SRO	10-22-2008 <a href="#">Unlink</a>
<a href="#">View</a>	N	11E(1)		01/01/2008	SRO	11/13/2008 <a href="#">Unlink</a>
<a href="#">Next</a> <a href="#">Create New</a> <a href="#">Link to BD</a> <a href="#">Previous</a>						

BD - Regulatory Action DRPs						
		Questions	Affiliate List	Date Initiated	Initiator Name	Docket / Case #
<a href="#">View</a>	<a href="#">Link</a> <a href="#">Copy</a>	11D(5), 11E(1)		10/01/2000	STATE	000001
<a href="#">View</a>	<a href="#">Link</a> <a href="#">Copy</a>	11C(1)		01/08/1998	SRO	000002
<a href="#">View</a>	<a href="#">Link</a> <a href="#">Copy</a>	11C(2)		06/12/2001	STATE	000003

## Removing Item 11 Disclosure Reporting Pages (DRPs)

Form ADV allows for DRPs to be removed in certain circumstances. To remove, select the appropriate DRP to edit and select the correct reason for removal within the DRP itself. The system will archive the disclosure after the filing is successfully submitted, and on subsequent filings the answer to the disclosure question can be changed to “No” (if applicable).

(Note: All amendments to Form ADV are subject to review by the regulator(s) the firm is registered or notice filed with. DRPs that are removed in error may be required to be re-filed. Please contact your regulator for additional guidance regarding disclosure reporting obligations.)

<input type="checkbox"/> This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser.
<input type="checkbox"/> This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.
<p>If you are registered or registering with a <i>state securities authority</i>, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.</p>
<input checked="" type="checkbox"/> This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances: SAMPLE EXPLANATION OF CIRCUMSTANCES. <div style="border: 1px solid black; height: 100px; width: 100%;"></div>

## Schedule A Direct Owners/Executive Officers

Schedule A is used to add or update information on Direct Owners/Executive Officers of the applicant. Names for the following individuals and/or entities should be provided on Schedule A:

- Each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer, director and any other individuals with similar status or functions. Note, firms are required to report one Chief Compliance Officer.
- If your firm is organized as a corporation, report 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).
- 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.*
- If your firm is organized as a partnership, report all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
- 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
- If your firm is organized as a limited liability company ("LLC"), report (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, report all elected managers.

## Schedule B Indirect Owners

Schedule B is used to add or update information on Indirect Owners of the applicant. With respect to each owner listed on Schedule A (except individual owners), include:

**(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**, all 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.

### Adding Foreign Individuals as Direct and Indirect Owners

If an individual being added to Schedule A or B is a foreign associate and does not have a Social Security Number (SSN), leave the SSN fields blank and click the Create New ID button to create a new CRD number for the individual.

Create a New Individual			
SSN:	<input type="text"/>	SSN (again):	<input type="text"/>
Last Name:	<input type="text" value="doe"/>	First Name:	<input type="text" value="john"/>
Middle Name:	<input type="text"/>	Suffix:	<input type="text"/>
Birth Date:	<input type="text"/>		
<input type="button" value="Create New ID"/> <input type="button" value="Reset"/>			

### Reporting Direct and Indirect Owners as a Joint Firm

For investment adviser firms that are also registered broker-dealers, an ongoing association exists between the Form BD Direct Owners/Executive Officers and the Form ADV Direct Owners/Executive Officers (i.e. Schedule A/C). The same association exists for the Indirect Owners (Schedule B/C).

If a broker-dealer/investment adviser firm wishes to add, delete, or make a change to Schedules A or B, this addition, deletion or change must be done through a Form BD Amendment.

Once the change is made to the firm’s record on Web CRD (i.e. Form BD), the corresponding IARD record must be updated to include that ownership change before another ADV filing can be submitted.

A **Refresh** button will display on the Schedule A/C and Schedule B/C pages of Form ADV if Direct and Indirect Owner information has been updated on Form BD since your last Form ADV filing.

