

Examination Information Request List

Examination Period

Information is requested for the period J _____ (the "Examination Period") unless otherwise noted.

Organizing the Information to be Provided

Please label the information so that it corresponds to the item number in the request list. If information provided is responsive to more than one request item, you may provide it only once and refer to it when responding to the other request item numbers. If any request item does not apply to your business, please indicate "N/A" (not applicable).

Please provide the information requested below and hereafter during the examination in electronic format, and please ensure that all electronic information provided is "read-only." We request electronic records be sent to us through our secure email system, if the file is less than 10 MB. If larger than 10 MB, please send the file through Accellion, our secure file transfer system, for which we will send you links.

1. A copy of the Adviser's organization chart showing ownership percentages of the Adviser and control persons, and a schedule or chart of all affiliated entities. Include all entities that are commonly controlled by, or under common control with, the Adviser.
2. Current advisory clients (please provide in one excel spreadsheet, if possible), indicating those that are wrap clients, including:
 - a. the Account number, name and current balance, as of _____;
 - b. whether the client is a related person, affiliated person, or a proprietary account;
 - c. the type of account (e.g., individual, defined benefit retirement plan, registered fund, or unregistered fund);
 - d. the account custodian and location;
 - e. whether or not the custodian sends periodic account statements directly to the client; whether or not the delivery is electronic, if so, a copy of the authorization; and the form of electronic delivery (e.g., email or website login);
 - f. whether or not the Adviser has discretionary authority;
 - g. whether the Adviser, an officer, an employee, or an affiliate acts as trustee, co-trustee, or successor trustee or has full power of attorney for the account;
 - h. whether Adviser or related persons are deemed to have custody of, possession of or access to the client's assets, and if so, the location of the assets;
 - i. the investment strategy (e.g., global equity, high-yield, aggressive growth, long-short, or statistical arbitrage) and the performance composite in which it is included, if any;
 - j. the Account portfolio manager(s);
 - k. the value of each client's account that was used for purposes of calculating its advisory fee for the most recent billing period;
 - l. whether the client pays a performance fee and the most recent account performance figures;
 - m. whether or not advisory fees are paid directly from the client's custodial account; and

- n. for clients obtained during the Examination Period, provide account inception date and name(s) of consultant(s) related to obtaining the client, if any; and
 - o. for any accounts for which securities were not maintained with a qualified custodian, please include a description of the security, security name, and location of the security.
3. Names of advisory clients lost, including the reason, termination date, and asset value at termination.
 4. Names of any financial planning, pension consulting or other advisory clients not named above.
 5. Compliance policies and procedures that were in effect during the Examination Period
 6. Any written interim or annual compliance reviews, internal control analyses, and forensic or transactional tests performed. Include any significant findings, both positive and negative, and any information about corrective or remedial actions taken regarding these findings.
 7. A current inventory of the Adviser's compliance risks that forms the basis for its policies and procedures. Note any changes made to the inventory during the Examination Period and the dates of the changes.
 8. A record of any non-compliance with the Registrant's compliance policies and procedures, and a description of any action taken as a result of such non-compliance.
 9. List of current employees, partners, officers and/or directors and their respective titles.
 10. Names of any of the Adviser's employees, partners, officers and/or directors who resigned or were terminated during the Examination Period, and information regarding the reason for their departure.
 11. Any threatened, pending and settled litigation or arbitration involving the Adviser or any "supervised person" (if it relates to the individual's association with the Adviser or a securities-related matter) including a description of the allegations, the status, and a brief description of any "out of court" or informal settlement. Note that "supervised person" is any partner, officer, director (or other person occupying a similar status or performing similar functions), or employee of an investment adviser, or other person who provides investment advice on behalf of the investment adviser and is subject to the supervision and control of the investment adviser (defined in Section 202(a)(25) of the Advisers Act). If none, please provide a written statement to that effect.
 12. A list of all client or investor complaints and information about the process used for monitoring client/investor correspondence and/or complaints.
 13. Names of securities held in all client portfolios (aggregate position totals for all instruments) as of . This record should include the security name, name of each client holding an interest, the amount owned by each client, the aggregate number of shares or principal and/or notional amount held and total market value of the position.
 14. Any restricted, watch, or grey lists that were in effect for the Examination Period.
 15. Adviser's balance sheet, trial balance, and income statement as of the end of its most recent fiscal year and the most current year to date. Adviser's general ledger and cash receipts and disbursements journal for the most recent calendar quarter.

