

**Advisers to Registered Investment Companies
("RIC")**

RIC: General Information

1. A chart listing all Funds with the following information as of **October 31, 2018**:
 - a. fund/portfolio name;
 - b. share class;
 - c. registration number;
 - d. net asset value;
 - e. total shares outstanding;
 - f. number of shareholder accounts;
 - g. maximum sales load;
 - h. investment objective;
 - i. portfolio turnover rate for last 2 years;
 - J. commencement date of operations; and
 - k. whether the Fund was classified as aggressive capital appreciation, balanced, capital appreciation, growth and income, foreign issuer, growth, income, long term debt (taxable), long term debt (tax-free), money market (taxable), money market (tax-free), precious metals, index, or other.
2. A list of threatened, pending and settled litigation or arbitration to which the Fund was a party during the Examination Period. Provide a description of the allegations forming the basis for each issue, the status of each pending issue, and a brief description of any "out of court" or informal settlement. If none, please provide a written statement to that effect.
3. Any correspondence with the staff of the Commission or other regulatory agencies and any no-action letters or exemptive orders relied upon by the fund, including those relied upon for engaging in securities lending.

RIC: Compliance Policies and Procedures

4. The Fund's policies and procedures adopted pursuant to the Compliance Rule. Please be sure to also include Code of Ethics, insider trading, gift giving/receiving, 2a-7, securities lending, and valuation policies and procedures.
5. The annual reports submitted to the Board by the CCO during the Examination Period. Please include any attachments to the report.
6. A current inventory of compliance risks. If changes were made to this inventory of risks during the Examination Period, please indicate what these changes were and the corresponding date of the change. Please provide this information, if possible, in Word, Excel or the equivalent format.

RIC: Fund Corporate Governance

7. Minutes of Directors/Trustees ("Board"), independent directors/trustees, and Board committee meetings since the Fund's inception through **October 31, 2018**. Please also provide all Board materials including ad hoc presentations. A draft of the minutes for the most recent Board meeting should also be provided.
8. Board's annual calendar reflecting proposed approvals.
9. Identify any relationships that the Fund or any affiliate may have with any service provider, (e.g., custodian, transfer agent, administrator, pricing service, accountant, marketing firm), and provide documents indicating that these relationships were disclosed to the fund's Board in connection with its review of the contract with the service provider or otherwise. This would include, for example, whether a broker-dealer affiliate has an investment banking relationship with a service provider; whether the Fund's adviser manages the corporate pension plan of a service provider; whether the Fund or its adviser has investments in the service provider; whether the service provider also provides services to the Fund's adviser or an affiliate, etc.
10. Information regarding any compensation, whether direct or indirect, received by the Fund's adviser from any of the Fund's service providers. Please include information provided to the Board regarding this compensation.