Printer Friendly									
Direct Owner Information was updated on a BD filing since your last ADV filing. You need to refresh this information.									
To update Schedule A on the Form ADV, you must file the information via an amended Form BD on Web CRD. The amended BD filing will update the Form ADV Schedule information on the IARD system.									
<b>BD/IA FIRM</b> <span style="float: right;"><b>Reference #: 733925783887B04</b></span>									
<b>Schedule A/C Direct Owners / Executive Officers</b> <span style="float: right;"><b>State Application</b></span>									
<a href="#">View Instructions</a> <input type="button" value="Refresh"/>									
<table border="1"> <thead> <tr> <th></th> <th>Name</th> <th>Title / Status</th> </tr> </thead> <tbody> <tr> <td><a href="#">View</a></td> <td>DOE, JOHN</td> <td>PRESIDENT, VICE-CHAIRMAN</td> </tr> <tr> <td><a href="#">View</a></td> <td>DOE, JANE</td> <td>CHIEF COMPLIANCE OFFICER</td> </tr> </tbody> </table>		Name	Title / Status	<a href="#">View</a>	DOE, JOHN	PRESIDENT, VICE-CHAIRMAN	<a href="#">View</a>	DOE, JANE	CHIEF COMPLIANCE OFFICER
	Name	Title / Status							
<a href="#">View</a>	DOE, JOHN	PRESIDENT, VICE-CHAIRMAN							
<a href="#">View</a>	DOE, JANE	CHIEF COMPLIANCE OFFICER							
<input type="button" value="« Previous"/> <span style="float: right;"><input type="button" value="Next »"/></span>									
<p><b>Do you have any indirect owners required to be reported on the Schedule B form? *</b></p> <input type="radio"/> Yes <input checked="" type="radio"/> No									

## Schedule D Section 7.A. Financial Industry Affiliations

This information is required if you checked any box in Part 1A Item 7.A. and is used to report information about related persons.

One of the features in this Schedule D section is the firm **Look Up** button, which enables the system to populate the Firm Name based on the SEC number or CRD number.

?	Printer Friendly
<b>INVESTMENT ADVISER</b>	<b>Reference #: 697083382888660</b>
<b>SECTION 7.A. Financial Industry Affiliations</b>	<b>Other-Than-Annual Amendment</b>

Certain items in Part 1A of Form ADV require additional information on Schedule D. Use this Schedule D to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.

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

- Legal Name of *Related Person*: \*
- Primary Business Name of *Related Person*: \*
- Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
 -    
 or  
 Other
- Related Person's* CRD Number (if any):

In the above example, based on the CRD number entered, the system will populate the firm's legal name, primary business name, and SEC number (if applicable). See below.

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

- Legal Name of *Related Person*: \*
- Primary Business Name of *Related Person*: \*
- Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)  
 -    
 or  
 Other
- Related Person's* CRD Number (if any):

## Schedule D Section 7.B.(1) and 7.B.(2) Private Fund Reporting

This information is required if you answer “Yes” to Part 1A Item 7.B. and is used to report information about a private fund. Each fund reported will need to be assigned an identification number, called a “Private Fund Identification Number.”

### Tips

- If a firm has relying advisers listed on Schedule R, they will be required to link each private fund on Schedule D 7.B.(1) with a relying adviser.
- Private Funds are required to be submitted on Form ADV prior to being included on a Form PF filing. See Instruction 10 of [Form PF](#) for more information.

### Adding a Private Fund

Filers with existing funds have the ability to clone Questions 23-28 or clone all of the fund information entered in Section 7.B.(1) to a new fund. Otherwise, click the Create New button to create a new fund.

				Printer Friendly	
<b>INVESTMENT ADVISER</b>				<b>Reference #: 35733190969EA8F</b>	
<b>SECTION 7.B.(1) Private Fund Reporting</b>				<b>Other-Than-Annual Amendment</b>	
<p>Certain items in Part 1A of Form ADV require additional information on Schedule D. Use this Schedule D to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.</p> <p>If you want to create a new Schedule D, Section 7.B.(1) for a <u>new private fund</u> that is pre-populated with the information entered in either Questions 23-28 or in all questions from one of the <i>private funds</i> listed below, select the "Clone Question 23-28" or "Clone Full Fund" button beside the <i>private fund</i> whose information you wish to copy into the new <i>private fund's</i> Section 7.B.(1). The IARD system will pre-fill those questions for you, but you will be able to manually edit the information after it is pre-filled and before you submit your filing.</p>					
			<b>Private Fund Name</b>		<b>Private Fund Identification Number</b>
<a href="#">Edit</a>	<a href="#">Delete</a>	<a href="#">Clone Question 23-28</a>	<a href="#">Clone Full Fund</a>	SAMPLE FUND	805-1111111111
<a href="#">« Previous</a>		<a href="#">Create New</a>		<a href="#">Next »</a>	

## Schedule D Section 7.B.(1) and 7.B.(2) Private Fund Reporting (Continued)

### Generate a Private Fund Identification Number

This feature generates a 10-digit private fund ID number (with an '805' prefix) to be used on Form ADV to report a private fund. This private fund ID number will not be associated with any private fund until a Form ADV filing is submitted that contains this number in Schedule D Section 7.B.(1) or 7.B.(2) of Form ADV.