16. A trade blotter (i.e., purchases and sales journal) for the Examination Period that lists transactions (including all trade errors, cancellations, re-bills, and reallocations) in securities and other financial instruments (including privately offered funds) for: current and former clients; proprietary and/or trading accounts and access persons.
17. A copy of any advertisements, promotional brochures, pamphlets, or other materials furnished to prospective clients during the Examination Period.
18. List of all solicitor/consultant/placement agents used to solicit advisory clients or raise capital for the advised funds, including the fee arrangement with that party, the total cash and non-cash compensation paid, any written agreements in place, whether the party is affiliated with the Adviser, and the investor(s) obtained.
19. List the terms of any loans from clients or Adviser employees to the Adviser, including promissory notes, or sales of the Adviser's or any affiliate's stock to clients.
20. Provide the account number and contact information (e.g., name, mailing address, phone number and e-mail address) for the entities that maintained custody of the cash and securities of each client's account during the Examination Period. For any securities that were not maintained with a qualified custodian, please include a description of the security or private fund, security or private fund name, location of the security, and the name of the clients who held such securities or private funds. For purposes of this request, you may exclude any assets held pursuant to a derivative or swap contract. Such information, if applicable, may be requested later.
21. Provide all documents that pertain to the whistleblower regulations [REDACTED] including, but not limited to, compliance policies and procedures, employee contracts, and any employee agreements. Please note, if a document was provided in response to another question, then just identify the corresponding item number, and reference any page numbers that pertain to Confidentiality/Whistleblower Topics. (i.e. *Item 5: Compliance Manual, p.60 or n/a*)

Definition: "Confidentiality/Whistleblower Topics" means any of the following: (a) confidentiality or dissemination of information, (b) communications with outside parties, (c) communications with regulators, and (d) whistleblowing.

- a. All compliance policies and procedures that were in effect during the Examination Period for the Adviser that pertain to Confidentiality/Whistleblower Topics;
- b. A copy of the Adviser's code of ethics currently in effect;
- c. Documents pertaining to communications with officers, directors, employees or contractors regarding any violations or potential violations of (a) the compliance policies and procedures produced in response to Request 21a. or (b) the code of ethics produced in response to Request 21b., relating to Confidentiality/Whistleblower Topics;
- d. If not otherwise produced in response to Request 21c., all documents pertaining to any disciplinary or legal action or potential disciplinary or legal action with respect

- to any officer, director, employee or contractor of the Adviser that relates to Confidentiality/Whistleblower Topics;
 - e. All amendments to the compliance policies and procedures identified in response to Request 21a. after August 2011;
 - f. All amendments to the provisions of the code of ethics identified in response to Request 21b. after August 2011 that pertain to Confidentiality/Whistleblower Topics;
 - g. If the confidentiality and non-disparagement clauses (or clauses with similar effect) in the employment agreements you entered into during the Examination Period are standard, provide a copy of the agreement containing those clauses. However, if the confidentiality or non-disparagement clauses (or clauses with similar effect) have varied, provide all agreements containing such variations (with names of employees and amounts of payments redacted);
 - h. If the confidentiality and non-disparagement clauses (or clauses with similar effect) in the separation or severance agreements you entered into during the Examination Period are standard, provide a copy of the agreement containing those clauses. However, if the confidentiality or non-disparagement clauses (or clauses with similar effect) have varied, provide all agreements containing such variations (with names of employees and amounts of payments redacted); and
 - i. If not otherwise produced, provide all policies regarding whistleblowers.
22. Please indicate whether the Adviser conducts periodic risk assessments to identify cybersecurity threats, vulnerabilities, and potential business consequences. If such assessments are conducted, please also:
- a. Identify who (individual(s), business group(s), and title(s)) conducts them, and the month and year in which the most recent assessment completed; and
 - b. Describe any findings from the most recent risk assessment that were deemed to be potentially moderate or high risk and have not yet been fully remediated. Alternatively, provide written reports from the review that discuss the findings and remediation efforts.
23. Please indicate whether the Adviser provides clients with on-line account access. If so, please provide the following information:
- a. The name of any third party or parties that manage the service;
 - b. The functionality for clients on the platform (e.g., balance inquiries, address and contact information changes, beneficiary changes, transfers among the clients' accounts, withdrawals or other external transfers of funds);
 - c. How clients are authenticated for on-line account access and transactions;
 - d. Any software or other practice employed for detecting anomalous transaction requests that may be the result of compromised client account access;
 - e. A description of any security measures used to protect client PINs stored on the sites; and
 - f. Any information given to clients about reducing cybersecurity risks in conducting transactions/business with the Adviser.