If more than one adviser will report the same private fund in Section 7.B. of Schedule D (e.g., there are sub-advisers), these advisers will need to coordinate with each other to use the same private fund identification number in Form ADV.

SECTION 7.B.(1) <i>Private Fund Reporting</i>	Other-Than-Annual Amendment
<p>Certain items in Part 1A of Form ADV require additional information on Schedule D. Use this Schedule D to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.</p>	
<p>A. PRIVATE FUND</p> <p><b>Information About the <i>Private Fund</i></b></p> <p>1. (a) Name of the <i>private fund</i>: *</p> <p><input type="text"/></p> <p>(b) <i>Private fund</i> identification number: * (include the "805-" prefix also)</p> <p><input type="text"/></p> <p><a href="#">Click here to generate a <i>Private Fund</i> Identification Number</a></p>	

When the "Click here..." hyperlink is selected, a pop-up window will open that allows the user to generate a new private fund identification number (PFID).

SECTION 7.B.(1) <i>Private Fund Reporting</i>
<p>Certain items in Part 1A of Form ADV require additional information on Schedule D. Use this Schedule D to report details for items listed below. Report only changes/updates to previously submitted information. Do not repeat previously submitted information.</p> <p>A. PRIVATE FUND</p> <p><b>Information About the <i>Private Fund</i></b></p> <p>1. (a) Name of the <i>private fund</i>:</p> <p><input type="text"/></p> <p>(b) <i>Private fund</i> identification number: (include the "805-" prefix also)</p> <p><input type="text"/></p> <p><a href="#">Click here to generate a <i>Private Fund</i> Identification Number</a></p> <p>2. Under the laws of what state or country is the <i>private fund</i> located?</p> <p>State: <input type="text"/></p>

**Click the button below to generate an identification number for a *private fund***

If you or another adviser has already acquired an identification number for this *private fund*, do not generate a new identification number. You must use the existing number.

If more than one adviser or subadviser will report on the same *private fund*, they are responsible for coordinating to ensure that they all use the same *private fund* identification number for that fund.

For additional information, see [Instruction 6 to Part 1A of Form ADV.](#)

## Generate a Private Fund Identification Number (Continued)

After clicking the "Generate" button, the new PFID will be auto-populated in Question 1.(b).

SECTION 7.B.(1) <i>Private Fund Reporting</i>	Other-Than-Annual Amendment
<p>Certain items in Part 1A of Form ADV require additional information on Schedule D. Use this Schedule D to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.</p>	
<p>A. PRIVATE FUND</p>	
<p><b>Information About the <i>Private Fund</i></b></p>	
<p>1. (a) Name of the <i>private fund</i>: *</p> <p><input type="text" value="Sample Fund"/></p>	
<p>(b) <i>Private fund</i> identification number: * (include the "805-" prefix also)</p> <p><input type="text" value="805-1111111111"/></p> <p><a href="#">Click here to generate a <i>Private Fund</i> Identification Number</a></p>	

## Adding Funds Previously Reported by Another Firm

When providing a PFID on 7.B.(1) that has previously been reported on another firm's Form ADV, an informational pop-up message will display (sample below). This is not an error that will prevent submission, rather a reminder for the user to confirm that the PFID entered is correct. After confirming, users can click the Close button and continue with the filing.

Schedule D, Section 7.B.(1) - 1(b) Private Fund Identification Number entered has already been entered on Schedule D, Section 7.B.(1) – 1(b) by another organization. Please verify that the Private Fund Identification Number being entered is valid.

## Reporting funds on 7.B.(2)

If the firm is a sub-adviser to a fund, do not report the fund on 7.B.(1). Instead add the fund to 7.B.(2), including the name and SEC number of the adviser that lists the fund on their 7.B.(1).

SECTION 7.B.(2) <i>Private Fund Reporting</i>	Other-Than-Annual Amendment
<p>Certain items in Part 1A of Form ADV require additional information on Schedule D. Use this Schedule D to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.</p>	
<p>1. Name of the <i>private fund</i>:</p> <p><input type="text"/></p>	
<p>2. <i>Private fund</i> identification number: (include the "805-" prefix also)</p> <p><input type="text"/></p> <p><a href="#">Click here to generate a <i>Private Fund</i> Identification Number</a></p>	
<p>3. Name and SEC File number of adviser that provides information about this <i>private fund</i> in Section 7.B.(1) of Schedule D of its Form ADV filing</p> <p>Name: <input type="text"/></p> <p>SEC File Number: 801 ▾ - <input type="text"/> <input type="button" value="Look Up"/></p>	
<p>4. Are your <i>clients</i> solicited to invest in this <i>private fund</i>? <span style="float: right;">Yes No</span> <span style="float: right;">○ ○</span></p> <p><small>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.</small></p>	

## Schedule R Relying Advisers

One adviser (the “filing adviser”) can file a single Form ADV on behalf of itself and other advisers that are controlled by or under common control with the filing adviser (i.e. a “relying adviser”), provided that they conduct a single advisory business (collectively an “umbrella registration”).

Firm 123		Reference #: 00000000000000D0		
Schedule R - Relying Advisers		Annual Amendment		
Records per Page: 25		Total Records: 1		
<a href="#">Edit</a>	<a href="#">Clone</a>	<a href="#">Delete</a>	<b>CRD Number</b>	<b>Legal Name</b>
			00000	FIRM A
Records per Page: 25		Total Records: 1		
<a href="#">« Previous</a>		<a href="#">Create New</a>		<a href="#">Next »</a>

Complete all of the required sections for each Relying Adviser.

Form ADV, Schedule R
<ul style="list-style-type: none"> <li>▪ <b>Section 1 Identifying Information</b></li> <li>▪ Section 2 SEC Registration</li> <li>▪ Section 3 Form of Organization</li> <li>▪ Section 4 Direct Owners</li> <li>▪ Section 4 Indirect Owners</li> <li>▪ Section 4 Control Persons</li> <li>▪ Section 4 Control Persons - Public Reporting Companies</li> <li>▪ Return To Schedule R</li> </ul>

### Tips

- The system will automatically assign each Relying Adviser a CRD Number. However, the form will allow the filer to use an existing CRD Number for the Relying Adviser (if they already have one) using the ‘Look Up’ feature.
- If a firm with Private Funds adds Relying Advisers to Form ADV, they will need to connect each Relying Adviser to a fund listed on Schedule D 7.B.(1).
- See the [SEC Regulatory Notifications](#) section for information about email notifications related to advisers listed on Schedule R.

## Form ADV Part 1B

Part 1B will only display for firms filing an initial application for state registration or firms that already hold or have requested state registration.

### Part 1B Item 1 State Registration

Select the boxes next to the states in which you would like to apply for registration.

NASAA provides information about state investment adviser laws and state rules, and how to contact a state securities authority, on its website: [www.nasaa.org](http://www.nasaa.org). Additional information can also be found on the IARD Web site: [www.iard.com](http://www.iard.com).

Printer FriendlyReference #: 733925783887B04

**Submission**

- Completeness Check
- Submit Filing
- Print Preview

**Form ADV, Part 1B**

- Part 1B Item 1 - State Registration**
- Part 1B Item 2 - Additional Information
- Part 1B - Disclosure Questions
- Part 1B - Business Information
- Part 1B - State Registered Adviser Execution Page
- Return To Form ADV, Part 1A

**STATE REGISTERED IA FIRM**

**Part 1B Item 1 - State Registration** **State Application**

**You must complete this Part 1B only if you are applying for registration, or are registered, as an investment adviser with any of the state securities authorities.**

Complete this Item 1 if you are submitting an initial application for state registration or requesting additional state registration(s). Check the boxes next to the states to which you are submitting this application. If you are already registered with at least one state and are applying for registration with an additional state or states, check the boxes next to the states in which you are applying for registration. Do not check the boxes next to the states in which you are currently registered or where you have an application for registration pending.