24. During the Examination Period, identify whether your Adviser experienced any of the types of events listed below. If so, please provide a brief summary for each category, identifying the number of such incidents (approximations are acceptable when precise numbers are not readily available) and describing their significance and any effects on the Adviser, its clients, and its vendors or affiliates. If the response to any one item includes more than 10 incidents, the respondent may note the number of incidents and describe incidents that resulted in losses of more than \$5,000, the unauthorized access to client information, or the unavailability of a Adviser service for more than 10 minutes. The record or description should, at a minimum, include: the extent to which losses were incurred, client information accessed, and Adviser services impacted; the date of the incident; the date the incident was discovered and the remediation for such incident.
- a. Malware was detected on one or more Adviser devices. Please identify or describe the malware;
 - b. The availability of a critical Adviser web or network resource was impaired by a software or hardware malfunction. (Down time resulting from routine maintenance and equipment upgrades should not be included in this response.) Please identify the service affected, the nature and length of the impairment, and the cause;
 - c. The Adviser's network was breached by an unauthorized user. Please describe the nature, duration, and consequences of the breach, how the Adviser learned of it, and how it was remediated;
 - d. The compromise of a client's or vendor's computer used to remotely access the Adviser's network resulted in fraudulent activity, such as efforts to fraudulently transfer funds from a client account or the submission of fraudulent payment requests purportedly on behalf of a vendor;
 - e. The Adviser received fraudulent emails, purportedly from clients, seeking to direct transfers of client funds or securities;
 - f. The Adviser was the subject of an extortion attempt by an individual or group threatening to impair access to or damage the Adviser's data, devices, network, or web services; and
 - g. An employee or other authorized user of the Adviser's network engaged in misconduct resulting in the misappropriation of funds, securities, sensitive client or Adviser information, or damage to the Adviser's network or data.
25. The names and location of all affiliated and unaffiliated key service providers and the services they perform.
26. Please provide a summary of the valuation process used during the Examination Period by security type (e.g., RMBS, CMBS, etc.) in terms of the data and models used, analysis performed, and output of the analysis. If indicative bid pricing is used, please indicate how indicative bids are obtained.
27. A list of securities for which the price provided by a pricing service was overridden by the Adviser, and the date of the override.

28. List all cross transactions that took place during the Examination Period between current or former clients and/or proprietary or affiliated accounts. Please identify the security, number of shares, execution price, pricing sources, total dollar value, the client accounts and the reason for the crosses.
29. Soft dollar budget or similar document that describes the products and services the Adviser obtains using clients' brokerage commissions. State the annual hard and soft dollar costs of each product. If the product is a "mixed" use, please state the amount paid in both hard and soft dollars.
30. Please provide a list of all securities for which the Adviser or its related persons made 13 F, 13D and/or 13G filings for the relevant reporting dates, including corresponding ownership percentages.
31. For each client account managed by the Adviser during the Examination Period, provide monthly performance returns of each client from _____, as well as the returns for the accounts' comparable indices or benchmarks. If possible, provide this information in Excel.