Jurisdictions \*

<input type="checkbox"/> AL	<input type="checkbox"/> ID	<input type="checkbox"/> MO	<input type="checkbox"/> PA
<input type="checkbox"/> AK	<input type="checkbox"/> IL	<input type="checkbox"/> MT	<input type="checkbox"/> PR
<input type="checkbox"/> AZ	<input type="checkbox"/> IN	<input type="checkbox"/> NE	<input type="checkbox"/> RI
<input type="checkbox"/> AR	<input type="checkbox"/> IA	<input type="checkbox"/> NV	<input type="checkbox"/> SC
<input type="checkbox"/> CA	<input type="checkbox"/> KS	<input type="checkbox"/> NH	<input type="checkbox"/> SD
<input type="checkbox"/> CO	<input type="checkbox"/> KY	<input type="checkbox"/> NJ	<input type="checkbox"/> TN
<input type="checkbox"/> CT	<input type="checkbox"/> LA	<input type="checkbox"/> NM	<input type="checkbox"/> TX
<input type="checkbox"/> DE	<input type="checkbox"/> ME	<input type="checkbox"/> NY	<input type="checkbox"/> UT
<input type="checkbox"/> DC	<input checked="" type="checkbox"/> MD	<input type="checkbox"/> NC	<input type="checkbox"/> VT
<input type="checkbox"/> FL	<input type="checkbox"/> MA	<input type="checkbox"/> ND	<input type="checkbox"/> VI
<input type="checkbox"/> GA	<input type="checkbox"/> MI	<input type="checkbox"/> OH	<input type="checkbox"/> VA
<input type="checkbox"/> GU	<input type="checkbox"/> MN	<input type="checkbox"/> OK	<input type="checkbox"/> WA
<input type="checkbox"/> HI	<input type="checkbox"/> MS	<input type="checkbox"/> OR	<input type="checkbox"/> WV
			<input type="checkbox"/> WI

### Part 1B - Disclosure Questions

For State-registered Investment Adviser firms, additional Disclosure questions display in Part 1B. The questions are broken out into the following categories: Bond, Judgment/Lien, Arbitration, and Civil Judicial. For each "Yes" answer, provide details of the disclosure event on the corresponding Disclosure Reporting Page (DRP). State-registered advisers must also respond to the disclosure questions in Form ADV Part 1A, Item 11.

<b>Submission</b>	<span>?</span> Printer Friendly												
STATE REGISTERED IA FIRM <b>Part 1B Item 1 - State Registration</b>	Reference #: 733925783887B04 State Application												
Form ADV, Part 1B Part 1B Item 1 - State Registration	<p><b>You must complete this Part 1B only if you are applying for registration, or are registered, as an investment adviser with any of the state securities authorities.</b></p> <p>Complete this Item 1 if you are submitting an initial application for state registration or requesting additional state registration(s). Check the boxes next to the states to which you are submitting this application. If you are already registered with at least one state and are applying for registration with an additional state or states, check the boxes next to the states in which you are applying for registration. Do not check the boxes next to the states in which you are currently registered or where you have an application for registration pending.</p> <p>Jurisdictions *</p> <p style="background-color: #2e5496; color: white; padding: 2px;">Select All</p> <table border="0" style="width: 100%;"> <tr> <td><input type="checkbox"/> AL</td> <td><input type="checkbox"/> ID</td> <td><input type="checkbox"/> MO</td> <td><input type="checkbox"/> PA</td> </tr> <tr> <td><input type="checkbox"/> AK</td> <td><input type="checkbox"/> IL</td> <td><input type="checkbox"/> MT</td> <td><input type="checkbox"/> PR</td> </tr> <tr> <td><input type="checkbox"/> AZ</td> <td><input type="checkbox"/> IN</td> <td><input type="checkbox"/> NE</td> <td><input type="checkbox"/> RI</td> </tr> </table>	<input type="checkbox"/> AL	<input type="checkbox"/> ID	<input type="checkbox"/> MO	<input type="checkbox"/> PA	<input type="checkbox"/> AK	<input type="checkbox"/> IL	<input type="checkbox"/> MT	<input type="checkbox"/> PR	<input type="checkbox"/> AZ	<input type="checkbox"/> IN	<input type="checkbox"/> NE	<input type="checkbox"/> RI
<input type="checkbox"/> AL	<input type="checkbox"/> ID	<input type="checkbox"/> MO	<input type="checkbox"/> PA										
<input type="checkbox"/> AK	<input type="checkbox"/> IL	<input type="checkbox"/> MT	<input type="checkbox"/> PR										
<input type="checkbox"/> AZ	<input type="checkbox"/> IN	<input type="checkbox"/> NE	<input type="checkbox"/> RI										
Form ADV, Part 1B Part 1B - Disclosure Questions													

<b>Submission</b>	<span>?</span> Printer Friendly
STATE REGISTERED IA FIRM <b>Part 1B - Disclosure Questions</b>	Reference #: 733925783887B04 State Application
Form ADV Part 1B - Disclosure Questions	<p><b>BOND DISCLOSURE</b></p> <p>For "yes" answers to the following question, complete a Bond DRP.</p> <p>C. Has a bonding company ever denied, paid out on, or revoked a bond for you? *</p> <p style="text-align: right;">Yes No <input type="radio"/> <input type="radio"/></p> <hr/> <p><b>JUDGMENT/LIEN DISCLOSURE</b></p> <p>For "yes" answers to the following question, complete a Judgment/Lien DRP.</p> <p>D. Do you have any unsatisfied judgments or liens against you? *</p> <p style="text-align: right;">Yes No <input type="radio"/> <input type="radio"/></p> <hr/> <p><b>ARBITRATION DISCLOSURE</b></p> <p>For "yes" answers to the following questions, complete an Arbitration DRP.</p> <p>E. Are you, any <i>advisory affiliate</i>, or any <i>management person</i> currently the subject of, or have you, any <i>advisory affiliate</i>, or any <i>management person</i> been the subject of, an arbitration claim alleging damages in excess of \$2,500, involving any of the following:</p> <p>(1) an investment or <i>investment-related</i> business of activity? *</p> <p>(2) fraud, false statement, or omission? *</p> <p>(3) theft, embezzlement, or other wrongful taking of property? *</p> <p>(4) bribery, forgery, counterfeiting, or extortion? *</p> <p>(5) dishonest, unfair, or unethical practices? *</p> <p style="text-align: right;">Yes No <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/></p> <hr/> <p><b>CIVIL JUDICIAL DISCLOSURE</b></p> <p>For "yes" answers to the following questions, complete a Civil Judicial Action DRP.</p> <p>F. Are you, any <i>advisory affiliate</i>, or any <i>management person</i> currently subject to, or have you, any <i>advisory affiliate</i>, or any <i>management person</i> been found liable in, a civil, <i>self-regulatory organization</i>, or administrative <i>proceeding</i> involving any of the following:</p> <p>(1) an investment or <i>investment-related</i> business or activity? *</p> <p>(2) fraud, false statement, or omission? *</p> <p>(3) theft, embezzlement, or other wrongful taking of property? *</p> <p>(4) bribery, forgery, counterfeiting, or extortion? *</p> <p>(5) dishonest, unfair, or unethical practices? *</p> <p style="text-align: right;">Yes No <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/></p> <p style="text-align: center;"> <span style="background-color: #2e5496; color: white; padding: 2px 10px;">← Previous</span> <span style="background-color: #2e5496; color: white; padding: 2px 10px; margin-left: 100px;">Save</span> <span style="background-color: #2e5496; color: white; padding: 2px 10px; float: right;">Next →</span> </p>

## Removing Part 1B Disclosure Reporting Pages (DRPs)

Form ADV allows for DRPs to be removed in certain circumstances. To remove, select the appropriate DRP to edit and select the correct reason for removal within the DRP itself. The system will archive the disclosure after the filing is successfully submitted, and on subsequent filings the answer to the disclosure question can be changed to “No” (if applicable).

(Note: All amendments to Part 1B are subject to review by the jurisdiction(s) the firm is registered with. DRPs that are removed in error may be required to be re-filed. Please contact your regulator for additional guidance regarding disclosure reporting obligations.)

<input type="checkbox"/> This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> or <i>management person(s)</i> is no longer associated with the adviser.
<input checked="" type="checkbox"/> This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances: SAMPLE EXPLANATION OF CIRCUMSTANCES. <div style="border: 1px solid black; height: 80px; width: 100%;"></div>
NOTE: The completion of this form does not relieve the <i>advisory affiliate</i> or <i>management person</i> of its obligation to update its IARD or CRD records.

## Submission Menu

**Completeness Check** - A firm can manually perform a Completeness Check, prior to submission, to check filings for completeness of required fields. If the filing does not pass the completeness check, the system will display a description of the error and a link to the error location. The filing fees due, if any, are also provided at the bottom of the completeness check page.

<b>Submission</b>	<b>TRAINING FIRM</b>	<b>Reference #: 4065561170B992F</b>				
<b>Form ADV</b>	<b>Check Filing</b>	<b>Other-Than-Annual Amendment</b>				
<ul style="list-style-type: none"> <li>▪ Completeness Check</li> <li>▪ Submit Filing</li> <li>▪ Print Preview</li> </ul>	<p>⚠ Please double-check the chief compliance officer information you have provided in Item 1.J., especially the chief compliance officer e-mail address, to ensure that it is current. You are required to amend this information promptly if it becomes inaccurate in any way.</p> <p>⚠ Please double-check the additional regulatory contact person information you have provided in Item 1.K., especially the additional regulatory contact person e-mail address, to ensure that it is current. You are required to amend this information promptly if it becomes inaccurate in any way.</p> <p>⚠ No information was provided in Schedule D Section 6.A regarding the other line's of businesses in Item 6.A. Please verify that a Schedule D Section 6.A entry is not needed.</p> <p>⚠ No information was provided in Schedule D Section 7.A regarding the types of related persons selected in Item 7.A. Please verify that a Schedule D Section 7.A entry is not needed.</p> <p>⚠ Reminder: Passing a completeness check does not relieve an investment adviser of its legal and regulatory obligation to file accurate and complete information in a timely manner with the appropriate authorities.</p>					
<ul style="list-style-type: none"> <li>▪ Instructions</li> <li>▪ Item 1 Identifying Information</li> <li>▪ Item 2 SEC Registration/Reporting</li> <li>▪ Item 3 Form of Organization</li> <li>▪ Item 4 Successions</li> <li>▪ Item 5 Information About Your Advisory Business - Employees, Clients, and Compensation</li> <li>▪ Item 5 Information About Your Advisory Business - Regulatory Assets Under Management</li> <li>▪ Item 5 Information About Your Advisory Business - Advisory Activities</li> <li>▪ Item 6 Other Business Activities</li> </ul>	<p><b>This filing cannot be submitted, due to the following completeness errors:</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Error Location</th> <th style="text-align: left;">Error Description</th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;"><a href="#">Domestic Investment Adviser Execution Page</a></td> <td style="vertical-align: top;">The Domestic Execution page is required when the Principal Office and Place of Business is within the United States.</td> </tr> </tbody> </table> <p style="color: red; text-align: center;">There are no Accounting Charges for this Filing.</p>		Error Location	Error Description	<a href="#">Domestic Investment Adviser Execution Page</a>	The Domestic Execution page is required when the Principal Office and Place of Business is within the United States.
Error Location	Error Description					
<a href="#">Domestic Investment Adviser Execution Page</a>	The Domestic Execution page is required when the Principal Office and Place of Business is within the United States.					

**Submit Filing** - Submitting a filing is a two-step process: IARD automatically runs a completeness check when Submit Filing is selected. If the filing passes the completeness check, the system allows you to continue with the submission process, if the filing does not pass the completeness check, return to the screens where the errors have occurred and correct them.

1. Select **Submit Filing**.
2. Once the filing has passed the completeness check, select **Submit Filing** a second time.

<b>Submission</b>	<b>TRAINING FIRM</b>	<b>Reference #: 4065561170B992F</b>
<b>Form ADV, Execution Pages</b>	<b>Submit Filing</b>	<b>Other-Than-Annual Amendment</b>
<ul style="list-style-type: none"> <li>▪ Completeness Check</li> <li>▪ <b>Submit Filing</b></li> <li>▪ Print Preview</li> </ul>	<p>⚠ Please double-check the chief compliance officer information you have provided in Item 1.J., especially the chief compliance officer e-mail address, to ensure that it is current. You are required to amend this information promptly if it becomes inaccurate in any way.</p> <p>⚠ Please double-check the additional regulatory contact person information you have provided in Item 1.K., especially the additional regulatory contact person e-mail address, to ensure that it is current. You are required to amend this information promptly if it becomes inaccurate in any way.</p> <p>⚠ No information was provided in Schedule D Section 6.A regarding the other line's of businesses in Item 6.A. Please verify that a Schedule D Section 6.A entry is not needed.</p> <p>⚠ No information was provided in Schedule D Section 7.A regarding the types of related persons selected in Item 7.A. Please verify that a Schedule D Section 7.A entry is not needed.</p> <p>⚠ Reminder: Passing a completeness check does not relieve an investment adviser of its legal and regulatory obligation to file accurate and complete information in a timely manner with the appropriate authorities.</p>	
<ul style="list-style-type: none"> <li>▪ Execution Page Instructions</li> <li>▪ Domestic Investment Adviser Execution Page</li> <li>▪ Non-Resident Investment Adviser Execution Page</li> <li>▪ Return To Form ADV</li> </ul>	<p><b>ADV on-line completeness checks passed successfully.</b></p> <p style="color: red; text-align: center;">There are no Accounting Charges for this Filing.</p> <p style="text-align: center;"><input type="button" value="Submit Filing"/></p>	

## Print Preview

Use this feature view or prepare the filing for printing. You can choose to print a specific page or the entire filing.

1. Select **Print Preview** from the Submission menu.

		
<b>Submission</b>		<b>SECURITIES FIRM</b> <span style="float: right;">Reference #: 6328332613879CE</span>
<ul style="list-style-type: none"> <li>▪ Completeness Check</li> <li>▪ Submit Filing</li> <li>▪ <b>Print Preview</b></li> </ul>	<b>Item 1 Identifying Information</b> <span style="float: right;">Other-Than-Annual Amendment</span>	
<p><b>WARNING:</b> 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.</p>		
<p>Responses to this Item tell us who you are, where you are doing business, and how we can contact you.</p>		
<b>Form ADV</b>		
<ul style="list-style-type: none"> <li>▪ Instructions</li> <li>▪ <b>Item 1 Identifying Information</b></li> <li>▪ Item 2 SEC Registration/Reporting</li> </ul>	<p>A. Your full legal name (if you are a sole proprietor, your last, first, and middle names): <b>SECURITIES FIRM</b></p> <p>B. Name under which you primarily conduct your advisory business, if different from Item 1.A.: <b>SECURITIES FIRM</b></p>	

2. To print the entire form filing select **All Sections** from the navigation panel. Otherwise, select the Form ADV Item you wish to print.
3. Click the **Printer Friendly** icon located on the right side of the screen.

		
		<h2>FORM ADV</h2>
<b>Submission</b>		<b>UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS</b>
<ul style="list-style-type: none"> <li>▪ Completeness Check</li> <li>▪ Submit Filing</li> <li>▪ Return To Data Entry</li> </ul>	<b>Primary Business Name: SECURITIES FIRM</b> <span style="float: right;">CRD Number: 0000</span>	
<b>View Form ADV</b>		<b>Other-Than-Annual Amendment - All Sections</b>
<ul style="list-style-type: none"> <li>▪ <b>All Sections</b></li> <li>▪ Item 1 Identifying Information</li> <li>▪ Item 2 SEC Registration</li> <li>▪ Item 3 Form of Organization</li> <li>▪ Item 4 Successions</li> </ul>	<p><b>WARNING:</b> 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.</p>	
		<b>Item 1 Identifying Information</b>
		<p>Responses to this Item tell us who you are, where you are doing business, and how we can contact you.</p>

## View Historical Form ADV Filings

The **Historical Filing** feature allows users to view and/or print previously submitted Form ADV filings. Users will have the option to view the full filing or view changes in “redline mode”. Firms can only view filings submitted by their firm. Redlining will not display across form versions.

Select ADV Filing		ADV - Filing History				
<ul style="list-style-type: none"> <li>Organization Search</li> <li>New/Draft Filing</li> <li><b>Historical Filing</b></li> </ul>	Filing Date	Filing Type	Corrections Filing	View Filing	View in Redline Mode	
	03/30/2011	Annual Amendment	No	<a href="#">View</a>		
	08/05/2009	Other-Than-Annual Amendment	No	<a href="#">View</a>	<a href="#">View</a>	
	07/09/2009	Annual Amendment	No	<a href="#">View</a>	<a href="#">View</a>	
	05/16/2008	Annual Amendment	No	<a href="#">View</a>	<a href="#">View</a>	
	05/01/2007	Other-Than-Annual Amendment	No	<a href="#">View</a>	<a href="#">View</a>	
	11/30/2006	Annual Amendment	No	<a href="#">View</a>	<a href="#">View</a>	
	01/06/2006	Annual Amendment	No	<a href="#">View</a>		
	08/02/2004	Other-Than-Annual Amendment	No	<a href="#">View</a>	<a href="#">View</a>	
	07/07/2004	Other-Than-Annual Amendment	No	<a href="#">View</a>	<a href="#">View</a>	
	05/19/2004	Other-Than-Annual Amendment	No	<a href="#">View</a>	<a href="#">View</a>	
	01/02/2004	Annual Amendment	No	<a href="#">View</a>		
	06/27/2002	Other-Than-Annual Amendment	No	<a href="#">View</a>		